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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
712 SWIFT BOULEVARD, SUITE 5  
RICHLAND, WASHINGTON 99352

December 14, 1994



Steven H. Wisness  
Hanford Project Manager  
U.S. Department of Energy  
P.O. Box 550, A5-15  
Richland, WA 99352

Re: Completion of 100-D Island Portion of Hanford Federal Facility Agreement and Consent Order Milestone M-16-80, and the 100-N Portion of the Columbia River.

Dear Mr. Wisness:

We are in receipt of Mr. Robert Holt's November 8, 1994 ✓ letter which states that statistical analyses of 100-D Island survey results indicate that there is no significant risk to the public from 100-D Island. That letter also states that no additional characterization and/or cleanup efforts are warranted on 100-D Island.

Contact with a discrete radioactive particle, for as little as several hours may result in localized acute exposure. It is incumbent upon us and DOE to do our best to prevent human contact with these particles. Thus, we do not concur with the U.S. Department of Energy's (DOE's) recommendation to do nothing further to prevent exposure. The DOE conclusion is not supported by the technical report enclosed in the November 8 letter. That letter indicates that it will take 10.8 years (two half lives for <sup>60</sup>Co) before the particles will have decayed to levels below concern for an acute localized effect.

The probability of human contact can be reduced by removing the particles and/or restricting access through posting the island with radiological warnings. Since a campaign to remove all the particles would be environmentally destructive to the island and disturbing to the surrounding environs, we recommend that the island be well-posted to inform Hanford Reach users of the radiological particles. These warnings should also be posted at public access points to the Hanford Reach of the Columbia River (i.e. the Vernita, White Bluffs, Ringold, and Leslie Groves boat launches). In addition, the downstream portion of the island consisting of finer grained sediments, and used by boaters, should be surveyed for discrete particles.

Steven H. Wisness

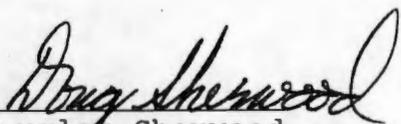
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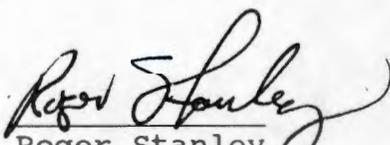
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In review of the technical report transmitted with the November 8th letter, we identified a number of concerns that will be detailed in a later letter. We expect these concerns will be addressed in the Columbia River Comprehensive Impact Assessment (Milestone M-13-80) -- which has identified discrete particles as part of its scope. Enclosed is a draft Tri-Party Agreement Change Control Form proposal developed by the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology). The change package is intended to clarify the EPA and Ecology unit managers' guidance for this project, and to aid bringing this assessment to a timely and successful completion.

We request that DOE be ready to discuss this issue at the January 1995 project managers' meeting. If you have any questions please contact Larry Gadbois at (509) 376-9884, Dave Holland at (509) 736-3027 or Jerry Yokel at (509) 736-3009.

Sincerely,

  
 Douglas Sherwood  
 Hanford Project Manager  
 U.S. Environmental Protection  
 Agency

  
 Roger Stanley  
 Hanford Project Manager  
 Washington State  
 Department of Ecology

Enclosure: Draft Change Control Form, Titled "Columbia River Comprehensive Impact Assessment (CRCIA) for M-15-80": Draft for Discussion Purposes

cc: Randy Brich, DOE  
 Mike Thompson, DOE  
 Steve Alexander, Ecology  
 Hanford Advisory Board, ER Sub-Committee Chair  
 Ralph Patt  
 Tribal Nations  
 Allan Childs, CTUIR  
 Mike Bauer, YIN  
 Rico Cruz, Nez Perce  
 U.S. Fish & Wildlife Service  
 Liz Block  
 Administrative Record, 100 Area

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Columbia River Comprehensive Impact Assessment  
(CRCIA) for M-15-80:  
Draft for Discussion Purposes

Enclosure  
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Change Number  DRAFT	<b>Federal Facility Agreement and Consent Order Change Control Form</b>	Date 12-14-94
Originators EPA and Ecology Unit Managers		Phone
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Columbia River Comprehensive Impact Assessment (CRCIA) for M-15-80		
Description/Justification of Change This change package provides for public, stakeholder, tribal, and regulatory input to a technically reviewed assessment of the Columbia River for completion in a timely manner. See attached milestones, including goals and scope.		
Impact of Change		
Affected Documents Tri-Party Agreement Handbook.		
Approvals      ___ Approved      ___ Disapproved  _____ Steve Wisness, DOE      Date  _____ Doug Sherwood, EPA      Date  _____ Roger Stanley, Ecology      Date		

