

Confederated Tribes and Bands
of the Yakama Indian Nation

Established by the
Treaty of June 9, 1855

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August 20, 1998

Mr. John Wagoner, Manager
U. S. DOE, Richland Operations Office
P. O. Box 550
Richland, WA 99352

RECEIVED

**AUG 26 1998
DOE-RL/DIS**

**SUBJECT: SUGGESTED REORIENTATION OF THE DRAFT TRIBAL GOVERNMENT
AND PUBLIC CONSULTATION PLAN; GROUNDWATER/VADOSE ZONE
(GW/VZ) INTEGRATION PROJECT**

Dear Mr. Wagoner,

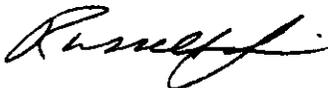
We would like to commend the Bechtel GW/VZ Project staff for the progress that they have made since your recent delegation of authority to them to manage this important effort. As Assistant Secretary Owendoff has said, 'there is no project at Hanford of greater importance' -- excepting, we assume, safety projects such as removing the spent fuel from the K-Basins and the remaining liquids from the tanks.

We continue to be disappointed in the DOE-RL staff's actions, however, to maneuver the GW/VZ effort away from a Hanford effects assessment such as that defined and documented by the Columbia River Comprehensive Impact Assessment (CRCIA) Team, even though RL formally committed on February 26 of this year to support the assessment and the CRCIA approach. Manipulation of Site budget priorities to strangle the GW/VZ assessment work by underfunding it, together with obvious efforts to transition past interactions with the CRCIA Team to the Hanford Advisory Board unmistakably demonstrate DOE-RL's opposition to this fundamental assessment. Nevertheless, we will continue our efforts to help Hanford build credibility under the cleanup program by whatever means we can, and specifically by advocating an assessment of the future state of the Columbia River as a basis for rational and defensible cleanup decision making.

The subject consultation plan misses entirely the credibility problem which pervades the Congressional appropriation process, the affected tribes, and the region's stakeholders. As we have advised orally for sometime, even thinking of this plan as the GW/VZ Project's "public involvement" plan totally defeats the effort before a word is written. If trust is to be revived at all between the Hanford establishment and the potentially affected people living in the vicinity of the Site, this plan must describe an open management process for the Project, how the Expert Panel and special subpanels will validate the Project's work, how results will be peer reviewed, how the National Academy will provide oversight and -- last but not most important -- how the tribes and stakeholders can participate and meaningfully influence these activities and the Project in general. If such an approach is not adopted, please leave out all references to this document being a tribal consultaion plan.

The "design-for-credibility-through-meaningful-participation-concept" which must be defined in this document will become DOE's defacto response to the controversial management approach in the CRCIA requirements document (Appendix D, Part II). After the Team's two year effort to find a solution to Hanford's credibility problem, it concluded an acceptable effects assessment would have to be directed by some other organization than DOE-RL. No other viable solution has yet been offered. We await your thoughtful proposal.

Sincerely,



Russell Jim, Manager
Environmental Restoration and
Waste Management Program

cc: Under Secretary Moniz
Senator Ron Wyden

**RL COMMITMENT
CONTROL**

AUG 25 1998

**RICHLAND
OPERATIONS OFFICE**