STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Richland Field Office
3100 Port of Benton Blvd., Richland, WA 99354 • 509-372-7950

August 6, 2026 26-NWP-118

Ricky Bang, Deputy Assistant Manager
Tank Waste Operations
Hanford Field Office
United States Department of Energy
PO Box 550
Richland, Washington 99352

Re: The Department of Ecology's (Ecology) Response to the United States Department of Energy (USDOE) Letter 26-TWO-0059 (Reference 1)

References: See page 4

Dear Ricky Bang:

Ecology has worked with USDOE for almost a year to review and resolve comments for the A-103 Tank Waste Retrieval Work Plan (TWRWP), RPP-PLAN-65683. Here is the history of our progress:

- August 6, 2025, USDOE sent, via email, DRAFT RPP-PLAN-65683, Revision 0, for Ecology to start their review (Reference 2).
- September 11, 2025, Ecology sent, via email, a review comment record (RCR) to USDOE (Reference 3).
- November 4, 2025, USDOE sent, via email, the RCR back to Ecology with comment responses (Reference 4).
- December 1, 2025, Ecology sent, via email, the RCR back to USDOE with responses to their comment responses (Reference 5).
- December 17, 2025. Ecology and USDOE met to discuss the RCR comments.
- January 22, 2026, USDOE sent, via email, redlines for the DRAFT RPP-PLAN-65683, Revision 0, for Ecology to review (Reference 6).
- February 11, 2026, Ecology sent, via email, the RCR with additional responses and added 5 new comments on the redline DRAFT RPP-PLAN-65683, Revision 0, to USDOE (Reference 7).
- February 26, 2026, Ecology and USDOE met to discuss the RCR comments.

- April 29, 2026, USDOE sent letter 26-TWO-0030 to Ecology (Reference 8). Attached with the letter was the Final TWRWP RPP-PLAN-65683, Revision 0 and the RCR from the DRAFT RPP-PLAN-65683, Revision 0 review.
- June 11, 2026, Ecology sent letter 26-NWP-080 to USDOE (Reference 9) Attached to the letter was Ecology's comment dispositions to the Final TWRWP RPP-PLAN-65683, Revision 0. The letter also stated that "Some comments have been closed, but most remain open. Ecology is open to meeting with USDOE to resolve the open comments as we work towards approval."
- July 7, 2026, USDOE sent letter 26-TWO-0059. Letter states "The U.S. Department of Energy, Hanford Field Office (HFO) reviewed Ecology's updated responses and determined no additional changes are needed to the document."

Ecology reiterates that the A-103 Tank Waste Retrieval Work Plan (TWRWP), RPP-PLAN-65683 Revision 0, is a primary document. As such, the process for primary documents needs to follow the process outlined in the *Hanford Federal Facility Agreement and Consent Order* (HFFACO) Action Plan, Section 9.0, Documentation and Records:

> Upon receiving written comments from the lead regulatory agency, the DOE will update the document and/or respond to the comments. The response will address all written comments and will include a schedule for obtaining additional information if required.

USDOE's transmittal of Revision 0, via letter 26-TWO-0030, officially started the process outlined in the HFFACO Figure 9-1 and USDOE is required per the Action Plan to respond to comments or request an extension within 30 days of receiving Ecology comments transmitted in letter 26-NWP-080. Ecology's official comments are of a regulatory nature and require complete and responsive information. USDOE's contractors may not "close" Ecology's comments without obtaining Ecology's concurrence to do so. Because there are open comments and Ecology has not met with USDOE after Revision 0 was submitted, Ecology cannot approve RPP-PLAN-65683, which is a primary document, until the RCR comments are closed.

Ecology asks again to meet with USDOE to address the remaining open comments:

- Comment 3 regarding resolving data gaps for tank waste characterization.
- Comment 10 regarding meeting the requirements of WAC 173-303-300.
- Comments 37, 38, 42, and 43 regarding the EPA Tap Water scenario, which is not one of the state's scenarios for drinking water under WAC 173-303 that references WAC 173-340. The Hanford Site-Wide Permit Rev.9 (WA7890008967) SST permit will not refer to the EPA Tap Water scenario, rather, we will be adhering to the requirements in WAC 173-340-720.

- Comment 50 regarding USDOE referencing the use of secondary documents in the A-103 TWRWP that may conflict with WA ECY authority and regulatory mandates under WAC 173-303 and cited portions of WAC 173-340.
- Comment 51 regarding document requests.

If you have any questions or concerns, please contact Luissa Johnston, Tank Systems Operation and Closure Coordinator, at luissa.johnston@ecy.wa.gov or (509) 975-1285.

Sincerely,

Amie Green
Digitally signed by amgr461@ecy.wa.gov
Date: 2026.08.06 15:38:24 -07'00'

Amie Green
Tank Systems Operation and Closure Project Manager
Nuclear Waste Program

lj/bp

cc: See page 5

References:

1. Letter 26-TWO-0059, dated July 7, 2026, “U.S. Department of Energy, Hanford Field Office Request for Approval of RPP-PLAN-65683, ‘241-A-103 Tank Waste Retrieval Work Plan,’ Revision 0”

2. Email with attachment, dated August 6, 2025, from K. Wong to A. Green, et al.; Subject: A-103 TWRWP for Review

   Attachment: RPP-PLAN-65683_A-103 TWRWP_Cleared Draft 8-5-25.pdf

3. Email with attachment, dated September 11, 2025, from A. Green to K. Wong, et al.; Subject: RE: [EXTERNAL]RE: A-103 TWRWP for Review

   Attachment: RCR_Form_A-103_TWRWP - ECY.docx

4. Email with attachment, dated November 4, 2025, from A. Olander to L. Johnston; Subject: RE: [EXTERNAL]RE: A-103 TWRWP Comment Resolution

   Attachment: Comment Response 10-27-25 dnld 11-4-25.pdf

5. Email with attachment, dated December 1, 2025, from L. Johnston to A. Olander, et al.; Subject: RE: [EXTERNAL]RE: A-103 TWRWP Comment Resolution

   Attachment: RCR_Form_A-103_TWRWP_ECY_Response_2025.12.01.docx

6. Email with attachment, dated January 22, 2026, from K. Wong to A. Green, et al.; Subject: RE: REVIEW & RESPONSE: A-103 TWRWP Redline

   Attachment: A-103_TWRWP_RCR_12-31-25_Comment_Resolution_Redline.pdf

7. Email with attachment, dated February 11, 2026, from L. Johnston to A. Cassinelli, et al.; Subject: A-103 TWRWP RCR Review

   Attachment: RCR_Form_A-103_TWRWP - Ecology Responses 2-11-2026.docx

8. Letter 26-TWO-0030, dated April 29, 2026, “U.S. Department of Energy, Hanford Field Office Submittal of RPP-PLAN-65683, ‘241-A-103 Tank Waste Retrieval Work Plan,’ Revision 0”

9. Letter 26-NWP-080, dated June 11, 2026, “Transmittal of the Department of Ecology’s Review Comment Record (RCR) for the 241-A-103 Tank Waste Retrieval Work Plan (TWRWP), RPP-PLAN-65683, Rev. 0.”

cc electronic:

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Brett Feldhahn, EPA
Michelle Mullin, EPA
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Becky Blackwell, USDOE
Mat Irwin, USDOE
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Luissa Johnston, Ecology
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George Peck, Ecology
Eric Pierce, Ecology
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Stephanie Schleif, Ecology
Environmental Portal
Hanford Administrative Record
Hanford Facility Operating Record
H2C Correspondence Control
HAB Correspondence Control
HMIS Correspondence Control
USDOE Correspondence Control