



2010I-154

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 12, 2010

Ms. Susan Leckband, Chair
Hanford Advisory Board
1933 Jadwin Avenue, Suite 4
Richland, Washington 99352

Re: Hanford Advisory Board Consensus Advice #227, "DOE's Use of Modeling Versus More Characterization," dated February 5, 2010

Dear Ms. Leckband:

Thank you for the Hanford Advisory Board's advice to the Tri-Party Agreement agencies on the use of modeling. The Department of Ecology (Ecology) has similar concerns.

Modeling can be a great help in understanding the importance of various influences in an environmental system. It helps focus on the key drivers that affect things such as contaminant migration and remedy effectiveness. However, modeling should be part of a process with characterization to define and limit uncertainties. Ecology currently requires, at a minimum, evaluation of models in accordance with Washington Administrative Code 173-340-747(8).

We have told the United States Department of Energy that we believe post-record of decision characterization can be very risky. The cost of correcting a cleanup decision shown to be inadequate can be very high compared to the cost of having enough information to make a good decision from the start. Ecology is concerned that, in many cases, we have not gained the confidence we need in the models using the limited characterization information we have. We will continue to identify these concerns where we see them.

Again, thank you for your thoughtful advice on a subject that is critical to our cleanup decisions. If you have any questions, please call Cheryl Whalen at 509-372-7972.

Sincerely,

Jane A. Hedges
Program Manager
Nuclear Waste Program

cc: Dennis Faulk, EPA
Catherine Brennan, USDOE-HQ
David Brockman, USDOE-RL
Shirley Olsson, USDOE-ORP

Response to HAB advice #227
HAB Consensus Advice: DOE's Use of Modeling Versus More Characterization
Letter from Jane Hedges dated 4/12/10