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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 8, 1992

Mr. Steve Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352-0550



Dear Mr. Wisness:

Re: Elevation of 100-NR-1 and 100-NR-2 Operable Unit Schedules Issue

On May 29, 1992, I delivered a "Tri-Party Issue Decision Analysis Position Paper" to Mr. Eric Goller. The subjects of that informal dispute were the relation of N-Reactor shutdown activities to cleanup activities, and the proposed 24 and 30 month delays in the 100-NR-1 and 100-NR-2 Operable unit schedules attributed to "funding limitations." While Mr. Goller and I have discussed the subject on numerous occasions, Ecology has received no formal response or position paper from Mr. Goller. These issues remain unresolved.

I am forwarding a copy of the May 29 position paper pursuant to section 5.1.7 of the Tri-Party Agreement Handbook Management Guideline number TPA-MG-11, thereby elevating these issues to the project managers for resolution. This matter should appear on the agenda for the September 24, 1992, project manager's meeting.

Mr. Goller has apparently made sincere and diligent efforts to produce the information necessary to provide a complete response to my position paper. The project managers should attempt, with their supervisors as necessary, to produce the information or justify why it cannot be produced.

Please request that your staff contact me as soon as possible to confirm that this matter will be discussed at the forthcoming project manager's meeting. I can be reached at (206) 459-6675.

Sincerely,

Steve F. Cross
CERCLA Unit
Hanford Section
Nuclear and Mixed Waste Management

SFC:jr

- cc: Paul Day, EPA
- Tim Veneziano, WHC
- Pamela Innis, EPA
- Larry Goldstein, Ecology
- Eric Goller, USDOE
- Dave Jansen, Ecology
- Darci Teel, Ecology
- Michael Thompson, USDOE



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May 27, 1992

Tri-Party Agreement Issue Decision Analysis Position Paper
100-NR-1 and -2 Work Plan Schedules

Responsible Managers:

IA (Issue Advocate): Steve Cross, Ecology

DP (Disputing Party): Eric Goller, USDOE-RL

Non-Disputing Party: Pam Innis, EPA

IA Statement of Issues:

Must all reactor shutdown activities be completed before any environmental restoration activities may be commenced in the field?

Is a 24-month delay of remedial activities in the 100-NR-1 operable unit, and a 30-month delay in the 100-NR-2 operable unit, justified by "funding limitations" to N-Reactor shutdown.

Statement of Facts:

At a meeting on July 2, 1991, Ecology was presented with a 100N SHUTDOWN PROGRAM SCHEDULE. This schedule extends from 1991 to N-Reactor turnover for decommissioning at the end of 1997.

Enclosure 2 to the cover letter (dated DEC 13 1991) submitting the 100-NR-1 and -2 operable unit work plans states:

"The RFI/CMS work plan schedule is based upon the June, 1991, N-Reactor Shutdown Program Plan which has been deferred for two years due to funding limitations. Under this deferred schedule, N-Reactor shutdown activities will begin in FY 1994 and be completed by the end of FY 1999 (6-year schedule)."

The NR-2 schedule provides for completion of the RFI report by June of 1994, the CMS report by February of 1995, and the IRM plan by February of 1995. The schedule indicates that, after a 30-month hiatus, preparation of an interim ROD would begin in September of 1997, and be completed by October of 1999. The schedule provides for no investigatory or remedial action during the 30-month hiatus.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: S. F. Cross, Ecology Addressee: S. H. Wisness, RL Correspondence No.: Incoming: 9206444

Subject: ELEVATION OF 100-NR-1 AND 100-NR-2 OPERABLE UNIT SCHEDULES ISSUE

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