



Confederated Tribes and Bands
of the Yakama Indian Nation

Established by the
Treaty of June 9, 1855

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Mr. Brian L. Foley
U.S. Department of Energy
Richland Operations Office
3350 George Washington Way
Richland, WA 99352



February 22, 1999

RECEIVED

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DOE-RL/DIS

Dear Mr. Foley:

**200 AREAS REMEDIAL INVESTIGATION/FEASIBILITY STUDY
IMPLEMENTATION PLAN (DOE/RL-98-28, DRAFT A)**

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Thank you for the opportunity to comment on the 200 Areas Remedial Investigation/Feasibility Study Implementation Plan (RIFSIP). This plan attempts to present a streamlined approach to develop and implement a common regulatory, characterization, documentation, and communication strategy for the 200 Areas, the problem is it falls short in all aspects of remedial planning and implementation. This plan is presumptive and creates an unacceptable remediation and closure remedy. We cannot endorse this fragmented strategy or this implementation plan without a more comprehensive database and total integration of the 200 Areas. There must be a single 200 Area combined Environmental Remediation (ER), Waste Management (WM), and Tank Waste Remediation Systems (TWRS) strategy document with clearly defined endstates. There must be an open dialog on the development of these strategies and endstates as a prerequisite to planning and concurring in individual programs or projects.

Additionally, the approach of reducing the number of operable units from 32 geographical-based groupings to 23 process-based, waste site operable units is flawed. The original grouping of the 32 operable units is both a geographic and process-based grouping, which was developed by WDOE and EPA. Furthermore, the "Analogous site Approach", "Observational Approach", and "Plug in Approach" cannot be used to support closure activities without actual characterization. Without a complete characterization plan and an understanding of the site source term, development of a conceptual model of expected site conditions and potential pathways is premature.

This strategy also needs to present a total management plan that integrates all the 200 Areas remedial and closure activities. At the present this is a closed process with no Tribal or Stakeholder involvement.

Specific comments can be addressed and discussed in an open forum with the technical staff at our ER/WM office in Richland or Union Gap.

Sincerely,

Russell Jim, Manager
Yakama Nation ER/WM Program

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cc: Linda Bauer, DOE/RL
Kevin Clarke, DOE/RL
Nanci Peters, YIN ER/WM Richland
Doug Houston, Oregon Department of Energy