

***COMMENTS ON HANFORD 2012: ACCELERATING CLEANUP
AND SHRINKING THE SITE, FORMERLY KNOWN AS DONE IN
A DECADE: AN ACTION PLAN***

GENERAL COMMENTS (G):

SHADED AREAS INDICATE PLANTEXT

	COMMENT	RESPONSE
G-1	Cover page-last paragraph- shouldn't "over \$700M " be \$686M? Does the \$700M include FFTF?	No, \$700M is an approximate figure but it <u>ex</u> cludes the safeguards and security budget and <u>in</u> cludes additional congressional funding (plus-ups). It did not include funding for FFTF, which was never to be funded from cle anup dollars.
G-2	"Done in a Decade"-sounds like a repackage of the "Ten Year Plan" to cover for the fact that we won't meet the Ten Year Plan's 2006 commitments.	Title of the plan has changed due to stakeholder concerns that it was misleading, and to reflect RL's commitment to real and visible progress and to reduce the Hanford "footprint", while meeting all legal obligations. It is now "Hanford 2012: Accelerating Cleanup and Shrinking the Site".
G-3	<ul style="list-style-type: none"> • What planning/communication has gone into implementation of the vision? Will stakeholders accept it? The Office of River Protection (ORP)? Tri-Party Agreement (TPA) parties? • Will the ORP work to the plan? 	<ul style="list-style-type: none"> • RL senior management has worked with, and continues to work with stakeholders, Washington State Ecology (Ecology), the Environmental Protection Agency (EPA), ORP and others to gain support for Hanford 2012, so we can approach the outcomes as a team, determine what tradeoffs are acceptable, and ensure the fulfillment of our TPA commitments. • ORP's mission is more fully incorporated into the final publication of the plan, now known as Hanford 2012. However, fundamental to Hanford 2012 is our commitment to ensuring RL provides required infrastructure, certain administrative services, etc. to ensure the vitrification plant stays on schedule.
G-4	Employees could serve as a resource pool to plan and implement. Would provide employee training and generate support.	This is a good suggestion. Considerable teaming has been done already, and we will look for additional opportunities.
G-5	Plans for land use in the next 10 years should be captured in the goals.	Although land use is an important issue, Hanford 2012 is primarily a cleanup plan; that's why land use isn't addressed. We have a Comprehensive Land Use Plan, but the new National Monument status will

		require updated plans.
G-6	<ul style="list-style-type: none"> • Suggestions for projects to reduce "footprint": <ol style="list-style-type: none"> 1. apply use of Segmented Gate System to reduce volume of contaminated soils, 2. obtain a VecLoader® to remove asbestos from deactivated facilities, 3. remove three power plants using private contractors, 4. offer razor wire to the Army in exchange for removal, 5. donate video equipment from N-Reactor/PUREX to high schools, 6. donate redwood from water treatment plant (183-D) to local communities, 7. remove water towers in 300 Area to improve skyline, or donation to interested cities. Labor issues would require resolution but all suggestions have potential participants 	<p>1) A technical panel was established to evaluate the Segmented Gate System about 5 years ago; it was determined not to be feasible because the large cobble and boulders in the 100 Area must be broken down and this would drive the cost up.</p> <p>2) The VecLoader® was evaluated in March of 1997 for use in asbestos abatement at the Hanford Site. At that time it was determined the technology did not meet the Site's need. The VecLoader® appears to do a great job of removing asbestos placed in walls for insulation or sound proofing (e.g., bat and blown-in insulation). However, only a small percentage of the asbestos on the Hanford Site is in such form. Asbestos on the Hanford Site generally consists of asbestos panels, asbestos tiles, and asbestos insulation materials around pipes and ducts. The material is usually contained by paint. Since most of our asbestos abatement requires that we remove the asbestos in the usual manner of building containment structures and wear protective clothing, the use of the VecLoader® at Hanford would not result in the cost savings seen during the Fernald large scale demonstration.</p> <p>3 - 7) RL and the Fluor Hanford Asset Transition Team are reviewing these suggestions and will be following-up where appropriate.</p>

	<ul style="list-style-type: none"> Change the definition of cleanup to include non-contaminated facilities; disposition of non-contaminated facilities reduce the footprint. 	<ul style="list-style-type: none"> We agree and intend the definition of cleanup to include non-contaminated facilities.
G-7	If the plan represents overall Hanford mission, ORP's role should be part of it.	ORP's mission is more fully incorporated into the final publication of the plan. However, fundamental to Hanford 2012 is our commitment to ensuring RL provides required infrastructure, certain administrative services, etc. to ensure the vitrification plant stays on schedule.
G-8	Lack of clear leadership at HAMMER. Money is being wasted due to constant internal fighting between separate entities for their pieces of the pie.	This summer the HAMMER project was transferred from the RL Office of Training and Asset transition (OTS) to the Associate Manager for Science and Technology (AMT). This was done to allow the focused applications of the management and leadership practices that have enabled success at Pacific Northwest National Laboratory, which is also a multi- program "user facility", to be applied at HAMMER.
G-9	Consider the radiation standards in "Health Physics Society Newsletter", 6/93 (copy provided).	At this time we plan to clean up to the levels required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
G-10	We don't need a short-term (decade) plan; we need a well-funded, realistic plan that rises above political interests.	The emphasis of this cleanup plan is to provide a vision and long-term funding by making real, visible progress by 2012. We hope it will provide the basis for stable funding of slightly above fiscal year '01 levels for the long term.
G-11	<ul style="list-style-type: none"> Acceleration won't succeed without congressional support. Acceleration is feared by local community. PNNL must be seen as a national lab, not just another contractor. The plan needs professional communicators with Risk Communications experience. 	<ul style="list-style-type: none"> Congressional support is crucial (see the response to G-10 above) With the vitrification plant, cleanup jobs will last far into the future. However, that is also why the third outcome exists -- we want to help the region prepare for the future. We agree and made that clear in the final Hanford 2012 document. RL and its contractors have professional communications staff, who will be tasked with communicating the plan and are familiar with risk communications.
G-12	Projects do not have effective management. There may be accountability at higher levels of management, but it diminishes down through the layers.	This point is well taken and we are looking for ways to filter accountability, ownership, and enthusiasm through all layers of employees.

G-13	Mention the Fast Flux Test Facility (FFTF) -- either under the River if it will be shut down and deactivated/decommissioned (D&D'd), or under the Future if a restart would result in new jobs.	The Secretary of Energy will make a final decision on the future of the FFTF in January 2001 and that decision will be incorporated in the Hanford 2012 plan.
G-14	Participation is the key to acceptance -- get stakeholders and customers into the process early and aggressively.	Good suggestion -- we have been actively seeking comments from the stakeholders and regulators.
G-15	<ul style="list-style-type: none"> • Use new technology -- e.g. a laser size reduction system will be tested 2/01. • Think outside the box to reduce surveillance and maintenance (S&M) cost -- e.g. B-Plant accelerated deactivation. 	<ul style="list-style-type: none"> • Good suggestion -- we are looking at technology for remote-handled waste, particularly for the 618-10 and 618-11 burial grounds. We will add your suggestion to our list of potential technologies. • We agree and support this suggestion 100%. PFP decommissioning has already been shortened by 22 years at about a \$1.2B savings. The 300 Area Accelerated Closure project trims about 30 years and \$1B off 300 Area closure. Both are examples of early deactivation and D&D savings millions by eliminating long-term S&M costs. These savings are also available on a smaller scale from other smaller facilities. RL will continue to foster an environment where the contractors are able and want to pursue accelerated cleanup.
G-16	RL needs systems thinking which creates a nurturing and learning organization. RL does the opposite -- management by objective results in lack of teamwork.	The restructuring and RL Integrated Management System (RIMS) are both designed to foster interdependency. We agree that teamwork is the objective.
G-17	Save money by implementing the Asbestos Abatement Plan during D&D instead of starting a new plan with each demolition or waste project.	The Asbestos Abatement Plan was written in the early '90s and updated annually until recently. Although the Plan can be useful as a high-level plan for asbestos abatement, by itself it is insufficient to meet the requirements of each D&D project. Costs will still be incurred because a lower level plan must be written for each facility to meet applicable Washington Administrative Code requirements.
G-18	Consider application of an in-situ crystallization process using inhibited gypsum to immobilize subsurface wastes.	The effectiveness of this and other stabilization technologies are dependent on specific characteristics and levels of contamination at a specific location, and we have a variety of contaminants at Hanford. Because there are high amounts of calcium

