

# Hanford Advisory Board Draft Letter

**Topic:** Cleanup Decisions in the Central Plateau

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**Originating Committee:** River & Plateau

The Hanford Advisory Board's (HAB or Board) advice has been consistent and unwavering in support of permanent retrieval, treatment, and disposal of all production mission hazards. Board values promote protection and preservation of human, biological, natural, and cultural resources in a manner that does not impose a burden on future generations.

It has been announced that the 200-WA-1 work plan is under negotiation and is scheduled for release in the near future. The Board understands that this work plan will set precedents for future Central Plateau operable unit work plans, and will also reflect the Central Plateau Inner Area Guidelines developed by the Tri-Party Agreement (TPA) agencies. HAB advice #283 expresses our concerns with those guidelines. The Board stands behind all prior Board advice regarding these guidelines (and overall cleanup in the Central Plateau) and we are reiterating some of our comments to emphasize Board and public values during this time of negotiation in hopes that it will influence the TPA agencies to make the most protective decisions for the Inner Area.

In HAB Consensus Advice #283, the Board advised the TPA agencies to approach the remediation of the Inner Area with an end-state vision of what the condition of the Inner Area will be when the cleanup is done. The agencies were advised:

- To avoid use of the analogous sites approach, in lieu of characterization, because characterization data will be necessary for determining a final ROD.
- To not rely on post-ROD characterization to validate remediation.
- To determine the depth points of compliance only after adequate characterization is available in order to inform, with real data, the depth compliance decision.
- To not reduce the depth of compliance for direct contact to less than 15 feet. The Board advised wariness on the agencies' part about the deep-rooted nature of some of Hanford's native plants.
- To continue to set the groundwater point of compliance at the boundary of the operable unit and not to move it out to the boundary of the Inner Area.
- To remediate contamination in the deep vadose zone and/or explore strategic removal of concentrated mass of isotopes in the deep vadose zone before adopting Institutional Controls and Monitored Natural Attenuation.
- To continue to employ the Observational Approach to remediate the Inner Area. This approach allows cleanup personnel to remove waste based on what they actually find. If a high concentration of contaminant is encountered, then it is removed. If little is found, the site can be safely left in place. This remedial approach has, in the past, saved considerable characterization costs and resulted in an immediate reduction in risk in the River Corridor.

Additionally the agencies were advised:

- To include an Intruder Scenario and a Tribal Use Scenario to evaluate risk in the Central Plateau and the Inner Area.

- To compare the lifetime costs of maintaining institutional controls and pump-and-treat operations versus removing as much of the contaminant mass as possible (HAB Advice #173).
- To remove pre- and post-1970 transuranic waste from the Hanford Site.
- To run sensitivity analyses to determine the amount of infiltration it will take to move vadose zone contaminants to water.
- And to utilize previous Board advice for cleanup decisions on the Central Plateau (HAB Advice numbers 132, 170, 173, 174, 197, 207, 226, 227, 229, 231, 243, 290 as well as the HAB Values White Paper [11/3/12]).