



Oregon

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Subject: Draft Sections 1 through 3 of 100 and 300 Area Component River Corridor
Baseline Risk Assessment

Mr. Sands:

Oregon appreciates the ability to preview the first three sections of the 100 and 300 Area component risk assessment. We believe that early feedback will result in a better risk assessment in light of the upcoming June 2007 milestone. We will continue to submit early feedback and share our thoughts with other trustees in hopes of stimulating discussion in forthcoming workshops. Oregon understands this is an "early" draft and many important issues have not yet been addressed during the monthly workshops. The suggestions that follow are generally high level rather than specific in nature but critical for the success of the document.

1. It is essential for this document to describe how the results of this risk assessment will fit into the overall strategy for closure of the river corridor. A framework describing how this risk assessment, and the risk assessments for the inter-areas, the Columbia River component, deep vadose zone and groundwater operable units managed by Washington Closure Hanford (WCH) and other DOE contractors should be packaged by DOE to obtain a final remedy record of decision for the 100 and 300 source areas.
2. A discussion of the contaminant sources remaining in each reactor area, in terms of remediated and unremediated CERCLA waste sites is provided in Section 2.1.1.2. The section also refers to a list of waste sites and their "remediation status" (although this information was not provided). The information presented for each reactor area is general, repetitive, and lacks detail on the methodology for selecting waste sites for inclusion in the risk assessment.

This section needs a description of the criteria or decision-logic for the selection or exclusion of waste sites for evaluation in the risk assessment. Further, explain why the number and types of waste sites ("interim closed out" or "no action" sites)

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8. Oregon recognizes that the 100 and 300 Area Component Risk Assessment will be voluminous in nature. We suggest that every effort be made to minimize the amount of redundant information. Much of the information presented in Sections 1 and 3 was obtained from previously published documents. Additionally, the information presented in Section 3 seems out of sequence, and is more relevant to the background information that should be provided in Section 1. We recommend retaining information in the main body of the text if it is relevant to understanding the risk assessment and referring the reader to the original document or assigning it to an appendix for the remainder of the background information.

We look forward to discussing these comments and the following comments as you continue to develop the draft baseline risk assessment. Please feel free to contact Donna Morgans at the Oregon Department of Energy (503) 378-5584.

Sincerely,



Ken Niles
Assistant Director

CC: Larry Gadbois, U.S. Environmental Protection Agency
John Price, Washington Department of Ecology
Hanford Natural Resource Trustees