



**Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563**

April 25, 2003

Mr. Brian Monson, RCRA Program Manager
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

**SUBJECT: Path Forward for the Idaho National Engineering and Environmental Laboratory's
Idaho Nuclear Technology and Engineering Center's VES-SFE-20 Hot Waste
Tank Characterization Effort - (EM-ER-03-115)**

Dear Mr. Monson:

This correspondence provides the Idaho Department of Environmental Quality (IDEQ) with a proposed course of action for characterizing the waste in the VES-SFE-20 hot waste tank at the Idaho National Engineering and Environmental Laboratory (INEEL). The proposed course of action for obtaining a sample of the VES-SFE-20 tank contents is to collect the sample in December 2005, during the Phase I remedial action. The planned Phase I remedial action is described in the draft Remedial Design/Remedial Action (RD/RA) Work Plan for the VES-SFE-20 Hot Waste Tank System (DOE/ID-11048). It includes removing the tank, placing the tank in an above ground engineered container, sampling the contents, then treating and disposing of the tank and tank contents off-Site. The Phase I remedial action would begin in fiscal year 2005 (FY-05), which is 6 years ahead of the schedule in the draft RD/RA Work Plan. The acceleration of the Phase I remediation integrates the HWMA/RCRA closure activities with Comprehensive Environmental Response, Compensation and Liability Act RD/RA work, provides a high assurance of sample collection, and enhances worker safety by combining the characterization and remediation efforts. Treatment of the tank and contents would occur in FY-06, followed by disposal.

The DOE made several attempts to obtain a sample of the VES-SFE-20 tank contents, as required by the approved *Hazardous Waste Management Act/Resource Conservation and Recovery Act (HWMA/RCRA) Closure Plan*. Both vent line sampling and manned entry, as described in the Closure Plan and *Characterization Work Plan for the VES-SFE-20 Hot Waste Tank at INTEC* (DOE/ID-10747), were attempted. During the February 21, 2003 attempt to collect a sample by manned entry, unexpected conditions were experienced. The planned entry attempt was discontinued because of worker safety and radiological hazards. Consequently, the tank contents were not sampled by February 25, 2003, as required by the schedule in the approved Closure Plan. The DOE notified the IDEQ of the unexpected event and received approval in a February 27, 2003, letter from Brian Monson to Kathleen Hain to submit an alternate plan for sampling within 60 days.

The DOE will submit a modification to the approved Closure Plan describing the proposed course of action to IDEQ by May 14, 2003. The Closure Plan modification will include a description of the tank removal process, sample collection, and revised schedule for completing the sampling. The schedule will also include a date for resubmitting a revised Characterization Work Plan (sampling plan) to the IDEQ.

Brian Monson

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If you would like to discuss this recommendation in more detail or if you have questions, please call Dave Wessman at (208) 525-0082 or me at (208) 526-4392.

Sincerely,



Kathleen E. Hain, Lead
Environmental Restoration Program

cc: R. Bullock, IDHW, DEQ, 1410 N. Hilton, Boise, ID 83706
M. English, IDHW, DEQ, 1410 N. Hilton, Boise, ID 83706
D. Koch, IDHW, DEQ, 1410 N. Hilton, Boise, ID 83406
T. Kluk, DOE-HQ, EM-441
R. Cummings, DOE-HQ, EM 441