

0075745

RECEIVED

JAN 24 2008

GENERAL COUNCIL
and
BOARD OF TRUSTEES



EDMC
CONFEDERATED TRIBES
of the
Umatilla Indian Reservation

P.O. Box 638
PENDLETON, OREGON 97801
Area Code 541 Phone 276-3165 FAX 276-3095
September 3, 1997

AL COMMITMENT CONTROL
CONTROL NO: 971798.7F
ASSIGNED TO: OEA
DISTRIBUTION:

MGR
AME
AMW
MET
OCC
PRO
RPS
RP
SAS
SID
EAP

The Honorable Federico Pena
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

RE: INVITATION TO VISIT THE UMATILLA INDIAN RESERVATION

Dear Secretary Pena:

I enjoyed our August 28, 1997, meeting in Richland, Washington. Although the time was short, I hope that I was able to convey to you the range of the Confederated Tribes of the Umatilla Indian Reservation's (CTUIR's) interests in Hanford activities, the depth of our involvement in those activities, and the importance of our role in Hanford decision making. I am enclosing with this letter a copy of my speaking notes, so that you have a record of my comments.

During my comments, I invited you to tour the Umatilla Indian Reservation and to meet with the CTUIR's governing body, the Board of Trustees, the next time you come to the Columbia Plateau. Of course, we provided former Energy Secretary O'Leary with such a tour and meeting. We have also met several times with Secretary of the Interior Bruce Babbitt, and I recently met with Secretary of Agriculture Dan Glickman. In June, we met with DOE Assistant Secretary for Environmental Management Al Alm. We would like to offer to you the same opportunity to view DOE from the CTUIR's perspective, and to discuss substantive matters of interest to both your agency and our government.

At our meeting in Richland, I described a number of the CTUIR's activities at Hanford, as well as our broad issues of concern. I mentioned that several years ago the CTUIR identified issues concerning the Columbia River as a "yardstick" we would use to measure DOE's compliance with its legal duties to the CTUIR, including the duty to consult. I also mentioned that the CTUIR was concerned about recent attempts by some DOE staff to undermine the Columbia River Comprehensive Impact Assessment (CRCIA) project. In response to this comment, you requested that we send you some documentation that explains this matter in more detail. I am enclosing with this letter a summary, prepared by CTUIR staff, of the current dispute.

Finally, let me note that the CTUIR's interests in DOE matters extend well beyond those related strictly to Hanford. Salmon recovery and restoration is an extremely high priority for both the CTUIR's Board of Trustees and its tribal members. Declining salmon runs have been caused by many complex factors and by many agencies' actions, not the least of which have been those of the Bonneville Power Administration (BPA). Now, this agency within DOE stands at something of a crossroads, and its further actions and ultimate fate will do much to determine the fate of salmon and other fish and wildlife in the Columbia River Basin as well.

The Honorable Federico Pena
September 3, 1997
Page 2

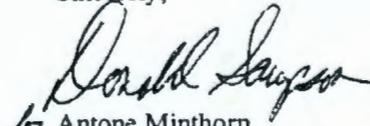
The CTUIR will be looking to you, as the cabinet officer with direct oversight of the BPA, to act commensurate with the trust responsibility to the CTUIR and in compliance with the Treaty of 1855 your predecessors-in-interest signed with mine. We hope that we can continue to work as partners to assure that our rights, religion, culture and economy, and the species around which they revolve, are protected and enhanced such that will all enjoy a future as long and robust as their past.

In doing so, we need merely follow some examples from the recent past. Working cooperatively with DOE and agencies like BPA, we have established a remarkable record of success, both on and off the reservation, addressing a wide variety of resource management issues. In addition to those related to Hanford that I've discussed with you, there is the unqualified success we've achieved in returning salmon to the Umatilla River. With assistance from BPA and in cooperation with other agencies, local agricultural interests, environmental organizations and the community, the CTUIR restored salmon to the Umatilla after they had been extinguished for three-quarters of a century. We've gone from zero fish to well over two thousand returning spring chinook for the last two years in a row. It is our aim to repeat this success in other local rivers, and throughout the Columbia/Snake watershed.

