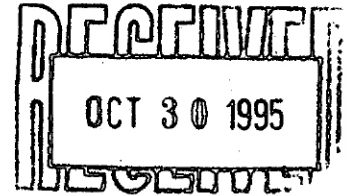




## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352



SEP 30 1995

Ms. Marilyn B. Reeves, Chair  
Hanford Advisory Board  
800 NW Sixth Avenue  
Portland, Oregon 97209-3715

Dear Ms. Reeves:

### DRAFT RISK REPORT TO CONGRESS

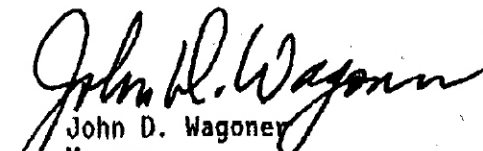
The subject report represents the Department of Energy Headquarters' (DOE-HQ) response to a Congressional directive concerning a risk-based approach for prioritizing activities and evaluating human health risks posed by the conditions as addressed in compliance agreements. Thank you for taking the time to review the draft Risk Report to Congress and providing comments to us expressing your concerns.

Your suggestions for enhancing the future risk assessment process are very much appreciated. Most important is your suggestion that more opportunities are created for meaningful two-way dialogue. Attached are our responses to each of your comments.

The Department of Energy, Richland Operations Office (RL), in concert with DOE-HQ, has been involved in the initial draft and review of the report. We understand that the report is still being modified to incorporate stakeholders' concerns and advice. We can assure you that DOE-HQ will be taking your comments into consideration to the fullest extent possible prior to transmittal to Congress.

We are sending a copy of this letter to DOE-HQ for their consideration. Although we cannot promise that DOE-HQ will implement all your suggestions, we would like to use this as an avenue for further discussion to give them the serious consideration they deserve. If you have any further questions or comments, please contact me or your staff may contact Mr. Steve Hwang, of my staff, on (509) 376-7796.

Sincerely,

  
John D. Wagoney  
Manager

PID:STH

Attachment

cc: C. Clarke, U. S. Environmental Protection Agency  
T. Grumbly, Department of Energy  
C. Kelly, Designated Federal Official  
L. Lingle, Site Representative  
M. Riveland, Washington Department of Ecology  
The Oregon and Washington Congressional Delegations

General Comments

The HAB has expressed their concerns on four major areas. Uncertainties; additive or synergistic health risks; definitions of low, medium, high risks; and lack of public involvement. The HAB's advice is needed as to how we can proceed on these concerns. We need to discuss them in the near future.

Response to Concerns from the Board:

1. The June 16, 1995 draft Risk Report to Congress is a first attempt at providing a link between budget, compliance agreements, and risk reduction. Your comment on the incompleteness of the document's preliminary conclusions (Section VI) will be considered as this report is revised. We expect uncertainties to be summarized in the report to Congress.
2. There are a large number of site-specific and unit-specific risk assessment documents. However, Congress has directed the DOE to provide a concise summary of complex-wide risk information posed by the conditions required by compliance agreements. Congress has further directed DOE not to perform exhaustive formal risk assessment, but to use the best scientific evidence available. Hence, the report will not address complex additive or synergistic health risks if the information is not readily available. As you mention, site-specific analyses are more reliable for certain evaluations. The evaluation in the draft risk report is meant to deal with the environmental damage resulting from the Cold War era. Given this perspective, there may be areas which need detailed site-specific analyses that consider complex or synergistic health risks. However, such studies are beyond the scope of the current Congressional inquiry.
3. Your concern over the definitions of low, medium, and high are something we should discuss further. It is not clear at this time how this concern can be resolved.
4. We (DOE-RL) agree with the suggestion that the Board's comments be included in the final draft document submitted to Congress.

Comments on Advice from the Board:

1. There are ongoing efforts to improve site-specific risk evaluation procedures to reflect stakeholder and tribal values for the Hanford site (e.g., Integrated Risk Assessment Program, Natural Resource Damage Assessment Trustee Meetings, Interagency Risk Assessment Committee). Stakeholder values have been summarized at various times as well; however, we believe this is a continual and evolving process. It might be suitable to arrange a meeting between appropriate members of the HAB and PID to discuss this issue further.

2. The current risk-based prioritization method is a complex-wide effort and is still being re-evaluated. We will keep the SSAB informed of the process so that the SSAB has an opportunity to participate. It also appears proper to arrange a meeting between the appropriate members of the HAB and PID to plan a future course of action.
3. Various methods are being debated nationally. It appears that the method used is one of the best methods readily available for this purpose. If the Board can suggest another method, we would be very interested in your suggestions.
4. Land use and exposure scenarios are important in site-specific risk evaluations. Site-specific evaluations have taken these factors into account. The land use plan is presently in the preliminary stage. Hence, various assumptions were made in the interim in this regard for the risk evaluations. These assumptions were previously made available to the HAB.
5. The Risk Data Sheets (RDS) have been used as a means to respond to the Congressional request to develop a mechanism for establishing priorities. These RDSs address risks of performing a particular activity in terms of the before, during, and after scenarios. Clarification concerning institutional control assumptions is needed. Here again, further discussion appears appropriate.
6. We agree with these comments. We are continuously striving to improve the process. Input from the SSAB with respect to further improving the process is welcome.