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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

September 10, 1998

Ms. Linda Bauer  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Mr. Steve Liedle  
Bechtel Hanford, Inc.  
P.O. Box 969  
Richland, WA 99352



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SEP 16 1998  
**DOE-RL/DIS**

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Dear Ms. Bauer and Mr. Liedle:

Re: Groundwater/Vadose Zone Integration Project Status Report

This letter is a follow-up to the Washington State Department of Ecology's (Ecology) letter dated April 16, 1998. It further describes Ecology's expectations concerning the Groundwater/Vadose Zone Integration Project (GW/VZ Project).

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In our April 16, 1998 letter, Ecology cited the following three related issues that needed to be resolved quickly if the GW/VZ Project is to continue on a path to success. The following are our comments concerning U.S. Department of Energy's (USDOE) progress, to date, in addressing these three issues:

1. "USDOE-HQ needs to actively participate in the project during next steps . . . ."

**Comment:** USDOE-HQ and Undersecretary Moniz' Office are to be commended for demonstrating a serious commitment to this project through their onsite presence and active participation. Despite this commitment, however, the project lacks an agreed to integrated plan, integrated objectives, and meaningful public, stakeholder, and tribal involvement plan.

2. "Our first priority in starting the project needs to be a focus on quality – setting an overly ambitious deadline for the project (October milestone for example) before all parties reach consensus on who, what, how, etc., creates a constraint on stakeholder involvement . . . ."

**Comment:** The ambitious deadline has worked in a positive way by focusing everyone's attention on the GW/VZ Project. On the other hand, the USDOE focus on meeting budget deadlines, without establishing consensus on what the project is to achieve, how it would be achieved, and what role each party would play, has resulted in a poorly defined scope of work and associated budget.

3. "The process needs to be completely open from this day forward . . . . Success in achieving and maintaining an open process is a minimum requirement for Ecology's continuing participation and support for this project."



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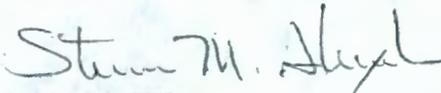
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**Comment:** USDOE is to be recognized for providing numerous opportunities and locations for the sharing of information, issues, and concerns. However, USDOE has failed to establish roles acceptable to the public, stakeholder, tribal, and regulatory representatives in the development of an integrated project. The result is a lack of overall acceptance of the public, stakeholder, and tribal involvement process. Ecology does not consider this "*Success in achieving and maintaining an open process . . .*"

After several months of considerable effort and cost, the GW/VZ Project lacks an agreed to integrated plan, integrated objectives, and meaningful public, stakeholder, and tribal involvement. It is imperative that USDOE develop a credible integration plan, schedule, and budget for this project and that the assumptions, purpose, goals, and objectives be developed in coordination and cooperation with the public, stakeholders, Tribal Nations, and regulators.

In summary, Ecology feels progress, to date, is not acceptable. Ecology is currently evaluating actions to take to ensure that this project gets on track. We look forward to continuing to work with USDOE, contractors, regulators, Tribal Nations, stakeholders, and the public on this project.

Sincerely,



skr Michael A. Wilson  
Program Manager  
Nuclear Waste Program

MAW:SMA:skr

cc: Marilyn Reeves, HAB  
Donna Powauke, Nez Perce Tribe  
J. Wilkinson, CTUIR  
Russell Jim, YIN  
John Wagoner, USDOE  
Doug Sherwood, EPA  
Mary Lou Blazek, ODOE