

## **Preliminary framing questions for the TPA agencies regarding information the HAB would like presented at the proposed January COTW**

These framing questions are preliminary and draft. They are compiled from the December 10 Webinar and issue manager discussions. The numbers are for ease of reference only – they do **not** imply order of importance.

### **Category: Changes from Draft to Final**

1. What has changed from the draft to the final EIS, and where do we find the changes?
  - a. Are there substantial changes (that alter decision, that causes a larger than 20% change in some measure, etc.) between draft and final documented, beyond what is documented in S.1.5?
  - b. There appear to be substantial changes documented in the supplemental analysis, yet the EIS appears to argue in the supplemental analysis that there are not substantial changes (e.g. looking at carbon tetrachloride, chromium, uranium and other contaminant levels displayed on the maps).
    - Why do the groundwater maps show less impact in the final than the draft? Did the parameters change?
  - c. What are substantial changes in the EIS modeling and projections from the draft, and where are they in the document? How do we easily find them (for instance...*"we made a number of changes in modeling parameters and assumptions. The most impactful on the results [were X] and they changed our conclusions [in this way]. You can find details [here] in the document."*)?

### **Category: Public Involvement**

1. How and where has DOE responded to the Hanford Advisory Board's and public comments on the TC&WM FEIS?
2. How and where has DOE incorporated the Hanford Advisory Board's and public comments into the TC&WM FEIS?
3. How has the Final EIS responded to Oregon's proposed Alternative #7 either by incorporating it or responding to the reasoning underlying the proposed alternative (for example, why were the technologies Oregon suggested considered "immature" in comparison to the technologies DOE is proposing to use)?
4. Which of the HAB's/public's comments particularly influenced the changes between draft and final?

### **Category: Decision-Making Process/Requirements**

1. What are the potential options for Records of Decisions (types of decisions)? Can you identify by name the RODs that will be issued?
2. What is the timeframe for when the RODs will be issued?
3. Who is making the decision about the RODs (timing, sequence, grouping, etc.)
4. How can DOE make a ROD that utilizes/references technology not analyzed in the EIS (e.g. effluent treatment facility waste)?

5. The EIS does not comply with the regulatory requirement that the agency declare its preferred alternative for secondary waste. The EIS also does not evaluate alternatives to the proposed actions that avoid impacts to the environment that the proposed action would cause. How is DOE planning to correct this?
6. Why is the mitigation action plan issued after the EIS?
7. What are Ecology's concerns? Please explain Ecology's role as a cooperating agency and how can Ecology can find "fault" with the document and still be a cooperating agency?
8. How will DOE reconcile RODs with Ecology (SEPA and NEPA)?
9. What are EPA's overall concerns?
10. EPA rated the EIS as an "EO2" and identified mitigations are needed. What mitigations has DOE committed to, to resolve EPA's issues? How will DOE come into compliance with its own regulations?
11. Will Ecology support holding back on issuing ROD's so the HAB can engage the public? It will take significant time to review the EIS and it will be necessary to write advice.
12. How will DOE fulfill their consultation obligations for rare and endangered species with NMFS and USFW?

***Category: Preferred Alternatives***

1. How might the major impacts of proposed alternatives be mitigated / avoided / resolved?
2. On what bases did DOE choose its preferred alternative?

***Category: Standards and Projected Impacts***

1. How well/accurately has DOE assessed the releases of technetium and other contaminants from cribs and trenches?
2. It appears the major impacts the EIS alternatives project to occur violate standards for protecting human health and the environment over the period of the EIS analysis (10,000 years). How will DOE ensure that these effects won't occur? If/As analysis finds that the EIS is not protective, is DOE ready to accept RODs with more remediation, where the risk isn't covered in the EIS?
3. Does the final EIS incorporate the reduction of impacts resulting from cleanup under RCRA and CERCLA actions, or are these excluded from analysis?
4. Does the EIS provide bounding analyses to direct decisions, such as alternative/option "X" results in impacts that exceed regulatory standards and alternative/option "Y" does not?
5. Does the EIS assess uncertainty in the plans, the models, changing conditions and other factors; and is that assessment adequate?
6. How well does the EIS recreate what has actually been observed in groundwater? How likely is it that the EIS's model projections into the future are a) useful and b) protective?
7. Why does the EIS exclude some waste forms in the modeling? (e.g. example on page D-41, Volume 2, Book 4, Appendix D)

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8. Why was nitrite presented as nitrate (this reduces the risk in the final assessment by a factor of 3)? (*David Bernhard to elaborate at Jan TWC mtg*)
9. Waste inventory numbers (*David Bernhard to elaborate at Jan TWC mtg*)
10. Was there a change in assumptions (e.g. for retention values of technetium in the glass melter, treatment of ancillary facility waste streams)?

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