		carbonate in local soil, which could buffer the reaction of calcium sulfate and decrease its effectiveness, large amounts of gypsum would be required. However, we appreciate the suggestion; we will give it further consideration on a site by site basis.
G-19	<u>First</u> stabilize contamination source, <u>then</u> spend money on the river corridor.	Stabilization of waste sites is a top funding priority for RL. Stabilization of waste sites and buildings is considered a "minsafe" surveillance and maintenance (S&M) activity in the Integrated Priority List and therefore is at the top of the funding list. RL and its contractors ensure that the site is first operated in a "minsafe" condition before spending money on remediation projects where the S&M mortgage is actually reduced. The Columbia River Corridor project is designed to cost-effectively reduce the life-cycle S&M mortgage by taking advantage of economies of scale and reduced mobilization/demobilization costs.
G-20	Save money by having DynCorp manage <u>all</u> office facilities on Site. Multiple contractor management means competition instead of Site planning.	We are considering a full range of contracting scenarios as our major contracts begin to expire in 2001 and 2002.
G-21	What are the National Environmental Policy Act (NEPA) impacts of the plan? What happens to key cleanup decisions under NEPA?	We will comply with NEPA when it is applicable. We believe the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process satisfies most NEPA requirements outlined in the plan. We also will comply with Tri-Party Agreement change requirements.
G-22	Get rid of multi-contractors (3 are OK), hold contractors responsible for screw-ups, make contracts longer (life of the job).	We are considering a full range of contracting scenarios as our major contracts begin to expire in 2001 and 2002.
G-23	Use this plan as a yardstick with annual updates. Use a thermometer graph to denote square miles cleaned up	Measuring progress was a common theme of several commenters. RL plans to present a "scorecard" soon to employees and stakeholders. Part of the work being done under the Hanford 2012 plan will be the basis for the annual commitments on which the scorecard is based.
G-24	Convert all Hanford employees to DOE federal employees and keep DOE and its regulators in charge of, and responsible for, everything.	Regardless of its merits, converting Hanford contractors to federal employees is unlikely to happen given existing caps on federal employment.
G-25	Stop wasting money with projects that	RL complies with Life-Cycle Asset

	<p>don't make sense, e.g. putting a new roof on a building scheduled for destruction in two years.</p>	<p>Management and Long-Term Stewardship Orders and Guides to make the most appropriate near-term and long-term decisions regarding the surveillance and maintenance of surplus facilities at Hanford. We recognize your comment applies to more than new roofing, but we will use it as an example. For the most part, RL does not put roofs on a building scheduled for demolition in two years. Part of the evaluation to determine priorities for demolishing facilities is whether they require major expenses, and the trade-off between the short-term cost of demolition and the long-term cost of maintenance. In some cases, the final decision for appropriate final disposition has not been made. In the meantime, essential roof repairs will be required to prevent water leaks and structural degradation resulting in safety hazards for workers.</p>
G-26	<p>RL organization is too risk-avoidant, procedure-oriented and not aligned with Klein's vision; he needs an organization that's focused, energized, imaginative, ready to try different relationships with the community.</p>	<p>We are trying to change the culture through a variety of avenues, but agree we should encourage thoughtful risk-taking and institutional alignment.</p>
G-27	<p>Latest planning efforts have changed River Corridor scope to 2012 -- change appropriate dates.</p>	<p>Dates have been changed.</p>
G-28	<ul style="list-style-type: none"> • Are schedules, funding levels, repository schedules and personnel integrated? • Mixed message -- done in decade <u>and</u> "it's going to take 40 years to clean up". • How will milestones be prioritized -- risk-based? 	<ul style="list-style-type: none"> • We are making efforts to ensure they are. • Title of the plan has changed due to stakeholder concerns that it was misleading, and to reflect RL's commitment to cleanup by making real and visible progress to reduce the Hanford "footprint" while meeting all legal obligations. It is now "Hanford 2012: Accelerating Cleanup and Shrinking the Site." • Risk is one way to prioritize projects; opportunity, for example, is another. We remain committed to completing the highest risk priorities, like removing spent nuclear fuel and stabilizing plutonium, under this plan.
G-29	<p>Use a philosophy of "baby steps" to implement a plan, getting rid of most</p>	<p>The "baby steps" philosophy is at least partially incorporated in this plan, in that it</p>

	burdensome small things then working toward the few big problems.	prioritizes some small, more visible projects before larger, less critical ones, or those that we need better technology to help us accomplish.
G-30	<ul style="list-style-type: none"> Workers will need management help to reduce repetitive assessments. Relax some of the ridiculous interpretations of the Occupational Safety and Health Administration and the Hanford Site Radiological Control Manual. 	<ul style="list-style-type: none"> Reducing the impact of assessments is one that is important to everyone. Because of the importance, complexity, and cost of the work being done here at Hanford, oversight assessments will continue to be a fact-of-life. The areas of safety, hazardous materials management, funding, and natural resource management each come with layers of oversight by both internal and external organizations. RL has worked with the overseers to combine assessment programs where practical and continues to encourage you to “push back” where you think the oversight is unreasonable. Although we strive to be reasonable in the interpretation of regulations, some are undoubtedly interpreted broadly and may seem ridiculous. Without challenge, they will not change -- question your management about what seems ridiculous to you.
G-31	Funding is limited -- work at Tank Farms and K-Basins must not be slowed.	We strongly agree -- the plan maintains priorities such as Tank Farms and K-Basins, these projects will be accomplished on schedule.
G-32	Cornerstone of cleanup is vit plant -- where is it in the plan?	The Office of River Protection's vitrification mission is more fully incorporated into the final publication of the plan. However, fundamental to Hanford 2012 is our commitment to ensuring RL provides required infrastructure, certain administrative services, etc. to ensure the vitrification plant stays on schedule.
G-33	<ul style="list-style-type: none"> Discussion of the River creates confusion between RL and ORP. I worked at Fernald -- the success of their 10-year plan was the consistency of a single prime contractor. What about the resistance to working yourself out of a job? 	<ul style="list-style-type: none"> We hope we have clarified this relationship in the final plan. We appreciate the suggestion; we are considering new contracting strategies. With the vitrification plant, cleanup jobs will last far into the future. However, that is also why the third outcome exists -- we want to help the region prepare for the future.

G-34	The public needs to know what assumptions or actions by others must be in place if the plan is to be successful.	Although assumptions can be an important piece of information, we made a decision not to go to that level of detail in this plan. Some of these assumptions are found in the introduction to the plan, others in a revised RL strategic plan currently under development, work plans, various presentations, etc.
G-35	<ul style="list-style-type: none"> • Money will be a big issue. • Nevada may not accept Hanford's waste -- then what? 	<ul style="list-style-type: none"> • We believe the plan is achievable with slightly elevated funding, based on support by employees, regulators and communities, and good contracting decisions. • The plan assumes a geologic repository will be licensed and will accept Hanford's high-level waste.
G-36	How do we judge progress on the plan? I want an annual score card that shows progress.	We agree; measuring progress was a common theme of several commenters. RL plans to present a "scorecard" soon to employees and stakeholders. Part of the work being done under the Hanford 2012 plan will be the basis for the annual commitments on which the scorecard is based.
G-37	The plan should include a statement to support waste minimization and pollution prevention through recycling, reuse, or recovery.	This comment makes an important point, but is more appropriate for the RL Strategic Plan, which is currently being developed. We have forwarded it to the RL Mission Planning Division.
G-38	How are you addressing staff management in light of the change/redirection of work scope and priorities? How will RL retrain and retain the workforce?	Good point. RL is setting the objectives through this plan and contracting strategies and expects the contractor, working with its employees and labor, to make necessary adjustments.
G-39	<ul style="list-style-type: none"> • Impression is that DOE isn't serious about tank waste cleanup because it is barely mentioned. • Resources for peripheral cleanup projects could be shifted to tanks after 10 years. 	<ul style="list-style-type: none"> • ORP's mission is more fully incorporated into the final publication of the plan. However, fundamental to Hanford 2012 is our commitment to ensuring RL provides required infrastructure, certain administrative services, etc. to ensure the vitrification plant stays on schedule. • The goal is to shrink the Site to about 75 sq. miles in the Central Plateau. This will allow all funding to be focused on Central Plateau cleanup issues.
G-40	We are wasting time/money on repackaging items such as light bulbs or a punctured can of cleaner.	Although we strive to be reasonable in the interpretation of regulations, some are undoubtedly interpreted broadly and may

