



Westinghouse  
Hanford Company

P.O. Box 1970 Richland, WA 99352

October 19, 1992

9257492D

Mr. R. D. Izatt, Acting Director  
Environmental Restoration Division  
U.S. Department of Energy  
Richland Field Office  
Richland, Washington 99352

Dear Mr. Izatt:

M-14 SETTLEMENT - PROPOSED 100-N SPRINGS EXPEDITED RESPONSE ACTION

- References: (1) Letter, D. B. Jansen, Ecology, to S. H. Wisness, RL,  
"N-Springs Interim Response Action," dated May 15, 1992. - 21250
- (2) Letter, C. Clarke, Ecology, D. A. Rasmussen, EPA, to  
J. D. Wagoner, RL, "Milestone M-14 Settlement," dated  
September 8, 1992. - 23577

Over the past two years a great deal of attention has been placed on the question of whether an early clean up action should be taken at the 100-N Springs. In the most recent letters, referenced above, the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) requested the U.S. Department of Energy, Richland Field Office (RL) to initiate an accelerated response at the N-Springs, as a stop-gap measure minimizing the environmental harm, until final cleanup actions can be taken. In response to these letters, Westinghouse Hanford Company (WHC) believes an Expedited Response Action (ERA) would be appropriate and could be carried out in a cost effective and efficient manner. This proposal is endorsed by the N-Reactor Facility Operations as well as the Environmental Restoration Program.

Funds have been identified in the FY-93 budget (ADS 3125) to begin the ERA. The ERA would be accomplished by focusing the efforts on the single goal provided in the first reference, to reduce the amount of contaminants reaching the river. The following steps would be taken to achieve this goal:

- A project plan (Enclosure 1), containing a description of the alternatives to be considered along with the evaluation criteria, is submitted for consideration. The plan provides the basis for the development of the Engineering Evaluation/Cost Analysis (EE/CA). The technologies and evaluation criteria are consistent with the approach



used in the technology baseline document. The direction to evaluate pump and treat alternatives to satisfy the Milestone M-14 settlement are included. The use of existing pilot plant water treatment facilities in the 100 Areas would also be considered when evaluating the alternatives.

- A focused EE/CA would be prepared, taking advantage of the existing site characterization information and previous engineering studies, recommending the most cost beneficial alternative. If initiated in October 1992, this EE/CA could be completed in draft for EPA and Ecology review in March 1993. To comply with National Environmental Policy Act regulations, the elements of an environmental assessment will be combined with the EE/CA.
- Following regulatory review, the EE/CA would be reviewed by the public and an action memorandum prepared by the regulators authorizing the work to commence.
- Depending on the action selected, it is anticipated that a full service subcontract would be pursued to accomplish the preferred alternative. Based on the EE/CA schedule discussed above, it is anticipated that the procurement activities for this contract could be initiated in June 1993, with award being eight to nine months later. Where appropriate, existing site resources would be utilized to expedite this process (i.e., well drilling, site preparations, etc.).
- Utilizing the above approach, the response action would be fully underway in the Spring of 1994, satisfying the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestone M-14 dispute resolution agreement to initiate a new ERA in FY-94 (reference 2).

The above activities are also consistent with, and satisfy elements of, the DOE Order 5400.5 Compliance Plan for N-Reactor. For example, the EE/CA can replace the need for performing a best available treatment study for N-Springs.

Implementation of the proposed ERA on an accelerated schedule requires the ER program expend FY-93 funds to implement the ERA in FY-94 as directed in the M-14 settlement. In addition, the need to obtain schedule relief for the 100-N Operable Unit (OU) remedial investigation will be created due to reprioritization of resources to implement the ERA. The schedule relief provides the positive benefit of providing integration of the N Reactor shutdown, Resource Conservation and Recovery Act (RCRA) closure plans and activities for the 1301-N, 1325-N Liquid Disposal Facilities, and 1324-N/NA Surface Impoundment/Percolation Pond with the RCRA Past Practice OU process. The Tri-Party Agreement requires RCRA closure plans for the above RCRA facilities. A more prudent move is to consolidate the RCRA Treatment, Storage, and Disposal facilities with the RCRA past practice remediation into the 100-N OU RCRA facility investigation/corrective measures studies to provide a cost effective mechanism, meeting the intent of the regulations, while addressing cleanup of the operable unit in a single set of documents.

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If RL agrees with our proposed approach and schedule of activities, a draft letter is enclosed for use in transmitting this information to the regulators and providing a copy of the ERA Project Plan for review. If you have any questions, please contact me on 376-0902, or Mr. J. K. Patterson of my staff on 376-0568.

Very truly yours,



T. M. Wintczak, Acting Manager  
Environmental Restoration Program  
Environmental Division



H. L. Debban, Manager  
N Reactor  
Facility Operations

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Enclosures 2

- RL - S. S. Clark
- J. K. Erickson
- R. O. Puthoff (w/o enclosures)
- R. P. Saget
- R. K. Stewart

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Enclosure 1

100-N SPRINGS EXPEDITED RESPONSE ACTION PROJECT PLAN

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Subject: M-14 SETTLEMENT - PROPOSED 100-N SPRINGS EXPEDITED RESPONSE ACTION

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