The CTUIR views all of our resource management activities comprehensively, as part of a single, indistinguishable whole. Our ancestors looked upon the earth in its entirety, and did not see it as merely suggesting a number of different, discrete scientific disciplines. We try to carry on that tradition today. Successful clean-up of Hanford, restoration of native fish and wildlife, and protection of cultural sites, practices and resources, are all elements of a seamless web. They are the objectives that the CTUIR is obligated to pursue, as a sovereign nation, for the benefit of our tribal members. Not incidentally, achieving these goals will also benefit all the citizens of the Northwest.

The CTUIR thanks you for your continued interest and support. We look forward to discussing with you and your staff--perhaps in person on the Umatilla Reservation--many of these topics in greater detail.

Sincerely,


for Antone Minthorn
Chairman, General Council

AM: DNR/cb, sh, cm

CC: John Wagoner
Lloyd Piper
Linda Bauer

Enclosures: Speaking Notes from 8/28/97 meeting
Outline of CTUIR concerns regarding progress on the CRCIA

**RL COMMITMENT
CONTROL**

SEP 10 1997

**RICHLAND
OPERATIONS OFFICE**

ANTONE MINTHORN
Speaking Notes
Joint meeting of CTUIR, YIN and NPT with Federico Pena
Secretary of the U.S. Department of Energy
Richland, Washington
August 28, 1997

I would like to welcome Secretary Pena to the ceded lands of the CTUIR. The CTUIR met with Secretary O'Leary twice. On one of these occasions she came to the Umatilla Indian Reservation for a tour and meetings. We had an excellent working relationship with Sec. O'Leary, and we hope that we can continue to have the same sort of relationship with you, Secretary Pena.

Last June, Assistant Secretary Alm also came to the Umatilla Indian Reservation. This was a valuable visit. We would like to offer Secretary Pena the same invitation we extended to Secretary O'Leary and to Assistant Secretary Alm to come to our reservation and to try to see how DOE looks from the CTUIR's perspective. If you can't come to the CTUIR, then we would like to suggest that next time you come to Hanford you schedule time to meet with each tribe individually.

Tribes have unique perspective that is essential for good Hanford decision making:

1. We are the users of Hanford resources (religious, archaeological, and natural) Have used Hanford for at least 13,000 years, fully intend to use it in near future, and for a long time into the future. This is a different perspective than the DOE or the regulators, who are much more concerned with timetables and individual cleanup tasks.
2. Tribes are sovereigns. Tribes have legal rights to Hanford resources that are in some ways more significant than the legal powers of regulators. DOE must consistently work with tribes on a government-to-government basis, in compliance with the Clinton Indian policy. DOE's Indian policy is a good starting place, but we need to create institutions that assure its consistent implementation.

Tribes are helping to solve Hanford problems:

The CTUIR has been a major architect or contributor to many important efforts at Hanford, including:

1. CRCIA (Columbia River Comprehensive Impact Assessment)
2. NRTC (Hanford Natural Resource Trustee Council)
3. TWRS-EIS (Tank Waste Remediation System Environmental Impact Statement)
4. HRA-EIS (Land Use Planning Environmental Impact Statement)
5. Technology Development efforts
6. Development of a Tribal Subsistence User Exposure Scenario for Risk Assessment
7. Native seed gathering and plant rearing for mitigation/restoration

In 1993 the CTUIR described the range of its Hanford concerns to Sec. O'Leary. At that time we selected one issue to use as a yardstick for measuring DOE's track record of consulting with the CTUIR. We picked work related to Columbia River for that yardstick.

