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Mr. Douglas R. Sherwood
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State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Stanley:

COMPLETION OF 100-D ISLAND PORTION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-16-80, AND THE 100N PORTION OF THE COLUMBIA RIVER

References:

- (1) EPA/Ecology ltr. to S. H. Wisness, RL, from D. R. Sherwood and R. F. Stanley, same subject as above, dtd. December 14, 1994. 39621
- (2) DOH ltr. to Larry Gadbois, EPA, from J. L. Erickson, same subject as above, dtd. October 25, 1994.
- (3) RL ltr. to D. R. Sherwood, EPA, and R. F. Stanley, Ecology, from R. G. Holt, same subject as above, dtd. November 8, 1994.

This is in response to the U.S. Environmental Protection Agency (EPA) and State of Washington Department of Ecology (Ecology) letter dated November 8, 1994 (Reference 1) regarding EPA and Ecology's view of actions necessary to be protective of human health and safety from possible effects of exposure to discrete radioactive particles (specks) through public use of D Island. The November 8, 1994, letter states that EPA and Ecology do not concur in the U.S. Department of Energy, Richland Operations Office's (RL's), recommendation that no further actions are necessary to protect the public from significant risks. This appears to be based upon the stated concern that contact with a speck for several hours may result in a localized acute exposure. While it is true that such contact may result in a "localized acute exposure," the short term result of such an event would be the reddening of the skin or possible skin lesion which may produce scar tissue. However, the risk of such an event has been calculated to be in the 10^{-6} range, as indicated by the work of the State of Washington Department of Health reflected in Reference 2. In consideration of competing Environmental Restoration priorities on finite resources, and established cleanup and risk requirements, RL does not advocate additional expenditures to reduce risks of exposure that are already in the 10^{-6} range

Messrs. Sherwood and Stanley

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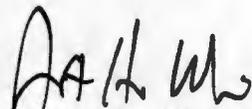
for non-carcinogenic radiation effects, and in the 10^{-10} range for carcinogenic effects. However, in the interest of confirming the conceptual model that the specks are deposited in the higher-energy, cobble environment on the upstream end of the island and not the lower-energy, sandy environment of the island, RL will perform a radiation survey of the sandy beach on the downstream end of D Island.

Public access from the waterline to the islands and the Hanford shoreline upstream of the wooden tower power line crossing has been, and still is, restricted. Billboards notifying river users of this policy remain strategically placed along the Reach. Additionally, signs stating "NO TRESPASSING" have been, and still are, positioned near the high water mark at six locations on D Island. Directly below each NO TRESPASSING sign is a sign stating "RADIOLOGICALLY CONTROLLED AREA, UNDERGROUND RADIOACTIVE MATERIAL." Therefore, no additional signs are required.

Regarding the enclosed draft Tri-Party Agreement Change Control Form proposal for the Columbia River Comprehensive Impact Assessment (CRCIA), the following information is provided. Milestone M-13-80 contains one remaining milestone. This milestone requires a determination of the date for publishing the final assessment by December 1995. RL intends to meet this milestone. Supporting information for Milestone M-13-80 states that an independent technical peer review group shall be established to objectively review the CRCIA. This review would include plans, approaches and results. Numerous discussions were held with both EPA and Ecology Unit Managers to formulate the peer review group. Every formulation proposal that RL provided was declared unacceptable by at least one of the regulators. Consequently, expending significant resources toward the CRCIA without the benefit of an independent review would be extremely risky. Given that the peer review group is not yet in place, and the scope and schedule for the study have not yet been reviewed and consensus achieved, it is unacceptable to agree to milestones leading to completion of the study at this time.

Should you have any further questions or comments regarding this matter, please contact Mr. K. M. Thompson at (509) 373-0750, or Mr. R. F. Brich at (509) 376-9031.

Sincerely,



Steven H. Wisness
Hanford Project Manager

RSD:RFB

cc: J. Wilkinson, CTUIR
J. Erickson, DOH
S. Alexander, Ecology
R. Patt, HAB

R. Cruz, Nez Perce
L. Block, USF&W
M. Bauer, YIN