

Confederated Tribes and Bands
of the Yakama Indian Nation

0048773

Established by the
Treaty of June 9, 1855

056736

February 23, 1998

Dr. Robert Alvarez
Deputy Assistant Secretary
U. S. Department of Energy
1000 Independence Avenue, S. W.
Washington, D. C. 20585

HANFORD VISIT

Dear Dr. Alvarez,

It was a pleasure seeing you again. Since we worked together in connection with the Hanford Health Effects Panel in 1986 a lot has changed -- and nothing has changed. If allowed to remain unaddressed, fundamental management and cultural problems, such as those here at Hanford, don't get better with time; they simply continue to impact more efforts and neutralize the best of recommendations. Nevertheless, I am delighted to see your involvement again. I hope it is a long term assignment.

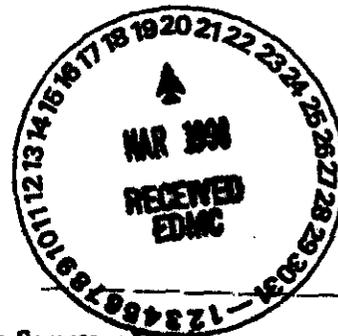
As we discussed with Secretary Moniz when you and he were here in January, we feel strongly that Hanford's cleanup lacks both direction toward any defined endstate conditions, and an understanding of the regional effects of the technical solutions that, nevertheless, are being implemented. We will continue to advocate conduct of the Columbia River Comprehensive Impact Assessment (CRCA) as an essential regional effects analysis. Hopefully, it would be used as a decision aid in developing truly sensible cleanup strategies.

Hanford's latest politically correct science initiative, the Integrated Ground Water / Vadose Zone Project (GW/VZ), seems disappointing so far. As the attached letter to Secretary Moniz indicates, we see an absence of thinking about purpose, scope, or integration of subordinate analysis efforts. Failing to define these elements, GW/VZ seems to wander aimlessly around trying to look like whatever it is expected to look like -- including the CRCA -- while destroying that which we (and many others) believe to be the sound approach forged into the CRCA. I have attached a figure from the CRCA to help make the point that there is no escaping the need for an overarching analysis. GW/VZ can only be, at best, a subordinate element of that broader analysis.

I hope Secretary Moniz allows us to provide a CRCA familiarization presentation as we requested in our letter. Should that come about I hope you can attend. I would look forward to hearing your views on these issues. Your suggestions are always welcome.

