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December 5, 1996

John Wagoner, Manager  
U.S. Department of Energy, Richland Operations  
P.O. Box 550 (A7-50)  
Richland, WA 99352

Subject: Columbia River Comprehensive Impact Assessment

Dear Mr. Wagoner:

The Hanford Advisory Board has considered the status of the Columbia River Comprehensive Impact Assessment (CRCIA) and has several concerns that need to be addressed in Phase 2 of the CRCIA. The CRCIA Phase 2 would provide a tool to evaluate impacts on the River from all current and future sources at the Hanford Site, enabling systematic analyses of cumulative impacts to guide decisions on cleanup actions. Our concerns and advice relate to a number of the values and principles adopted by the Board, including the following:

- Protect the Columbia River ecosystem;
- Deal realistically and forcefully with groundwater contamination;
- Use a systems design approach that keeps endpoints in mind as intermediate decisions are made;
- The importance of cultural, ecological diversity, and recreational opportunities should be recognized; those resources should be enhanced as a result of cleanup and waste management decisions; and,
- These concerns should be considered while promoting the most effective and efficient actions that will protect the environment, public health and safety now and for future generations.

The Board has several concerns with respect to the CRCIA, including the following:

1. Currently funded work for the CRCIA is focused on immediate problems of contamination in the River such as islands, outlet pipes, and so on. However, major potential impacts to the River could occur in the future when additional groundwater contaminant plumes on the Hanford Site reach the River. Phase 2 of the CRCIA is intended to address both current and future impacts on the River.
2. The Board has recommended in previous consensus advice (#13, #34, and #38) that there is a need for an integrated approach that evaluates the cumulative impacts of the various cleanup alternatives for the Hanford Site. The Phase 2 CRCIA would provide a mechanism for such an integrated and systematic analysis.

3. Recommendation 94-2 of the Defense Nuclear Facilities Safety Board stated that there is a need for a consistent approach to performance and risk assessments across the DOE complex. The recommended activity will provide tools that could be useful to other sites in the DOE complex and support valid cross-site evaluations of risk. Similarly, the Board sees a need for better sitewide coordination of and consistency between the risk and impact assessment approaches used for all the projects and programs at the Hanford Site. For example, the Environmental Restoration Program's sitewide groundwater strategy needs to be coordinated with TWRS plans for vadose zone characterization to ensure that these address the gaps and uncertainties in data and models for movement of contaminants through the vadose zone into the groundwater and subsequently to the River. Phase 2 of the CRCIA would define the requirements and tools to provide consistent risk assessments across the Hanford Site.

To address these concerns, the Board recommends that funding should be provided for continuing Steering Committee work on CRCIA Phase 2, particularly in FY-97, to develop a baseline risk assessment methodology and to provide better sitewide coordination of risk and impact assessments among the projects and programs at Hanford. To further facilitate this coordination, the Board recommends that coordination of the activities of the CRCIA Steering Committee should be elevated to the Deputy Manager.

The Board looks forward to your written response, as called for in our charter.

Very truly yours,

Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: Alice Murphy, Designated Federal Official  
The Oregon and Washington Congressional Delegations  
Chuck Clarke, EPA Region X  
Randy Smith, EPA  
Mary Riveland, Washington Department of Ecology  
Dan Silver, Washington Department of Ecology

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