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DEC 14 1995

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. Mike Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Wilson:

**MODIFICATION TO THE COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT (CRCIA)  
MILESTONE**

This letter follows discussions and consensus of the recently formed CRCIA Project Management Team regarding the scope of the CRCIA. The CRCIA Team is composed of the CRCIA Project Managers from the tri-party agencies and designated representatives from the Confederated Tribes and Bands of the Yakama Indian Nation, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, State of Oregon, Hanford Advisory Board, Pacific Northwest National Laboratory (primary contractor), Bechtel Hanford, Inc., and Dames and Moore (General Services Support Contractor). In August 1995, the CRCIA Team was formed to resolve issues associated with the CRCIA, including the issue of "required" scope. On October 3, 1995, the CRCIA Team reached consensus on work to be performed in FY 1996 and an approach to identifying additional work believed needed; this agreement was recorded and signed by the CRCIA Team members.

To adopt the CRCIA Agreement, modifications to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) interim milestone M-15-80 is necessary. The necessary modifications have been incorporated into the attached Tri-Party Agreement Change Request (M-15-95-09). The Change Request itself was developed by the CRCIA tri-party agencies Project Managers and coordinated with the CRCIA Team. During the coordination process, changes were made to incorporate the CRCIA Team comments; the resulting document has the consensus support of the CRCIA Team and is being submitted for approval by the U.S. Environmental Protection Agency and State of Washington, Department of Ecology.

Messrs. Sherwood and Wilson

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Milestone M-15-80B, which is added per the Change Request, requires the U.S. Department of Energy (DOE) to provide a recommendation for follow-on work to M-15-80, ". . . primarily based on M-15-80A, as well as funding considerations, overall Sitewide objectives, and TPA authority." Milestone M-15-80A, also added, requires DOE to, ". . . provide a list of comprehensive work scope tasks developed and prioritized in coordination with the CRCIA Management Team (not based on funding)." In the coordination process with the CRCIA Team on the Change Request, the team did not support including the phrase, "based on . . . overall Environmental Restoration objectives (focus is on cleanup)" as a part of M-15-80B. DOE believes strongly that this phrase helped to clearly indicate the intent of the U.S. Congress, the three tri-party governmental agencies, DOE-Headquarters, and the DOE Richland Operations Office (RL) that physical cleanup work is to be prioritized above studies. Thus, as DOE works with the CRCIA Team, the intention is to continue to ensure that this point is a primary consideration in specific team prioritization activities.

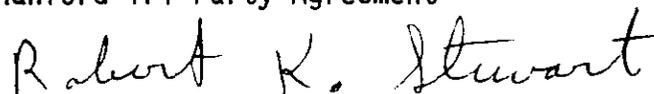
If you have any questions about the Change Request, please call Mr. Bob Stewart on (509) 376-6192, RL's Project Manager for the CRCIA Project, or you can discuss this with your respective CRCIA Project Managers.

Sincerely,



P.F.X. Dunigan, Jr., Administrator  
Hanford Tri-Party Agreement

GWP:RKS



Robert K. Stewart, Project Manager  
Groundwater Project

Attachment

cc w/attach:  
L. D. Arnold, WHC  
R. L. Dirkes, PNNL  
L. E. Gadbois, EPA  
R. S. Hajner, BHI  
D. P. Holland, Ecology  
T. M. Wintczak, BHI

Change Number M-15-95-09	Federal Facility Agreement and Consent Order Change Control Form	Date 12-13-95
Originators <span style="float: right;">Phone</span> Bob Stewart - DOE; Larry Gadbois - EPA; Dave Holland - Ecology		
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modification to M-15-80 Milestone, the Columbia River Comprehensive Impact Assessment (CRCIA), Scope and Schedule		
Description/Justification of Change Based on consensus of the recently formed CRCIA Management Team (described on page 2):  <i>M-15-80      Submit the Columbia River Comprehensive Impact Assessment to EPA and Ecology (Human Health and Environmental Risk Assessment) [formerly M-13-80B]</i> <div style="text-align: right;"><i>Submittal date to be determined no later than 12/15/95</i></div> <p>is changed to:</p> <i>M-15-80      Submit to EPA, Ecology, Technical Peer Reviewers, CRCIA Team, and the public for review a draft interim report (considered an initial scoping Report for the "Columbia River Comprehensive Impact Assessment" by the CRCIA Team) which incorporates human health and ecological risk assessments and documents completion of the "Agreed-to FY 1996 Work" detailed on page 3, items #1, 4, and 5.</i> <div style="text-align: right;"><i>Due July 31, 1996</i></div> <p>Additionally, the following target date is added:</p> <i>M-15-80-T01      Submit a revised report of the draft from M-15-80 which incorporates responses to comments from the CRCIA Team, technical peer reviewers and the public. Responses are to be based on consensus of the CRCIA Team to the extent practicable; to the extent that comments cannot be reconciled, "minority opinions" will be included.</i> <div style="text-align: right;"><i>Target date Oct 31, 1996</i></div> <p>and, based on information to be included in the M-15-80/M-15-80-T01 report above (and any other pertinent information), the following milestones addressing follow-up work beyond FY 1996 are added:</p> <i>M-15-80A      DOE is to provide a list of comprehensive work scope tasks developed and prioritized in coordination with the CRCIA Management Team (not based on funding).</i> <div style="text-align: right;"><i>Due Sept 30, 1996</i></div> <i>M-15-80B      DOE is to provide a recommendation for follow-on work to M-15-80, primarily based on M-15-80A, as well as funding considerations, overall Sitewide objectives, and TPA authority.</i> <div style="text-align: right;"><i>Due Dec 31, 1996</i></div>		

