



Department of Energy
National Nuclear Security Administration
Nevada Site Office
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**DEPARTMENT OF ENERGY (DOE) ENVIRONMENTAL MANAGEMENT (EM)
APPROVAL OF THE "CRESP Amchitka Independent Assessment Science Plan"**

The DOE Nevada EM program is pleased to approve the "CRESP Amchitka Independent Assessment Science Plan" dated June 24, 2003, with the following approval statements.

- Nevada EM agrees conceptually with the Science Plan and the top priority projects as agreed to in the May 1-2, 2003, meeting in Las Vegas, Nevada as modified by the June 20, 2003, conference call and listed below. We do not necessarily agree with or concur with every statement in the plan.
- Nevada EM understands the "core" activities in the CRESP Science Plan to be only those activities which can be funded within the DOE committed funding limitation of \$3.1M over a three-year period.
- Nevada EM is responsible for funding only the high-priority tasks listed below, and up to a total funding limitation of \$3.1M. The \$3.1M is to be allocated as follows: \$2M in Fiscal Year (FY) 2003, \$1M in FY 2004, and \$100,000 in FY 2005. Dollars in FY 2004 and FY 2005 are subject to available funding.
- The highest priority tasks identified and agreed to by all four parties who must approve the Science Plan as noted in the Letter of Intent (enclosed), were agreed to at the CRESP meeting in Las Vegas, Nevada, May 1 - 2, 2003, and modified on the June 20, 2003, conference call. They are listed in Table 9 of the plan dated June 24, 2003, and are as follows:

- 1.1.1 Initial Sampling
- 1.1.2 Main Sampling
- 1.2.1 Physical Sampling - Water
- 1.3.1 Lab Analysis
- 3.1 Data Recovery
- 3.3 Groundwater Recharge
- 3.4 Radionuclide Source
- 3.5 Water/rock interaction

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Management and oversight costs and Ship-time were also on the high-priority funding list.

- If CRESP can find or undertake cost efficiencies, additional tasks may be added from the next tier of priority tasks. These second tier tasks were identified as 2.2 Salinity Structure, 4.1 Stakeholders, and 1.4 Food Consumption. This second level priority tier was also agreed to in the Las Vegas, Nevada, meeting May 1 - 2, 2003, by all four parties. Similarly, if additional further efficiencies can be gained, Tasks 3.2 Subsurface Interface, 3.3 Groundwater Recharge, and 4.2 Monitoring could be added, as long as the total funding level stays at or below the \$3.1M level. CRESP will continue to evaluate cost efficiencies, sequencing of activities, reduction or elimination of tasks based on early results, and possible collaborations with other agencies to gain maximum benefit from the DOE funding of \$3.1M over three years.
- If any party wishes to make changes to the approved plan, they will notify the CRESP principle investigator (PI) who will evaluate the request. If the CRESP PI feels the change is necessary or warranted, they will notify all parties of the need and rationale for the change. If the change impacts the established priorities, all parties must approve the changes in writing. If the change requires additional funding, the CRESP PI will obtain funding prior to implementing any such change.
- Agreed upon tasks, exclusive of the management and oversight costs, to be funded by this office must either be funded in entirety prior to implementation of the task or, if only partially funded, must be shown to be beneficial to the entire overall plan even if full funding is not achieved, to ensure that the government funding is utilized in a beneficial manner.
- All tasks must be completed efficiently in order to meet the scheduled completion date for Amchitka of September 30, 2005. This schedule requires that information and data resulting from the implementation of the tasks must be received by this office in time to be analyzed and incorporated into the completion report to be prepared by this office and submitted to the state of Alaska by July 30, 2005.
- Nevada EM had previously listed Task 2.3 Ocean Circulation as a high-priority task based on technical perspectives. Given the task cost information provided at the Las Vegas meeting we now recognize that the expected cost-benefits of the task lower it from a high priority task. We agree that the lowest priority tasks identified in the plan, 3.6 Radionuclide Sorption on Sediments, and 3.7 Deformation of Amchitka Massif are similarly not cost effective. As we have repeatedly stated, however, if the other parties feel they would benefit from additional studies and can find funding outside of this office then they should by all means pursue the remainder of the studies.

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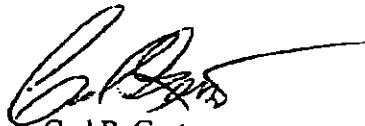
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- While approval of the CRESA plan by DOE is offered in accordance with DOE policy to address state and stakeholder concerns, it must be noted that this action does not constitute a waiver of any existing applicable authorities or jurisdiction available to DOE regarding regulation and oversight of radionuclides.
- Since the work being performed by CRESA is intended to be used to establish the framework for a scientific assessment providing a basis for long-term stewardship and will focus on model verification and reduction of risk uncertainty, it is crucial that the work be conducted in accordance with safety, environmental and security requirements within appropriate quality assurance processes and systems.

The Nevada EM is gratified with the continuing evolution of the Science Plan and anticipates that successful completion of the high-priority tasks will assist us in completion of the stewardship plan for Amchitka. We also recognize that the lower priority tasks provide useful information and should be pursued through alternative sources of funding. These tasks are not required; however, for completion of the stewardship plan. As noted in the June 2002, Letter of Intent, DOE's support of this assessment will be focused on the model verification and reduction of risk uncertainty aspects.

The February 12, 2003, Congressional Conference Agreement, and the March 21, 2003, EM FY 2003 Allocations for Nevada identified \$2,000,000 for cleanup acceleration in Alaska. Once all parties have submitted letters of approval of the CRESA Science Plan, the remainder of the FY 2003 funds will be released and implementation of the plan can begin. This office released \$150,000 at CRESA's request in April 2003 to enable finalization of the CRESA Science Plan.

Approval letters from each of your offices, the State of Alaska, the U.S. Fish and Wildlife Service and the Aleutian Pribilof Island Association, should be sent to Runore C. Wycoff, Division Director, Environmental Restoration Division, P.O. Box 98518, Las Vegas Nevada, 89193-8518. Upon receipt of those approvals, funding will be released and the plan implementation may begin. If you have questions, please feel free to contact Runore C. Wycoff (702) 295-0250 or Monica L. Sanchez at (702) 295-0160 of the Nevada EM program.



Carl P. Gertz
 Assistant Manager
 for Environmental Management

ERD:RCW-189

Enclosure:
 As stated