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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

May 7, 1993

Paul Pak
US Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352



Dear Mr. Pak:

Re: 200-Area Ecological Investigation DOW

USDOE has been preparing a DOW for 200-area ecological investigations. We are concerned that the opportunity for conducting timely ecological field work in the 200-area has already been missed.

USDOE informed Ecology in early March that it wished to begin ecological investigations in early April. In our letter dated March 12, we expressed concerns about approving this work prior to evaluating the data and success of similar 100-area work. A March 26 letter from Steve Wisness stated that the DOW would be transmitted in mid-April. We have not received a reply to our March 12 letter. At the March 25 unit managers' meeting, we were informed that Ecology would receive the DOW April 17, and that WHC would finalize it by May 5. On April 27, you told me that I would receive the DOW by April 30th. Ecology has not been appraised of what USDOE factors are delaying our review of the DOW. The time that Ecology had allocated to review the DOW has passed.

The scope of the DOW was conceived many months ago without our involvement. The DOW having not benefitted from data quality objective planning, we have serious concerns that the results will not support interim RODs in the 200-area. The outline of the DOW presented at the March 25, unit managers' meeting did not seem to follow the HSBRAM; specifically, the problem formulation phase of the EPA Framework for Ecological Risk Assessment was not followed.

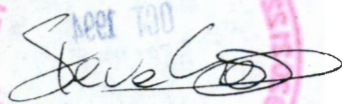
The proposed scope of the 200-area ecological investigation DOW is four samples from four sites (sixteen samples total). There was \$558,000 allocated for 200-area ecological investigations in the 1993 budget. This amount of money appears relatively large considering the small number of samples. Our inquiries regarding these expenditures remain unanswered.



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We can not guarantee that the DOW will be reviewed and approved in accordance with USDOE schedules. Our confidence in the DOW would have been much enhanced had Ecology been involved in its initial scoping many months ago.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Cross", is written over a circular pink stamp. The stamp contains the text "DEPARTMENT OF ENERGY" and "OFFICE OF NUCLEAR ENERGY" around the perimeter, and "MAY 1993" in the center. The signature is written in a cursive style.

Steve Cross
Nuclear and Mixed Waste Management Program

SC:lj

cc: George Hofer, EPA
Roger Stanley, Ecology
Steve Wisness, USDOE
Lee Michael, WHC
EDMC