Impact of Change No impact to FY 1996 planned work or budget. There are budget impacts in FY 1997 or future years because development of M-15-80B recommendations and execution of follow-on work are not in the current budget plan. Carry-over of FY96 funds into October 1996 (FY97) would be required to complete final editorial and publication costs for the M-15-80C-T01 document.

## Affected Documents

Tri-Party Agreement Handbook.

## Approvals

 Approved     Disapproved

Linda K. McClain \_\_\_\_\_ Date 12/14/95  
Linda McClain, DOE

\_\_\_\_\_  
Doug Sherwood, EPA Date \_\_\_\_\_

\_\_\_\_\_  
Mike Wilson, Ecology Date \_\_\_\_\_

**Background:**

For years, appropriate scope and priority for assessments of contaminant impacts to the Columbia River has been controversial. During 1993 the Tri-Parties began work towards a Columbia River Comprehensive Impact Assessment. This effort was established in the Tri-Party Agreement in January 1994. Differences in project participants' expectations are at least partially attributable to the word "comprehensive" in the CRCIA project name and to the description of the project scope for the original M-13-80B milestone. To help establish common expectations, a CRCIA Project Management Team was formed in late August 1995, consisting of the following organizations and representatives:

- (Chair) U.S. Department of Energy, CRCIA Project Manager
- U.S. Environmental Protection Agency, CRCIA Project Manager
- State of Washington, Dept. of Ecology, CRCIA Project Manager
- Confederated Tribes and Bands of the Yakama Indian Nation, CRCIA Representative
- Confederated Tribes of the Umatilla Indian Reservation, CRCIA Representative
- Nez Perce Tribe, CRCIA Representative
- State of Oregon, CRCIA Representative
- Hanford Advisory Board, CRCIA Representative
- Pacific Northwest National Laboratory (Primary Contractor), CRCIA Project Manager,  
CRCIA Team Administrator
- Bechtel Hanford, Inc (Environmental Restoration Contractor), CRCIA Technical  
Coordination Representative,  
Public Involvement Representative
- Dames & Moore (General Services Support Contractor) - Technical Support Representative

This team began meeting in late August 1995 and continues to meet, one-half day per week, to resolve issues associated with the project. An agreement concerning the scope of the project was agreed-to (and signed) by Team members on October 3, 1995. This agreement is restated on page 3 as "Agreed-to FY 1996 Work" and becomes part of the revised M-15-80 milestone.

Agreed-to FY 1996 Work

The following work, with proactive involvement by the non-TPA members, will be performed in response to TPA Milestone M-15-80:

- 1) Perform an assessment of Hanford-derived contaminants (existing conditions including residual contaminants from past operations) in a scoping level risk assessment to support IRM decisions.
- 2) Compile and make available to the public the approximately 2000 documents identified in Appendix A of the data compendium; pertinent supporting Hanford data will be made available.
- 3) Work with the declassification efforts of the HAB in identifying the Columbia River documents as a high priority for release.
- 4) Define the essential work remaining to provide an acceptable "comprehensive" river impact assessment. This work will be documented in the same report as the scoping level risk assessment.
- 5) Data (from 2&3) will be available for reconciliation against the risk assessment.

These actions are designed to fulfill the requirements for a scoping level risk assessment to support IRM decisions limited only by the time and FY96 funds available for this effort. However, the "comprehensiveness" issue is left open. Work identified under #4 will be assigned TPA milestones as appropriate, scoped, prioritized and scheduled.