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DOE-RL/DIS

Mr. Robert Stewart
Department of Energy
P.O. Box 550 (HO-12)
Richland, WA 99352



Dear Mr. Stewart: *Bob*

I offer my personal comments on the draft "Screening Assessment and Requirements for a Comprehensive Assessment, Columbia River Comprehensive Impact Assessment".

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1. The CRCIA should not claim to be "comprehensive" when it deals only with the impacts of materials on the Hanford site alone. What assessments will be done by whom on impacts of human activities both upstream and downstream of Hanford? What is the authority for a "New Paradigm" to replace the current EPA and Ecology regulations and procedures? How will decisions be made as to comparisons and priorities of actions to remediate or mitigate impacts arising from non-Hanford activities? Do EPA and Ecology plan to make this a standard part of their procedures for all waste cleanup sites? This is a vital issue to taxpayers as well as to local governments and businesses along the river.
2. The CRCIA Board proposed as a new agency to exercise management authority over all aspects of risk assessments relating to Hanford cleanup is not authorized by the TPA or existing federal or state legislation. I strongly oppose this concept as a "new paradigm" which apparently will apply only to Hanford cleanup.
3. The screening assessment is interesting; but really doesn't add much to the existing knowledge base. The river is still rated as Class A and suitable for all uses. The known potential impacts to the ecology and to humans are due to both past Hanford releases and to other industrial and mining wastes from upstream. It says nothing about the problems in the portion of the river below Bonneville Dam which I understand are quite serious.

4. The Requirements are an exceptionally comprehensive effort to assemble all the factors worthy of consideration in the final baseline risk assessment. More needs to be done to identify the data which already exists and is of adequate quality and then to define what additional data is needed. I suspect that it will be an extremely large task to obtain all the data required. Again, unless this approach is planned to become a standard part of the regulating agencies procedures for all waste sites, I will not support it for Hanford's final performance assessment or for interim cleanup decisions.

5. I wish to receive a copy of the "Response to Comments" for this document when issued.

Thank you for the opportunity to comment on this draft.

Sincerely,

Gordon Rosen