

**FINAL MEETING SUMMARY**

**HANFORD ADVISORY BOARD  
RIVER AND PLATEAU COMMITTEE MEETING  
March 9, 2010  
Richland, WA**

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*This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.*

**Welcome and Introductions**

Pam Larsen, River and Plateau Committee (RAP) Chair, welcomed everyone and introductions were made. The results of the Mid-Term Evaluation will be attached to the February meeting summary; Pam suggested this be sent out via email, as well. The RAP committee adopted the February meeting summary.

Paula Call, Department of Energy Richland Operations Office (DOE-RL), gave an update on the Engineering Evaluation/Cost Analysis (EE/CA) for removal actions regarding buildings across the site that could have incidental contamination. She stated that these are predominantly office buildings. She said the comment period is in place and DOE has received three comments thus far. She said this project will be completed under American Recovery and Reinvestment Act (ARRA) funding. Rick Bond, Department of Ecology (Ecology), said the waste will go to the Environmental Restoration Disposal Facility (ERDF). Paula said the comment period ends March 19<sup>th</sup>.

The RAP committee discussed nominations for the committee chair and vice chair positions. Pam Larsen and Dale Engstrom were nominated and selected for these positions, which will take effect as of April 2010.

## **Long Term Stewardship (LTS)**

Bob Suyama said he utilized the flip chart notes from the LTS committee of the whole meeting March 3, plus combining common topics from the prior RAP meeting, to prepare the draft advice on Long Term Stewardship (LTS). He said the discussion and notes regarding DOE's preliminary draft LTS plan included topics which may not be included in the draft advice on the plan; these points may better fit in advice later on. He said LTS takes place after cleanup is complete. He stated that there needs to be more detail regarding Washington Administrative Code (WAC) and Comprehensive Land Use Plan (CLUP) in the advice.

## **Regulator Perspectives**

- Emy Laija, Environmental Protection Agency (EPA), said the CLUP is a not regulator-approved document; it is a DOE document. The EPA does not completely support the CLUP. The EPA sees the CLUP as a land use tool, and Emy is concerned that this advice makes the CLUP sound like a decision document.
- Rick Bond, Ecology, said the concepts addressed in this advice have been heard before, and it might be useful to highlight what is new.

## **Committee Discussion**

- Doug Mercer said the advice should not focus on the congruence of the CLUP with the WAC code. Emy suggested taking focus off of the CLUP completely. Boyd Hathaway, (DOE-RL), said the CLUP has the authority for DOE because it was created by congress and is a tool that is used for management. He offered to come back and give a presentation on land use if the RAP committee deemed it useful and said he would talk to Bob Suyama more about LTS.
- Pam said that the transition to legacy management will not happen until 2050. Bob said the LTS program is more near term within the Hanford site, and the Legacy Management (LM) happens after the cleanup is done. Maynard Plahuta said the difference should be clarified in the advice. Doug said he has changed the wording in evaluating the merits of LM and local site maintenance for more clarity.
- Dale Engstrom asked if the timing of responsibility will overlap. He said the LTS program should not start up abruptly. There should be a transfer process. Bryan Foley, DOE-RL, said there is a transfer from contract to contract to Mission Support Alliance (MSA). Doug said there is a problem with things getting lost from contract to contract. He said as soon as RL is done with the remediation work, Natural Resource Damage Assessment (NRDA) will start, followed by

Legacy Management (LM) issues. Boyd said these comments should be submitted officially. Dale said he will work with Bob on written comments.

