December 5, 1996

Chuck Clarke, Regional Administrator
U.S. Environmental Protection Agency, Region 10
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Seattle, WA 98101

Mary Riveland, Director
Washington Department of Ecology
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John Wagoner, Manager
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Subject: Interim Safe Storage of 105-C Reactor

Dear Messrs. Clarke and Wagoner, and Ms. Riveland:

BACKGROUND AND COMMENTS ON AGREEMENT-IN-PRINCIPLE

A TPA milestone change request required that the agencies conclude negotiations to establish schedules and milestones for cleanup and removal of the reactor cores from all nine production reactors by December 31, 1996. These actions would be conducted to implement a Record of Decision (ROD) issued in 1993 which selected safe storage for up to 75 years followed by one piece removal and disposal in the 200 Areas. The ROD also commits DOE to reevaluate the priority of D&D actions to support TPA final site cleanup schedules and RCRA and CERCLA cleanup decisions for adjacent waste sites. A draft Agreement in Principle (AIP) has been prepared to govern conduct of negotiations and to extend the negotiation completion date to March 31, 1997. The AIP recognizes that the 105-C Interim Safe Storage (ISS) project will proceed during the negotiations.

The Board has reviewed the draft AIP and requests that Topic E be more specific and state that the cost estimates and worker/public health and environmental impacts will be updated to either verify the final EIS values and assumptions or to support selection of a different final disposal alternative. The presentation to the Board by Roger Stanley in November stated that this was planned. The Board may wish to give further advice following availability of updated information.

SPECIFIC ADVICE ON 105-C INTERIM SAFE STORAGE

The 105-C ISS demonstration project proposes sealing openings into the reactor block, demolishing and removing outer portions of the building and equipment while leaving intact the three to five foot thick shield walls around the reactor core and front, rear and side spaces. These heavy walls would have
openings filled in and be extended up to the top of reactor block elevation. A 75-year design life metal roof would cover the entire structure. The project includes major innovative technology demonstration activities funded by EM-50 for characterization of contaminants, decontamination, dismantlement, segmentation and demolition, waste minimization, facility stabilization, surveillance and monitoring and worker health and safety protection.

The Environmental Restoration Committee attended an informative presentation on the ISS project and tour of the 105-C reactor building on September 25. The Board is supportive of the proposed approach to reducing the footprint of the facility and providing a much more secure, safe, and intrusion resistant facility having much lower surveillance and maintenance costs until final disposal occurs. Interim safe storage is the first step for any of the alternatives for final disposition of the reactors. The Board also supports the innovative technology activities to be demonstrated during this project. Principal questions center on possible vadose zone contamination below the reactor and fuel storage basin from past leaks and concerns that ISS will become the final disposal. The Board supports the 105-C ISS project and recommends that maximum use be made of the FY 1997 funding available from EM-50, plus whatever ER program funds are available. This work represents a major part of reducing risks and performing clean up along the River corridor.

The Board looks forward to your written response, as called for in our charter.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Alice Murphy, Designated Federal Official
The Oregon and Washington Congressional Delegations