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Columbia River Comprehensive Impact Assessment  
(CRCIA) for M-15-80:  
Draft for Discussion PurposesEnclosure  
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Milestone	Description	Date
M-15-80	Submit the Columbia River Comprehensive Impact Assessment to EPA and Ecology (Human Health and Environmental Risk Assessment). Primary document.	Sept 1996
M-15-80--T1	Submit Preliminary Contaminants and Species of Concern List to EPA, Ecology, Tribes, Trustees, and Hanford Advisory Board (HAB). Secondary document.	Feb 1995
M-15-80--T2	Public Involvement and Tribal Consultation Plans provided to EPA, Ecology, Tribes, HAB.	Feb 1995
M-15-80--T3	Submit Technical Review proposal to the HAB Environmental Restoration Subcommittee. (Contains the selection criteria, and proposed funding mechanism.)	Feb 1995
M-15-80--T4	Public Workshop on the result of M-15-80--T1. Focus on HAB.	March 1995
M-15-80A	Technical Review personnel hired.	April 1995
M-15-80B	Submit Human and Ecological Risk Exposure Scenarios to EPA, Ecology, Tribes, Trustees, and HAB. Primary document.	April 1995
M-15-80C	Post D-Island of the Columbia River with warning signs that describe the radiological hazard. Also post warnings regarding these areas at access points to the Hanford Reach. This milestone includes an appropriate public information campaign.	May 1995
M-15-80D	Complete survey of downstream end of D-Island (via a regulator-approved description of work).	May 1995
M-15-80--T5	Submit Data Acceptance Criteria. (Guidelines for use of historical data.)	May 1995
M-15-80--T6	Public Workshops on the results of M-15-80-T5	June 1995
M-15-80--T7	Initial Screening of Data Against Draft Human and Ecological Scenarios (for data completeness, scenario refinement, field work proposals).	July 1995
M-15-80E	Public Workshops on the results of M-15-80--T7.	August 1995
M-15-80F	Submit work plan for additional field work identified in M-15-80--T7 and as modified by M-15-80E.	September 1995
M-15-80--T8	Initial Results (trial run) of the Data with both Human and Ecological Scenarios.	Dec 1995
M-15-80--T9	Public Meetings on the results of M-15-80--T8.	March 1996

Goals and scope for the M-15-80 milestones:

#### I. Goal

The primary goal for the CRCIA is to evaluate the human and ecological risks resulting from exposure to Columbia River contaminants attributable to past and present activities at the Hanford site to support cleanup decisions.

Secondary goals to assure completion of the primary goal for the assessment include:

- \* The evaluation of historical information and, where lacking, the performance of additional data collection and analyses. Data gaps should be identified as an ongoing process with the intent of fulfilling any needed additional data collection during calendar year 1995.
- \* All evaluation activities of a technical nature will be reviewed by a credible external review comprised of highly qualified individuals acceptable to the Tri-Parties and the HAB.
- \* To provide an acceptable assessment for the stake holders, tribes, and the general public. To that end public involvement and tribal consultation plans will be developed that involve the public and tribes at pre-decision stages in the assessment.
- \* Coordinate current and planned activities of other agencies related to the CRCIA (for example the Columbia River Inter-Tribal Fish Commission Study).
- \* Special attention will be given to identify risks posed by the presence of multiple chemicals and radionuclides (synergistic, antagonistic, potentiation, additive etc.)

#### II. Scope

The assessment shall characterize the areas where there are present and potential future risks to Columbia River users. The assessment shall provide answers to identified concerns.

- \* The media scope includes the surface water, sediments, hyporheic zone (water spaces in river bottom gravels), springs, seeps, riparian zone, and irrigated crops.
- \* The temporal scope is a quantitative assessment of current risk and a qualitative assessment of future risk.
- \* The geographic scope will be determined by the risk associated with Hanford contaminants to human health and the environment. Higher risk localized areas will be addressed as well as broader geographic areas of exposure.
- \* An appropriate set of risk scenarios will be evaluated.