



Mr. Joe Letourneau
c/o Risk Team
U.S. Department of Energy
955 L'Enfant Plaza North, Suite 1207
Washington D.C. 20024

August 11, 1995

Dear Mr. Letourneau,

Please find enclosed the Hanford Advisory Board's comments to the Risk Initiative Report. In our letter we have detailed several concerns and advice for the Department of Energy in conducting future risk assessments. To summarize those concerns and recommendations are:

CONCERNS:

1. The Conclusions presented in this report do NOT reflect the uncertainties and concerns discussed in the body of the document. These indicate that a complex- wide risk assessment is not reliable (or even possible) at this time!
2. Although site-specific risk analyses can be more reliable, the overly simplified method used in this report does not address complex additive or synergistic health risks.
3. Broad definitions of low, medium, and high risk contain arbitrarily chosen time scales that cause the site evaluations to be subjective and inconsistent.
4. The Board is especially disturbed by the limited amount of public involvement that was sought for the preparation of this report. We urge and regret that our present remarks be included in the final draft document submitted to Congress.

ADVICE:

1. Develop a more technically sound standardized site-specific risk evaluation procedure that reflects stakeholder and tribal values.
2. Actively involve the SSABs in this process and in the evaluation of site-specific risk based priorities.
3. Avoid using inherently flawed complex-wide risk evaluations to prioritize and justify DOE budgets.
4. Include land use and exposure scenarios in site-specific evaluations.
5. Explicitly include institutional controls in the budget analyses.
6. Involve the public! Create more opportunities for meaningful 2-way dialogue with stakeholders, tribal communities and SSABs.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

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For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov

HAB Consensus Advice #28c

Subject: Risk Initiative Report (Environmental Restoration Committee)

Adopted: August 3-4, 1995