



CONFEDERATED TRIBES
of the
Umatilla Indian Reservation

P.O. Box 638
PENDLETON, OREGON 97801
Area Code 503 Phone 276-3018

September 14, 1987

Mr. John H. Anttonen
Assistant Manager for Commercial
Nuclear Waste
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Dear John:

In general, we are pleased with your approach on our comments regarding the drilling restart of the DC boreholes for the BWIP Hydrology Program. However, but we feel it's necessary to make some additional comments on your rejection of our concerns number 1 and 5:

- #1. Just because the determination of QA level is based upon the use of the data and not how the data is produced, we would again like to express our dissatisfaction on your decision of using only geophysical logging data in the piezometer placement, at QA level 1, but drill cutting analyses at QA level 3. Further we cannot understand how geophysical logging data (QA level 1) can be "confirmed by drill cutting analyses" (QA level 3).

Because the piezometer installation is one of the most important steps in the whole program it must be very carefully done, and all possible information has to be used.

The drill cutting analyses can provide not only "initial recognition of stratigraphic contacts" but also, correlated to the geophysical log analysis, more information necessary in a thorough piezometer installation. From this point of view, we think the drill cutting analysis has to be QA level 1 too, and maybe, for higher information level it can be replaced by coring at the depths designated for the placement of the piezometer.

- #5. We agree the drilling of one of these boreholes through the basalt into the mesozoic sediments is inconsistent with the goals of the piezometer installation, but not to the purposes of the site characterization plan. The drilling to the sediments would mean a real saving of time and money as well supply information related to your natural resources study program.

TREATY JUNE 9, 1855 ♦ CAYUSE, UMATILLA AND WALLAWALLA TRIBES

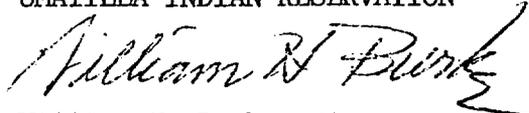
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Mr. John H. Anttonen
September 14, 1987
Page Two

The comment on which you base the rejection of our request is inconsistent. After drilling below the horizons to be monitored the hole can be cased, so no pressure effects and contamination of the aquifers can occur. We realize the drilling program of that borehole has to be changed, but from prospective of the whole site characterization program this would not be a delay but a schedule and cost savings.

Sincerely,

CONFEDERATED TRIBES OF THE
UMATILLA INDIAN RESERVATION



William H. Burke, Director
Nuclear Waste Study Program

cc: Ralph Stein, Headquarters
Bob Browning, NRC

WHB/MP/sm

WM Record File
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WM Project 1D

Docket No. _____

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