Office of River Protection

OCT 01 2009

Mr. Gabriel Bohnee, Director
Environmental Restoration and Waste Management Program
Nez Perce Tribe
P. O. Box 365
Lapwai, Idaho 83540-0365

Dear Mr. Bohnee

THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY (ECOLOGY)/THE U.S. DEPARTMENT OF ENERGY (DOE) RESPONSE TO NEZ PERCE COMMENTS ON WASTE MANAGEMENT AREA (WMA) C CLOSURE

Reference: Nez Perce letter from G. Bohnee, to S. J. Olinger, ORP and J. Hedges, Ecology, "Waste Management Area (WMA) C Closure," Dated June 19, 2009.

The U. S. Department of Energy, Office of River Protection (ORP) and Ecology want to thank the Nez Perce Environmental Restoration and Waste Management (ERWM) organization for providing input to the ongoing Waste Management Area – C (WMA-C) Performance Assessment (PA) working sessions. Your involvement in this effort has been appreciated and was helpful in the May 2009, WMA-C PA working session, and we look forward to your continued participation in the upcoming working sessions in the next two years. We appreciate the recommendations provided in your June 19, 2009, letter and would like to respond briefly to those suggestions. In addition, both ORP and the Ecology management would like to come to Lapwai, Idaho, and discuss in detail your suggestions for improving the upcoming working sessions.

Your letter recommended involving independent experts in review of the WMA-C PA. The WMA-C PA working sessions involve a wide variety of expertise from Ecology, the Nez Perce Tribal Nation, the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Hanford Advisory Board, the U. S. Nuclear Regulatory Commission (NRC), and the Environmental Protection Agency. The ORP and Ecology C-Farm program staff believe that this involvement will lead to an appropriate set of performance assessment parameters that will help all parties obtain the information they need for future decisions on the closure of the 241-C Tank Farm.

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Ecology has previously involved independent modeling experts to evaluate technical issues. Recently, three different independent contractors have evaluated modeling on projects under Ecology's responsibility. In 2005, an independent consultant looked at the Subsurface Transport Over Multiple Phases (STOMP) model for the initial draft Single Shell Tank Performance Assessment. In 2008, under Ecology's responsibility for the 200-UW-1 modeling, a separate consultant reviewed the STOMP model. Also in 2008 for Ecology's role as a cooperating agency for the Tank Closure and Waste Management Environmental Impact Statement (TC & WM EIS), a third consultant reviewed MODFLOW and portions of the STOMP application. As recommended by the ERWM, Ecology contributed to the "independent expert" modeling review, and reviewed information that has been used to validate and calibrate the STOMP code for the EIS. Ecology has had three separate consultant reviewers look at the STOMP code, and the state has confidence in the STOMP code and platform for the upcoming WMA-C PA. The result of the ongoing working sessions will provide additional confidence in the inputs, parameters and assumptions that will be used for the WMA-C PA. Also as recommended by the ERWM, the NRC agency experts, along with their independent resources at Southwest Research Institute, will be involved in expert panel reviews of the WMA-C PA methodology and modeling.

The ERWM recommends that all computer modeling methods and results be calibrated and validated. During the upcoming working sessions, we will be reviewing field data and comparing results of different Hanford Site locations for potential calibrating and validating purposes at WMA-C. At a future point, the WMA-C staff are also looking to the TC & WM EIS draft release to also incorporate the calibration and validation done in a Hanford Site regional modeling effort.

Your letter recommended employing three dimensional visualization methods and DOE agrees. On April 7, 2009, some of the Nez Perce three-dimensional visualizations of the vadose zone contamination were demonstrated for DOE. We look forward to using that information in future working sessions. As you know, DOE also has three-dimensional visualization with specific data results, but has not extrapolated plumes with the current technical data for the WMA-C vadose zone. Sharing information with data from the ERWM in a combined effort will be beneficial for all involved. We look forward to this synergistic effort offered by ERWM.

We request that you suggest a date for the DOE and Ecology to come to Lapwai, Idaho to discuss the recommendations presented in ERWM's letter of June 19, 2009.

Please contact either Erik Olds at 509-372-8656 or Jill Conrad at 509-376-0288 if you have any questions or comments.

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