

Draft HAB Letter: Remedial Design/Remedial Action (RD/RA) Work Plan for the 200-CW-5, 200-PW-1, PW-3, PW-6 Operable Units, DOE/RL-2015-23 (Draft B).

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To: Stacy and Dennis

Cc: Ecology and DOE HQ (Monica), Bertrand

Recognizing that the Tri-Party Agencies are in the process of negotiating the remediation of 200-CW-5, 200-PW-1, PW-3, PW-6 Operable Units (Remedial Design/Remedial Action Work Plan, DOE/RL-2015-23, Draft B), the Hanford Advisory Board (HAB) takes this opportunity to reiterate its belief that every effort should be undertaken to get as much of the contaminated mass out of these high-risk, easily-accessible Hanford waste sites as possible, especially when plutonium is present. The HAB proposes that the Tri-Party Agencies use the Observational Approach as was used successfully throughout the River Corridor. 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, it can be safely left in place. This remedial approach saved considerable characterization costs and resulted in an immediate reduction in risk.

There has been a good deal of discussion between the Regulators and DOE about how much deeper than the 15-feet-plus-two feet below grade level will be considered for further material removal. The HAB advises the Tri-Party Agencies that the removal of the high-risk, concentrated contaminated mass is the most important decision factor, not whether the removal goes to fifteen feet, two feet more, or deeper.

Once removed, keeping these transuranic materials, especially plutonium, at Hanford makes little sense. Therefore, the HAB proposes that the most reasonable approach is to use surgical removal techniques as much as possible to keep the overall volume of material to a minimum. Per regulations, the HAB has always supported the concept that all transuranic waste that is removed should be disposed in deep geologic burial at the Waste Isolation Pilot Plant.

The Board stands behind all prior HAB advice on this issue, but is providing these comments to emphasize HAB and public values during this time of negotiation in hopes that it will influence the Tri-Party Agencies to make the most protective decision. The HAB has previously provided advice to the associated draft Proposed Plan in HAB Advice 177, Advice 188, Advice 207 and Advice 247. HAB Advice 207, in particular, expresses the HAB values for the remedial treatment of these waste sites. The HAB would appreciate a meeting with the Agencies, once the negotiations over the remediation of these waste sites is done, to explain what EPA's comments to this important issue were and what DOE responses were in return.