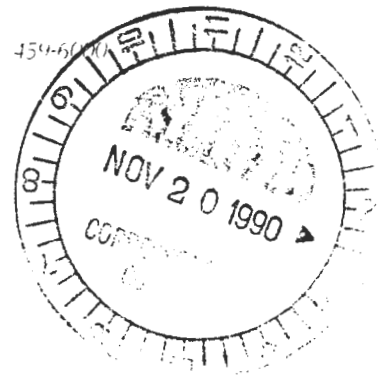




STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 454-6000

November 13, 1990



Michael Thompson
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Re: Hanford Site Past Practice Investigation Strategy

Dear Mr. Thompson:

We are pleased that our comments were reviewed and many accepted in whole or in part. Some further discussion is required on the comments numbered 153, 155, 156, and 217 before we can achieve an acceptable level of comfort with the strategy to proceed to its adoption and implementation. The page references below are to USDOE's October 23, 1990 draft.

153) Page 16, top paragraph, 3rd sentence

Our concern over data use could be resolved as follows:

Replace "(based on existing information)"

with "(to the extent that existing information supports the desired level of certainty)."

155) Page 16, 4th paragraph ("INITIATE THE STUDY")

We again recommend clarifying language. This paragraph is not clear and does not explain how to initiate an AAMS. The explanation provided by DOE with the October 16 draft is itself grammatically and substantially ambiguous. While we do not specifically object to anything in the paragraph, or offer substitute, there is a danger that subjects not fully explained will become issues of contention at the time of implementation by field work or incorporation into the TPA. For example, there are implications of altering boundaries and priorities that are unexplained. Unless and until we reach an understanding on the meaning and ramification of this paragraph, we reserve our own interpretation of how AAMSS can and should be initiated.



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156) Page 16, 4th paragraph ("INITIATE THE STUDY"), 3rd sentence

With your explanation of the meaning of "operable unit study," we do not reject the term. However, we suggest that the language be clarified. There should be no suggestion that a new type of study is being referred to in this sentence.

217) Page 22, 1st full paragraph, 4th sentence

There is merit in the principle of documenting data at interim steps to a final decision, as would the proposed "topical reports." The topical reports will have to be primary documents if not incorporated into an AAMSR. A primary document such as an AAMSR can not be downgraded by fragmentation.

The strategy states that "all available and relevant data would be included in the AAMSR" We take this to mean that topical reports would be included in the AAMSR, and that the regulators would effectively treat them as primary documents when reviewing the AAMSRs.

It is inconsistent with our interpretation to suggest that an AAMSR may not be prepared. This inconsistency and our understanding could be resolved as following:

Replace "If an AAMSR is prepared . . ."

with "When an AAMSR is prepared . . ."

We look forward to further discussions on the strategy. The discussions will culminate in an understanding of the procedure for adopting this strategy, and proceeding to implementation.

Sincerely,



Larry Goldstein
CERCLA Unit Supervisor
Nuclear and Mixed Waste Management

cc: Tim Nord, Ecology
Paul Day, EPA
T.B. Veneziano, WHC

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