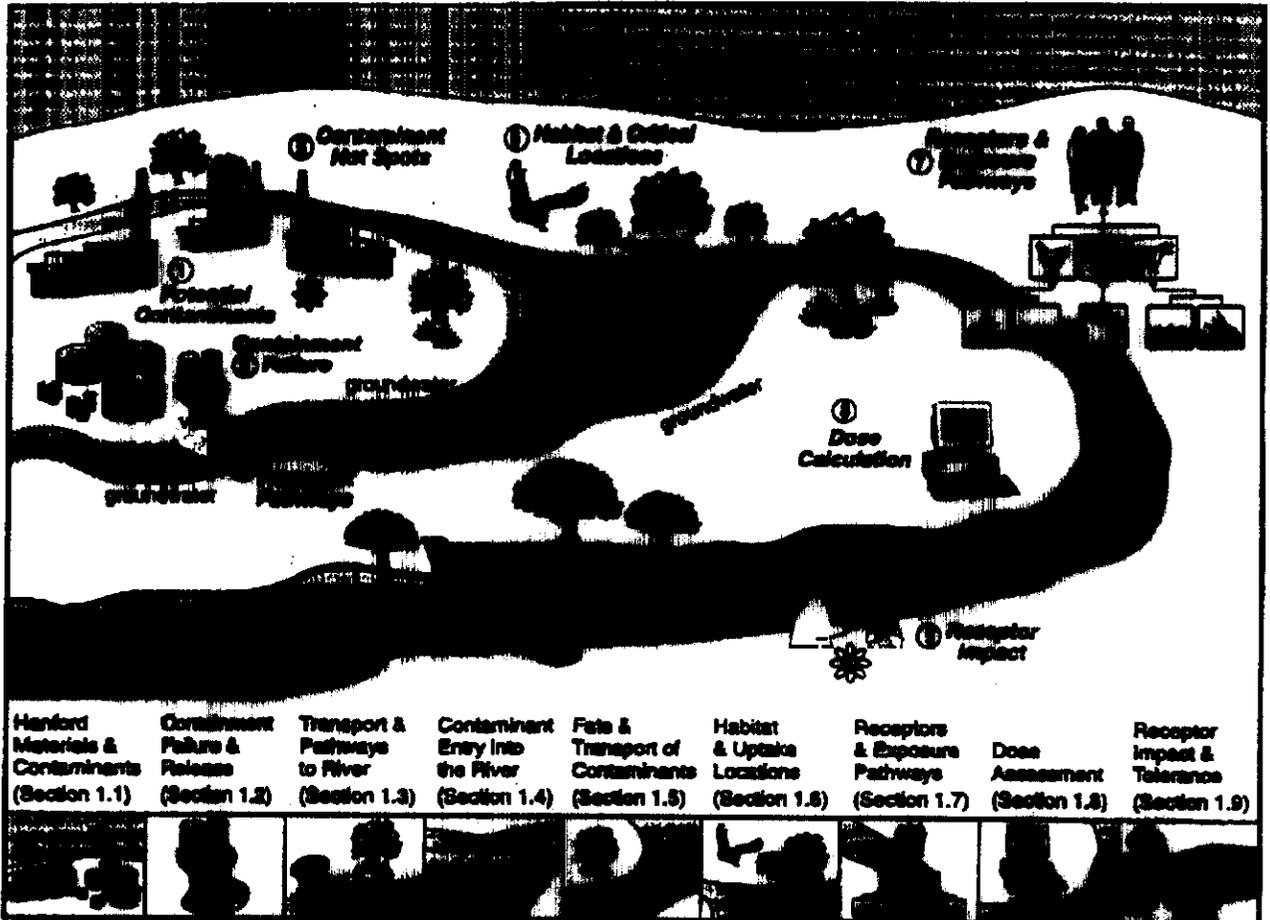
Sincerely,

Russell Jim, Manager
Environmental Restoration and
Waste Management Program



2 attachments:
CRCA figure
Yakama Nation letter to Secretary Moniz

Post Office Box 151, Fort Road, Toppenish, WA 98948 (509) 865-5121



Hazard Materials & Contaminants (Section 1.1)	Contaminant Release & Release (Section 1.2)	Transport & Pathways to River (Section 1.3)	Contaminant Entry into the River (Section 1.4)	Fate & Transport of Contaminants (Section 1.5)	Habitat & Uptake Locations (Section 1.6)	Receptors & Exposure Pathways (Section 1.7)	Dose Assessment (Section 1.8)	Receptor Impact & Tolerance (Section 1.9)
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Dr. Ernest J. Moniz
Under Secretary of Energy
U. S. Department of Energy
1000 Independence Avenue, S. W.
Washington, D. C. 20585

HANFORD VISIT FOLLOW-UP

Dear Mr. Secretary,

The Yakama Nation wishes to thank you for taking your time to meet with Councilman Ike and our technical staff when you visited Hanford January 22, 1998. Perhaps you'll recall the frank conversation about the deficiency in DOE-Hanford's decision-making practices, specifically that past and present cleanup decisions are not defensible due to the absence of analyses of the cumulative effects on the region of those decisions. Councilman Ike's letter to you of January 22 requested your independent review of how Hanford cleanup decisions are reached and asked for an early meeting with you to more fully explore this and other Yakama concerns.

We watch with great interest the development of Hanford's Integrated Ground Water / Vadose Zone Project (GW/VZ). We have not been able to see the February 13th draft plan but have discussed it with a number of the staff. We sincerely hope there is more science than hype in the GW/VZ concept. At the present time, however, we are skeptical. Currently we see little to no grasp among the leadership or staff of an explicit purpose for the Project, a vague to non-existent definition of its scope, and such a poor understanding of "integration" as to render impossible any definition of interfaces between source term, transport, exposure and impact.

The Yakama Nation applauds DOE's efforts to establish consistency across the Site in vadose characterization and modeling approaches for both the vadose and groundwater. These are difficult matters by themselves. We hope the GW/VZ Project confines itself to these lofty objectives without diffusing its efforts by ambitious expansionism into Site source term definition, containment/containment failure performance, contaminant distribution in and through the Columbia River, and ecosystem uptake/exposure/impact projections. A credible Hanford regional effects analysis must have reliable travel time and concentration information from the GW/VZ Project, but the GW/VZ Project cannot become an *acceptably credible* regional effects analysis.

When you were here we expressed disappointment that your agenda was set so as to preclude any opportunity for you to learn about the Columbia River Comprehensive

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Under Secretary Ernest J. Moniz

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Impact Assessment (CRCIA) -- a defined and peer reviewed regional effects assessment for the Hanford Site which establishes a solidly rational analytical framework in which the GW/VZ could be an important contributing analysis. Copies of the document describing this assessment were provided to you and Dr. Alvarez during our discussion.

We would like to provide you with a technical briefing of the CRCIA and discuss its merits in context with the GW/VZ Project, and how these analyses could provide the needed defensible basis for Hanford cleanup decisions. We await your response to these requests and look forward to your leadership in these critical areas.

Sincerely,

William F. Yallup
for William F. Yallup, Chairman
Yakama Indian Nation Tribal Council