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DEPARTMENT of NATURAL RESOURCES

Environmental Planning/ Rights Protection Program

CONFEDERATED TRIBES
of the
Umatilla Indian Reservation
P.O. Box 638
PENDLETON, OREGON 97801
Area code 503 Phone 276-3449 FAX 276-3317

22 March 1994

DEC 1995
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EDMC

Don Anderson
U.S. Department of Energy
P.O. Box 550, Mail Stop R3-73
Richland, Washington 99352

Dear Mr. Anderson:

At the request of Kevin Clarke, DOE Indian Programs Manager, technical staff of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) are submitting this letter and the enclosed documents as a summary of Tribal concerns about tank waste management issues and the Tank Waste Remediation System program. The identified concerns should be integrated into the scoping, development, and preparation of tank waste Environmental Impact Statements (EIS).

The CTUIR have addressed tank waste issues in a number of our previously submitted comments, in particular, the comments on the Tentative Agreement on the Hanford Tri-Party Agreement (TPA). The Tribes also have addressed these issues in connection with the proposed stabilization run for PFP and the proposed deactivation of PUREX and UO3. Copies of these comments are enclosed with the appropriate sections flagged for reference.

1 The Tribes' view is that waste management and safety issue resolution at the tank farms comprises but one component of waste management on the central plateau as a whole. In a series of meetings that staff have held with representatives of PFP, PUREX, and the tank farms in recent weeks, it was readily apparent to us that there are not now either long-term objectives or a broader, sitewide strategy to integrate all aspects of waste management and D+D activities of surplus production facilities.

2 One important element of such a strategy would be an effective land use plan for the central plateau. Such a plan would comprehensively assess and plan for Hanford site waste management and storage needs by fully accommodating the ERDF, siting of future waste management and storage facilities, the tank farms, and planned waste treatment and vitrification facilities, providing sufficient on-site storage space for vitrified waste logs and other nuclear and chemical waste materials, and addressing the ongoing need for emergency response capabilities and evacuation routes. Furthermore, such a comprehensive plan would minimize the need for additional consumption of land for waste management activities by identifying and consolidating all current and foreseeable waste management needs into the smallest possible area, consistent with recommendations of the Hanford Future Site Uses Working Group, retain the necessary buffer zone surrounding these facilities, minimize further

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disturbance or fragmentation of currently intact and relatively undisturbed shrub-steppe habitat, and minimize the need for mitigation.

In summary, the chief concerns of the CTUIR center around the following issues. This list is by no means exhaustive nor are concerns necessarily listed in order of importance.

1) Maximize protection of the Columbia River ecosystem and associated natural and cultural resources
2) Get on with characterization, retrieval, treatment, and disposal of tank wastes making full use of all available or promising technologies and resources
3) Minimize existing or new waste streams directed toward the tanks
4) Minimize the need for new tanks and tank farm expansion
5) Eliminate any use of leaking tanks and single-shell tanks in general
6) Remove and remediate tank wastes leaked into the subsurface
7) Eliminate discharge of contaminated or partially treated wastewater to the ground
8) Resolve and eliminate tank safety issues associated with:
   a) Criticality potential
   b) Flammable gas generation and venting
   c) Ferrocyanide explosive potential
   d) Organic-nitrate reactivity potential
   e) High heat generation
9) Development and implementation of environmentally benign barrier/containment technology
10) Improvements to tank farm infrastructure, particularly given extended delays in ultimate waste retrieval and treatment
11) Maximize retrieval and treatment of tank sludges and solids
12) Accelerate and expedite development of on-site waste storage/disposal facilities
13) Environmentally compliant closure of all tank farms.

Thank you very much for the opportunity to identify issues of Tribal concern to be addressed in the proposed tank waste EIS. Please do not hesitate to contact either Tom Gilmore, Hanford Environmental Restoration Project Hydrogeologist, or J.R. Wilkinson, Hanford Projects Coordinator, at 503-276-3449, if there are any further questions or need for additional clarification.

Sincerely,

Rick George

Program Manager
Environmental Planning/Rights Protection Program
Department of Natural Resources

cc: William Burke, Treasurer, CTUIR Board of Trustees
John Bevis, CTUIR Board of Trustees
Michael Farrow, Director, CTUIR Department of Natural Resources
Hanford Projects Staff
Kevin Clarke, DOE Indian Programs Manager
Doug Sherwood, Hanford Project Manager, USEPA
Toby Michelena, Washington State Department of Ecology

① (CTUIR) 9513305.0615 Development, and Preparation of the TWRS Letter Dated 22 MARCH 1994 to DON ANDERSON, DOE from Rick George

Comment: ①

R: The commentor expresses the Tribe's view that WM and safety issue resolution at the tank farm is but one component of WM on the central plateau. The central plateau is (I3) ~~assumed to be the Hanford Site and surrounding geologic area.~~

The "National Environmental Policy Act; Implementing Procedures and Guidelines," 10 *Code of Federal Regulations* 1021, states that the DOE shall prepare a sitewide EIS to analyze the impacts of all or selected functions at those sites that are large and contain multiple facilities. Further, this guidance suggests that these sitewide EISs are revisited every 5 years to evaluate their relevance.

