



Confederated Tribes and Bands  
of the Yakama Indian Nation

Established by the  
Treaty of June 9, 1855

0047763

September 3, 1997

Mr. John D. Wagoner, Manager  
U. S. Department of Energy  
Richland Operations Office  
P. O. Box 550  
Richland, Washington 99352



### ERDF EXPANSION

Dear Mr. Wagoner,

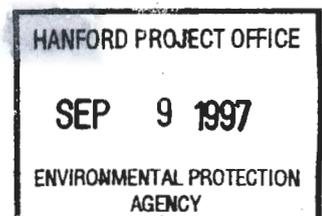
The Yakama Indian Nation cannot endorse the proposed ERDF expansion until a number of technical questions are answered. We expect that many of the following questions have been addressed in previous documents and could be answered by providing us with the citation and the actual document where the issues were addressed. However, in order to meet your deadline for comments of September 3, we are responding to the proposed expansion with a series of questions to be followed later by a letter accepting or rejecting the proposal depending on the answers to the questions.

Please contact Dr. Barbara Harper of my Richland office staff (946-0101) to arrange a meeting at which time you can provide us with information as requested. We do not anticipate that a formal briefing will be necessary and will try to make your visit as efficient as possible. We are aware of your time constraints and will provide you with a formal letter within a week of receiving this information.

#### *Questions about ERDF and about the proposed expansion:*

1. Do excavated soil volume estimates still match the original estimates? What are those volumes, and what is the process for feeding new information about disposal needs into ERDF containment performance requirements and waste acceptance criteria?
2. What is the total inventory of cells 1&2 (volume, contaminants, concentrations, total curies and quantities)? What is anticipated for cells 3&4? What was used as the original analysis in the RI/FS?
3. What exactly has been put into ERDF so far (soil, rubble, debris, etc.)? How is it mapped in case something specific needs to be retrieved?

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4. What containment assumptions are most current? What updates are there on the barrier testing program? If that program is slated for discontinuance (and the probes removed) how will long-term performance be validated? Is any monitoring planned as long as the test barrier is there?
5. Do any of the following items need revisiting for analysis or underlying assumptions:
  - a. the Native American subsistence scenario was not developed then -- does it need to be added now? If not now, when?
  - b. if a 500 year intruder scenario was used, we also need a 100 year intruder scenario;
  - c. how does ERDF fit into the 200 Area composite source term and the entire Sitewide source term?
  - d. what kind of composite risk profile was done (including socio-cultural risks, impacts, and values)? Was anything done beyond simple dose calculations?
  - e. what is the groundwater point of compliance for ERDF? How does that POC fit into other POCs?
6. What is the total time frame of analysis? What is the total long-term risk profile?
7. Are the original groundwater and vadose models still adequate for predicting environmental releases and waste acceptance criteria? What process is there for refining the WAC and containment performance assessments as the groundwater and vadose models are further refined?
8. What performance assumptions were used to set the original waste acceptance criteria? On what additional factors were WAC based? Were the WAC based on a composite Sitewide analysis evaluating long-term (post-closure) releases and impacts from ERDF as well as all other 200 Area and Sitewide (including the 100 Area) sources? What is the process for refining the WAC as more complete information is received?
9. What waste treatment is anticipated?
10. Please provide a copy of the Safety Analysis (BHI-00370, Rev 2)
11. What are the total volume projections and how many total cells will be needed? How will DOE guarantee that only on-site waste will be disposed of, and how are the ultimate total limits determined and enforced?
12. What is the process by which other projects guarantee that their wastes will be characterized adequately to be accepted by ERDF? How does ERDF know exactly what

other projects are planning to send to ERDF? Do the current ERDF volume estimates include those plans of other projects?

13. What natural resource mitigation has been planned in response to the total area impacted by ERDF?

Thank you for your attention to this matter. We look forward to working with Mr. Dave Olson of your staff or whoever you may designate.

Sincerely,



Russell Jim, Manager  
Environmental Restoration and  
Waste Management Program

cc: Pam Innis  
U.S. Environmental Protection Agency  
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