

C R E S P

The Consortium for Risk Evaluation with Stakeholder Participation

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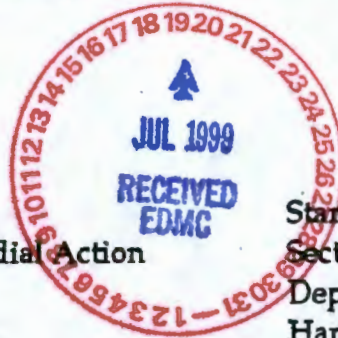
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Dear Sirs,

Soil remediation in the 100 Area of the Hanford site has progressed to the point that several sites in the area of the B/C and D reactors are held to have achieved goals specified in the 1995 Record of Decision (ROD). The 1995 ROD for 100 Area lays out the general framework through which the Tri-Parties agree that soil remediation is to proceed. The February 10, 1999, meeting on the Hanford 100 Area Cleanup, co-hosted by the Washington Department of Health, the Washington Department of Ecology, and the Environmental Protection Agency, highlighted these activities.

The Consortium for Risk Evaluation with Stakeholder Participation (CRESP) has a basic interest in understanding how risk information is developed and used in management planning and in determining that site remediation goals are achieved. Using its expertise in risk assessment, movement of chemicals and radionuclides through soil, and information gained through its Risk Information Project, CRESP has had initial discussions with the Hanford Office of USEPA to determine the feasibility of reviewing the cleanup verification packages from selected locations in the B/C area. To gain an experience base that may be generalized across many 100 Area soil remediation sites, CRESP proposes to review at least two completed activities in the D reactor area in addition to the 116-C-1 site in the B/C reactor area.



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With this letter we formally bring to the attention of the Washington Department of Health, Washington Department of Ecology, and Department of Energy our interest in conducting this review. We hope to solicit your comments on the components of the proposed task and gain your cooperation in furnishing documents, reports, etc. that facilitate its completion. Parallel with this communication, we are interacting with stakeholder groups so they may comment on our draft review plan and allow CRESP to tailor its effort so that results may be responsive to at least some of their needs and interests.

Some features of our draft approach include:

- Review for consistency the activities that implemented the 1995 ROD with narrative contained in the 1995 ROD;
- Evaluate the statistical attributes of the soil sampling scheme used to guide the soil removal process;
- Compare residual risk goals stated in the site document with plausible human activities as envisioned in the Future Use Report, Tribal Nation perspectives, and Hanford Advisory Board advice;
- Review generic strengths and limitations of the risk estimation model (RESRAD) used at the sites;
- Review specific applications of the model including:
 - a) estimating risk to individuals inhabiting the site;
 - b) estimating the movement of residual radioactive material through the vadose zone to the groundwater and to the Columbia River; and
 - c) estimating risk for non-radioactive toxicants;
- Restrict its focus to the site(s) being remediated, e.g., CRESP will not review the near or long-term consequences of depositing contaminated soil at the Environmental Restoration Disposal Facility located in the 200 area of the Hanford site.

CRESP has obtained and begun to review several key documents that detail the 100 Area soil remediation. Our desire is to interact with interested parties and finalize our scope of work by the end of April. We hope to promulgate an initial draft report in the first half of June. The work that is outlined will involve participation by CRESP personnel in Seattle, New Jersey and Washington, DC. Dr. Jack Moore will be coordinating our effort with active participation by Dr. Bill Griffith and Kieran McCarthy.

In summary, CRESP proposes to review the approach used for soil remediation at three sites in the B/C and D reactor areas. The review will note consistency of the remediation with the ROD, examine the sampling scheme that guided soil removal, and examine the use of the model used to estimate near and long-term health risks. CRESP seeks your thoughts on our draft study approach and your cooperation in assisting or facilitating our

effort. Jack Moore can be reached by phone: 202-289-8721, Fax: 202-289-8530, or E-mail: iehr@erols.com.

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Sincerely,

EM Faustman ^{SMS}

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