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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 22, 1992

Mr. Alan Harris
U.S. Department of Energy
200 Area Aggregate Area Unit Manager
P.O. Box 550
Richland, WA 99352



Dear Mr. Harris:

Re: Status of the *U Plant Aggregate Area Management Study Report* (M-27-02)

On March 19, 1992, Ecology submitted comments and recommendations regarding the *U-Plant Aggregate Area Management Study Report*. We subsequently received the *U-Plant Aggregate Area Management Study Report*, "Environmental Engineering and Geotechnology Comment Record Form", dated 4/16/92. This transmittal indicated that with few exceptions, Ecology comments were accepted and new text would be written to incorporate comment dispositions. We were also advised that most of Ecology's concerns were corroborated by USDOE-HQ review.

On April 24 we received a "redline" draft of chapters 1 and 9 for this report. This draft should have reflected comment dispositions identified in the "Environmental Engineering and Geotechnology Comment Record Form". However, in reading these two chapters we found few changes, and in some cases, the changes made were contrary to previous agreements. In other examples, new text was added without explanation. We were informed that USDOE-RL was aware there were some problems in the transmitted "redline" text, but a new rewrite of affected sections would be forthcoming. As of this date, Ecology has yet to receive any additional information on this report. Repeated inquiries on the status of this document from Ecology staff have been met with ambiguous responses.

Ecology is very concerned about continued delays in approving the final *U Plant Aggregate Area Management Study Report*, and the impact this has on the 200 Area Aggregate Area Management Study program. It is our understanding that due to the nature of comments on this report, Drafts B of similar reports, e.g., *Z-Plant* and *S-Plant Aggregate Area Management Study Reports*, are being delayed. We note that the *PUREX Aggregate Area Management Study Report* transmittal letter of May 29, 1992, stated that USDOE-RL comments "have not been completely incorporated into the text (and) RL may require changes to the draft." Lack of progress in finalizing these reports has the potential to adversely impact field work and schedules for operable unit specific activities in the 200 Area.

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Ecology is ready to provide assistance to USDOE-RL and its contractors in order to resolve this matter as soon as possible. Please call me at your earliest convenience to discuss the status of the aforementioned reports. I can be reached at (206) 438-7018.

Sincerely,



Larry Goldstein
CERCLA Unit Supervisor
Nuclear and Mixed Waste Management

LG:jw

cc: Paul Day, EPA
Darci Teel, Ecology
T. Veneziano, WHC
Steve Wisness, USDOE

