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STATE OF WASHINGTON

DEPARTMENT OF HEALTH

DIVISION OF RADIATION PROTECTION

Airdustrial Center, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827

October 8, 1996

Thomas W. Ferns  
NEPA, Document Manager  
U.S. Department of Energy  
P.O. Box 550, MSIN HO-12  
Richland, WA 99352



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DOE-RL / DCC

Dear Mr. Ferns:

The staff of the Environmental Radiation Section of the Washington Department of Health have reviewed the summary of the *Draft Hanford Remedial Action Environmental Impact statement and Comprehensive Land Use Plan*, DOE/EIS-0222D and provide the following comments.

**Page Summary 6** Environmental contaminants are listed on the map. For the Columbia River and the Reactors on the Columbia, europium isotopes are not listed. At many locations in the operable units of these geographic areas,  $^{152}\text{Eu}$  and  $^{154}\text{Eu}$  are major nuclides and sometimes the limiting ones for cleanup.

**Pages 8-20** There is an inconsistency in the use of the No Action alternative. In some instances, No Action is listed as an alternative to Restricted and Unrestricted use. On page 15 the term Exclusive Land Use is described and it appears to be used interchangeably with No Action, but on page 16, both terms are used in the same table. No Action is really an exclusive land use since Hanford is now exclusively for U.S. DOE use.

**Page 21** Table S-3 lists "Not Applicable" for the exposure scenario of the No Action alternative. A recreational scenario should be indicated because even now there is public access to the Columbia River and shoreline for recreation that has some potential for exposure.

**Page 27** The broad expanse of undisturbed shrub-steppe on the Hanford site is considered a visual resource by many. This feature of Hanford is not included as a visual resource.

**Page 29-31** It is not clear which impacts have been considered. It states on page 29 that the "The EIS analyzes potential consequences of each alternative on resources..." It appears the impacts considered are only the impacts of cleanup, not the impact of the land use alternatives. For example, an agricultural land use alternative would result in a fugitive dust impact, destruction of wildlife habitat, destruction of acres of shrub-steppe etc.

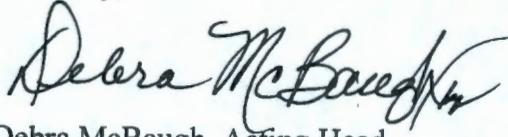


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Page Two

**Page 33** Table S-7 is not clear. Is this the total cancers over the period indicated or is it an annual cancer incidence?

We appreciate the opportunity to review this document. If there are any questions on these comments, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra McBaugh". The signature is fluid and cursive, with a large initial "D" and "M".

Debra McBaugh, Acting Head  
Environmental Radiation Section