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# Nez Perce

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT  
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November 4, 2004

Stacy Charbonneau  
U.S. Department on Energy  
Richland Operations Office  
P.O. Box 550 (A5-11)  
Richland, WA. 99352

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EDMC

**RE: "Alternatives Evaluated for the Plutonium Finishing Plant"**

Dear Ms. Charbonneau:

Since 1855, reserved treaty rights of the Nez Perce Tribe in the Mid-Columbia have been recognized and affirmed through a series of Federal and State actions. These actions protect Nez Perce rights to utilize their usual and accustomed resources and resource areas in the Hanford Reach of the Columbia River and elsewhere. In the Nez Perce Tribe's Environmental Restoration and Waste Management Program (ERWM) ongoing efforts to protect these rights, ERWM is responding to the Department of Energy's request for comments on the "Engineering Evaluation/Cost Analysis for the Plutonium Finishing Plant" alternatives.

In reviewing this document and others dealing with the PFP issue and as a result of attending many Department of Energy meetings where this issue has been discussed, it has become evident to ERWM technical staff, that the Department of Energy fully intends to utilize the Slab on Grade alternative, regardless of what many stakeholders and tribes prefer. In some cases, where it can be shown that all contamination - both radiological and chemical - has been removed and only construction debris is left, this may be appropriate. However, in many cases the clean-up of sites at Hanford can not be shown to be this clean. This seems to be the case here. In the preferred alternative, many of the ancillary structures and much of the currently residing material/equipment will be left within the lower, below grade cavities, with some sort of grout or fill being placed within. To ERWM, this makes the site nothing more than another low level waste burial ground with a cap over it. As a result, ERWM is not convinced that the PFP site will never pose a threat to human and ecosystem health. ERWM preferred alternative would be to completely remove all contaminated material, equipment, and ancillary structures to the ERDF site for disposal with other LLW. This would result in the centralization of this type waste into one location for easier long term monitoring and waste management.

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November 5, 2004

The ERWM staff appreciates the opportunity to express our comments, concerns, and thoughts regarding the Engineering Evaluation/Cost Analysis for the Plutonium Finishing Plant alternatives. If you have any questions or concerns, please contact John W. Stanfill of my staff at 208-843-7375, ex. 2369.

Sincerely,



Patrick Sobotta  
ERWM Director

Cc: Kevin Clarke, DOE-RL