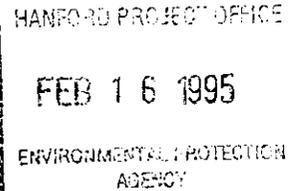




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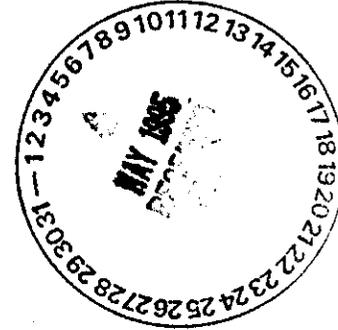
ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT

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February 14, 1995

Mr. Paul R. Beaver
Unit Manager, 200-BP-1 OU
United States Environmental Protection Agency
Region 10, Hanford Project Office
712 Swift Blvd, Suite 5
Richland, Washington 99352



Subject: COMMENTS ON 200-BP-1 OU PROPOSED PLAN

Dear Mr. Beaver:

The Nez Perce Tribe Environmental Restoration and Waste Management (ERWM) Office has received and reviewed a copy of the 200-BP-1 OU Proposed Plan. We regret that due to staff shortage we were unable to provide comments soon. However, we feel some issues relating to the plan are important enough to warrant this letter to you, even at this date. Due to the circumstances, ERWM staff have chosen to forego our usual practice of providing line-by-line detailed comments on the document, but wish to provide a summary of our issues with regards to the plan, as described below.

Preferred Alternative

ERWM concurs to the selection of the preferred alternative, which is the "Modified RCRA Barrier". It was really important to see that EPA have considered 10 alternatives on this project. One of our concerns is the effect of seismic activities on the barrier. Another concern is the certainty of the life expectancy of the barrier. What are the basis of arriving to 1,000 years design life?. No prototype has been tested to last that period of time. Would it be better to indicate that the barrier was designed to last for 1,000 years, with a certainty included? It could be that the barrier can last up to 10,000 years, but at a lower confidence that it will last that long.

Contamination and Risks

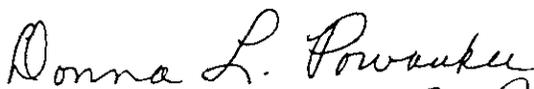
ERWM wants to know the criteria behind the evaluation of the levels of contaminants. It was indicated that the contaminated surface soils contain relatively low levels; the 2-15 ft near surface soils contain low contamination of ^{137}Cs , ^{226}Ra , ^{238}Pu to ^{240}Pu , ^{90}Sr , ^{99}Tc , ^{60}Co , U , ^{238}Th , and Nitrates; and soils between 15-50 ft contain most significant contamination by ^{90}Sr , ^{137}Cs , ^{238}Pu to

²⁴⁰Pu and U. Since extensive soil investigations and sampling were done, it will be useful to have a three-dimensional map showing the contamination. It is our impression that the contaminants are mixed with each other, are there some chemical reactions or bombardments that could occur which may accelerate or delay the decay of the contaminants? Moreover, it was stated that ⁹⁰Sr and ¹³⁷Ce are attributed for the most of the radioactivity, with half-lives of up to 30 years, and will *decay away* in 200-300 years. It might be better to state the latter clause that these radionuclides will be gone 200-300 years from now.

A baseline risk assessment was done to estimate the health and environmental problems that may occur due to the contamination. ERWM suggests that the **baseline risk assessment** must include **cultural risk**. There are risk methods that equalize cultural values and resources with the more easily quantified public, worker and ecological health. As an example, USEPA has Comparative Risk projects that have sets of metrics related to *quality of life* that include various measures of cultural, social, economic and "outrage" impacts.

If you wish to discuss Nez Perce ERWM's comments further, please contact me or Dr. Rico O. Cruz at 208-843-7375.

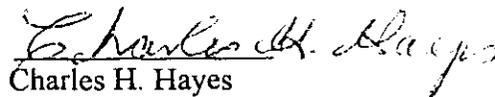
Sincerely,


Donna L. Powauke, Manager *By JHR*

Nez Perce Tribe

Department of Environmental Restoration and Waste Management

In Concurrence:



Charles H. Hayes

Chairman

cc: Doug Sherwood, USEPA, Hanford Project Manager
Kevin Clarke, DOE-RL, Indian Programs Manager
J.R. Wilkinson, CTUIR Hanford Programs Manager