



Department of Energy

Washington, DC 20585

November 14, 2003

The Honorable John T. Conway
 Chairman
 Defense Nuclear Facilities Safety Board
 625 Indiana Ave, NW, Suite 700
 Washington, DC 20004

Dear Mr. Chairman:

The purpose of this letter is to provide the status of commitments from the Office of Environmental Management (EM) to the Defense Nuclear Facility Safety Board (DNFSB) that are currently past due.

Three commitments on Sludge Removal at Hanford as delineated in (a) Commitment 119 of the Implementation Plan (IP) for Recommendation 2000-1 "Stabilization and Storage of Nuclear Material", (b) your April 10, 2003, requirement to report on K-Basins path forward and (c) my June 10, 2003, commitment to provide an update on K-Basins sludge removal:

- The Department is evaluating alternate direct disposition strategies to process sludge that would eliminate interim storage at the T-Plant and reprocessing to prepare it for disposal.
- Until such time that EM has an alternate credible path for direct disposal, the site will continue along the path to remove sludge from the basins and package it in large diameter containers (LDC).
- The start of removal of sludge from the K-Basins (Commitment 119) will not start in 2003. The schedule does not support a Department of Energy Operational Readiness Review (ORR) before January 2004.

Three commitments (2.9, 2.11, and 2.12) on the low curie salt-waste process as delineated in the IP for 2001-01 "High-Level Waste Management at the Savannah River Site":

- Due to litigation related to waste incidental to reprocessing (WIR) provisions of DOE Order 435.1, our detailed response to address these DNFSB 2001-01 commitments continues to be worked. I expect to have these response issues resolved by December 15, 2003.
- The programmatic risk assessment with mitigation strategy (Commitment 2.12) and the low curie salt processing evaluation (Commitment 2.11) are currently undergoing internal review and will be provided as soon as the review is complete.



- The South Carolina Department of Health and Environmental Control has notified the Department that they would take no official action on the permit applications pending resolution of the ongoing litigation. The Saltstone Facility permit modifications are required for processing low curie salt feed and disposal of the resulting grouted waste.
- The transfer of first batch of low curie salt cake from Tank 50 (Commitment 2.9) is thus impacted and will not be completed this calendar year.

There are two actions from the Secretary's November 22, 2002 letter on the "Quality Assurance Improvement Plan for Defense Nuclear Facilities." Past due deliverables include (a) issuing EM requirements for Functions, Responsibilities and Authorities (FRA) and Quality Assurance documents and (b) updating the EM Headquarters and Field FRA documents. EM will revise its FRA document after the corporate FRA is reworked and issued. A reissued EM FRA document is not expected before February 2004, with the EM Field FRAs to follow, provided the corporate FRA is issued by the end of December 2003.

I will provide the Board an update on these issues by January 31, 2003, and will brief your senior staff next month. If you have any questions, please call me at (202) 586-0738.

Sincerely,



Paul M. Golan
Chief Operating Officer
Office of Environmental Management

cc: Mark Whitaker, DR-1