

Proposed HAB letter to RL following its response to HAB Advice # 242----DRAFT

The HAB is disappointed in the RL letter response to HAB Advice # 242 "Preservation of Historical Properties and Artifacts". The DOE response primarily restates the positive DOE actions already mentioned in the HAB advice; but unfortunately summarily addresses only a few of the HAB advice items. However, the attachment to that letter (although not referenced in the letter—but apparently provided as an "add on" by program director Colleen French) does more adequately address more of the points made in HAB Advice # 242.

Never the less, the HAB is still skeptical of how well the RL preservation program is implemented. This skepticism appears to have been enhanced by the fast pace of work funded by the American Reinvestment and Recovery Act, and the apparent lack of DOE and contractor project directors' understanding and active participation in RL's recent improved emphasis on preservation. The issue is particularly focused on those project directors who have responsibility and direction over demolition projects.

The above concern is not limited only to preservation of artifacts required by the National Historic Preservation Act (NHPA), but also to artifacts and other properties worthy of preservation for the "enhanced benefit" of historians, researchers, and the general public. In most cases the preservation of these types of properties is less costly than disposing them in a landfill such as ERDF.

The DOE response to the HAB advice asks if HAB members have specific items we believe were lost. A few apparent suspect examples of both types of artifacts and properties that HAB believes should have been considered for continued use or for preservation (some occurring since Advice # 242 over one year ago---items 1 thru 3, and some prior to last year—items 4 and 5) include the following: 1) demolition of the security tower at N; 2) the removal of the railroad spur to B reactor; 3) preservation of both types of the early plutonium storage racks at the plutonium vault (one type instrumented and the other not); 4) a 20 inch diameter tritium furnace pot used at the 108 B facility; 5) a non contaminated unique outer cladding of an inner fuel element.

HAB is not saying all of these items would necessarily have needed to be preserved; but rather, it appears no consideration was given by the project directors to even question or inquire whether these items are of public interest, continued use, or potential future reuse and therefore be considered for some form of preservation---either continued use, full preservation, relocated or possible reuse. This is the "hub" of HAB's concern. Apparently the removal of the B reactor rail spur was "low hanging fruit" for the contractor and it was removed before the people at the B Reactor Project Office (who were interested in continued use of the spur) were aware that it was happening. These type considerations are of public interest and economic benefit to the local community. The removal of the ties and rail from that spur also increased the DOE cost of moving the locomotives and cask cars DOE graciously provided to the B Reactor Preservation Project. It appears in this case either the DOE or contractor project directors (probably

both) ignored or were unaware of their responsibility to determine possible continued Hanford site use or possible consideration under DOE's property reuse program. It appears the removal of the security tower at N raises questions as to whether the tower could have been relocated.

The HAB also suspects items in the past may not have been identified for preservation for reasons of contamination. In all types of preservation considerations where some incremental cost may be involved for decontamination or for other reasons DOE is again reminded of Section 110 (g) of the NHPA which states "Each federal agency may include the cost of preservation activities of such agencies under this Act as eligible project cost in all undertakings of such agency...." Thus, for example because an item may be contaminated does not necessarily mean that item may be automatically deleted from preservation consideration.

In any case, the above examples demonstrate the RL policy on preservation and property reuse is not being effectively considered and implemented by either DOE or its contractors. HAB questions how effective DOE and contractor management have been in setting forth all aspects of an appropriate preservation culture and how well this culture is implemented through the management chain---has it been effectively carried forth and enforced?

The HAB suggest careful preservation consideration be given to those properties not yet covered by the MSA 100% inventory check which is to be completed next year. It is noted that the DOE senior management official designated to provide advocacy on preservation can not alone be expected to achieve effective implementation of preservation plans. This is particularly true when there appears to be a lack of preservation advocacy among all DOE and contractor management levels, particularly the project directors.

As stated in Advise # 242 HAB appreciates the significant improvement DOE has made in its preservation program. HAB believes however the implementation of the program needs significant management attention and much greater oversight by all management levels. It is hoped DOE can instill a greater sense of awareness of NHPA responsibilities directed to both DOE and its contractors.

Sincerely,