		seem ridiculous. Without challenge, they will not change -- question your management about what seems ridiculous to you.
G-41	<ul style="list-style-type: none"> I am leery about government funding to support the goals. No mention of the Fast Flux Test Facility (FFTF) -- it should be maintained. 	<ul style="list-style-type: none"> The emphasis of this cleanup plan is to ensure long-term funding by making real, visible progress by 2012. We hope it will provide the basis for stable funding of slightly above fiscal year '01 levels for the long term. As we point out in the final plan, the Secretary will make a final decision on FFTF in January, 2001.
G-42	Good luck on funding requests. Some of the work identified in the draft would have been done in the '70s if Congress had provided funding.	The emphasis of this cleanup plan is to ensure long-term funding by making real, visible progress by 2012. We hope it will provide the basis for stable funding of slightly above fiscal year '01 levels for the long term.
G-43	A highly disciplined integrated management system is needed as defined in DOE Order 4700.1.	Good and insightful comment. Although DOE Order 4700.1 has been superceded by DOE Order 430.1A, "Life-Cycle Asset Management" and the newly issued DOE Order 413.3, "Program and Project Management for the Acquisition of Capital Assets," the principles in the Order you cite are still in effect. For the last year, and continuing in fiscal year '01, RL is developing an integrated management system that rigorously analyzes requirements such as those in the above Orders and documents the appropriate business processes for RL staff to follow that will ensure compliance with these requirements. This analysis also ensures that appropriate requirements are applied to our prime contracts. The resulting management systems and processes will help ensure consistent, repeatable results and more effective leadership by RL staff.
G-44	<ul style="list-style-type: none"> Meet all Tri-Party Agreement (TPA) milestones. Support acceleration of immediate hazard remediation projects, those with greater levels of risk. 	<ul style="list-style-type: none"> We agree. The plan's reprioritization of some of the cleanup work at Hanford adopts or accelerates most TPA milestones. We will enter negotiations with the regulators to modify others if necessary, which will include a public involvement process. We are committed to completing the highest risk priorities, like removing spent nuclear fuel and stabilizing

	<ul style="list-style-type: none"> • Allow for reuse/diversification of local community. 	<p>plutonium, under this plan.</p> <ul style="list-style-type: none"> • The Future outcome is how we plan to help the local community to diversify and support national goals in science and technology.
G-45	<ul style="list-style-type: none"> • Provide better description of the implications of the National Monument designation. • Add USFWS to the Tri-Party Agreement (TPA). • Assure cleanup criteria will protect fish and wildlife. • Address groundwater cleanup in a separate section. • Biota monitoring should be done. • DOE should establish and fund a multi-agency biological technical assistance group 	<ul style="list-style-type: none"> • We are working with the US Fish and Wildlife Service (USFWS) to coordinate decision-making and planning in Monument areas. There will be a separate public process to help make those land use decisions. • The TPA is a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) regulatory compliance document. • We are currently meeting standards that protect fish, wildlife, and their habitat. CERCLA and other environmental laws that apply to the Hanford Site require these standards. • Our Groundwater Vadose Zone Integration Project is the place to go for more information. Related documents can be found on the Internet at http://www.bh-erc.com/vadose/docs.htm. • Ecological monitoring <i>is</i> being conducted by RL and its contractors as well as by other agencies such as the Washington Department of Fish and Wildlife. RL and its contractors annually monitor and conduct studies on the ecology of the Site and how cleanup activities could be affecting the flora and fauna. • The function of a biological technical assistance group (BTAG) is to support the Environmental Protection Agency (EPA) in its Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) decision-making process. The responsibility for establishing such a team rests with the EPA. EPA has recently stated that "a BTAG would compete for already limited funding with the Hanford Natural Resource Trustee Council* and hence may not

		<p>serve to expand the role of Trustees in the decision process, but reduce their involvement Site-wide...EPA does not believe another forum for these issues, outside the Hanford Natural Resource Trustee Council, is necessary." We agree with EPA.</p> <p>*The Hanford Natural Resource Trustee Council is a multi-agency organization to address issues related to contaminant impacts on natural resources at Hanford.</p>
G-46	Clean up priorities should be risk-based	Risk is one way to prioritize projects; opportunity, for example, is another. We remain committed to completing the highest risk activities, like removing spent nuclear fuel and stabilizing plutonium, under this plan.
G-47	DOE should ensure that cultural and natural resources are being protected and biological monitoring is done	RL is committed to protecting cultural resource. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) establishes cleanup standards and the Environmental Protection Agency ensures we meet them.
G-48	<ul style="list-style-type: none"> • How will RL accelerate cleanup if it doesn't obtain a 10% budget increase? • Don't delay work with urgent risks (e.g. tanks); don't shift away from risk-based cleanup decisions. • How will DOE address groundwater cleanup? • How does the plan impact the Tri-Party Agreement (TPA)? 	<ul style="list-style-type: none"> • RL got a 5% increase in funding in fiscal year '01, so we have achieved half of our goal. We will do the best we can with what we get and hope our contractors can find additional savings. • This plan does not impact our commitment to completing the highest risk activities, like the tank waste vitrification project (which is funded separately through the Office of River Protection), removing spent nuclear fuel, and stabilizing plutonium. • Our Groundwater Vadose Zone Integration Project is the place to go for more information. Related documents can be found on the Internet at http://www.bhimerc.com/vadose/docs.htm. Also, under the provisions of the Tri-Party Agreement (TPA), there is a process called "Remedial Investigation" or "Superfund Process" to address groundwater cleanup. • The plan's reprioritization of some of the cleanup work at Hanford adopts or accelerates most TPA milestones. We

		will enter negotiations with the regulators to modify others if necessary, which will include a public involvement process.
G-49	<ul style="list-style-type: none"> • Include a list of "trade-offs". • Explain impacts on the Tri-Party Agreement. • Explain how RL plans to report back progress to its stakeholders and the public. 	<ul style="list-style-type: none"> • The "trade-offs" in the plan are reducing the number of waste sites characterized and delaying remediation of those in the Central Plateau (200 Area), since the tanks will not be resolved in the short term anyway. • The plan's reprioritization of some of the cleanup work at Hanford adopts or accelerates most TPA milestones. We will enter negotiations with the regulators to modify others if necessary, which will include a public involvement process. • RL plans to present a "scorecard" soon to employees and stakeholders. Part of the work being done under the Hanford 2012 plan will be the basis for the annual commitments on which the scorecard is based.
G-50	<ul style="list-style-type: none"> • Include a list of "tradeoffs". • How will the Tri-Party Agreement (TPA) be impacted? • Include a "contact" name for questions or additional information. • Explain how RL will report back to its stakeholders and the public on progress made. 	<ul style="list-style-type: none"> • The "trade-offs" in the plan are reducing the number of waste sites characterized and delaying remediation of those in the Central Plateau, since the tanks will not be resolved in the short term anyway. • The plan's reprioritization of some of the cleanup work at Hanford adopts or accelerates most TPA milestones. We will enter negotiations with the regulators to modify others if necessary, which will include a public involvement process. • Good suggestion. We have provided the address and phone number of the Office of Intergovernmental, Public, and Institutional Affairs on the back of each piece of the plan. • Measuring progress was a common theme of several comments. RL plans to present a "scorecard" soon to employees and stakeholders. Part of the work being done under the Hanford 2012 plan will be the basis for the annual commitments on which the scorecard is based.
G-51	<ul style="list-style-type: none"> • Plan activities must not impact other 	<ul style="list-style-type: none"> • We agree. The plan does not impact

	<p>high priorities (vitrification, protecting the river, the 618-10 and -11 burial grounds, Plutonium Finishing Plant, etc.).</p> <ul style="list-style-type: none">• The plan does not resolve concerns about contaminated groundwater. • DOE must commit to expedite technology development for the 618-10 and -11 burial grounds.	<p>progress on those top priorities.</p> <ul style="list-style-type: none">• Our Groundwater Vadose Zone Integration Project is the place to go for more information. Related documents can be found on the Internet at http://www.bh-erc.com/vadose/docs.htm.• We agree. A top technology request for RL is assistance with remote-handled waste.
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RESTORE THE RIVER CORRIDOR (R):

