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## Department of Energy

Richland Operations Office  
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Ms. Dana A. Rasmussen  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Mr. Chuck Clarke, Director  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Ms. Rasmussen and Mr. Clarke:

### INTERIM STABILIZATION OF SINGLE-SHELL TANKS AT HANFORD SITE

Over the past several months we have all come to realize the benefit of tri-party discussions in the early phase of solving technical issues. As an example, our joint meetings have proven successful in generating new interim milestones for groundwater wells under milestone M-24-00. We are approaching another juncture wherein I can foresee substantial mutual advantage if our respective staffs work together to resolve issues prior to entering into formal Dispute Resolution. The current issue that requires resolution involves the interim stabilization of single-shell tanks (SST), milestone M-05-00.

Interim stabilization of Hanford's SSTs has experienced difficulties since the onset of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). Change packages have been approved by the three parties in 1990 and 1991, each implementing a substantiated delay. Another change package was submitted for your consideration in September 1991, which almost went to formal Dispute Resolution when the parties differed on the sufficiency of information to support modifying the milestones. Since that time, U.S. Department of Energy, Richland Field Office (RL) has continued to pursue a technically supportable plan for achieving interim stabilization of



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the remaining SSTs. It is in all our best interests that interim stabilization of these SSTs proceed as quickly as possible. However, we must be confident that the stabilization process does not create additional safety issues in the tank farms.

On January 30, 1992, during the Dispute Resolution process for milestone M-14-00, I proposed a procedure for the future in which our organizations work together, informally, in a method which supplements the formal procedures of the Tri-Party Agreement. In correspondence to you, I outlined four steps that I believe will enhance the understanding of problems and provide avenue for jointly resolving issues. Those steps are:

- (1) RL submit a written request to review potential modifications to milestones;
- (2) Following approval of RL's request, the regulators jointly review the potential modification to Tri-Party Agreement milestones, with an allowance provided by the regulators for any delay in RL's progress towards meeting an established milestone while such reviews are being conducted;
- (3) If agreement is reached by the parties, submit a formal change package by any party, as appropriate, to reflect the results of such a review; and
- (4) If no agreement is reached, or if RL's request to review potential modifications is denied, any party may submit a formal change package as provided by the Tri-Party Agreement.

In recent months, both U.S. Environmental Protection Agency and the State of Washington Department of Ecology (Ecology) have concurred, in varying degrees, with the benefits to this type of an approach. I now solicit your support for implementing a method similar to that which I proposed in January 1992, to work together to resolve the issues surrounding interim stabilization of the remaining sixteen SSTs not on the watch list and the twenty-eight SSTs (including SSTs 241-C-105 and -106) that are not yet available for interim stabilization due to safety restrictions. The fact that further delays in this milestone are inevitable has been discussed with your people at the Unit Manager and Project Manager levels. The Tri-Party Agreement change packages are necessary for this milestone. We had committed to provide a change package to you this month. Rather than send you a unilateral position, I want my people to work with your people to come to a cooperatively-derived, supportable change to this milestone.

Toward this end, I propose that Mr. Steven H. Wisness, coordinate a series of discussions between cognizant, technical staff from your two organizations, RL and Westinghouse Hanford Company, with the objective to develop and process two change packages for milestone M-05-00. The first change package will address only those SSTs that are available for stabilizing (non-watch list),

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and which have yet to be stabilized (a total of 16 tanks, either in progress or being prepared for stabilization at this time.) The second change package will address the twenty-eight SSTs that are not, at this time, available for interim stabilization due to safety restrictions. Although the end product of interim stabilization is the same for these two categories, the issues involved are substantially different and should be addressed separately.

I ask that you support these discussions with resources available to you. My staff and I are eager to work together with you in this spirit of cooperation to provide timely resolution of this issue. Please contact me and provide your comments and, hopefully, your commitment to support this endeavor. Should you have questions, feel free to call me, or your staff may call Mr. S. H. Wisness on (509) 376-6798, or Mr. R. D. Izatt on (509) 376-5441.

Sincerely,

  
for John D. Wagoner  
Manager

EAP:SHW

cc: P. T. Day, EPA  
N. Pierce, Ecology  
D. B. Jansen, Ecology  
T. B. Veneziano, WHC

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**Subject:** INTERIM STABILIZATION OF SINGLE-SHELL TANKS AT HANFORD SITE

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