



Department of Energy
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FEB 24 1997

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FEB 27 1997

Ms. Marilyn B. Reeves
Hanford Advisory Board
723 The Parkway, Suite 200
Richland, Washington 99352

Dear Ms. Reeves:

COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT (CRCIA)

Thank you for your letter of December 5, 1996, regarding the CRCIA. Mr. John Wagoner forwarded your letter to me for response. Since your letter discusses items outside the purview of the Environmental Restoration Project (ER), I have coordinated my response with Lloyd Piper, Deputy Manager, and others who have responsibilities for managing the various activities mentioned in your letter.

This response addresses the points in your letter, in the primary categories of the letter: values and principles, concerns, and recommendations.

Values and Principles:

The U.S. Department of Energy, Richland Operations Office (RL) continues to endorse the values and principles enumerated in your letter regarding Hanford cleanup and has implemented a number of actions designed to support these, such as protecting the Columbia River by removing contaminated soil near the river and installing several groundwater pump and treat interim actions.

Concerns:

RL understands and appreciates the Hanford Advisory Board's (HAB) concerns identified in your letter with respect to the CRCIA. The following paragraphs relate to these:

1. Current CRCIA work focused on immediate problems:

RL agrees with the points made in the paragraph, namely that: (a) the present CRCIA work focuses on immediate problems (or risks); (b) major potential impacts to the river could occur if additional groundwater contaminant plumes on the Hanford Site reach the river (however, RL does not think that this is likely as long as planned actions are taken); and (c) Phase 2 of the CRCIA is intended to address both current and potential future impacts on the river. More about this last item is discussed in our response to your recommendations.

2. Previous HAB advice - need for integrated approach that evaluates cumulative impacts of various cleanup alternatives, and that CRCIA Phase 2 would provide such a mechanism:

RL is mindful of the HAB's previous consensus advice and agrees that CRCIA Phase 2 would be one approach for evaluating such impacts. This item is discussed further in our response to the HAB's recommendations, below.

3. Defense Nuclear Facility Safety Board (DNFSB) Recommendation 94-2 and the HAB's call for better sitewide coordination of and consistency between the risk and impact assessment approaches used for projects and programs at Hanford:

RL agrees that conduct of risk analysis and performance assessment work at Hanford and across the DOE complex based on the requirements outlined for CRCIA Phase 2 could satisfy the need expressed in DNFSB 94-2 and provide "tools" useful at Hanford for supporting cross-site comparisons of risks. (For your information, the DNFSB effort you mentioned is presently going forward; the CRCIA Management Team [which includes representatives from the U.S. Environmental Protection Agency (EPA), State of Washington Department of Ecology (Ecology), Oregon Department of Energy, Yakama Indian Nation, Nez Perce Tribe, Confederated Tribe of the Umatilla Indian Reservation, Bechtel Hanford, Inc. and Pacific Northwest National Laboratory] has been briefed on this effort a number of times.) RL also agrees that the CRCIA Phase 2 tools, if developed and used appropriately, could aid in promoting better sitewide coordination and consistency between the risk and impact assessment approaches used at Hanford. However, before RL can commit to the effort necessary for implementing the CRCIA Phase 2 approach, RL plans to assess costs and other impacts. More about this is discussed below in our response to your recommendations. As an aside, the example you cited of the need for the Hanford Groundwater Strategy to be coordinated with the Tank Waste Remediation Systems (TWRS) plans for vadose zone characterization is in fact being done.

Recommendations:

Finally, RL believes that we are taking prudent steps in addressing the recommendations contained in your letter. As in the above format, our response follows your enumeration of these.

1. "...that funding should be provided for continuing Steering Committee work on CRCIA Phase 2, particularly in Fiscal Year 1997 to develop a baseline risk assessment methodology and to provide sitewide coordination of risk and impact assessments among the projects and programs at Hanford."

The CRCIA is currently funded at approximately \$909,000. This amount includes \$147,000 of carryover and \$762,000 of Fiscal Year 1997 funding (including \$306,500 recently made available as a result of Tri-Party

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Agreement Change M-15-96-13, which delays completion of approved CRCIA work until the end of this Fiscal Year). The delay and associated funding assures that the CRCIA Management Team can continue to stay involved in CRCIA work, including work on CRCIA Phase 2 (or CRCIA follow-on), through the duration of this fiscal year, because: (a) delay in the CRCIA Tri-Party Agreement Milestones will require that the CRCIA Team be consulted with respect to the deliverables due, and (b) it is in the DOE's and the other Tri-Party members' interests to work with the CRCIA Team to avoid a repetition of the contentious situation existing before formation of the CRCIA Team in August 1995.

With respect to the recommendation that in Fiscal Year 1997, the CRCIA Phase 2 work involve the CRCIA Team, focusing on (1) developing a baseline risk assessment methodology, and (2) providing for sitewide coordination of risk and impact assessments, the following is being done: a) Mr. Lloyd Piper, Deputy Manager, has determined that the ER Project, as a part of satisfying the previously mentioned CRCIA Tri-Party Agreement Milestones, has responsibility for addressing this recommendation, b) Working with the CRCIA Team, ER has begun an effort to develop cost estimates for implementing an effort, based on the CRCIA "requirements for a comprehensive assessment," which hopefully would satisfy the HAB recommendation (RL is concerned with the potential total cost and phasing of the work and wants to minimize the diversion of funds from actual remedial work while achieving meaningful results from CRCIA), c) In ER, we have begun a series of meetings with representatives from other major Hanford Projects (TWRS, Waste Management, Facilities Transition, and Technology Development) and cross-cutting organizations (Project Management Division, Project Integration Division, and Environmental Assurance, Permits, and Policy Division) to discuss efforts which could lead to a cooperative, "bottoms-up" approach for achieving the HAB recommendation (included in these meetings was a briefing by the CRCIA Team on January 29, 1997, to representatives from these various organizations), and d) based on the results of (b) and (c), we plan to work with representatives from the other Site Projects, appropriate cross-cutting organizations, the RL Deputy Manager, EPA, Ecology, and the CRCIA Team in determining next steps, which will then "feed into" satisfying the Tri-Party Agreement Milestones discussed above - primarily M-15-80B, which requires that DOE provide a recommendation for CRCIA follow-on work. Further, if it appears prudent, based on the preliminary results from the cost estimate and various discussions, ER may prepare a "mid-year" (March/April 1997 timeframe) Change Request to reallocate Environmental Restoration funds to actually begin highest priority work required to implement the CRCIA Phase 2 approach during Fiscal Year 1997.

2. "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."

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As mentioned above, at this time the RL Deputy Manager has determined that ER should continue to be responsible for work associated with the HAB's recommendations because of the past responsibilities and history associated with the CRCIA. Additionally, he has indicated that the various Site Projects should be involved to support CRCIA Phase 2 work. That is why ER is focusing on discussions and communications with individuals from the various Projects to seek this determination. RL believe that this is as it should be. ER can continue to be the Project Manager with any issues requiring resolution being brought to the RL Deputy Manager.

In summary, RL appreciates your letter and believes that RL is being attentive to the values and principles, concerns, and recommendations therein. RL intends to keep the HAB aware of CRCIA developments, and believes this should be relatively easy, as CRCIA Team membership includes HAB members. If you have any questions about our response or about the CRCIA, please contact me at (509) 376-6628, or Mr. Bob Stewart, RL CRCIA Project Manager, at (509) 376-6192.

Sincerely,



Linda K. Bauer, Assistant Manager
for Environmental Restoration

cc: R. Patt, ODOE
D. Sherwood, EPA
M. Wilson, Ecology