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Department of Energy

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Richland Operations Office
P.O. Box 550
Richland, Washington 99352

94-PCA-040

SEP 23 1994

Ms. Dru Butler, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

Dear Ms. Butler:

VALUE ENGINEERING STUDY TO ADDRESS CONDITIONS II.U. AND II.V. OF THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

During our reviews of the Hanford Facility Resource Conservation and Recovery Act Permit, concerns have been raised regarding regulatory, cost, and potential worker safety issues associated with mapping and marking of underground piping, as specified in Conditions II.U. and II.V. These concerns were discussed in more detail in a September 9, 1994, phone conversation between Mr. Joe Stohr of your staff and Mr. Bill Dixon of Westinghouse Hanford Company. As was discussed during that conversation, the U.S. Department of Energy, Richland Operations Office (RL), and its contractors, believe that the most appropriate way to address these concerns is for us to join together in an up-front value engineering study. Therefore, RL requests that the State of Washington Department of Ecology (Ecology) join with the permittees in conducting a value engineering study to determine how mapping and marking permit condition objectives can be met most effectively. This study, to be completed by September 30, 1995, should address safety and cost effectiveness and other significant impacts that may be discovered during the study.

RL also requests that Ecology agree to consider and act on any proposed modification to the mapping and marking permit conditions resulting from the value engineering study (in keeping with your July 20, 1994, letter to Messrs. Steve Wisness and Jim Rasmussen of RL). As discussed with Mr. Stohr on September 9, 1994, Ecology's involvement would be an asset in helping to frame the study, conducting periodic reviews of progress, and analyzing the results and conclusions of the study. Please confirm that this approach is acceptable to you by September 26, 1994.

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Ms. Dru Butler
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Thanks for your help in resolving our concerns. Should you have any questions regarding this request, please contact Mr. C. E. Clark of my staff on 376-9333.

Sincerely,

Robert G. Holt/for
James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:CEC

cc: Administrative Records
J. Badden, BHI
B. Burke, CTUIR
W. Dixon, WHC
D. Duncan, EAP
M. Jaraysi, Ecology
R. Jim, YIN
D. Lundstrom, Ecology
D. Powaukee, NPT
S. Price, WHC
J. Stohr, Ecology
H. Tilden II, PNL
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Author

Addressee

Correspondence No.

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D. Butler, Ecology

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Subject: VALUE ENGINEERING STUDY TO ADDRESS CONDITIONS II.U. AND II.V. OF THE
HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

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