



U.S. Department of Energy Hanford Site

March 11, 2021

21-HAB-000933

Ms. Susan Leckband, Chair
Hanford Advisory Board
ProSidian Hanford Project Office
713 Jadwin Ave, Suites 3 and 4
Richland, Washington 99352

Dear Ms. Leckband:

HANFORD ADVISORY BOARD OCTOBER 8, 2020, CONSENSUS ADVICE NO. 308,
B PLANT COMPLEX ENGINEERING EVALUATION / COST ANALYSIS

Thank you for the Hanford Advisory Board's (HAB) October 8, 2020, Advice No. 308 regarding demolition actions for the B Plant Complex. The U.S. Department of Energy (DOE) also appreciates the HAB's input on the proposed grouting of the 291-B cell High Efficiency Particulate Air (HEPA) filters and the possible final remedy implications.

DOE and its contractors are committed to resolving cleanup issues and working with stakeholders to ensure that financially reasonable and technically sound resolutions are developed.

In May 2020, DOE published the B Plant Complex Engineering Evaluation/Cost Analysis (EE/CA) to evaluate interim removal actions in anticipation of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Record of Decision in the 2032 time frame. The proposed actions in this EE/CA target reducing the complexity and costs of surveillance and maintenance. The actions also target maintaining a skilled Hanford workforce that is experienced in contaminated-facility deactivation and decommissioning work, which will be needed when funding becomes available in the future.

Below are the responses to the advice in your letter:

Advice Point 1: Due to the estimated high contamination levels of the HEPA filters, the HAB is concerned that grouting the 291-B cell HEPA filters may preclude other alternatives for final disposal.

Response: Grouting has been successfully used across the Hanford Site and the nuclear industry to stabilize contamination, reduce exposure from radiological sources, and stabilize structures. Grouting will not preclude future remedial actions such as removal and disposal.

Advice Point 2: The HAB advises DOE to evaluate how filters, which may be Greater Than Class C or High-Level Waste, would be dispositioned prior to stabilization.

Response: Evaluation of how the filters would be dispositioned prior to stabilization is premature. The disposition work planning will be conducted during the development of the final Remedial Design/Remedial Action Work Plan following the CERCLA process, consistent with DOE and U.S. Environmental Protection Agency (EPA) requirements. It would be inappropriate for DOE to attempt to characterize/classify the waste in a CERCLA decision document. DOE would like to reiterate that this removal action does not constitute disposal; it is to reduce threats to human health and the environment and minimize contaminant migration.

Advice Point 3: The HAB advises DOE to proceed with investigations and consideration of alternatives consistent with the remedial investigation/feasibility study milestones of the Tri-Party Agreement (TPA) (M-85-70 and M-15-00) to achieve the following:

- Increase confidence in cost estimates for the proposed work; and
- ensure any proposed removal action will not prevent characterization of *Resource Conservation and Recovery Act* wastes, compatibility assessments, and/or final remediation.

Response: A comprehensive remedial action will be planned pursuant to the remedial investigation/feasibility study work plan in accordance with the M-85 TPA milestone series.

The environmental cost estimate developed for this EE/CA (ECE-200E15-00004) follows EPA guidance and provides the appropriate level of confidence for a removal action. DOE agrees that adequate characterization data is necessary. DOE will ensure that the filters are properly characterized to be removed, treated and disposed of safely. Removal actions are a key part of CERCLA response actions. As an interim step, grouting reduces threats and potential threats to human health and the environment while allowing the remedial action process to develop for eventual implementation. Grouting has been used successfully for decades to reduce risks on the Hanford Site.

If you have any questions, please contact Stanley Branch, Deputy Designated Federal Officer, , on (509) 376-9450.

Sincerely,

Brian T. Vance
Manager

HAB:GLY

cc: See page 3

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cc: D. R. Einan, EPA
K. K. Snyder, EMCBC
L. Watson, Ecology
Oregon & Washington Delegations