SHADED AREAS INDICATE PLANTEXT

	COMMENT	DATE RESPONDED
R-1	<ul style="list-style-type: none"> • By 12/31/00-aren't these plans dependent upon Congressional plus-ups (budget increases) for FY 01? • By 12/31/00 - references to Fish & Wildlife management of DOE control of National Monument land is confusing. • By 12/31/02-should we plan for recreational opportunities when we can't meet TPA milestones? Would it be better to get Congressional direction to do these things? 	<ul style="list-style-type: none"> • No, however RL got 5% increases for the Plutonium Finishing Plant, Spent Nuclear Fuel, and Interim Safe Storage in fiscal year '01 and will seek slightly more for fiscal year '02. • We agree and clarified this in the final plan. The US Fish and Wildlife Service (USFWS) is about to undertake a new planning process for the Hanford Reach National Monument. The mechanisms for RL cooperation are still being developed with the USFWS. An important feature of the designation of the Monument is that it requires a management plan, including full public participation, prior to making any permanent recreational decisions. Whatever happens in the Monument will be a collaborative effort of the two federal agencies. • For the last 50 years, DOE has had the natural resource trustee responsibility for the lands of the River Corridor. The President directed the Secretary of Energy to “manage the...area to protect these important values where practical” and to “consult with the Secretary of the Interior on how best to permanently protect these objects, including the possibility of adding lands to the monument as they are remediated.” Direction from Congress or the President does not necessarily come with funding. Congress expects RL to manage the remediation of the Hanford Site safely, and cost-effectively, with the funds that have been allocated. We believe that by coordinating the River Corridor remediation as one large project, we will gain efficiencies, and reduce the life-cycle costs. Coordination with the U.S. Fish and Wildlife through the River Corridor project seems to be the best way to accommodate all of RL's customers, including the other Tri-Party Agreement agencies.
R-2	By 12/31/02, provide recreational	We agree. The US Fish and Wildlife

	<p>opportunities, availability of 21 miles of river shore-How does DOE reconcile recreational opportunities with the National Monument requirements? DOE should say that agreements will be developed with US Fish and Wildlife Service.</p>	<p>Service (USFWS) is about to undertake a new planning process for the Hanford Reach National Monument. The mechanisms for RL cooperation are still being developed with the USFWS. An important feature of the designation of the Monument is that it requires a management plan, including full public participation, prior to making any permanent recreational decisions. Whatever happens in the monument will be a collaborative effort of the two federal agencies.</p>
R-3	<p>Don't cocoon remaining reactors--they have historical significance.</p>	<p>We agree the reactors have historical significance, and as a result, RL has established a Historic Buildings Task Group to identify, inventory, and evaluate all historic buildings and structures on the Hanford Site. A 1996 Programmatic Agreement (PA) between RL, the Washington State Historic Preservation Office and the Advisory Council on Historic Preservation, addresses the historical significance of the buildings constructed during the Manhattan Project and Cold War Era of Hanford's operational history. In the PA only B Reactor, K West Reactor and N Reactor were identified as historically significant enough to be eligible for mitigation, which can be anything from simply documenting their existence to preservation. RL is evaluating the feasibility of a B Reactor Museum through the preparation of an Engineering Evaluation/Cost Evaluation under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), which will undergo public review. The RL Site Preservation Officer examines other Cold War Era facilities before they can be modified in any manner that might affect their historical significance. Cocooning the remaining reactors (i.e., those other than B) is necessary for reduction of surveillance and maintenance costs and assured environmental contamination control.</p>
R-4	<p>Finish the Vernita boat launch project</p>	<p>As an outcome of the Hanford Comprehensive Land Use Plan Environmental Impact Statement, RL has been involved in a planning effort with the State of Washington, Grant County, and</p>

		<p>Benton County that included the Vernita boat launch area. However, the effort was suspended with the establishment of the Hanford Reach National Monument. The US Fish and Wildlife Service (USFWS) is about to undertake a new planning process for the Monument in which the Vernita boat launch project could be considered. The mechanisms for cooperation are still being developed with the USFWS. In addition, designation of the Monument requires a management plan, including full public participation, prior to making any permanent recreational decisions. Whatever happens in the monument will be a collaborative effort of the two federal agencies.</p>
R-5	<p>By 12/31/02, increase public access - what projects exactly, and where?</p>	<p>Much of the future land use planning for the Hanford Site was established in the Hanford Comprehensive Land-Use Plan Environmental Impact Statement (HCP EIS) (DOE/EIS-0222, at http://www.hanford.gov/eis/hraeis/hraeis.htm). In the EIS the US Fish and Wildlife Service (USFWS) and eight other government agencies cooperated with DOE to project a future for the Hanford Site. This EIS states that the B-Reactor will eventually become a museum/recreational complex. RL has also explored the feasibility of providing public access to boat launches and constructing a bike path to the Hanford Town Site. These feasibility studies have been primarily focused on “use alternatives” after the lands are released from the National Priorities List. RL’s primary goal is to remediate and cleanup the Columbia River Corridor to Tri-Party Agreement approved standards that will allow public access.</p>
R-6	<ul style="list-style-type: none"> • By 12/31/10, remediate solid waste sites - burial grounds that fall outside accelerated schedule should be identified (618-5, -1, and -2). • By 12/31/10, delete 100 & 300 Areas from EPA's NPL - What about sites like the 618-10 and -11 burial grounds? 	<ul style="list-style-type: none"> • There are too many other burial grounds to list in Hanford 2012, however <i>all</i> 300 Area burial grounds, with the exception of 618-10 and -11 will be cleaned up in this cleanup plan. • The 618-10 and -11 burial grounds are addressed in the introduction and throughout the plan. These explain the challenges they pose and our timeline for decision-making.

R-7	By 12/31/00 Fish and Wildlife will be managing National Monument - some of the goals cannot be accomplished without US Fish and Wildlife (USFWS) participation (e.g. increased public access, availability of 21 miles of river shore).	You are correct. The USFWS is about to undertake a new planning process for the Hanford Reach National Monument. The mechanisms for RL cooperation are still being developed with the USFWS. An important feature of the designation of the Monument is that it requires a management plan, including full public participation, prior to making any permanent recreational decisions. Whatever happens in the Monument will be a collaborative effort of the two federal agencies.
R-8	Don't destroy 300 Area labs. Turn them into enterprise companies searching for private work. Better yet, turn <i>all</i> Hanford labs into a single company that would eventually be privatized so that their capabilities could be optimized.	The suggestion to turn the 300 Area labs into enterprise companies has been explored but abandoned because of the lack of response by private industry. We will continue to evaluate other options, including your consolidation/privatization suggestion.
R-9	Safety Analysis Reports (SARs) assume specific site boundaries to determine accident consequences. How does that fit with increased public access?	You are correct, each facility or hazard would have to re-evaluate risk to the public based upon proximity to new boundaries.
R-10	Under: by 12/31/05, 4 th bullet, change to "Deactivate <i>two of</i> the 300 Area's radiological labs".	We decided to remove this bullet entirely because the two radiological labs that <u>are</u> scheduled for destruction (324 and 327) won't be completed until fiscal year '06 or '07.
R-11	<ul style="list-style-type: none"> Accelerated Closure Project for the 300 Area has been asked to identify impacts to the current schedule of a 3-yr. delay -- won't be done in a decade if delayed. Put some seed money into the project to show some progress. 327 Bldg. deactivation could be accelerated. 	<ul style="list-style-type: none"> We agree and have changed the schedule accordingly and re-named the plan to reflect that change. Good idea, there are plans to show some immediate progress in the 300 Area. This is a good idea and likely to happen.
R-12	<ul style="list-style-type: none"> US Fish and Wildlife (USFWS) doesn't have a recreational use mandate so the Monument land will most likely be a wildlife refuge. If so, why clean up to "unrestricted" levels when clean up to "restricted" levels would be cheaper and faster. 	<ul style="list-style-type: none"> This comment has two parts. First, until USFWS public involvement process is complete, it would be presumptuous to assume that the whole Monument will be brought into the National Wildlife Refuge System. In its Strategic Plan, 1999-2003, USFWS states "By 2003... wildlife dependent recreational visits to National Wildlife Refuges...will have increased by 10%." To accomplish this goal, USFWS will "develop and improve public use