At the present time, the Hanford Site does not have a sitewide EIS to examine the cumulative impacts of its varied programs; however, a preliminary evaluation of the scope of this document is being performed. The sitewide EIS would examine ongoing and proposed activities at the Hanford Site, and cumulative impacts from these actions. It also might be used to analyze strategies for the D&D of the large processing plants, as well as certain programmatic infrastructure activities.

In the *Secretarial Policy Statement on the National Environmental Policy Act*, the Secretary of Energy proposed that each DOE installation submit an annual NEPA planning summary to the U.S. Department of Energy-Headquarters. This policy statement commits each field office, every 3 years, to examine the need for a sitewide EIS to cover activities at that site and facilitate future NEPA compliance efforts.

Comment: ②

R: The commentor expressed the Tribe's view ~~for the~~ on the importance of a sitewide strategy to integrate WM + D&D activities and the strategy's inclusion of an effective land use plan for the central plateau while addressing the ongoing need for emergency response capabilities and evacuation routes. While at this time there is no strategic ~~plan~~ land use

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CENTRAL PLATEAU

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Description: The Central Plateau is at the center of the Hanford site and encompasses 9.4 square miles (or approximately 6,000 acres) of land. This geographic area encompasses all of the 200 East and West areas, the land between these areas, and extends to the north to include an area informally known as the 200 North area. The Central Plateau has been heavily used for fuel reprocessing and waste management and disposal activities. The Central Plateau is the most heavily contaminated of the six geographic areas. Most of the contamination and stored wastes on the Hanford site are within the boundaries of this area. A great deal of the stored wastes are contained in 149 single- and 28 double-shell tanks. At least sixty-eight of the single-shell tanks are known to be leaking or have leaked into the soil beneath the tanks.

R^2 (CONT)

plan for the Hanford Site, the DOE is committed to working with the Tribes in the development of a strategic land use plan. This land use plan should address the coordinated emergency response capabilities of the Tribes and DOE as well as the identification of existing or required evacuation routes. The development of the land use plan is not within the responsibility of the TWRS EIS project, however, the upcoming Hanford Sitewide EIS should examine ongoing and proposed activities and the cumulative ~~impacts~~ environmental and social impacts of those actions.

Comment (3)

R^3. The commentor expressed the Tribe's view that the DOE should minimize the need for additional consumption of land for waste management and the need to consolidate all current + foreseable WM needs into the smallest area possible to minimize the disturbance or fragmentation of the shrub-steppe habitat. The Hanford Future Site Uses Working Group has identified six options for the future use of the central plateau area of the Hanford Site and has made it's recommendation to the DOE. The DOE is committed to working toward

Preventing groundwater contamination in the 200 Area from migrating to other areas on the site and addressing risks associated with the tanks were identified as having the greatest importance for cleanup in this area. While there may be some "islands" within the 200 Area that can and should be cleaned up quickly, especially if necessary to minimize the migration of contamination, the waste management area designated as "exclusive" (though not necessarily the buffer zone), would remain "exclusive" for the foreseeable future. It is the desire of the Working Group and DOE that ultimately, depending on technical capabilities, the Central Plateau would be clean enough for future uses other than waste management activities.

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Comment: ④

R.④ the TWRS EIS and the DOE protect the Columbia River ecosystem and associated natural and cultural resources. The TWRS EIS will evaluate the environmental impacts, to the Columbia River ecosystem and associated natural and cultural resources, of proposed alternatives for action at the Hanford Site tank farms.

Comment: ⑤

R.⑤ the DOE get on with the characterization, retrieval, treatment, and disposal of tank wastes while making full use of available or promising technologies and resources. The TWRS EIS and the DOE in a continuing effort to comply with the Tri-party Agreement (TPA) will evaluate the impacts of tank waste characterization, retrieval, treatment, and disposal. ~~utilizing with the use of~~ The use of existing and promising technologies in this effort will be evaluated during the preparation of the TWRS EIS.

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Comment: (6)

R.(6) the DOE minimize existing or new waste streams directed toward the tanks. The minimization of waste generated at DOE facilities is always at the forefront of operational objectives. The TWRS EIS will use the facilities tank waste projections to evaluate the proposed activities as these activities relate to the alternatives being evaluated in this EIS.

Comment: (7)

R.(7) the DOE minimize the need for new tanks and tank farm expansion. The TWRS EIS will evaluate the impacts of adding new tanks to the tank farm in order to accomodate projected tank waste requirements.

Comment: (8) the DOE eliminate any use of leaking
R.(8) tanks and single-shell tanks. The TWRS EIS will address the discontinued use of single-shell tanks as part of the EIS evaluation.

Comment: (9) ~~the DOE remove and~~

R.(9) the DOE remove and remediate tank wastes that have leached into the subsurface. This effort has been identified as part of the tank closure eval.

(3) R.9 (cont) and will be examined in a subsequent EIS to evaluate the closure, removal, and remediation of subsurface tank waste contamination.

Comment: (10)

R.(10) the DOE C.(10). The TWRS EIS will evaluate the C.(10) and the potential impacts associated with the resolution of these issues.

Comment: (11)

R.(10) the DOE to C.(11) the TWRS EIS will evaluate the the use of barrier and containment technology during the evaluation of environmental impacts associated with the alternatives for this proposed action.