This work has included the Columbia River Assessment, 100 Area remediation decisions, and the NRTC 100 Area injury investigation. The CTUIR continues to use this yardstick to measure DOE performance. DOE's performance on river issues continues to be inconsistent. DOE has supported important river injury studies conducted by the Natural Resource Trustee Council. On the other hand, some DOE staff have recently tried to undermine the Columbia River Assessment. This incident demonstrates that DOE still is not consistently recognizing tribal rights and interests, or living up to its Indian Policy. The CTUIR is currently developing a proposal which we hope will assist DOE in implementing its Indian policy at Hanford.

The CTUIR's concerns regarding Hanford can be divided into four categories:

1. Protection of the CTUIR's Sovereignty. This includes insisting that DOE fully comply with its legal duties to the CTUIR.
2. Protection of the Environment. This means to protect, manage, clean up, and provide appropriate access to the natural resources upon which the CTUIR's culture and treaty rights depend.
3. Protection of Cultural Resources. This includes protecting, managing, and providing appropriate access to the CTUIR's archaeological and religious resources. These are the resources upon which the CTUIR's culture and religion depend.
4. Protection of Health of tribal members and reservation residents. This includes protection from continued releases from Hanford facilities. It also includes protection from threats posed by Transportation of Hanford materials across the Umatilla Indian Reservation on Interstate 84 and on the main line Union Pacific rail line.

In conclusion: Hanford decision making cannot be done correctly or efficiently unless tribes play an intimate role in that decision making.

1. No one can speak for the tribes but the tribes.
2. The tribes can only speak with knowledge or effect if they can maintain technical staff who are trained and knowledgeable about Hanford issues.
3. We have been here from time immemorial. We will be here long after Hanford is gone.
4. Hanford poses greater risks to our people and culture than to any other people or culture affected by Hanford. As a result, more than any other group of people, Hanford cleanup is being done for us.

DOE must continue to fund tribal governments at a level that allows them to be effective team players in Hanford decision making. Only then will all people interested in Hanford cleanup can be assured that Hanford remediation, waste management and restoration is done well.

CTUIR 09/03/1997 Attachment B to letter to Federico Pena

1

Attachment B

Following is a brief overview of some of the deficiencies and problems the CTUIR has noted regarding a July 23, 1997 letter, (USDOE #049393) concerning the CRCIA, forwarded by the U.S. Department of Energy (DOE) to the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology, but *not* to the CTUIR. A copy of this letter is attached.

DOE/RL is attempting to avoid its duty to consult with the tribes on a government-to-government basis.

Delegating the responsibilities of the management of Part Two of the CRCIA to the Hanford Advisory Board (HAB) marginalizes the federal trust responsibility and government to government responsibilities the DOE has to the CTUIR. Management must recognize the federal trust responsibility the DOE has to the Affected Tribes. This is a legal responsibility. It must become a part of the compliance base. Indeed, it is the ultimate source for developing the information requirements in CRCIA Part Two.

There is a difference between giving occasional advice in the context of the HAB (which may or may not be taken), and actually providing frequent and continual independent technical oversight through a management team. Although the CRCIA Team has functioned as an independent tribal-stakeholder-regulator team during the first phase, DOE intends to abolish the team and revert to a closed process without any provision for co-management or technical oversight by stakeholders.

DOE/RL is attempting to avoid implementing the recommendation of the CRCIA team that the scope of the CRCIA should be site-wide and cross-program.

Assigning the CRCIA as a groundwater project within the Environmental Restoration (ER) Program means that opportunities for multi-program funding and cross-program transfer of knowledge will fail. The CRCIA needs to be funded at a line item level, and placed at the Site Manager's level of responsibility above waste management (WM) and ER in order to keep the DOE-RL managers focused on the information and analysis needs of the sitewide strategic goals.