	<ul style="list-style-type: none"> The 100 Area Burial Grounds Focused Feasibility Study (FFS) provides a basis to disposition solid waste burial sites on the river corridor with huge potential cost savings. 	<p>facilities such as ...providing new and better wildlife dependent recreational opportunities...". Second, RL is cleaning up the 100 Areas to an "unrestricted rural residential" scenario because during the public comment process for the 100 Areas Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Records of Decision (RODs). The public supported the "unrestricted rural residential" scenario. The "unrestricted" rural residential scenario contains a restriction against excavation below 15 feet, e.g. the site is clean enough for <u>unrestricted</u> use given the expected <u>rural residential</u> activities, but not clean enough to establish a gravel pit using materials from below 15 feet. The 300 Area is being cleaned up to an "unrestricted industrial" scenario that has more post-clean up restrictions than the "unrestricted rural residential" scenario. Because each of the 100 Area CERCLA RODs are interim, there is a possibility that the cleanup scenario could change with future public input.</p> <ul style="list-style-type: none"> One of the FFS options was to disposition solid waste sites by "capping" them in place as your comment suggests, however the remedy selected in the subsequent ROD was to remove the waste, treat it as appropriate, and dispose of it (called RTD). The Tri-Party agencies agreed that RTD was appropriate and in the long run, less costly than characterizing and then capping the waste sites. Total life-cycle cost to RTD was estimated at approximately \$600M, while life-cycle costs for capping the waste in place was estimated at approximately \$1.9B.
R-13	Areas for public access should not be developed commercially and boat launches and paved areas kept to a minimum to preserve habitat for animals.	The Hanford Comprehensive Land Use Plan Environmental Impact Statement (http://www.hanford.gov/eis/hraeis/hraeis.htm) includes the concept of maintaining a "light touch" on the land by

		dividing recreational land use into High Intensity Recreation and Low Intensity Recreation, and by limiting infrastructure development, such as paved parking lots, to High Intensity Recreation. Late last year the Hanford National Monument designation was made and the US Fish and Wildlife Service (USFWS) will develop a management plan, including full public participation, prior to making any permanent recreational decisions. You will have an opportunity to make your preferences known during the public involvement process.
R-14	Does the proposed reduction in size change the location of the closest off-site receptor?	Changes to site boundaries would require assessments to assure the public would not be put at risk in the case of an accident.
R-15	<ul style="list-style-type: none"> By 12/31/00...Move...1000 MTU uranium -- cannot currently be done (we <u>can</u> move all UO3 powder by that date). Problems moving uranium billets to Ohio and uranium fuels to the 200 Area include Safety Analysis Report approval, winter, funding. 	<ul style="list-style-type: none"> Good comment, we will change the plan to indicate that we've moved 667 metric tons of uranium trioxide. The remaining uranium billet material will be moved in fiscal year '01 but this will not be mentioned in the plan.
R-16	Explain the relationship between the River Corridor and the National Monument.	The US Fish and Wildlife Service (USFWS) is about to undertake a new planning process for the Hanford Reach National Monument. The mechanisms for RL-USFWS cooperation are still being developed. An important feature of the designation of the Monument is that it requires a management plan, including full public participation, prior to making any permanent recreational decisions. Whatever happens in the Monument will be a collaborative effort of the two federal agencies.
R-17	Have agricultural uses been considered?	Agricultural land use per se is not allowed for under the Comprehensive Land Use Plan or the National Monument designation. However, the exercise of treaty rights or wildlife management could conceivably result in activities that <i>appear</i> agricultural, like gathering roots, pasturing horses, or growing poplar trees for bioremediation purposes.
R-18	Don't destroy buildings unnecessarily. 300 Area could be a commercial/light-industrial park with trees, gardens,	RL sought private industry interest in development of the 300 Area labs but abandoned the idea due to the lack of

	restaurants, etc. Refurbish existing buildings, remove steam pipes.	response. We will continue to evaluate other options, including your consolidation/privatization suggestion.
R-19	<ul style="list-style-type: none"> • By 12/31/00, 1st bullet -- Plan should make role of US Fish and Wildlife Service (USFWS) clear regarding authority over waste sites. • By 12/31/00, 3rd bullet -- Does the level of cleanup include NPL (National Priorities List) delisting and WIDS (Waste Information Data System) reclassification by 12/31/00, or removal of hazards so members of the public would not be endangered? 	<ul style="list-style-type: none"> • RL will maintain control of waste sites until hazards are removed. Greater detail on the role of USFWS is provided in the response to G-45, R-1, and R-4 above. • WIDS reclassification <u>could</u> have been accomplished by 12/31/00 along with removal of the hazards, but EPA, Ecology, and RL determined the hazards (an underground petroleum storage tank at an old fruit warehouse and an old smudge pot oil stain) were minimal, and since no risk was associated with these sites, there was no need to expedite the administrative process to delist or reclassify them. The parties to the Tri-Party Agreement feel that NPL delisting should wait until the majority of the 100 Area is remediated under the 2012 plan. Other required actions such as a site review by the regulatory agencies and well decommissioning have already taken place. (See R-21 below for additional information on WIDS.)
R-20	<ul style="list-style-type: none"> • Develop a means to measure progress towards goals. • Don't allow the dates to become the means of enforcement without supplying adequate resources. 	<ul style="list-style-type: none"> • Measuring progress was a common theme of several comments. As a result, RL plans to present a "scorecard" soon to employees and stakeholders, which will document progress or failure to meet key commitments. Part of the work being done under the Hanford 2012 plan will be the basis for the annual commitments on which the scorecard is based. • We agree. The emphasis of this cleanup plan is to ensure long-term funding by making real, visible progress by 2012. We hope it will provide the basis for stable funding of slightly above fiscal year '01 levels for the long term.
R-21	<ul style="list-style-type: none"> • Dose consequences and SARs must be revised requiring significant resources; transportation accident frequencies must be revised (also in SARs). 	<ul style="list-style-type: none"> • Any changes in site boundaries will require re-evaluation of risk. The comment is a good one -- current cost estimates for 14 planned SAR updates

	<ul style="list-style-type: none"> • Is development covered under an EIS? • Are we <i>sure</i> we know where all waste sites are prior to development? • Is all corridor land in the National Monument, or will it be sold? 	<p>is approximately \$10M.</p> <ul style="list-style-type: none"> • Much of the future land use planning for the Hanford Site was established in the Hanford Comprehensive Land-Use Plan Environmental Impact Statement (HCP EIS) (DOE/EIS-0222, http://www.hanford.gov/eis/hraeis/hraeis.htm). In the EIS, the US Fish and Wildlife Service (USFWS) and eight other government agencies cooperated with DOE to project a future for the Hanford Site. Additional information on land use will be found in the response to comment R-5 above. • The Waste Information Data System (WIDS) gives the location of all of the known waste sites located on the Hanford Site. All of the waste sites reported in WIDS will be remediated prior to any property being developed. Given the size of the Hanford Site there is always the possibility that a waste site exists that was never reported to WIDS. • All River Corridor is not in the National Monument, and there are no plans for sale of land.
R-22	Under 12/31/05, 4 th bullet, RL will deactivate 2 rad labs -- will the 2 labs be decommissioned to "slab on grade"?	The buildings will be taken down to 3 feet below slab unless contamination is found, in which case they will go further.
R-23	Schedules need to be revised per the recent RL Schedule Options Study Group results that say corridor won't be completed till 2012.	Schedules have been revised and are reflected in the new name for the plan: Hanford 2012.
R-24	Most of 300 Area schedule appears based upon the Accelerated Completion Project, but FDH/BHI have suggested a 2-year delay -- start decade in '02?	Schedules have been revised and are reflected in the new name for the plan: Hanford 2012. Fiscal year '02 was the first year by which we had hoped to secure funding to implement the plan.
R-25	<ul style="list-style-type: none"> • DOE has no money or time to upgrade facilities to allow closer public access (see Safety Analysis Reports). • Have the regulators accepted the B Reactor Museum -- what about the ROD that states it will be cocooned? 	<ul style="list-style-type: none"> • All requirements for public access safety will be met before allowing such access. • The Environmental Protection Agency (EPA) is supportive of the possibility of a museum at B Reactor. There is no requirement for cocooning, but EPA must look at what kind of hazard mitigation is necessary. The DOE National Environmental Policy Act (NEPA) Record of Decision (ROD) for

