



August 2, 1991

K. Michael Thompson
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: Risk Assessment Methodology Team

Dear Mr. Thompson:

Please accept these comments on the progress of the Risk Assessment Working Group. While there is much to commend about the first four meetings of the group, we are concerned about the progress toward the final goal.

The root of our concern is the absence of any written indication that the risk assessment methodology is taking form. The first meeting, on June 6, left us with the understanding that by the Friday prior to each meeting, the participants would be provided with draft text on which to either reach consensus or focus discussions. The bits and pieces that we have received have not gone far enough in this line.

The working group provides a fine opportunity to overcome an often-heard complaint about the regulator/regulatee interface, i.e., the "bring me a rock" scenario. We are concerned that the time and commitment expended by the team members on the methodology is not being utilized efficiently. Our involvement so far indicates that much in-depth review of detailed technical issues remains. By becoming more involved in the drafting stages of development of the methodology, the regulators would be in a better position to review and accept the ultimate product. It would be unfortunate if our formal review would lead to delay, when this opportunity to resolve potential issues exists.

We ask that the working group be presented work in progress before the August 29 meeting.

Thank you for your attention to this matter.

Sincerely,

David R. Einan
Environmental Engineer
Hanford Project Office

Steven F. Cross
CERCLA Unit
Nuclear and Mixed Waste
Management

cc: Linda Bergmann, WHC
Paul Day, EPA

Larry Goldstein, Ecology
Tim Veneziano, WHC



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subject: Risk Assessment Methodology Team

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