The CTUIR and the DOE will have trouble analyzing the long-term impacts of the composite source term if the project is fragmented into isolated pieces as DOE proposes to do. Additionally, please note that the sitewide composite source term being developed in response to the DNFSB 94-2 directive does not include the many sources outside the 200 Area. The basic assumptions (timeframe, containment assumptions, etc.) used in the composite analysis have not been presented to the CTUIR, and we have had no opportunity to review and either endorse or change them. The DOE does not have the independent TDI (technical development integration) oversight that is needed to help develop methods and data quality objectives. Together, this leads the CTUIR to conclude that the DOE does not intend to perform a truly comprehensive analysis such as outlined in the CRCIA part II. Furthermore, we do not believe that the DOE can manage overall uncertainty between parts of the overall analysis from source to impacts. For example, what good does a high degree of precision in a transport model do when some of the

impacts such as effects to natural resources of particular cultural importance are omitted altogether?

DOE/RL is placing excessive emphasis on developing new models, without first defining the Hanford Site's endstate conditions, contrary to the recommendations of the CRCIA team. The DOE-RL doesn't have endstate definitions for many of the facilities. Introducing a complication of this magnitude needs to be resolved in order to point to where, when, and how, the site will be cleaned up. This is a factor that clearly is not brought out in the DOE #049393 letter under the Approach section, underscoring that the problem is not one of prematurity and efficiency but one of vision and responding to tribal and stakeholder needs. Within the Timing section, the letter also states that spending significant resources on modules 4 through 9 is premature, yet the vadose zone model can only be planned, implemented, understood, or refined in consideration of the ultimate impacts of the contaminants being modeled. The CTUIR points out that the DOE does not have a truly comprehensive plan to address the complexities associated with the vadose zone and ground water flow let alone the complicating factors associated with the source terms (on the front end) and impacts (on the other end). Common sense dictates that the DOE utilize the work of the tribes and stakeholders by incorporating ALL of the source term work defined in the CRCIA part II as well as the full breadth of impacts beyond simple dose calculations. Additionally this section implies that only if *models* predict that contamination should reach the Columbia River in concentrations that exceed human health or environmental standards would the remaining modules be considered. This is merely another way of saying that the health of the Columbia River and the peoples and cultures dependent on it rests upon further model refinements, when in fact we (i.e. DOE, tribes regulators, and stakeholders as a group) could perform a rough order of magnitude analysis for the relevant impacts with current vadose and groundwater models. The models will need validation and continual refinement by incorporating actual field data, but there is no point in delaying the prediction of long-term impacts until those models are perfected. We will never have perfect models. At some point a value of information assessment needs to be done to ascertain whether DOE's limited funds should be spent on improving models or in allocating uncertainty across the various parts of the analysis. DOE's proposal is such a crude and backwards way of addressing this complex problem that following their path is sure to result in missing opportunities to avert major environmental problems.

In the absence of the extensive field characterization data asserted by DOE to be a prerequisite to performing the CRCIA, it is very important to get estimates of the regional effects of the Hanford cleanup as soon as possible, even if such estimates are highly uncertain. Uncertainty can - and should - be offset by engineering margin in the cleanup solutions. However, with no estimates at all, as is currently the case, there is no basis on which to determine the sufficiency of proposed cleanup solutions. Therefore, early conduct of the CRCIA will enhance DOE's efforts to get tribal-stakeholder acceptance of decision documents such as the 2006 Plan, EISs, and related documents.

DOE/RL is attempting to avoid complying with the recommendations of the CRCIA team and the public that the CRCIA project be fully funded.

Within the priority section, DOE states that it doesn't support funding the CRCIA at levels of effort and funding totaling \$23.8 million over five years. At Salt Lake City, this request was made by all the CRCIA team member organizations *except* the DOE. The estimated required funding level was developed by the CRCIA team and DOE-contractor budget developers. This is equivalent to the cost of an EIS, and would result in significant Hanford out-year savings due to efficiencies in coordination, communication, technical implementation, waste stream consolidation, and overall acceptability.

