



Confederated Tribes and Bands
of the Yakama Nation

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Established by the
Treaty of June 9, 1855

November 9, 2004

Mr. Keith Klein
Hanford Site Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550 MSIN: A7-50
Richland, WA 99352

Stacy Charboneau
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN A5-11
Richland, WA 99352

Mr. Michael Wilson
Nuclear Waste Program Manager
Washington Department of Ecology
1315 W. Fourth Avenue
Kennewick, WA 99336

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OCT 11 2005

EDMC

Subject: Review of the Engineering Evaluation / Cost Analysis (EE/CA) for the
Plutonium Finishing Plant Above-Grade Structures (DOE/RL-2004-05,
Revision 1)

Dear Mr. Klein, Ms. Charboneau and Mr. Wilson:

The Yakama Nation appreciates the opportunity to review and provide comments on the
proposed actions for the Above-Grade Structures at PFP.

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized
sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America
(12 Stat. 951). The U.S. Department of Energy's Hanford site was constructed on
Yakama Nation ceded land. The Yakama Nation retains reserved rights to this land
under the Treaty.

The Yakama Nation supports efforts by USDOE to remediate Plutonium Finishing Plant
Above Grade Structures that will ensure full exercise of reserved Tribal Treaty rights.
Unfortunately, the selected Alternative 4, fails to achieve this objective. It consists of:
Slab-To-Grade, which addresses removing the non-radiological and radiological
hazardous substances from the facilities, removing equipment and associated piping,

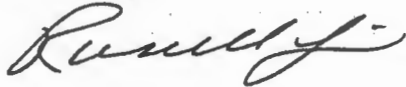
demolishing the structure to slab and stabilizing the area, possibly with some kind of barrier (cap). An alternative must be developed and implemented that will allow tribal members full use of the land once again.

The Yakama Nation recommends that DOE evaluate a removal and disposal alternative; as they have with B Plant and U Plant Ancillary/Support Facilities; which addressed removal of all contaminated structures, piping, equipment, etc., and the building foundation and soils to a depth of 1 meter – followed by soil sampling to determine if additional cleanup actions are needed.

The YN cannot and will not support cleanup activities that create small radiologically and chemically contaminated waste sites throughout the 200 Areas – making the entire area a sacrifice zone for hundreds, if not, thousands of years. Leaving contamination at these sites does not meet regulatory requirements for a radiologically LLW or MLLW burial ground.

If you have any questions regarding our comment on these EE/CAs, please contact me at (509) 452-2502.

Sincerely,



Russell Jim, Manager, Environmental Restoration/
Waste Management Program

cc:

Jay McConnaughey
Wade Riggsbee
Dave Rowland

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DOE-RL/RLCC