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UNCLASSIFIED FACSIMILE

DATE 11/7/94

NUMBER OF PAGES SENT, INCLUDING COVER SHEET 4

TO: Bob Holt
U.S. DOE - RLO

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FROM: John Bascietto
DOE HQ (EH-231)

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COMMENTS:

Here are Lisa Trichel's (CEM-442) comments on Joe Beck's presentation on the "HANFORD Trustee's STRATEGIC PLAN" Joe did at last NDA steering committee meeting (Oct. 19th). I don't know what else to say about them - Call me if you wish to discuss. - John Bascietto
P.S. - Lisa To. asked me to forward these to proper person at RLO.

Author: Lisa Treichel at EM-02

Date: 11/3/94 9:08 AM

Priority: Urgent

Receipt Requested

TO: JOHN BASCIETTO at EH-09

Subject: Re:Natural Resource Issues Hanford

Message Contents -----

Attached please find the improved comment set on the trustee council

Please tell me who to send it to.

Informal Note:

To: John Bascietto

From: Lisa Treichel

RE: Natural Resource Trustee Council

Attached please find my comments. They spell out problems with the word choices used in the Council presentation. At the presentation we were told that many of the statements would be echoed in the document going up for signature. I did not know who the appropriate distribution of these comments should be—just Kathy Leonard and Bob Holt or a bigger crew of the Steering committee members who heard the presentation (including the Tribal representatives). Please let me know if I need to do the distributing.

I can be reached at 301-427-1841.

DOCUMENT REVIEW: NATURAL RESOURCE
TRUSTEE COUNCIL STRATEGIC PLAN

o Page 3, Operation Principles, 5th bullet: The bullet states: "Establish Priorities." Currently, priorities at DOE-RL are established through the TPA and TPA negotiations. In cases where priorities established by the Council differ from the TPA, a serious legal problem will arise if the Councils' established priorities take precedence. It is suggested that the bullet be rewritten as follows: "Assist DOE in establishing priorities."

o Page 4, Operations Assumptions, 3rd bullet: The bullet states: "DOE will listen and act upon Council recommendations". As currently written, this bullet sounds too much like a mandate. It is suggested that the bullet be rewritten as follows: "DOE will listen, and take into consideration all recommendations made by the Council." Current wording is too strong, and implies that the Council will have the final say in remediation decisions.

o Page 5, Planning Values and Parameters, 1st bullet: The bullet states: "Facilitate planning using a holistic, comprehensive approach". As written, this bullet implies that the Council will act in an oversight role with respect to planning activities at the Hanford Site. Currently DOE has a mechanism in place which allows for adequate site planning. It is suggested that this bullet be reworded as follows: "Assist in planning using a holistic, comprehensive approach"

o Page 5, Planning Values and Parameters, 3rd bullet: The bullet states: "Encourage and implement proactive planning on natural resource issues". Again, this bullet implies authority that probably should not be afforded the Council. It is suggested that this bullet be reworded as follows: "Encourage and assist in the implementation of proactive planning on natural resource issues." DOE currently has responsibility as a trustee to provide good stewardship over its' natural resources.

o Page 5, Planning Values and Parameters, 5th bullet: This bullet states: "Ensure appropriate level of remediation, restoration, and/or mitigation". As written, this bullet appears to give the Council final say on setting appropriate levels of remediation, restoration and/or mitigation. Currently, there is a mechanism in place at the Hanford Site that allows for the development of appropriate remediation, restoration and/or mitigation levels (CERCLA Process and TPA). It is suggested that this bullet be reworded as follows: "Assist in the development of

o Page 6, Vision Statement, 2nd bullet: The bullet states: "Integration of natural resource services into all Hanford activities". It is unclear as to what the term "natural resource services" refers to. Without a clear definition of the term, the bullet has very little meaning. Please clarify this bullet.

o Page 6, Vision Statement, 4th bullet: The bullet states: "Minimal harmful impacts on natural resources from effective and efficient cleanups". It is unclear as to how this will enhance current cleanup activities at the site. The intent of this bullet should be more clearly defined.

o Page 6, Vision Statement, 5th bullet: The bullet states: "Transformation of DOE into an innovator and developer of environmental technology". The desire to transform DOE into an innovator and developer of environmental technology is a good idea. However, this statement is too strong and should be reworded as follows: "Assist DOE in becoming an innovator and developer ..." Current DOE programs (EM-50) fund innovative technologies.

o Page 7, Achievement Criteria for Vision Attainment, 2nd bullet: The bullet states: "Development of a DOE-RL division of natural resources". Under what authority can this Council mandate the development of a DOE/RL division for natural resources? This assumes that the council will have the power and authority to make decisions for DOE. It is suggested that this bullet be reworded as follows: "Encourage and assist in the development ..."

o Page 8, Achievement Criteria (Cont.), 4th bullet: The bullet states: "Transfer of non-contaminated sensitive habitats to natural resource agencies and organizations". Land transfer from DOE to other agencies is a very complicated problem due to liability issues. Some land transfer activities need congressional action before they can take place. Investigations into the steps needed to transfer ALE and the North Slope are ongoing.

o Page 9, Achievement Criteria (Cont.), 3rd bullet: The bullet states: "Implementation of a remediation, restoration, and mitigation policy". The 3rd and 4th bullets should be combined to read as follows: "Assist in the development and implementation of a remediation, restoration and mitigation policy which integrates natural resource values into all Hanford activities."

o Page 10, Achievement Criteria (Cont.), 3rd bullet: This bullet states: "Development of a site-wide land use vision". This task has already been completed for the Hanford Site (Hanford Site Future Use Working Group Report). It is suggested that this bullet be deleted.