As the community receiving the greatest risk from Hanford contamination, the tribes must continue to perform a central role in the estimation of risk associated with Hanford Site activities.

The assumption that the remediation goals of the 100 and 300 area Rods are met and are fully protective of tribal health and resources over thousands of years is premature. The application of the Native American Subsistence Scenario to these areas (as EPA has publicly committed to) will certainly influence cleanup decisions and goals. The DOE needs to provide information depicting that they *have* the right scope of impacts including social/cultural. The DOE cannot characterize risks from a tribal perspective; only the tribes can perform this function, so an adequate sitewide analysis can only be done as a joint effort, such as the CRCIA. Simply adding up all of the pieces of the EISs and EAs that have been done doesn't equal the result of a sitewide integrated baseline assessment, because no EIS done to date has adequately considered the full range of impacts or the distribution of impacts across segments of the population as required by the Environmental Justice Executive Order. Additionally, Hanford programs and projects may or may not have a commitment to the goals of the CRCIA, and are not likely to complete their impact and endstate analyses with the depth and breadth required in Part Two of the CRCIA.

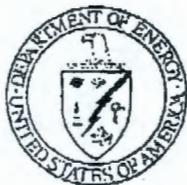
The depth and magnitude of the intent of the DOE #049393 letter is not lost on the CTUIR. It is plain that the DOE does not wish to truly incorporate CTUIR concerns within DOE goals with respect to either independent technical oversight or co-management of the overall analysis. This is very disappointing considering the enormous amounts of time and energy the CTUIR has invested in the CRCIA process, let alone the overwhelming support the CRCIA has received from the other participating tribal nations and stakeholders. It is also disappointing that DOE is not utilizing the considerable expertise that the Tribes have developed in the areas of risk analysis and related areas.

07/30/97 12:23

506 378 4360

DOE-AME

002



U.S. Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

049393

JUL 30 1997

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Mike A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Wilson:

COMPLETION OF THE COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT (CRCIA)
HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)
INTERIM MILESTONE M-15-80-B

This letter transmits the deliverable for the subject milestone, "DOE is to provide a recommendation for follow-on work to M-15-80, primarily based on M-15-80A [completed April 30, 1997], as well as funding considerations, overall sitewide objectives, and Tri-Party Agreement authority. This will include future milestones." The body of this letter sets forth the U.S. Department of Energy (DOE), Richland Operations Office's (RL), rationale for recommendations and the specific recommendations for follow-on work are attached.

RL extends its appreciation to the CRCIA Team and the staff members from the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) for the hard work put forth in the scoping study and the development of the requirements section in the "Screening Assessment and Requirements for a Comprehensive Assessment." (DOE/RL-96-16). The CRCIA Team includes representatives from the Confederated Tribes of the Umatilla Indian Reservation, the Nez Perce Tribe, the Confederated Tribes and Bands of the Yakama Indian Nation, the Hanford Advisory Board (HAB), and the State of Oregon. RL looks forward to continued participation of the team through finalization of DOE/RL-96-16. This is an unprecedented opportunity for Tribes and stakeholders to provide input to the development of a risk assessment

07/30/97 12:23

506 378 4360

DOE-AME

003

Messrs. Sherwood and Wilson

-2-

049393 JUL 30 1997

throughout the work process and on future activities. To assure a broad range of public input for the long-term effort, RL intends to utilize the HAB to provide stakeholder involvement in the cumulative risk assessment, consistent with Federal Advisory Committee Act (FACA) requirements. Tribal consultation will also continue to play an important role. Expert panels will be convened as necessary to assist in the resolution of technical issues.

