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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

DEC 5 1994

FEB 1995

Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

Dear Mr. Alexander:

FORWARDING OF COMMENTS FROM THE CONFEDERATED TRIBES AND BANDS OF THE YAKAMA INDIAN NATION (YIN) ON THE N SPRINGS DRAFT EXPEDITED RESPONSE ACTION PROPOSAL 33885

The U.S. Department of Energy, Richland Operations Office (RL) would like to notify you of their receipt of the attached YIN letter to Mr. John D. Wagoner from Mr. Russell Jim "N Springs Draft Expedited Response Action Proposal; Yakama Nation Disagreement with Proposal that makes use of a Sheet Metal Piling Barrier; Comments on Alternative Technology and Source Remediation--," dated October 12, 1994. The comments presented by YIN clearly present their concerns regarding preferred remediation measures and appropriate technology for N Springs. RL has responded in writing to YIN regarding the receipt of their letter. 40230

Additionally, RL would like to confirm that the State of Washington Department of Ecology, which serves as the lead agency on this project, is planning to formally respond to the YIN comments.

If you have any questions, please call Mr. Paul M. Pak on 376-4798.

Sincerely,

Julie K. Erickson, Director
River Sites Restoration Division

RSD:DEO

Attachment

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Confederated Tribes and Bands
of the Yakima Indian Nation

Established by the
Treaty of June 9, 1855

October 12, 1994

RL COMMITMENT CONTROL PHONE 6-8537
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Mr. John Wagoner, Manager
Richland Operations Office
Department of Energy
P.O. Box 550 A7-50
Richland, WA 99352

Subject: N-SPRINGS DRAFT EXPEDITED RESPONSE ACTION PROPOSAL; YAKAMA NATION DISAGREEMENT WITH PROPOSAL THAT MAKES USE OF A SHEET METAL PILING BARRIER; COMMENTS ON ALTERNATIVE TECHNOLOGY AND SOURCE REMEDIATION--

The following are the Yakama Nation's comments on the N-Springs Expedited Response Action Proposal (ERA) prepared by the Department of Energy. They supplement our comments in a letter of November 16, 1993 on N-Springs remediation technology.

1. The Yakama Nation disagrees with the introduction of sheet metal wall because of its potential impact to the cultural resources, for example, burial grounds, below grade in the area. We consider that the least impact technology to isolate contamination sources should be utilized. In this regard we would agree with freeze barrier technology as being a minimum impact technology. (We estimate the mechanical disturbance of the sub-surface conditions to be less than one-tenth of the impact of the proposed sheet metal piling being considered.)

2. The freeze barrier technology is useful for in-situ remediation of the source of contaminants in the N-Springs area in that it will allow isolation of sources both horizontally and vertically. The sheet pile barrier does not have this potential. The freeze barrier technology can be utilized to completely isolate the sources in the 100-N area (without dependence upon the uncertain vertical isolation afforded by incompletely characterized aquitards) and protect uncontrolled discharge to the river during significant variation in river levels from flood scenarios to low-river flows. (We note that the area at the N-Springs is part of the river's bank storage zone and, thus, subject to large groundwater fluctuations.)

3. Remediation of the source contaminant material in the 100-N area should not depend upon a scheme of digging up wastes and transportation to a future 600 area burial ground or other disposal facility away from the site. Such action should only be considered for wastes that cannot be remediated in-situ with other existing technology or technology anticipated in the next 30 years, with the

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objective of such remediation being to allow unrestricted access at the completion of remediation work. In any case where actions would remove waste for disposal or remediation at another site, permanent disposition (disposal) should not be planned unless the waste disposal site meets site-specific performance requirements that the Yakama Nation has identified as necessary for such facilities in previous correspondence.

Regarding planning for treatability test planning, we refer you to our recent letter of September 6, 1994 concerning the B-Reactor Burial Ground treatability test plan. (A copy is attached to this letter.)

4. Actions should not proceed with interim or final remediation until a risk assessment approved by the Yakama Nation in consultation with other natural resource trustees is accomplished and there is agreement with the course of action to be taken.

Sincerely,

Russell Jim

Russell Jim, Manager
Environmental Restoration/Waste Management Program
Yakama Indian Nation

cc: K. Clarke, DOE/RL
J. E. Rasmussen, DOE/RL
M. Riveland, WA Ecol.
G. Emison, U.S. EPA Reg. 10
D. Sherwood, EPA Richland
T. Grumbly, DOE/EM
Washington Gov. M. Lowry
U. S. Congressman J. Inslee
U. S. Senator P. Murray
DNFSB

ATTACHMENT: Yakama Nation letter of September 6, 1994

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