- Boyd said he would like to read through the document more closely before commenting on the draft advice.
- Maynard said the uncertainties of transitions could be an advice issue and suggested the possibility of a transition team. Boyd said DOE is working on this transition process, and there are several contracts going through J-3 requirements. He said there are interface agreements and procedures on how this will be taken over. Washington Closure has to hand off this responsibility to MSA.
- Maynard said it might be good to go on record that RAP wants a transition period. Bob said he tried to focus on this transition in the first bullet in the advice.
- Dick Smith asked who is responsible for the five-year reviews. Boyd said DOE is responsible, either from LM or another form of DOE.
- Doug said that the LTS plan is not a decision document.
- Dale said the advice bullet for site ownership should clarify the surveillance and maintenance closure contractor and give more detail on how NRDA restoration meshes with the other activities. Boyd said the LTS plan addressed this, as LTS would monitor the completed restorations.
- Harold said he does not understand the bullet addressing WAC and CLUP. Doug said he addressed this in his edits to the advice. He split up land ownership and site ownership with federal ownership in perpetuity. He said the plan should talk about how to manage land that is not under federal ownership.
- Maynard said he would not use land transfer because it implies that it is outside of RL and DOE ownership. He suggests using DOE land management. Doug said the background section of the advice is explaining how the transition process works.
- Dick said the title “DOE responsibility for new waste sites” should be changed to “newly discovered waste sites”. Bob said the title of this section should be changed to “newly discovered contamination.” Maynard said to add “Hanford” to the title.
- Bob said, in regards to the funding section of the advice, that present value is prior to the LTS program which will be addressed in the advice. Maynard said present value is not an LTS issue but a restoration and program decision.
- Dale said funding should be considered for cleanup in the new waste sites section of the advice. Harold said this is an annual appropriation process and DOE can request funding.
- Dale said it is important to include commitment in the advice as well.
- Harold said there should be language to ensure continual funding. He is concerned about using a trust fund as an example of funding.

- Pam suggested changing the wording in the third bullet under funding from higher level of contamination to significant plutonium waste. Boyd said he is not sure if significant plutonium waste would be accurate.
- Bryan said this plan is not a decision document and has to comply with the relevant cleanup Record of Decision (ROD). He stated that this will be confirmed in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) document, not the LTS plan.
- Doug said the cost accounting approach makes sure that cost is accounted for. Harold said there are provisions in CERCLA on cost.
- Doug said before transfers are made there is a complete list of stewardship actions, including incentives and failure safeguards, for management and property issues. He said he would like to be able to see each agency's responsibilities in this process. Pam said these transfer processes might be applicable somewhere besides Hanford and the only way local governments get involved is if there is development on the property. Doug said the issue is transparency regarding the obligations for stewardship, which would be applicable to management of property.
- Pam said costs associated with Institutional Controls (ICs) need to be included in the cleanup remedy ROD.
- Maynard suggested providing an example of organizational responsibility and structure to make sure there is someone who is staffing tasks.
- Dale said it is important as new technologies come along that removal of contamination remains consistent and improves. Dick agreed only if the technology is cost effective. Harold asked if investigating new technologies is part of the CERCLA five-year review. Doug said he is not sure if the five-year review addresses the reliability and durability of ICs in the remedy review phase.
- Doug said the first bullet of the information and knowledge management section should state that there is accelerated development of planning and active stakeholder participation. He said there should be a pooling of resources with LTS and LM programs with respect to their databases.
- Harold suggested a comparison between LTS and the CERCLA process to eliminate similarities and look for ways to simplify. Maynard said LTS would not take effect until after the CERCLA process.
- Susan Leckband said there might be a need for a committee call on LTS advice to get it ready for the April Hanford Advisory Board (HAB or Board) meeting. Doug said it would be beneficial to have a reference to the DOE LTS plan the advice is responding to as well as previous related advice. Boyd said LTS does not make decisions, and the CERCLA process is still proceeding.
- On a related note, Paula said she would distribute copies of the 30-day notice of the CERCLA five-year review to the RAP committee. Maynard said it would be nice to be aware of any foreseen issues with the five-year review since there is not

much time before the 30 day comment period is up. Emy said this particular five-year review is essentially an update. Mike Thompson, DOE-RL, said DOE is testing treatment technologies and working towards a new ROD. Maynard said it appears that there is not much to discuss regarding the five-year review.

- Pam said RAP wants to hear from Susan Leckband on past advice from the previous five-year CERCLA review and from DOE on the anticipated scope of the review. Susan said she will work with DOE and get information on the review to the committee; she does not anticipate any need for advice.

