

## **Draft Advice re: Hanford Long-Term Stewardship Program**

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### **Background**

The purpose of this advice is to present Hanford Advisory Board (Board) recommendations to the U.S. Department of Energy – Richland Operations Office (DOE-RL) for consideration concerning the current 100-F Area and other planned site transitions to the Long-term Stewardship (LTS) Program.

The Board's perception of the LTS Program's process is that all cleanup is to be completed to the requirements as defined in the Final Record of Decision (ROD) applicable to the waste sites in the Operational Units covered by the specific ROD, before that area can be transitioned into the Site's LTS Program.

As defined in the Hanford Long-Term Stewardship Program Plan, DOE/RL 2010-35; "Long term Stewardship refers to all activities necessary to ensure protection of human health and the environment following completion of cleanup, disposal, or stabilization at a site or a portion of a site. Long term stewardship includes all engineered and institutional controls designed to contain or to prevent exposure to residual contamination and waste, such as surveillance activities, record-keeping activities, inspections, groundwater monitoring, ongoing pump and treat activities, cap repair, maintenance of entombed buildings or facilities, maintenance of other barriers and contained structures, access control, and posting signs."

The key implied concept is that the LTS program assumes responsibility for a remediated site after all cleanup has been demonstrated to be complete. These cleanup requirements are officially delineated under the Final ROD. Transferring the site to LTS when the site has been remediated to only Interim ROD requirements seems illogical to the Board for many reasons. It creates general confusion of responsibility and authority. Waste sites may require additional cleanup activities creating an additional expense of transitioning contractual responsibility for the entire or portions of the waste site(s) out of the responsibility of the LTS program and then back, upon the completions of the remediation activities. There may also be difficulty in identifying funding sources for additional cleanup when waste sites are being transferred back and forth between internal programs.

DOE is currently in the process of transitioning the 100-F Area to the LTS Program. The 100-F Area has been remediated to the requirements as delineated in the Interim ROD. The Final ROD for the 100-F Area is not expected to be issued for at least a year. Groundwater remediation activities for this area are not being transitioned and will remain the responsibility of a separate groundwater remediation program. In addition, the current LTS contract does not include any

provisions to address any newly identified site remediation issues. Any site remediation issues identified will require the modification or issuance of a new contract and the transfer of responsibility for that portion of the area requiring further remediation to the responsibility of this cleanup contractor.

The Board views the LTS program as an administrative process within DOE. It is not a requirement of CERCLA or other regulatory process. The Board does not believe there is any compelling reason to transfer all or part of waste sites in any operable unit covered by a specific Interim ROD to the LTS Program until all of the requirements of the Final ROD are met.

**Advice<sup>1</sup>:**

1. The Board advises DOE not to transition site areas to the LTS Program until all remediation of waste sites can be demonstrated to meet the requirements of the Final ROD.
2. The Board advises DOE to establish an Interim Maintenance and Surveillance process to address contractual responsibilities during the period between completion of remediation activities under the Interim ROD and the definition of the full site closure requirements under the Final ROD. This process should be designed to provide cost effective site maintenance and surveillance activities during this interim period. In order to quickly respond to any newly identified cleanup issues, consideration should be given to the inclusion of a contractual structure to allow for remediation activities under this process.

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<sup>1</sup> **PLEASE NOTE:** *These advice bullets are numbered for ease of editing; they do not reflect order of importance and will be revised to a bulleted list following the editing process.*