



0017995

Department of Energy

9106061

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

DEC 13 1991

91-TPA-200

Mr. Paul T. Day
Hanford Project Manager
U. S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 99504-8711



Dear Messrs. Day and Nord:

HANFORD RISK ASSESSMENT METHODOLOGY

The September 9, 1991, Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Changes included a new past practice milestone for the development of a document describing the proposed methodology to perform risk assessments at Hanford past practice operable units in compliance with CERCLA and RCRA past practice requirements. The description/justification states, "the guidelines to be established will be used on a site-wide basis and will enhance the consistency in risk assessment methods and in evaluation of remedial action alternatives". The specific milestone is M-29-03 which requires that a risk assessment methodology document (primary document) be submitted in March 1992. Upon approval of the document, it will be incorporated into Appendix F of the Tri-Party Agreement.

To achieve the goal of submitting an acceptable document in March 1992, the U.S. Department of Energy, Richland Field Office (RL) and its contractors formed a task group with the U.S. Environmental Protection Agency (EPA), the State of Washington Department of Ecology (Ecology) and their contractors to discuss the objectives and scope of the risk assessment methodology document. The task group held numerous and lengthy discussions on all aspects of the proposed risk assessment methodology. Although not all issues were resolved, the task group made significant progress in achieving concurrence on many issues affecting the document. The difficulties involved in writing the document stem from inconsistent and changing regulatory guidance on the evolving human and environmental risk assessment process for past practice decisions. Objectives and regulatory authorities are different for the three parties involved. Therefore it was expected that the first draft of the document would generate a number of comments from EPA, Ecology, RL, and U.S. Department of Energy Headquarters (HQ). However, the seemingly widely divergent responses from the two regulatory agencies was not expected.

EPA responded by letter on November 4, 1991, which included the following statements:

"The document was reviewed to ensure that the methodology applies U.S. Environmental Protection Agency (EPA) guidance while being customized to the Hanford Site. The comments presented below are based on a comprehensive technical review of the methodology."

"The document contains appropriate information on methods of conducting human health and environmental evaluations for the Hanford Site. However, the document requires general editing for typographical and grammatical errors."

The general and specific comments, including those received at a later date (by electronic mail, November 19, 1991) on radiological impacts would indicate that EPA is basically in agreement with the draft of DOE-RL-91-45 Hanford Site Baseline Risk Assessment Methodology.

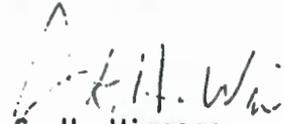
However, the comments offered by Ecology in the October 31, 1991, response indicates that the document is "fundamentally flawed and at variance with (Ecology's) expectations". As such, "Ecology envisions no less than a major redrafting of the methodology to meet its original intentions". The Ecology reviewer fears that the "methodology is in danger of becoming an inappropriate vehicle for fomenting dispute" as "volatile issues" such as threshold, cleanup levels and interim remedial measure decisions (based on risk) are discussed, thus swelling the document with a "surfeit of issues and topics".

It has been the intention of the RL to use the task group to provide input and insight on the regulatory reviewers' views on what was essential in the risk assessment process, so that the first draft of the document could be reasonably close to their expectations. However, it has never been the intention to abnegate the responsibility of producing a risk assessment methodology document that can be used in the regulatory decision process. The regulatory community must not evade the opportunities to formulate policy on regulatory issues while expecting RL to produce documents describing the technical aspects associated with decision making processes. It is advantageous to all of the Tri-Party Agreement members to have a risk assessment methodology document that addresses both the technical and regulatory/policy issues. Therefore, RL will continue to insist that regulatory and policy issues that impact cleanup decisions (based on risk) be discussed in DOE-RL-91-45 Hanford Site Baseline Risk Assessment Methodology, and to the extent possible be resolved and documented therein.

RL and its contractors will attempt to resolve comments received on DOE-RL-91-45 Hanford Site Baseline Risk Assessment Methodology. EPA comments were dispositioned in a meeting held on November 25, 1991.

Although the meeting was originally scheduled to meet Ecology representatives' schedules, Ecology elected to postpone the meeting on the subject until December 1991. This action may seriously impede RL's ability to provide a document that is acceptable to Ecology on the milestone due date. However, the document will be delivered to meet the milestone. Upon receipt and review of the document, please be cognizant that the September 1991, draft was the first draft of the document, and it had neither received WHC, RL nor HQ review. Comments that are consistent or compatible across the regulatory and RL communities will be incorporated. Comments received from the regulators not incorporated into the document will be dispositioned outside of the document, but delivered concurrently. Outstanding comments and issues can be resolved through the primary document review process as outlined in the Tri-Party Agreement.

Sincerely,


S. H. Wisness
Hanford Project Manager

EAP:KMT

cc: T. B. Veneziano, WHC

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: S. H. Wisness, RL
Addressee: P. T. Day, EPA
T. L. Nord, Ecology
Correspondence No.: Incoming 9106061

Subject: HANFORD RISK ASSESSMENT METHODOLOGY

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		M. R. Adams	H4-55	
		R. J. Bliss (Level 1)	B3-04	
		L. C. Brown	H4-51	
		G. D. Carpenter	B2-16	
		S. W. Clark	H4-55	
		C. K. DiSibio	B3-03	
		M. J. Lauterbach	H4-55	
		R. E. Lerch, Assignee	B2-35	
		P. J. Mackey	B3-15	
		H. E. McGuire	B3-63	
		L. L. Powers	B2-35	
		T. B. Veneziano	B2-35	
		T. M. Wintczak	L4-92	
		R. D. Wojtasek	L4-92	
		EDMC	H4-22	

1dp, 6-7049