

## OREGON HANFORD WASTE BOARD

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March 26, 2003

Mr. Chris Smith  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550 (A3-04)  
Richland, WA 99352

Subject: Explanation of Significant Difference for the 100-NR-1  
Operable Unit Treatment Storage and Disposal Interim Action  
Record of Decision and 100-NR-1/100-NR-2 Operable Unit  
Interim Action Record of Decision

Dear Mr. Smith:

The Oregon Hanford Waste Board has reviewed the N-Area Explanation of Significant Difference (ESD). We believe that the separation of soils and groundwater leads to segmented decision making that is not comprehensive or protective of human health and the environment. We understand the U.S. Department of Energy (DOE) established Operable Units to facilitate management of contaminated sites, but disconnecting the contaminated soils and underlying groundwater is disturbing since it does not foster a holistic and comprehensive approach to restoration. This is especially worrisome due to the purpose of this ESD, which is to formally change existing cleanup decisions, and will leave highly contaminated soils and groundwater in place.

The range of options presented in support of the remedial change was too limited and inadequately developed. The Oregon Hanford Waste Board expects DOE to prepare a more comprehensive analysis regarding this change in remedial strategy. The analysis should evaluate the long-term impacts of leaving contaminants in place that will continue to leach into the Columbia River, yield unknown harm and may preclude future beneficial uses of the area, such as a National Monument.

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DOE should include an evaluation of the necessary institutional controls to stabilize the site for 300 or more years to allow the buried radioactive elements to decay. Establishing a National Monument that contains restricted use areas and unusable groundwater is a confusing strategy that we do not support. The N-Area is just one out of many sites at Hanford where DOE's actions continue to allow contamination to enter our drinking water. We do not find this strategy acceptable.

The Oregon Hanford Waste Board compels DOE to revise this analysis and any other analysis that would lead to decisions leaving readily accessible contamination in-place. This strategy undervalues the Columbia River and groundwater beneath the Hanford Site.

Sincerely,



Shelley Cimon, Chair

Cc: John Morse, U.S. Department of Energy, Richland Office  
Jane Hedges, Washington State Department of Ecology  
Nick Ceto, U.S. Environmental Protection Agency, Region 10  
Ken Niles, Oregon Office of Energy  
Armond Minthorn, Confederated Tribes of the Umatilla Indian Reservation  
Russell Jim, Yakama Nation  
Patrick Sobotta, Nez Perce Tribe