	<ul style="list-style-type: none"> • Goal to ensure 100/300 Area deletions from the National Priorities List (NPL) is vague and poorly conceived -- it says nothing about whether sites are clean. 	<p>the Decommissioning of Eight Surplus Production Reactors at the Hanford Site EIS (DOE/EIS-0119) (Sept. 16, 1993) recognized the historical significance of the B Reactor, and provided alternatives to 75 year interim safe-storage. On April 3, 1992, the National Park Service entered the B Reactor in the National Register of Historic Places. Specific actions to mitigate the cumulative impacts of decommissioning on the historic preservation of B Reactor will be determined later. In response to public comment, the more recent November 12, 1999 (FR Volume 64, Number 218) Hanford Comprehensive Land-Use Plan Environmental Impact Statement (HCP EIS) (DOE/EIS-0222), solidified RL's direction to establish the B Reactor as a museum, including the statement, "DOE will allow the B Reactor to be converted into a museum and the surrounding area will be made available for museum-support facilities."</p> <ul style="list-style-type: none"> • We are going to ensure significant cleanup issues are addressed and the majority of the 100 and 300 Areas are eligible for the EPA to delete them from the National Priorities List.
R-26	<ul style="list-style-type: none"> • Subdivide the Corridor into 1) recreational corridor next to the river and 2) an interior buffer around the plateau. 	<ul style="list-style-type: none"> • The Hanford Comprehensive Land Use Plan Environmental Impact Statement (HCLUP EIS) includes the concept of maintaining an interior buffer zone around the plateau by relegating High Intensity Recreation and Low Intensity Recreation land uses to sites near the river. The buffer zone you suggest is compatible with conservation uses because the only fulltime "users" are wildlife. RL will remain the landlord of the interior and manage according to the HCLUP EIS. For the quarter-mile river strip and the sand dunes (as delineated in the Hanford National Monument proclamation), the US Fish and Wildlife Service (USFWS) is about to undertake a new planning process where the Vernita boat launch

	<ul style="list-style-type: none"> • Work with groups such as the Boy Scouts to encourage public use of recreational areas; a campground could be a venue for informative displays on cleanup; consider a Visitor Center near 300 Area. 	<p>project and other recreational corridor uses could be considered.</p> <ul style="list-style-type: none"> • The USFWS is about to undertake a new planning process for the Hanford Reach National Monument. The mechanisms for RL-USFWS cooperation are still being developed. An important feature of the designation of the Monument is that it requires a management plan, including full public participation, prior to making any permanent recreational decisions. This public involvement process will provide you an opportunity to make your suggestions.
R-27	<ul style="list-style-type: none"> • The river corridor doesn't need restoring. • The US Fish and Wildlife Service (USFWS) isn't a good steward. • Plan doesn't adequately address public access. • "Cleanup" by your definition is too rigid. 	<ul style="list-style-type: none"> • The river corridor contains waste sites that are listed in the National Priorities List (NPL). The types of waste that are present are required to be remediated by the Comprehensive Environmental Response and Compensation Liability Act. • We are developing mechanisms for RL-USFWS cooperation. Both agencies will strive to be good stewards of the Monument. • Public access issues are yet to be determined. See the responses to G-45 and R-1 above. • Cleanup is not defined in the 2012 Plan, however it is used in several areas to describe actions that are being taken to reduce or minimize the impact, or potential impact, of hazardous substances to humans or the environment. "Remediation" is the terminology most often used within the industry, however this term also implies that "cleanup" to pre-existing conditions can never really be accomplished. In communicating with the public, "cleanup" has been shown to best convey RL's programmatic intent.
R-28	<p>I question the value of the B Reactor museum -- cost vs. public use.</p>	<p>An Engineering Evaluation/Cost Analysis (EE/CA) is under development to help RL and its regulators determine the future use of B Reactor. The EE/CA is a decision making tool utilized under the Comprehensive Environmental Response,</p>

		<p>Compensation and Liability Act (CERCLA) process, and will provide cost information for different clean up alternatives (including long-term surveillance/maintenance, interim safe storage, or museum-related use). The EE/CA process will include an active public involvement period and will be completed by September 2001. As part of the evaluation, the cost of each alternative will be presented to aid the decision makers in determining the trade-off between continued maintenance cost and public use and perceived value. RL has been working with the B Reactor Museum Association to determine criteria for preserving the B Reactor as a National Historic Site, or as a “Cold War Era Museum.”</p>
R-29	Suggest preservation of the White Bluffs Bank and Hanford High School	<p>Since 1987 the cultural resources program at Hanford has recorded site-wide historic archaeological locations including an assortment of farmsteads, corrals, and dumps. In addition, in 1995, large-scale surveys of the 100 and 200 Areas resulted in the recording of many more sites. Preservation of the White Bluffs Bank, Hanford High School, and other properties from the pre-Hanford Site era, has been proposed to RL by several interested groups, and with the establishment of the Hanford National Monument, the recreational aspect of the Hanford Site has come to the forefront. The US Fish and Wildlife Service is about to undertake a new planning process for the Hanford National Monument where preservation of the White Bluffs Bank and Hanford High School could be considered. Designation of the Monument requires a management plan, including full public participation, prior to making any permanent recreational decisions.</p>
R-30	<ul style="list-style-type: none"> Needs better definition of final end conditions. 	<ul style="list-style-type: none"> This is a good idea and we will address end states in additional planning documents, including our Long Term Stewardship plan, which is being developed. That is an area in which RL is seeking public participation in helping establish end states.

	<ul style="list-style-type: none"> • 300 Area should be developed as laboratory and industrial area 	<ul style="list-style-type: none"> • The suggestion to turn the 300 Area labs into enterprise companies has been explored but abandoned because of the lack of response by private industry. We will continue to evaluate other options.
R-31	<ul style="list-style-type: none"> • The 618-10/11 burial grounds should be on the map and excluded from the Monument. • DOE must coordinate with US Fish and Wildlife Service (USFWS) to ensure USFWS pre-acquisition standards are met. • USFWS must have a larger role in the B Reactor Museum project if the museum will eventually be managed by USFWS. 	<ul style="list-style-type: none"> • Good suggestion -- we will identify these burial grounds in the final revision. The color map makes it clear that neither burial ground is in the Monument. • Contaminant cleanup standards are established by RL, the Environmental Protection Agency, and the State of Washington, primarily based upon federal and state cleanup laws. We are working with USFWS to address contaminant concerns. • Collaboration between RL and USFWS includes the B Reactor Museum project. Please see previous responses (G-45, R-1, R-4) for additional information on the role of USFWS and the National Monument.
R-32	<ul style="list-style-type: none"> • The plan is not consistent with previous commitment to clean up soil sites on the river by 2011 and Tri-Party Agreement (TPA) requirement to allow unrestricted access to Monument land by 2018. • Plan allows public access to areas that pose a public health risk. • Plan does not consider state cleanup requirements under Washington State's Model Toxic Control Act (MTCA). • Plan should include 618 burial grounds. • Plan circumvents requirements for public involvement in TPA cleanup budget priorities, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and National Environmental Policy Act (NEPA) processes. • Decisions on the prime contract do the 	<ul style="list-style-type: none"> • The TPA requires cleanup by 2018; thus the Hanford 2012 Plan accelerates cleanup by 5 years. • Each facility or hazard would have to re-evaluate risk to the public based upon proximity to new boundaries. • MTCA issues continue to be addressed and discussed by RL and the Washington State Department of Ecology. • The 618 burial grounds will not be remediated by 2012, but will continue to be carefully monitored and if earlier action is required, RL will take it. • To the contrary, changes to the TPA, and the National Monument Plan both call for a public involvement process (see responses to G-44, R-12, R-13, R-28). All TPA agencies are committed to ensuring the public is involved as required by law. • TPA, CERCLA, NEPA don't require

	<p>same thing.</p> <ul style="list-style-type: none"> • Plan defers groundwater remediation in 100/300 Areas. • RL plans new or continuing nuclear process missions in the 300 Area. 	<p>public involvement for decisions on the prime contract.</p> <ul style="list-style-type: none"> • Final remediation plans for groundwater won't be decided until after contaminated soil sites are completed. • There are no new nuclear process missions in this plan; ongoing activities will remain unaffected by the Hanford 2012 plan..
R-33	<ul style="list-style-type: none"> • Groundwater remediation must include vadose zone remediation. • Large canyons may not be suitable for use as disposal facilities. • Monitoring movement of contaminants in the vadose zone is imperative. • Pre-determination of canyon closure methods avoids the regulatory process. • Burial grounds, including 618, must be better characterized before cleanup and <i>before</i> 2010. • Do characterization, then contain the source of contamination, <i>then</i> cleanup. • "Closure contract" concept won't work unless characterization and cleanup standards are clearly stated. 	<ul style="list-style-type: none"> • We agree. Groundwater remediation is addressed in the revised River Corridor piece. • This is correct-- the large canyons may <i>not</i> be suitable, and we are exploring options. • We agree. Post-remediation plans will include appropriate monitoring of contaminants. • Closure methods for the canyons are not pre-determined. RL is proceeding with a program called the Canyon Disposition Initiative (CDI) under the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Under this initiative, RL will determine the final disposition of one of the canyons, called U Plant. A feasibility study will evaluate several alternatives to determine feasible options. The public will have the opportunity to comment on the final determination, called a Record of Decision (ROD). We are working closely with our regulators on the CDI. • We agree that the 618 burial grounds must be better characterized. As clarified in the River Corridor section, we will meet Tri-Party Agreement requirements to establish a remediation schedule by 2002 and complete remediation as scheduled sometime after 2012 unless ongoing monitoring requires earlier action. • That is generally the process we follow. • We are working with our regulators and the public to finalize cleanup standards, but CERCLA provides