### **Unrestricted Surface Use/Unrestricted Use Advice**

Dale said the topic of unrestricted surface use and unrestricted use has come up many times, and basic assumptions have been identified. He said this topic was one of the original seven potential advice topics generated from the December 16, 2009 Base Assumptions Committee of the Whole meeting. The EPA has also given a presentation on the use of these terms. He said unrestricted surface use implies that a lot can happen on the surface, and it should be changed to prevent misconceptions. He said that in the advice the term “limited use” is proposed. He said when using the term unrestricted use it could be conceived that the area is fully cleaned, which is addressed in the last bullet of the advice.

### **Agency Perspectives**

- Mike Thompson, DOE-RL, said the concerns are clear and he suggested making sure the advice is succinct and carefully defined.

### **Regulator Perspectives**

- Emy, EPA, said the advice is clear and well written. She said it would be good to include that this terminology is Hanford nomenclature.
- Rick, Ecology, said he agreed with Mike Thompson and that the advice was clear and easily read.

### **Committee Discussion**

- Pam asked if the Hanford nomenclature is added if it would be the only change required in terms of the draft advice.

- Dick suggested changing the language in the first bullet from “the Board recommends” to “the Board discourages” the use of the term.
- Susan said in the last bullet where the advice is requiring more clarification on the connection between anticipated land use, exposure scenarios and the remedy selection, there should be a specified document for these clarifications to be written. Laura said this would be important to include in the final ROD.
- Susan said the advice would be clearer if it mentioned planning and decision documents in the background.
- John Morse, DOE-RL said risk assessments might be something that needs to be addressed.

### **100-N Area Work Plan**

Shelly said the 100-N Area work plan has a milestone and a CERCLA requirement. She said the draft plan comment period has ended, but DOE has announced that it will produce another draft work plan. This provides time for the RAP committee to produce advice for the June Board meeting. She said this is the last Remedial Investigation and Feasibility Study (RI/FS) work plan for the 100-N Area.

Shelly listed off some of the scheduled actions for the 100-N Area, along with the contamination that has occurred within the area.

Shelly said the workshop on the work plan was great. There were presentations providing information and background on the 100-N Area with many questions fielded from Ecology. She said after the discussion she heard at the workshop, she realized there is not enough being done regarding the nitrate plume in the 100-N Area. She said there is no record of the chemicals that went into the trenches and the well depths seem to be appropriate for the Strontium (Sr-90); however, other areas have not been properly characterized. She said the adequacy of the monitoring network needs to be reviewed. She said questions need to be asked, such as why there are still interim RODs being used and how advisable it is to be backfilling.

### **Agency Perspectives**

- Mike Thompson, DOE-RL, said the Sr-90 levels are high in the soil, and the soils in the aquifer matrix, including under the river, would have to be dug up to get rid of this.
- Mike said there were comments from Ecology on the first work plan and it is DOE’s intention to issue the second draft within 60 days. This will be done by the end of April. He said the second draft will be enhanced with the work that has

been done in the past. He said before developing advice it might be useful to look at the next draft of the work plan.

### **Committee Discussion**

- Pam said there has already been advice on Sr-90 and asked what the RAP committee wants to do.
- Dale said this is a well studied area; however, there is a lot of uncertainty that remains. He said this draft advice document is trying to look at these uncertainties, including one of the biggest uncertainties, the Sr-90 plume. Mike said the conceptual model describes these Sr-90 conditions. He said the operation of the reactor allowed Sr-90 with a moderate Kd to get into the soil. He said this is a matter of absorption and desorption until it decays away and is no longer complex. Dale said there was a feeling of uncertainty regarding how much Sr-90 was getting to the river and that there might not be enough testing in the lower aquifer. He said there are planned wells that are supposed to answer some of it, but it might not be enough. The chromium sampling may not be consistent and there might be some overlapping with nitrate. He said in general there is too much uncertainty on the relationship between the Ringold Upper Mud Unit and basalt.
- Pam asked if these are useful comments. She suggested waiting for the second draft work plan to start the advice process. Shelly said she is comfortable waiting for the second draft as long as there is enough time to generate advice. Dale said the concerns that DOE has heard to date gives them the opportunity to see where the concerns are focused.
- Maynard asked how DOE thinks these concerns in the second draft work plan will be addressed. Mike said DOE will address these issues; however, the RAP committee may not agree with the way they are addressed.
- Susan asked if an extended comment period is possible for the second draft of the work plan. Mike said he is comfortable with an extension of a month or more if it is known that work efforts will not be held up.
- Shelly asked about the apatite barrier and if it should be documented as a waste site. Mike said the amount of Sr-90 that gets to the river is not as much as expected and this issue will be addressed.

