



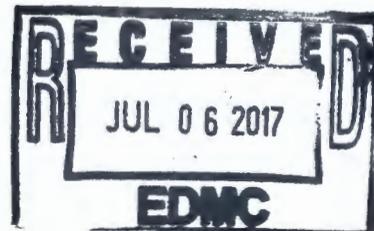
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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

17-AMRP-0186

JUL 03 2017

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354



Dear Ms. Smith:

M-091 ENGINEERING ALTERNATIVES STUDY, CHPRC-02916, REVISION 0

1240613

This letter is in response to the Washington State Department of Ecology's (Ecology) November 7, 2016, (16-NWP-192) comments on the M-091 Engineering Alternatives Study, CHPRC-02916, Revision 0. 1241074

The U.S. Department of Energy (DOE) Richland Operations Office (RL) appreciates the detailed analysis performed by Ecology regarding the challenges to meet the Tri-Party Agreement milestones associated with the M-091 waste. In addition to the concern associated with shipping rate from Hanford to achieve completion by 2030, this letter provides the following responses to Ecology's comments:

- 1) "... regulatory issues for retrieval (e.g., "processing of a container within the burial grounds . . . triggers RCRA and dangerous waste requirements within the burial ground" (p. 3-2))."

RL acknowledges it will be a challenge to perform the retrieval of the remaining inventory within the trenches. As the process to retrieve the remaining inventory develops, more detailed planning will be available. At the present time, the retrieval planning is in the conceptual design phase. It is anticipated the detailed planning for retrieval will begin around Fiscal Year 2020. An additional alternative for the remaining post-1970 transuranic waste retrieval is an option to address the remaining waste with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) associated with the remaining burial grounds in the 200 East and West Areas.

- 2) "USDOE-RL should coordinate schedules and cost estimates for treatment and packaging of CERCLA waste with negotiation of the M-091-52 milestone change request."

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The CERCLA waste will be coordinated with M-091 waste; however, the Tri-Party Agreement milestone is specific to the capabilities associated with the M-091 waste. Additionally, the assessment was limited to the waste currently in inventory and waste projected volumes where CERCLA decisions have been made. The future decision documents will outline the waste-stream specific processing and packaging which is not currently addressed. It is expected that the characterization, certification and shipping alternatives outlined within the M-091 Alternatives Analysis document will be suitable for future decontamination, decommissioning, and soil remediation.

- 3) "Ecology would like a discussion included in the report about how to potentially ship waste to INEL and WIPP by rail."

All interstate transportation of the waste will be conducted in compliance with DOE and Department of Transportation regulations. The National TRU Program managed out of the DOE Carlsbad Field Office (DOE-CBFO) has approved transportation containers and routes. As alternatives are evaluated, RL will work with the appropriate DOE leads to finalize the transportation alternative selection.

- 4) "Ecology and USDOE-RL clearly need to discuss [RH waste disposition] further so a pathway can be agreed to how this waste will be managed and disposed."

RL recognizes the challenges associated with the high-curie waste streams (e.g. German Logs). The storage of these wastes is currently authorized at the Hanford Site, and the continued storage will remain compliant with the storage regulations. The current technology associated with processing these waste streams such that the waste can be packaged and shipped to the Waste Isolation Pilot Plant (WIPP) represents a greater risk to the workers, public, and environment than continued storage. Maintaining the inventory of high-curie waste streams in their current compliant configuration will allow the material to naturally decay to significantly lower dose levels. RL will continue to monitor the decay of these waste streams for a period of time (e.g. 10-50 years). In the waste's current form, it is not acceptable for disposal at WIPP and when a national repository for high-level waste and/or spent nuclear fuel is commissioned, these waste streams will be considered for disposal.

RL is committed to meeting all Tri-Party Agreement milestones as scheduled. RL continues the TRU waste certification process by meeting Tri-Party Agreement milestones to repackage M-091 waste into compliant packages. Currently, RL is preparing waste shipments for offsite processing of large boxes of M-091 TRU waste to meet Tri-Party Agreement Milestone M-091-47D.

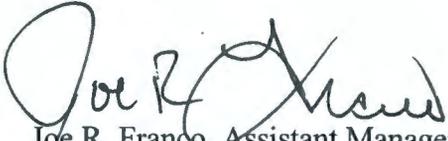
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The present Tri-Party Agreement M-091 milestones to have the waste addressed by 2030 will be a challenge. RL has begun discussions with WIPP about the operational life of WIPP and support on meeting the M-091 milestones.

RL is committed to maintaining an open dialog and working with Ecology to ensure the needs of the public and of agencies interested in the disposition of the Hanford Site TRU waste inventory are satisfied.

If you have any questions, please contact me, or your staff may contact, Al Farabee, of my staff, on (509) 376-8089.

Sincerely,


Joe R. Franco, Assistant Manager
for the River and Plateau

AMRP:OAF

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Administrative Record
Environmental Portal
HF Operating Record (J. K. Perry, MSA, A3-01)