	<ul style="list-style-type: none"> • Aquatic studies are needed. • Mitigation of natural resources should be part of the plan. 	<p>contaminant cleanup standards.</p> <ul style="list-style-type: none"> • Aquatic studies and ecological monitoring are being conducted by RL and its contractors as well as by other agencies such as the Washington Department of Fish and Wildlife. RL and its contractors annually monitor and conduct studies on the ecology of the river and how cleanup activities could be affecting the flora and fauna. The Washington Department of Health, in cooperation with Pacific Northwest National Laboratory, recently conducted extensive research on the ecology of the river shoreline adjacent to the N Reactor and associated N springs. RL has ongoing salmon research on the river in cooperation with Bonneville Power Administration. • Mitigation of biological resources is provided for under the Biological Resources Management Plan and its companion document Biological Resources Mitigation Strategy. A Minerals Management Plan is being written to handle activities concerning burrow pits for basalt, sand and gravel Cultural Resources, sometimes considered natural resources, will be mitigated under the Cultural Resources Management Plan.
R-34	Our Plan...By 12/31/00...cleanup of two square miles...public access to the...B Reactor -- this leaves the impression that the road between the boat launch and B Reactor will be paved. Please clarify.	We have removed this bullet from the River Corridor section of the plan. See G-45 and R-1 above for additional information about Monument planning.
R-35	What is the risk of deferring 200 Area and 618-10 and 618-11 burial ground cleanup?	We and our regulators believe the Hanford 2012 approach generally provides a comprehensive, logical plan for addressing 200 Area and 618-10 and 618-11 burial ground cleanup. Should any of us decide Hanford 2012 should be modified, we will do so.
R-36	Photo of 300 Area in 2010 is not consistent with photos in other RL publications.	You are correct and we have changed the photo. We have a series of "artists renditions" of the 300 Area and chose one for the draft plan that was different than one used in previous publications.

TRANSITION THE CENTRAL PLATEAU (P):

SHADED AREAS INDICATES PLAN TEXT

	COMMENT	DATE RESPONDED
P-1	To address...challenges we will...identify...high priority past waste disposal sites by 2002-aren't 618-10 and 618-11 excluded?	Yes, and we clarified that in the introduction and throughout the plan. As indicated in the River Corridor section, we will meet Tri-Party Agreement requirements to establish a remediation schedule by 2002 and complete remediation as scheduled sometime after 2012 unless ongoing monitoring requires earlier action.
P-2	Plan..to..complete Pu processing by 2005- I've also heard 2004--which is correct?	Any time before 2005 meets the goal, even if it turns out to be earlier (i.e. 2004).
P-3	Put the 427 Bldg in the 400 Area to use for something constructive; convert buildings instead of demolishing them.	Previous attempts to encourage private use of buildings have been unsuccessful to date, but we will continue to evaluate other options, including your suggestion.
P-4	<ul style="list-style-type: none"> • Our Plan...Identify and begin activities on waste disposal sites by 2002 - DOE has <i>already</i> identified and begun activities for high priority past waste disposal sites. Recommendation: Continue the clean up...using a "worst-first" approach. Gain...understanding of contamination...establish remediation decision framework by 2008. • Our Plan...Make...groundwater plume decisions by 2005 - This goal is premature, date should be 2010-2015. Recommendation: Develop strategy that supports how we will get remediation decisions on groundwater contamination plumes by 2005. 	<ul style="list-style-type: none"> • Good suggestion. We have changed the wording to indicate RL is engaged in an on-going characterization effort. We will gain the necessary and improved understanding of contamination in the Plateau subsurface, and by 2008, establish the remediation decision framework necessary to complete Plateau cleanup. • Good comment. We agree the date is premature and we need active source controls before final groundwater decisions can be made, sometime after 2015.
P-5	<ul style="list-style-type: none"> • Our Plan...Identify and begin activities on waste disposal sites by 2002 - This is OK for a goal but there is presently no funding. • Our Plan...Make...groundwater plume decisions by 2005 - The Environmental Protection Agency (EPA) can do it, but other decisions must be made first. E.g. one step toward decisions is to take action on high-priority sources so EPA can give DOE flexibility on groundwater concentration limits. Diffic ult to do by '05. 	<ul style="list-style-type: none"> • We hope to find sufficient funding to undertake this. • EPA expects to make these decisions by 2012 - 2015, when all soil sites are remediated.

	COMMENT	RESPONSE
P-6	<ul style="list-style-type: none"> • Outcome assumes 40 yrs to remediate - - change goal to 20-30 yrs for acceptable mitigation of tank waste. • Should be a higher priority on vadose zone. I suggest making decisions for remediation of plumes by 2003 and give a date by which groundwater contamination is contained or remediated. 	<ul style="list-style-type: none"> • Your comment refers to mitigation, and the plan refers to remediation -- not just mitigation. • 2003 is too early. We can't make final decisions on groundwater plumes until retrieval of tank waste is complete. We're currently working on interim measures. (per Mike Thompson)
P-7	Use large canyon facilities as permanent waste storage facilities, including regional hazardous waste disposal/treatment -- saves D&D costs	RL evaluates re-use alternatives as part of a Phase II Feasibility Study, or an Engineering Evaluation/Cost Analysis, as Required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). For example, the ongoing Hanford Chemical Processing facilities (Canyons) Phase II Feasibility Study will determine the final disposition of these massively constructed facilities. Three of the alternatives being evaluated are re-use of these facilities for long-term storage of low-level waste, including: 1) disposal of waste internal to the canyons, 2) disposal of waste internal and external to the canyons, and 3) disposal of waste into the processing cells, and then closure of the site with an engineered barrier. Two alternatives evaluated included: 1) complete removal of the facilities and disposal at another permitted land fill, and 2) partial dismantlement and collapsing the above grade structures in place and entombment with an engineered barrier.
P-8	Add a bullet to update the underground tank facilities infrastructure to meet 40-year design life.	Good idea, we have added it to the Central Plateau cleanup mission. Updating infrastructure has been proposed complex-wide and gained considerable DOE-Headquarters attention.
P-9	<ul style="list-style-type: none"> • Containerize and put K-Basin sludge into 224-T and deactivate T-plant, instead of retro-fitting T-plant, saving surveillance and maintenance dollars. 	<ul style="list-style-type: none"> • The 224-T facility was retrofitted in the mid-1980s to store plutonium and other transuranic (TRU) materials. It was originally used for TRU storage with the assumption that TRU wastes were going to the Waste Isolation Pilot Project (WIPP) in 1988. The facility's use for TRU storage was discontinued due to substandard configuration for

	<ul style="list-style-type: none"> • Workers at the Plutonium Finishing Plant (PFP) and K Basins are not working while waiting for clearances - let them work elsewhere while they wait (for example on the 300 Accelerated Closure Project). • Decouple the Plutonium Reclamation Facility (PRF) from PFP, freeing surveillance and maintenance money to be used elsewhere -- fix the clearance problem mentioned above. 	<p>operations (low roofs, inadequate elevator and structural interferences). The facility, starting from its construction in 1944, was never utilized as a Remote Handled (RH) TRU facility. The early use of the 221-T was as a bulk reduction facility to manage the RH TRU waste. The 224-T building is not constructed to manage RH TRU waste, either wet or dry. The Waste Encapsulation and Storage Facility (WESF) by the terms of its permit is only to be used for storage of the current non-TRU inventory. Activating WESF for a new TRU waste management activity could result in authorization basis, permitting, and operational problems.</p> <ul style="list-style-type: none"> • Workers are attending applicable, job-related training courses while they wait for clearances. Moving these employees to another project would require backfilling their original positions and starting the clearance process all over again. • As soon as all plutonium stabilization processes at PFP are running smoothly, RL will put more emphasis on accelerated deactivation at PFP, including PRF. The contractor is currently finding savings in the "minsafes" and surveillance and maintenance area. RL will continue to stress this activity. Without expensive changes in the security arrangement at PFP, uncleared workers could not help do work in PRF. FHI and PTH are working with RL to minimize the time required to get workers cleared.
P-10	Mention that we are consolidating site wide spent nuclear fuel (SNF) in its various forms (FFTF, NRF TRIGA, LWR and PWR Core 2/Shippingport) for storage at the 200 Interim Storage Area (ISA) site.	Consolidation of the SNF in the 200 Area was considered and is implied in the plan's references to storage on the Central Plateau. The Shippingport spent fuel currently stored in T-Plant will be placed into Multi-Canister Overpacks (MCOs) and stored in the Canister Storage Building (CSB); the remaining SNF (FFTF, NRF, etc.) will be placed in dry storage casks on the pads in the 200 Area ISA, which is adjacent to the CSB. This plan provides a

