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ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT
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May 12, 1998

Mr. Richard A. Holten
U.S. DOE, Mail Stop HO-12
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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DOE-RL/DIS



RE: Site-Wide Groundwater Model Consolidation

Dear Mr. Holton:

The Nez Perce Tribe Department of Environmental Restoration and Waste Management (ERWM) appreciates being invited to participate in the development of a site-wide groundwater model. Tribal consultation on this issue is important because modeling results will be used to support remediation decisions. Our rights to the Mid-Columbia were retained in the Treaty of 1855 and were affirmed through a series of federal and state actions.

ERWM has serious reservations about the direction of the Site-Wide Groundwater Model Consolidation. It appears that the approach is not the consolidation of the best approaches of the various groundwater models used onsite but rather the elimination of all groundwater models except that proposed by Pacific Northwest National Laboratory (PNNL). Obviously, this elimination of competition within the Site has several drawbacks which are listed below:

- The perception by Tribal Nations and stakeholders that PNNL's management is unwilling to allow PNNL's scientists to perform independent scientific study.
- PNNL does not routinely and adequately subject projects under its supervision to independent and adequate peer review. Will the reviewers be independent and qualified? Will the reviews be given enough time and information to conduct a thorough review? Will PNNL staff edit the reviewers' comments?
- The costs associated with groundwater model will be excessive as this work scope will not be awarded on a competitive basis.
- A consensus hydrogeologic model has not been established.

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- Model assumptions are not clearly stated.

At the Site Wide Groundwater Model Consolidation Meeting, April 24, 1998, PNNL's Geologic model was poorly presented and inadequately supported. Few geologic cross-sections were shown. Those that were shown were poorly labeled and not tied to well control. Without being shown supporting data, it was difficult to assess the validity of PNNL's Geologic model. However, it appears that PNNL's Geologic model ignores the structural complexity of the site and has mishandled the stratigraphy. ERWM is willing to meet with PNNL staff to review the geologic data supporting their model.

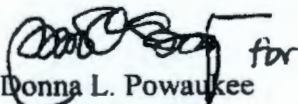
By this letter, ERWM is nominating Drs. Roy Mink and Kevin Lindsey for the peer review of the proposed groundwater model. As you know, Dr. Lindsey's work is the basis for the Hanford Site's understanding of the Ringold Formation and is referenced in PNNL groundwater documents. Drs. Mink's and Lindsey addresses and telephone numbers are shown below:

Dr. Leland L. "Roy" Mink
 Director
 Idaho Water Resources Research Institute
 Morrill Hall, Room 106
 University of Idaho
 Moscow, Idaho 8344-3011
 Phone: (208)885-6429

Dr. Kevin A. Lindsey
 Pacific Northwest Branch Manager
 Daniel B. Stephens & Associates, Inc.
 719 Jadwin Ave., Suite 28
 Richland, WA 99352
 Phone: (509)946-6431

If you wish to discuss these comments further, please contact Dr. Stanley M. Sobczyk at (208) 843-7375 or (208) 843-7378 (fax).

Sincerely,

 for
 Donna L. Powaukee
 Nez Perce Tribe
 ERWM Director

cc: John Wagoner, DOE-RL, Site Manager
 R. D. Hildebrand, DOE-RL
 Kevin Clarke, DOE-RL, Indian Programs Manager
 Dib Goswami, Ecology
 Larry Gabois, EPA
 Wade Riggsbee, YIN
 Ernie Moniz, DOE-HQ
 Bob Alvarez, DOE-HQ