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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 4, 2017

17-NWP-098

Mr. Doug S. Shoop, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-20
Richland, Washington 99352

Mr. Ty Blackford, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: A7-01
Richland, Washington 99352

Re: Corrective Actions to Ensure Safe Storage of Waste in the Plutonium Uranium Extraction Plant Storage Tunnels 1 and 2

References: See page 2

Dear Mr. Shoop and Mr. Blackford:

The Department of Ecology (Ecology) received Letter 17-AMRP-0222 and the attached report on August 1, 2017 (Reference 1). The report is to fulfill the United States Department of Energy Richland Operations (RL), and CH2M Hill Plateau Remediation Company (CHPRC) obligation to submit Corrective Action No. 2 in Ecology's May 10, 2017, Administrative Order, Docket Number 14156. Under that Order, Corrective Action No. 2 should detail the actions RL and CHPRC propose to structurally stabilize PUREX Storage Tunnels 1 and 2, and ensure safe storage of waste in them.

The referenced letter and report indicate RL and CHPRC are recommending a corrective action of grouting for Tunnel 1 and a phased approach for implementation of corrective actions to ensure safe waste storage for Tunnel 2. The phased approach for Tunnel 2 includes:

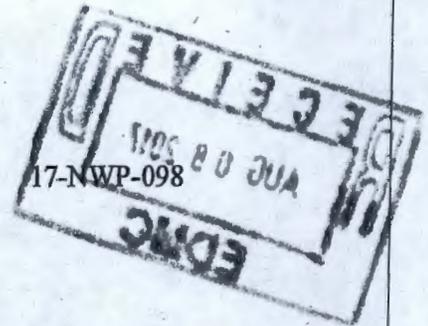
1. Enhanced surveillance and monitoring.
2. Assembly of a panel of experts to assess various options and corrective actions for Tunnel 2. This panel will provide input on a detailed alternative analysis for Tunnel 2.

While Ecology's Order contemplated RL and CHPRC would propose specific actions to stabilize Tunnel 2, we recognize there may be value to the phased approach you are recommending. However, because of the potential of a collapse in Tunnel 2 identified in your integrity assessment, Ecology is concerned that, in the short term, enhanced surveillance and monitoring will not fully address the immediate risk associated with the Tunnel.

Ecology, therefore, wants to ensure the phased approach you propose proceeds expeditiously and on a schedule that allows you to meet the deadline for submitting the Order's Corrective Action No. 3 by October 2, 2017.



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Ecology requests that, by August 18, 2017, RL and CHPRC provide us a schedule for the following:

1. Convening the panel of experts who will assess the corrective actions for Tunnel 2.
2. Completing the initial analysis of options and identification of data needs.
3. Completing the detail alternative analysis for Tunnel 2 and selecting an option to stabilize Tunnel 2 to make the continued storage of waste in the tunnels safe.

As indicated above, Ecology wants to ensure that the schedule provided by RL and CHPRC supports meeting their deadline to submit the permit modification required by Corrective Action 3 of the Administrative Order (Reference 2). The draft permit modification required by Corrective Action No. 3 must include the corrective actions needed to structurally stabilize and ensure safe waste storage in Tunnel 2. That draft permit modification must be submitted to Ecology by October 2, 2017.

We appreciate the cooperative working relationship with you on this urgent risk and the continued focus on addressing, as soon as possible, the safety risk the PUREX Tunnels pose.

If you have any questions, please contact Stephanie Schleif, Facility Transition Project Manager, at stephanie.schleif@ecy.wa.gov or (509) 372-7929, or Ron Skinnarland, Waste Management Section Manager, at ron.skinnarland@ecy.wa.gov or (509) 372-7924.

Sincerely,

Alexandra K. Smith
Program Manager
Nuclear Waste Program

ss/lkd

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Reference 1: Letter 17-AMRP-0222, dated August 1, 2017, "Administrative Order Number 14156 – Corrective Action 2 Submittal, Actions to Ensure Safe Storage of Waste in PUREX Storage Tunnels 1 and 2."

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Reference 2: Letter 17-NWP-053, dated May 10, 2017, "Administrative Order, Docket Number 14156"
cc: See page 3.

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cc electronic:

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Sheryl Bilbrey, EPA
Jack Boller, EPA
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CHPRC Correspondence Control
Environmental Portal
Hanford Facility Operating Record
MSA Correspondence Control
USDOE-RL Correspondence Control

cc: Matt Johnson, CTUIR
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Administrative Record
NWP Central File