



Nez Perce

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT
P.O. BOX 365 • LAPWAI, IDAHO 83540-0365 • (208) 843-7375 / FAX: 843-7378

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NMWMP - Hanford

MAY 01 1998

Kennewick

April 27, 1998

Mr. Phil Staats
Washington State Department of Ecology
1315 West Fourth Avenue
Kennewick, WA 99336-6018



Dear Mr. Staats:

The Nez Perce Tribe Department of Environmental Restoration and Waste Management (ERWM) has reviewed copies of **Engineering Evaluation/Cost Analysis for the 100-N Area Ancillary Facilities and Integration Plan, DOE/RL-97-22, Rev. 1, Proposed Plan for Interim Remedial Action and Dangerous Waste Modified Closure of the Treatment, Storage, and Disposal Units and Associated Sites in the 100-NR-1 Operable Unit, and Proposed Plan for Interim Remedial Actions at the 100-NR-1 Source Sites Operable Unit and the 100-NR-2 Groundwater Operable Unit.** ERWM has included comments on these documents within this letter.

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Since 1855, Nez Perce Tribe treaty rights in the Mid-Columbia have been recognized and affirmed through a series of Federal and State actions. These actions protect Nez Perce interests to utilize their usual and accustomed resources in the Hanford Reach of the Columbia River and elsewhere. Accordingly, the Nez Perce Tribe ERWM has U.S. Department of Energy (DOE) support to participate in and monitor relevant DOE activities, including comment on these documents.

The Nez Perce Tribe considers the protection of the Columbia River and its ecosystem to be of the utmost priority. ERWM considers remediation of 100-N Area waste sites as a positive step in Columbia River protection and supports these plans. ERWM endorses the Remove/Dispose Alternative for Treatment, storage and disposal units within the 100-NR-1 Operable Unit and 100-N Area Ancillary Facilities and the Preferred Alternative for the 100-NR-1 Soil Operable Unit. However, we have some concerns about the plan that may affect the health and safety of members and employees of our Tribe, Hanford workers, public, and local biota. Our general comments are as follows:

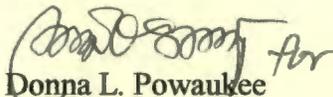
- The Nez Perce Tribe supports a cleanup standard in the 100 Areas that will not preclude any future use. We believe that this standard is most protective of the Columbia River and its biota. We are concerned that contaminants left in place at depth will result in further degradation of the Columbia River. The Remove/Dispose

Alternative to a depth of 4.6 m may prove insufficient should substantial vadose zone contamination exist at depth. Beneath the 116-N-1 Crib and Trench at depths greater than 4.6 m, contamination in concentrations above cleanup standards will remain in place after remediation. In particular, strontium-90 will remain at levels 500 times greater than the cleanup standard of 3.7 pCi/g. How will groundwater quality be improved if high levels of contaminants are left in place at depth in the vadose zone to further degrade groundwater quality?

- It is difficult to ascertain the impact of these actions upon our people as none of the Native American Scenarios outlined in the Columbia River Comprehensive Impact Assessment (CRCIA) were assessed.
- It doesn't appear that a complete range of alternatives were fully evaluated as to how to remediate Strontium-90 groundwater contamination.
- Chromium contamination of the 100-N Area is not being addressed. During Fiscal Year 1968, N reactor operations consumed more than 15,000 lb. of Sodium Dichromate (**Chemicals Discharged to the Columbia River from DUN Facilities, Fiscal Year 1968, DUN_4668**). Chromium concentrations in groundwater samples from Well 199-N-80 are consistently above drinking water standards of 50 µg/L, but remediation of chromium in groundwater is postponed until the final remedial action.

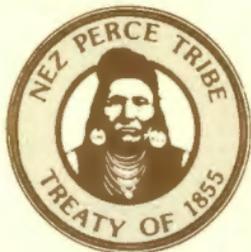
The Nez Perce Tribe ERWM appreciates the opportunity to provide comments on **Engineering Evaluation/Cost Analysis for the 100-N Area Ancillary Facilities and Integration Plan, DOE/RL-97-22, Rev. 1, Proposed Plan for Interim Remedial Action and Dangerous Waste Modified Closure of the Treatment, Storage, and Disposal Units and Associated Sites in the 100-NR-1 Operable Unit, and Proposed Plan for Interim Remedial Actions at the 100-NR-1 Source Sites Operable Unit and the 100-NR-2 Groundwater Operable Unit**. If you wish to discuss Nez Perce ERWM's comments further please contact Stan Sobczyk at (208) 843-7375 or (208) 843-7378 (fax).

Sincerely,



Donna L. Powaukee
ERWM Manager

cc: John Wagoner, DOE-RL, Site Manager
Kevin Clarke, DOE-RL, Indian Programs Manager
Douglas Sherwood, EPA, Hanford Project Manager
Russell Jim, YIN, ER/WM Manager
J.R. Wilkinson, CTUIR, SSRP Manager



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