DOE's recommendations for CRCIA follow-on work represents the culmination of much deliberation and is based on the following:

- The results of the scoping study described in DOE/RL-96-16;
- Tribal/stakeholder comments regarding content provided in DOE/RL-96-16;
- Additional inputs from the CRCIA Team and continuing interactions with regulatory staff;
- Technical Peer Review comments;
- Public comments on DOE/RL-96-16 via public meetings and letters;
- Values for work prioritization previously negotiated by RL, Ecology and EPA, consistent with HAB and Future Site Uses Working Group advice; and,
- Reconciliation of existing and projected Tri-Party Agreement required scope and schedules with the Hanford budget, consistent with the language and intent of the milestone ("DOE is to provide a recommendation for follow-on work to M-15-80, primarily based on M-15-80A, as well as funding considerations, overall Sitewide objectives, and Tri-Party Agreement authority").

RL agrees with the need to assess current and future cumulative impacts to the Columbia River from Hanford-derived contaminants. Environmental Restoration is assigned this effort as part of the Hanford Groundwater Project. The "composite analysis" presently being performed by RL in response to the recommendation of the Defense Nuclear Facility Safety Board, initiates a "rough order of magnitude" initial assessment for radionuclides. This analysis will provide the basis for investigating key areas of uncertainty and sensitivity for radionuclide transport. During FY 1998, funding is allocated to refine the predictive tools and include chemical contaminants.

DOE proposes alternatives to the technical approach, timing, priority, and management recommendation set forth in Part II of DOE/RL-96-16 (Milestone M-15-80 submittal), which was authored by Tribal and stakeholder members of the CRCIA:

07/30/97

12:24

508 378 4380

DOE-AME

001

Messrs. Sherwood and Wilson

-3-

049393

JUL 27 1997

APPROACH: The specific Tribal/stakeholder approach suggested in Section 1.0 of the "Requirements for a Comprehensive Assessment" from DOE/RL-96-16 requires study of concurrent multiple analysis modules, graphically portrayed in Figures 3 and 4 of that section. Applying resources across all of the modules is premature and is not efficient.

TIMING: Conceptual and numerical models for the prediction of future Hanford groundwater contaminant conditions cannot be significantly improved until more is known about existing vadose zone contaminant distribution and vadose zone transport mechanisms. The 200-Area strategy is intended to investigate the wastes sites assigned to the Environmental Restoration Project (ER). These investigations will play an important part of a cumulative impact analysis. ER is also working with the Tank Waste Remediation System (TWRS) and Waste Management (WM) to develop vadose zone investigations for non-ER facilities to assure groundwater protection consistent with the Hanford Groundwater Protection Management Plan. Until these source-term investigations are planned, implemented, and results are understood, expenditure of significant resources at this time on Modules 4 through 9, as proposed in the "Requirements for a Comprehensive Assessment" from DOE/RL-96-16, is premature. More needs to be known about existing vadose zone contaminant distribution and vadose zone transport mechanisms. This information must then be input into refined vadose zone and groundwater transport models. If such models predict transport of future contaminants to the Columbia River that exceed human health or environmental standards, then the remaining modules should be considered.

PRIORITY: RL, EPA, and Ecology must make hard choices in the balance of cleanup actions, characterization, and performing long-term future risk analyses. Generally, RL considers physical cleanup to be the highest priority, followed by characterization, with long-term risk assessment following. DOE does not support the diversion of cleanup and characterization funds to support the level of effort and funding requested by a subset of the Tribal and stakeholder members of the CRCIA Team (\$2.6M in FY 1998; \$23.8M total over a five year period; as stated in a letter to Mr. John D. Wagoner, RL Manager, from the CRCIA Management Team "CRCIA Budget," dated April 22, 1997). However, significant funding is being allocated towards a phased approach that starts with the development of predictive tools and for the collection of data necessary to perform a cumulative assessment of long-term risk.

MANAGEMENT: RL must fulfill its legal responsibilities for the management of cleanup at Hanford. RL is, however, very supportive of stakeholder and Tribal participation and will utilize the HAB for stakeholder participation, consistent with the FACA requirements concerning advisory bodies. Tribal consultation will continue based on our government to government relationship.

