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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 725-7561

June 20, 1996

Mr. James E. Rasmussen, Director
Environmental Assurance, Permits, and Policy Division
U.S. Department of Energy Richland Operations Office
P.O. Box 550
Richland, WA 99352



Dear Mr. Rasmussen:

Re: 224-T Transuranic Waste Storage and Assay Facility (TRUSAF)
(WA7890008967) (TSD: S-2-2)

The Washington State Department of Ecology (Ecology) has reviewed the U.S. Department of Energy's (USDOE) Risk Data Sheets (RDSs) pertaining to the above referenced unit. Specifically, RDS numbers R96N0218 and R96N0017 address TRUSAF transition to Deactivation and Decommission status and TRUSAF upgrades for continued long-term usage. It is noted that both activities fall below target funding levels and, therefore, may not be funded during 1998. It is also noted that the unit is scheduled to be permitted in 1999 to meet final facility standards required by WAC 173-303-806.

It is Ecology's understanding that the TRUSAF transition RDS includes an assessment of the TRU curie loading impact to storage operations at the Central Waste Complex (CWC). The assessment would consider the operational impact to CWC with the increased management of high curie loaded drums in the storage complex formerly stored at TRUSAF. It is Ecology's understanding that the TRUSAF upgrades RDS provides funding to upgrade the unit so that safe storage of TRU waste at the unit can be maintained. The RDS identifies systems which do not meet current codes, require extra maintenance, and present safety concerns to include: electrical systems, heating, lighting, ventilation, roof and roof drainage, radiological alarm system, and fire alarm system.

Given the above, Ecology concludes the funding of at least one of the above referenced RDSs is necessary to address TRU waste management issues related to storage at 224-T TRUSAF in the future and/or to address TRU waste management issues related to TRU waste storage at CWC in the future.

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Please respond by July 20, 1996 and identify what funding scenario will address the above identified concerns regarding TRU waste management. If you or your staff have any questions regarding this letter, please call me at (509) 736-3034. Also, if you or your staff have any questions regarding the Solid Waste Treatment and Disposal Project, please call Laura Cusack at (509) 736-3038.

Sincerely,



Alisa D. Huckaby, Unit Manager
Nuclear Waste Program

AH:mf

cc: Rudy Guercia, USDOE
Roger Gordon, USDOE
Cliff Clark, USDOE
Doug Sherwood, EPA
Dan Sauressig, WHC
Roger Bowman, WHC
224-T TRUSAF Administrative Record, H6-08