### **Committee Business**

Susan said there was a notice on Tri-Party Agreement draft change packages for M-91 and M-15 regarding an extension and she wanted to make sure this did not fall off of the table. Paula said this is a priority and it will be tracked. She said this topic would be good to address in the April and May meetings.

*Action items:* Susan Hayman, EnviroIssues, reviewed the action items:

1. Send “mid-term Evaluation” (re: priority lists) to RAP members – Susan
2. Paula to provide copies of 30-day notice CERCLA five-year review to committee
3. Susan L. will review past Board advice on CERCLA five-year reviews and provide synopsis to Susan H. to sent to committee (March 12)
4. Revise LTS advice for committee to take action (March 12 to committee)

Bob said he will try to get the LTS advice revised and out by Friday, March 12 to be ready for the RAP committee call.

The RAP committee then reviewed and updated the 6-month work plan and the topics for the April RAP committee meeting.

*Preliminary April Meeting Topics<sup>1</sup>:*

K-Area

- Early Removal of K-East reactor and lessons learned
- Briefing on cesium
- Update on sludge removal
- Update on waste sites

TPA change package update

- Agency presentation of what is contained in the change packages

Technology for uranium in deep vadose zone

- What are the new technologies being used?

CLUP, land use planning, local government’s plans

- Cleanup level requirements
- How does CLUP impact CERCLA process
- What are local government’s plans for land use on the site

Reverse Wells

- Use
- History
- Lessons Learned from other sites

*Updated 6-month Work Plan:*

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<sup>1</sup> These were modified in the subsequent March committee call. Refer to the April committee meeting agenda available March 31 for the final meeting topics.

## **Handouts**

*NOTE: Copies of meeting handouts can be obtained through the Hanford Advisory Board Administrator at (509) 942-1906, or [tgilley@enviroissues.com](mailto:tgilley@enviroissues.com)*

- Hanford Long-Term Stewardship Program Plan Draft Advice, Bob Suyama.
- Integrated 100 Area RI/FS work plan Draft Advice, Dale Engstrom, Shelly Cimon.
- Integrated 100 Area RI/FS work plan Addendum 5: 100-N Decision Unit, Dale Engstrom, 03/08/2010.
- Long-Term Stewardship Committee of the Whole Meeting Transcribed Flip Chart Notes.
- RAP Mid-Term Evaluation, 02/10/2010.
- “Unrestricted surface use” vs “unrestricted use” cleanup level Draft Advice, Dale Engstrom.
- U.S. Department of Energy Plans to Conduct Third CERCLA Five-Year Review, Cliff Clark U.S. DOE.

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## **Attendees**

### **HAB Members and Alternates**

Shelly Cimon (phone)	Floyd Hodges (phone)	Doug Mercer (phone)
Dale Engstrom	Pam Larsen	Bob Suyama
Harold Heacock	Susan Leckband	Dick Smith
		Maynard Plahuta

### **Others**

Paula Call, DOE-RL	Rick Bond, Ecology	Janice Williams, CHPRC
Bryan Foley, DOE-RL	Emy Laija, EPA	Susan Hayman, EnviroIssues
Boyd Hathaway, DOE-RL		Blair Scott, EnviroIssues
John Morse, DOE-RL		Ted Repasky, CTUIR
K. Michael Thompson, DOE-RL		Sharon Braswell, MSA
		Barb Wise, MSA
		Mike Priddy, WDOH
		Jean Vanni, YN – ERWM