

3 March 1995

Dr. Carol Henry
Office of Integrated Risk Management
Office of Risk Assessment
US Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

RE: Consortium for Environmental Risk Assessment (CERE) process

Dear Dr. Henry:

The Hanford Advisory Board wishes to thank you for coming to our February meeting to help us better understand the process of risk assessment and its implications to Hanford cleanup.

We are responding to your request for comments to the Consortium for Environmental Risk Assessment. As you are aware the Board has serious concerns with the CERE process including flaws in the technical data, and significant gaps in a meaningful public involvement process. Additionally, the Board is concerned the timing of the release of the CERE report to Congress prior to the release of technical support data, effectively eliminates any opportunity for a substantive review of the report.

The Board's concerns seriously challenge the credibility of CERE findings. We understand that the CERE final report will be sent to your office for possible revision, and hope our comments will assist as you prepare your report to Congress.

It is the recommendation of the Hanford Advisory Board that any site-wide risk assessment process be guided by the following principles:

- I. The CERE team should recognize and incorporate the priorities and values from Tank Waste Remediation System Task Force, Hanford Future Site Uses Working Group, Hanford Advisory Board, and other Site Specific Advisory Boards into the risk evaluation process.
- II. Negotiated agreements such as the Tri-Party Agreement are the products of extensive and ongoing research, discussion, and public input. As they

represent risks acceptable to the community they must enter the planning process in an integral way.

- III. Because evaluation of risks across different DOE weapons sites incorporate different values and difference assumptions at each site, cross-site risk comparisons should not be used to justify politically expedient budget cuts.
- IV. The Hanford Advisory Board, Native Tribes, Tri-Parties, Land Trustees, and the public must be part of the risk assessment, risk evaluation, and eventual risk management process.
- V. Because regulators and stakeholders were excluded from the base data collection process, the document sent to Congress must clearly show that the process did not gather input from all relevant sources.

We look forward to the opportunity to review the CERE final report. You can expect our comments regarding the report after our April Board meeting. Again, thank you for your time.

Sincerely,

Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Thomas P. Grumbly, US Dept. Of Energy , Headquarters
John Wagoner, Manager, US Dept. Of Energy, Richland Operations
Mary Riveland, Director, Washington Department of Ecology
Chuck Clarke, Regional Administrator, US Environmental Protection Agency,
Region 10