		high-level cleanup overview which doesn't allow space for this kind of detail.
P-11	What will happen to the solids left in the tanks?	Any residual waste remaining in the tanks after waste retrieval will be disposed in the same manner in which the tanks are disposed. The tanks and residual waste may be closed in place by filling the tanks with material (i.e., grout and/or gravel) that would inhibit waste migration and prevent tanks from caving in. Disposition of the tanks and residual waste will be determined through a public involvement process and will conclude with RL submitting a closure plan to the Washington State Department of Ecology for its approval.
P-12	"To modernize and operate" 3 rd bullet, 3 rd sub-bullet -- Unclear, the TWRS EIS and ROD have addressed disposal of cesium/strontium. If you mean storage for 10-20 years, until the vit plant, that's OK.	We've removed "prior to disposal" from this bullet.
P-13	<ul style="list-style-type: none"> Will any disposal sites be closed during the decade? If not, why not? Does clean up of "hundreds of inactive waste disposal sites" include B-Pond, cribs, French drains, etc? Plan should include a statement of the function of the final caretaker since some of the site will always be restricted. 	<ul style="list-style-type: none"> Yes. All sites where hazardous and radioactive waste was disposed of will be closed. Each waste site will have a clean-up verification package associated with it that will demonstrate the waste site has been remediated. However, a Final Record of Decision for the 100 Areas may not be completed during this time period. The waste sites that will be remediated include cribs, French drains, and some ponds. However, B-Pond is located in the 200 Area and all of the waste sites that are included in this plan are located in the 100 Area. We agree, and have added the words "in perpetuity" to the last bullet on the page to reinforce that monitoring and stewardship will continue indefinitely.
P-14	<ul style="list-style-type: none"> Under ...Mission Includes: 5th bullet, and To address, 3rd bullet, "Disposition or dispositioning" should be more clearly defined by end state vis a vis the canyons. Enumerate the "large canyons". 	<ul style="list-style-type: none"> We chose the word "dispositioning" because the end state has not yet been determined. The canyons will not be listed in this document because it does not reach that level of detail.
P-15	<ul style="list-style-type: none"> Tanks can be stabilized in place, slight leaks are not harmful. 	<ul style="list-style-type: none"> We assume your comment suggests <u>all</u> tank wastes (not just the residuals after

		<p>of with high level waste. This 17 metric tons is not suitable for fabrication into MOX fuel due to the complexity, time and cost involved in purifying the material. We believe this is a sound cost-benefit decision.</p> <ul style="list-style-type: none"> Your point is a good one, although we believe we look for opportunities to use "waste" as a resource. Through a process called Long-Term Stewardship, and by considering future missions at Hanford, RL continuously evaluates all resources to determine if they have any recycle or re-use value, as well as the return-on-investment ratio to recover and re-use resources. There are many examples where materials, equipment and major facilities have been re-utilized as valuable "resources." In the case of cleaning up contaminated soil sites and burial grounds, there is no economically feasible future use option, and the contaminants are a threat to humans, the environment (such as the vadose-zone soils and underlying groundwater), and the ecological systems that they come in contact with. RL has a regulatory driven mandate under the Tri-Party Agreement to take corrective and remediation actions under existing interim Records of Decision. In the case of "excess" or "surplus" facilities, RL evaluates re-use alternatives as part of a Phase II Feasibility Study, or an Engineering Evaluation/Cost Analysis, as required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). See an example in the response to P-7 above.
P-16	End condition needs definition -- suggests: establishment and federal operation as a comprehensive waste site and waste management system on the Plateau for handling, treating, storing, and permanently disposing of radioactive and nonradioactive material.	We agree we need much more work on end states. We will be developing opportunities for public involvement as we plan for long term stewardship, Monument protection, National Priorities List "de-listing", etc.
P-17	The Plateau in the proposal is larger than the version portrayed in the 9/99 final	Good observation. The map in the plan shows where we <i>want</i> to be in 2012. The

	Comprehensive Land Use Plan - Environmental Impact Statement (CLUP-EIS). Which is accurate?	CLUP map is smaller and shows where we will be at a later date. The plan map in no way changes RL's obligations under the CLUP-EIS.
P-18	Address remote-handled and transuranic (TRU) waste.	We indicate in the plan that we will begin treatment of remote-handled TRU by 2013. This document is a high-level cleanup plan that doesn't allow for great detail on specific elements.

PREPARE FOR THE FUTURE (F):

SHADED AREAS INDICATES ORIGINAL PLAN TEXT

	COMMENT	RESPONSE
F-1	Key Strategies: In partnership with the community- any thought given to "unpopular" projects like a prison?	RL is working on a future land use plan in which specific projects, such as a prison, could be addressed should the community propose them.
F-2	<ul style="list-style-type: none"> Maybe "The Future" doesn't belong in the vision; it might be more readily managed by HQ Office of Science. Be careful of articulating a vague DOE responsibility-second sentence-cite a specific requirement (e.g. in a CFR). It looks like a DOE money pit. 	<ul style="list-style-type: none"> The future of Hanford includes more than just a national laboratory. There are other industries and businesses that will still be here after Hanford is gone that are not tied to science. Hanford will still have a presence in this region with long-term stewardship responsibilities and it is our responsibility to transition the Site for future use and help the community prepare for a post-cleanup Hanford. We have tried to emphasize helping the community prepare for the future, while RL continues with its specific missions.
F-3	Repackage and sell the three constituents of this outcome: science and technology, economic diversification, and long-term resource management	We have tried to do so in our rewritten section on the Future.
F-4	<ul style="list-style-type: none"> Consider WSU-TC as a resource. There should be measurable milestones/dates. 	<ul style="list-style-type: none"> Good suggestion; WSU has been added to the text. Also a good suggestion, we have included more milestones and dates in the Future section of the plan.
F-5	<ul style="list-style-type: none"> Add a key strategy to work with national and international science and technology programs to develop solutions, which support initiatives for future use. There should be more direct discussion of strategies associated with PNNL initiatives. 	<ul style="list-style-type: none"> We have incorporated this suggestion in the Future section of the plan. We have incorporated this suggestion.
F-6	Sleeping giant in our area is Lockheed Martin Services Inc. (LMSI).	You're right. LMSI, a Fluor subcontractor, has been able to successfully diversify and create non-Hanford jobs at a 100% growth rate. Working with TRIDEC and local educational institutions, LMSI, RL, and all of their partners in development hope to encourage continued growth and economic diversification with a special emphasis in information technology.
F-7	<ul style="list-style-type: none"> Include the Advanced Product Evaluation Laboratory (APEL) as a 	<ul style="list-style-type: none"> APEL and other resources are not called out but understood in references

	<p>resource.</p> <ul style="list-style-type: none"> • Coordinate local institutions to support development and focus community goals, investments and initiatives. 	<p>to "community support". Although we identified a few of these resources, the plan lacks the space to include them all.</p> <ul style="list-style-type: none"> • Good idea. We added a section called "Working with the Community" that incorporates this suggestion.
F-8	<p>The Fast Flux Test Facility (FFTF) is an asset and should be mentioned in this section.</p>	<p>The recent DOE-headquarters Environmental Impact Statement on nuclear infrastructure selected deactivation of FFTF as its preferred alternative. The Secretary has said he intends to make a final decision in January, 2001.</p>
F-9	<p>Has this been coordinated with funding sources at HQ?</p>	<p>It is too early in the process to coordinate funding, but one reason for establishing the Hanford 2012 plan is to help secure funding for it.</p>
F-10	<p>Nuclear technology will be valued in the future and Hanford capabilities are a national treasure. We need an understanding of an integrated fuel cycle as we learn to address waste to learn how to minimize it in the future.</p>	<p>We, the community, and our stakeholders will evaluate all future missions and use of Hanford resources when new opportunities arise.</p>