



Dr. Carol Henry
Office of Integrated Risk Management
Office of Risk Assessment
US Department of Energy
1000 Independence Avenue SW
Washington D.C. 20585

May 10, 1995

RE: Comments on the CERE Report, "Health and Ecological Risks at the U.S. Department of Energy's Nuclear Weapons Complex: A Qualitative Evaluation" CERE Interim Risk Report, March 1995.

Dear Dr. Henry:

The Hanford Advisory Board (HAB) has reviewed a copy of the subject report giving special attention to those sections of the report that cover the Hanford site. The HAB has a number of concerns with this report and its possible use by the DOE or other governmental organizations as a basis for prioritizing, funding, or scheduling waste management and environmental restoration activities at Hanford. Some of these concerns are presented in the following paragraphs. The HAB also calls your attention to our earlier letter on this subject¹ and to a recent letter by Dr. Douglas P. Wells of the State of Washington Department of Health² (see attached copy).

I. General Comments on CERE Report

1. The HAB questions whether the CERE report adequately addresses the stated purposes of the CERE study. The CERE program was initially defined as a study to provide the DOE with the following:
 - An independent credible evaluation of "existing human health and environmental risk assessments" carried out at the Weapons Complex Facilities; the evaluation also is to include an assessment of the quality of supporting information and the consistency of risk methodologies and data among sites.
 - A review and evaluation of "existing remediation cost estimates associated with compliance agreements."
 - Identify and treat issues of concern to governmental organizations and non-governmental organizations.³

In reviewing the Hanford related sections of the CERE interim report, the HAB concludes that the above objectives are for the most part not achieved. We note that a large number of existing Hanford reports (covering risk assessments, ecological and human health risks, and

waste management issues) were reviewed and are briefly summarized in the report. However, there is very little assessment of the quality of the supporting information and essentially no assessment of the risk assessment methodology. There is also no review or evaluation of cost estimates associated with compliance agreements.

Also, the HAB does not believe the CERE Team obtained appropriate input from affected state or local government agencies, the tribes, and other affected stakeholder, including the Hanford Advisory Board (see references 1 and 2). Thus the report does not in our opinion adequately identify and track issues of concern to these groups.

2. The HAB does not disagree with the general context of the key findings in the report as long as the qualifications on the general applicability of these findings, which are noted in the report, are carefully considered by the DOE or other governmental bodies that chose to act on these findings. We particularly call attention to the following statement on page E5-6 of the report - "CERE's findings and conclusions do not provide a stand-alone basis for revision of plans or budget levels within an installation or between installations."
3. One key conclusion that is noted in the CERE study, but needs more emphasis in the Executive Summary, is that future risks and costs will be minimized by continuing key waste management cleanup and environmental activities at a prudent pace and not stopping or significantly slowing any of these programs. For example, on page 5-5, the report states "time is critical; some facilities are deteriorating, increasing the risk of accidents and compounding the difficulties of achieving safe shutdown and storage of dangerous materials." Also note the last paragraph on page 2-3.

II. Comments on "Hanford" Sections of the Report

1. Chapter One - Introduction - The section of this chapter describing Hanford contains several inaccuracies that should be modified, and/or updated. Careful review by appropriate DOE-Hanford personnel is suggested.
2. Chapter Two in Volume 2 is entitled "Hanford Installation Summary" - The HAB finds this chapter to be an inadequate evaluation of risks, risk assessments or methodologies or risk reduction activities at Hanford. This chapter is poorly organized, not particularly thorough, and the conclusions or key findings are not succinctly stated or defined. In fact, it is not clear exactly what are the key findings. For example, is the statement on page 2-8, "Ecological effects are associated with land use issues and endangered species" a key finding, a conclusion or just the heading for a chapter? It is somewhat difficult to comment on this chapter except to recommend that it be thoroughly reviewed and rewritten.
3. The March 14, 1995 letter from Dr. Wells of the State of Washington Department of Health (reference 2) notes several technical inaccuracies in the CERE Report particularly with respect to risks associated with the K-Basins and off-site health risks to the public who have access to the Columbia River in the vicinity of the Hanford facilities. The HAB concurs with the comments in that letter.
4. As a final comment, the HAB believes that a major omission from the CERE Report is a general recognition of the importance of cleanup of radioactive and chemical wastes adjacent to and in the vicinity of the Columbia River. The overall importance of the Columbia River to all stakeholders and public and private organizations in the Northwest

cannot be overstated. Thus the minimization of current and future risk to the ecology of the river and to the recreational and economic users of the river is a major driver to Hanford cleanup activities. The HAB recommends that this concern be clearly recognized and identified in the CERE Report.

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

Sincerely,

Merilyn B. Reeves, Chair
Hanford Advisory Board

Notes:

1. Reference attached copy of Hanford Advisory Board Consensus Advice Letter #15, dated March 3, 1995.
2. See attached letter to Dr. James L. Regens, dated March 14, 1995
3. See attached "Tulane/Xavier CERE Program Fact Sheet", dated June 15, 1994.

cc: Thomas Grumbly, Department of Energy-Headquarters
John Wagoner, Department of Energy-Richland
Mary Riveland, Washington Department of Ecology
Chuck Clarke, Environmental Protection Agency

[Hanford Home Page](#) | [HAB](#) | [Advice Index](#)

For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov
HAB Consensus Advice #21
Subject: CERE Report (Environmental Restoration Committee)
Adopted: May 4, 1995