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A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

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June 7, 2013

Matt McCormick, Manager
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Re: Hanford Long-Term Stewardship

Dear Mr. McCormick,

Background

The purpose of this advice is to present Hanford Advisory Board (HAB or 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.

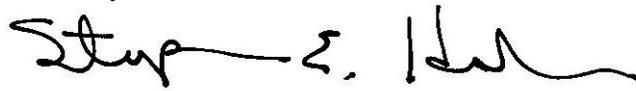
DOE-RL is currently in the process of transitioning the 100-F Area to the LTS Program. The 100-F Area has been remediated to the requirements as delineated in the Interim ROD. The final ROD for the 100-F Area is not expected to be issued for at least a year. Groundwater remediation activities for this 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 cleanup contractor.

The Board views the LTS Program as an administrative process within DOE. It is not a requirement of the Comprehensive Environmental Response, Compensation, and Liability Act (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:

The Board advises DOE not to transition the site areas (e.g. 100-F Area) to the DOE-RL LTS Program until all remediation of waste sites can be demonstrated to meet the requirements of the final ROD. Furthermore, final transition to the DOE-RL LTS Program should not be made until reactors are removed and remediation of contaminants under and around the reactors is completed.

Sincerely,



Steve Hudson, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Kevin Smith, Manager, U. S. Department of Energy, Office of River Protection
Jeff Frey, Deputy Designated Official, U.S. Department of Energy, Richland
Operations Office
Dennis Faulk, U. S. Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Catherine Alexander, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations