



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83708-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

December 5, 2003

Elizabeth D. Sellers, Manager  
U.S. Department of Energy  
Idaho Operation Office  
850 Energy Drive, MS 1103  
Idaho Falls, ID 83401-1563

Dear Ms. Sellers:

I write in reply to your letter of November 26, 2003. Timely and effective cleanup of the INEEL's Subsurface Disposal Area has been a long-standing priority for the State of Idaho, and we will support actions to achieve this goal.

Your November 26 letter proposed activities for federal fiscal year 2004 that are consistent with IDEQ's requests to evaluate opportunities for near-term risk reduction and efficient waste retrieval. IDEQ looks forward to completion of the Pit 9 Glovebox Retrieval within the next few months and endorses other planned activities, including:

- Retrieval design-related work
  - Work to support acceptance of retrieved transuranic waste at WIPP, including development of Acceptable Knowledge
  - Development of a Preliminary Documented Safety Analysis for retrieving buried waste more efficiently
  - Development of a Pre-Conceptual Design for a more efficient approach to buried waste retrieval in the SDA
- Drainage improvements to reduce water infiltration through waste zones and contaminated areas
- Isolation and drying of beryllium blocks to reduce migration of Carbon-14

We will also work with EPA and DOE to evaluate and pursue other suitable actions. It seems appropriate to halt other detailed Pit 9 Stage III design work that is likely to need significant modification or prove unnecessary if DOE can realize the design efficiencies we have discussed.

Following the agencies' evaluation of a number of factors, such as transuranic and other contaminant content, IDEQ agrees with the selection of a retrieval area in Pit 4 as a preferable

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location for the first large-scale retrieval following the Glovebox Excavation in Pit 9. IDEQ also identified two other locations as suitable for initial retrievals.

We should take steps to involve the public as we consider how to best proceed, especially because of the prior level of interest in buried waste cleanup. In addition, the agencies will need to determine what administrative mechanisms are best suited to begin larger scale retrieval.

IDEQ does not, however, find good cause for granting DOE's request for an extension of the Stage III milestone (September 2005) from the April 2002 Agreement to Resolve Disputes. IDEQ therefore denies this request. There is still ample time to complete a 10% retrieval design by September 2005, and we are hopeful the change in approach will enable DOE to proceed past this point well in advance of this milestone.

Please call me at (208) 373-0240 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Stephen Alfred". The signature is written in black ink and is positioned above the printed name and title.

C. Stephen Alfred  
Director

CSA:ra

C: Brian Whitlock, Office of the Governor