07/30/97 12:24

506 376 4360

DOE-AME

003

Messrs. Sherwood and Wilson

-4-

049393 JUL 28 1997

To provide progress toward performing an effective and efficient cumulative risk assessment, RL proposes an approach that assumes the 100 and 300 Area remediation goals of the Records of Decision (RODs) for interim action are met. These RODs are intended to assure future protection of the associated aquifer and the Columbia River. RL proposes to concentrate on the future impacts of the wastes released to the environment in the 200 Area. RL will work towards containment of existing and future 200 Area groundwater plumes within the 200 Area plateau or a reasonable buffer zone, consistent with the Hanford Groundwater Protection Management Plan. In this approach, predictive tools will be developed to determine if existing and potential future contaminants released to the environment from the 200 Areas will be transported through the vadose zone and subsequently outside of the 200 Area buffer zone via the groundwater pathway. As characterization of 200 Area proceeds, the model will be upgraded. Additional sitwide predictive work will be considered if it is shown that the 100 and 300 Area RODs do not achieve intended remedial goals and/or future groundwater contamination plumes migrate outside of the 200 Area buffer zone and could seep or upwell into the Columbia River at concentrations that exceed human health and environmental standards.

DOE believes that CRCIA follow-on work must also address information needs associated with current or near-term risks, as identified in the CRCIA Screening Assessment. To provide a better assessment of current risks (more suitable for decision purposes) and to better determine the levels of future contaminants that may result in an unacceptable risk to the Columbia River, RL also proposes to perform activities that will reduce the information gaps, uncertainties, and assumptions in the Scoping Study.

RL does not propose new Tri-Party Agreement milestones for these activities. There is a need for development of stakeholder and Tribal consensus on these actions, which may significantly impact schedules. RL prefers to work proactively with the regulators, Tribes, and stakeholders in the development of the tools as opposed to delivering RL-generated deliverables for review and comment. The attachment describes funded and unfunded activities for the remainder of FY 1997 and FY 1998, based on respective ER projected budgets of approximately \$144M and \$132M. Moving unfunded work into the FY 1997 - FY 1998 time period will require positive adjustments in the ER budget, with equivalent adjustments elsewhere through the Integrated Priority Budget review process. ER will, however, carry the unfunded work for consideration of funding through a prioritization process should cost savings in the ER baseline be achieved.

Planning documents will not carry a specific unit of analysis for the CRCIA follow-on work. However, applicable scope and funding will be identifiable within other units of analysis as applicable to a cumulative risk assessment.

07/30/97

12:25

508 376 4360

DOE-AME

006

Messrs. Sherwood and Wilson

-5-

049393

JUL 28 1997

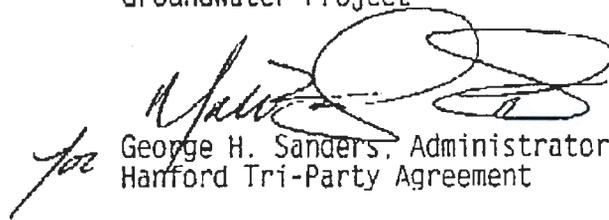
Recommendations have been informally shared with respective CRCIA Project Managers from EPA and Ecology. RL appreciates the time and effort of EPA and Ecology on the CRCIA and wish to continue the excellent working relationship with the follow-on effort. If you want to discuss this matter further or require additional information, please contact Mr. K. Michael Thompson at (509) 373-0750.

Sincerely,



K. Michael Thompson, Senior Project Manager
Groundwater Project

GWP:KMT



George H. Sanders, Administrator
Hanford Tri-Party Agreement

Attachment

- cc w/attach:
- R. Dirkes, PNNL
- L. Gadbois, EPA
- D. Holland, Ecology
- A. Knepp, BHI
- R. Morrison, FDH
- R. Pat, Oregon DOE
- M. Reeves, HAB