



0018418

9200415

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

January 6, 1992

Steve Wisness
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Re: Hanford Risk Assessment Methodology

Dear Mr. Wisness:

Your letter dated December 13, 1991, received on the 23rd, expressed several concerns that prompt this response. The three parties have expended significant time and resources towards meeting M-29-03, the Hanford risk assessment methodology. This is manifested in the six working group meetings, the September draft methodology, and the two informal comment resolution meetings on November 25th and December 18th of 1991. Our correspondence revolves around the role of the working group.

Authoritative guidance exists that clearly lays out a comprehensive method for conducting risk assessment. Therefore, the group decided early on that its technical expertise should be applied either to site-specific issues which the existing guidance expressly leaves to remedial project manager discretion, or to issues for which guidance has not been fully developed. The problems that the working group was formed to resolve do not provide explanations for unacceptable results.

Until the September draft was delivered, the working group participants had been frustrated by the dialogue, being in the position of neither tangibly contributing to the drafting, nor resolving issues. It became apparent during the course of the meetings that the formal process of document review would be the vehicle for resolving issues. It should not have come as a surprise that EPA and Ecology raised fundamental issues in their comments. The comments of EPA and Ecology are complementary, rather than contradictory. It was further emphasized that our feelings



Steve Wisness
January 6, 1992
Page 2

about the draft methodology were in concordance at the December 18th meeting. We understand your letter to mean that DOE intends to provide its disposition of our comments on the September draft methodology concurrently with, but separately from, delivery of the draft submitted to meet M-29-03. This resort to the formal process is an unfortunate example of the three party's difficulty in building working relationships.

Risk assessment is a practice delineated by professional convention and authoritative guidance. As maintained in all working group meetings, EPA and Ecology distinguish risk assessment from management decisions based thereon. The working group is an appropriate body to address critical issues such as cleanup levels, threshold levels, and other matters entailing consideration of risk. Such matters should be resolved before they stymie important decisions. We will make all due effort to address such issues when they are presented in an appropriate context.

Ecology is pleased that DOE intends to meet M-29-03. However, we will not condone an unacceptable document. We can make no allowance for the fact that Ecology's comments were unexpected by Energy. Recurring meeting discussions, capped by our letter dated August 2, 1991, gave fair notice of shortcomings in the process. Ecology's postponement of the November meeting followed two prior delays by DOE, and was well justified in Ecology's letter dated November 20, 1991. A two week delay may have been attributable to the postponement, had productive efforts been precluded. However, it does not appear that the delay was productively used to address Ecology's concerns. As example, Ecology's basic request for proposed comment resolution prior to the next working group meeting continues to be denied. We will learn at the next working group meeting, scheduled for January 9, 1992, whether the promising December 18th meeting proves to have been productive.

We hope that the specific issues that are stirring in the context of the working group will be resolved in open and constructive dialogue. It would be appropriate to extend the mission of the working group to: a) resolve site-wide issues related to risk assessment; b) refine, focus, and further develop the Hanford methodology; c) resolve ongoing risk assessment issues that may arise during site-specific application of the methodology; and d) update the methodology in light of evolving guidance.

Steve Wisness
January 6, 1992
Page 3

You may direct inquiries on these matters to Steve Cross, 206-459-6675.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy L. Nord". The signature is written in a cursive style with a long, sweeping underline.

Timothy L. Nord
Hanford Project Manager

cc: Paul Day, EPA
Tim Veneziano, WHC

