



Department of Energy
Idaho Operations Office
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December 13, 2004

Nicholas Ceto, INEEL Project Manager
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Richland, WA 99352

Daryl F. Koch, Remediation Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

SUBJECT: Transmittal of the Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10, and the Explanation of Significant Differences for the Record of Decision for the Power Burst Facility and Auxiliary Reactor Area Operable Unit 5-12 - (FMDP-FFA/CO-04-085)

Dear Mr. Ceto and Mr. Koch:

The Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10 is enclosed. The ESD addresses significant changes and clarifications to the remedies for the V-Tanks and PM-2A Tanks as currently specified in the Final Record of Decision (ROD) for Test Area North Operable Unit 1-10, October 1999, and the Record of Decision Amendment for the V-Tanks and Explanation of Significant Differences (ESD) for the PM-2A Tanks, February 2004.

For the V-Tanks the changes and clarifications to the remedy include incorporating additional waste to be treated with the V-Tank contents, revising the contents treatment approach, revising the PCB treatment requirements, and adding confirmation of the contents characteristic determination. For the PM-2A Tanks the changes and clarifications to the remedy that are addressed in the ESD include addition of ICDF as an alternate treatment location and clarification of treatment requirements.

This ESD also addresses the Agency agreement to remediate the TSF-46 TAN 616 Soils, TSF-47 TAN 615 Sewer Line Soils, and TSF-48 Soils Beneath TAN 615 East and West Sumps in accordance with the existing remedy for V-Tank area contaminated soil. Finally the ESD addresses the Agency agreement to remove, treat as necessary, and dispose of the TSF-19 Caustic Tank.

Supporting this ESD, and included in this transmittal, is the revised engineering design file (EDF) *Risk-Based Approach for Management of PCB Remediation Waste from the V-Tanks*,

Ceto, Koch

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(EDF-3077, Revision 1, December 2004. This EDF was previously issued in support of the ROD Amendment for the V-Tanks and ESD for the PM-2A Tanks, February 2004.

Also enclosed are signature ready copies of the *Explanation of Significant Differences for the Record of Decision for the Power Burst Facility and Auxiliary Reactor Area Operable Unit 5-12*. This ESD documents a significant difference in the remedy for the ARA-16 radionuclide tank. The ESD changes the remedy to allow the ARA-16 waste to be transported to TAN and treated with the V-tanks waste.

Agency comments have been incorporated as documented on the enclosed comment resolution forms and the ESDs are now ready for signature. As discussed in recent Agency conference calls the goal for having all approval signatures is December 23, 2004. Please call me at 208-526-6442 with any questions.

Sincerely,



R. Mark Shaw, Waste Area Group Manager
Facility and Material Disposition Project

Enclosures

cc: T. Livieratos, DEQ, 1410 N. Hilton, Boise, ID 83706
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