



Confederated Tribes and Bands
of the Yakama Indian Nation

Established by the
Treaty of June 9, 1855

074203

October 26, 1999

Doug Hildebrand
U.S. Department of Energy
Richland Operations
P.O. Box 550
Richland, WA 99352

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Dear Mr. Hildebrand:

We appreciate the opportunity to review and comment on the document "Recommendations for Selection of a Site-Wide Groundwater Model at the Hanford Site, August 1999". As you know, members of our technical staff have participated in this potential site-wide groundwater model. At this point, we have serious concerns about the direction being taken by the Modeling Group. The basis for our involvement was utilization of the CRCIA Part II Requirements document, which provides guidance in this effort. Earlier drafts of this document did capture the elements of the CRCIA and thus we were encouraged by its use. This current document has dropped the CRCIA chapter. We are extremely disappointed by this.

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In general, the presentation in this document is quite convoluted. The overall selection process and recommendations for the consolidated model needs independence. The basis for this consolidation has not been fully established since there aren't any regulatory milestones or drivers identified. The overall need for this consolidation of a groundwater model comes into question. Does this effort need to continue? The needs and requirements for each of the model elements referenced in this document have not been fully developed or defined. Uncertainty has not been defined nor is it addressed in any manner in this document. Definition of uncertainties established the range that realistic results are likely to fall in. As such, uncertainty should be a key topic in this document and addressed at length and not ignored.

If you have any questions, please feel free to contact me.

Sincerely,

Russell Jim, Manager
Environmental Restoration and
Waste Management

Cc: Keith Kline, DOE
Wade Ballard, DOE
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Wade Riggsbee