



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

13-HAB-0026

AUG 7 2013

Mr. S. E. Hudson, Chair
Hanford Advisory Board
Enviroissues Hanford Project Office
713 Jadwin, Suite 4
Richland, Washington 99352

Dear Mr. Hudson:

HANFORD ADVISORY BOARD (HAB) JUNE 7, 2013, CONSENSUS ADVICE #269,
"HANFORD LONG-TERM STEWARDSHIP"

Thank you for advice #269 on Hanford Long-Term Stewardship (enclosed) concerning the current 100-F Area and other planned site transitions to the Long-term Stewardship (LTS) Program.

Below is the response to the point in your advice:

Advice Point: The Board advises DOE not to transition the site areas (e.g. 100-F Area) to the DOE-RL LTS Program until all remediation of waste sites can be demonstrated to meet the requirements of the final ROD. Furthermore, final transition to the DOE-RL LTS Program should not be made until reactors are removed and remediation of contaminants under and around the reactors is completed.

Response: The Hanford Site will remain under Federal management and control for the foreseeable future. As the cleanup along the River Corridor is completed to interim Records of Decision (RODs) and the cleanup contractor finalizes their contract obligations, the Hanford Long-Term Stewardship (LTS) Program provides a cost-effective and efficient means of managing the remaining and ongoing stewardship activities. Management of these activities is performed in accordance with the post-cleanup requirements specified in the associated cleanup decision documents. These cleanup decision documents include, but are not limited to, the "Comprehensive Environmental Response, Compensation and Liability Act of 1980" (CERCLA) RODs, and the "Resource Conservation and Recovery Act of 1976" (RCRA) corrective action decisions and post-closure plans.

In addition to managing the post-cleanup completion obligations, the Hanford LTS Program manages Site natural and cultural resources through the framework of DOE/EIS-0222-F, "Final Hanford Comprehensive Land-Use Plan - Environmental Impact Statement" (HCP EIS), and 64 FR 61615, "Record of Decision: Hanford Comprehensive Land-Use Plan Environmental Impact Statement (HCP EIS)," and in accordance with federal laws, executive orders, Tribal Nations' treaties, DOE directives, and Hanford Site procedures.

AUG 7 2013

The U.S. Department of Energy (DOE) and the agencies are finalizing cleanup plans to complete cleanup in the River Corridor. These plans, known as Proposed Plans will be issued for public comment prior to DOE and the agencies issuing formal RODs that will identify the requirements to complete cleanup in the River Corridor.

Even though these RODs set the requirements to complete cleanup, DOE and the agencies are required to evaluate the effectiveness and protectiveness of the RODs and its requirements every five years. If the cleanup under the RODs is found to not be protective of human health and the environment, or problems arise from the planned cleanup, DOE and the agencies will identify how the RODs need to be modified. Substantial modifications (called amendments) to the RODs will allow for public review and comment before being finalized.

As final RODs are determined, DOE, as required, will seek the funding and will put in place a contract mechanism to complete any remaining required remediation. If necessary, the Hanford LTS Program will initiate a Memorandum of Understanding with any contractor needing access to the areas that have been transitioned so that the remaining required remediation can be completed. Also, if deemed appropriate, DOE can direct the Hanford LTS contractor, under their current contract (Section C.2.3.1.2), to perform the subsequent remediation. When the final ROD actions are completed, the cleanup documentation will be integrated with the other LTS records.

Cleanup of any contaminants under the reactors is not scheduled for completion within the current contractors contract period of performance. The National Environmental Policy Act (NEPA) "Record of Decision for the Decommissioning of Eight Surplus Production Reactors EIS (58 FR 48509) documents DOE's decision of interim safe storage followed by one-piece removal to a Central Plateau disposal facility. N Reactor was not included in the EIS, as it was not available for decommissioning at the time of the NEPA EIS, and interim safe storage (ISS) was approved through the CERCLA process. Final disposition of N Reactor will be determined by a subsequent NEPA or CERCLA decision process. B Reactor has been designated a National Historic Landmark by the U.S. Department of Interior and will be placed in a configuration consistent with controlled access by the general public for the foreseeable future. For all reactors except B Reactor, ISS actions, selected through the CERCLA removal action process, are designed to prevent deterioration and release of contamination from the reactors for up to 75 years. The LTS Program will manage the surveillance and monitoring requirements of the reactors and the reactor areas as long as required. These activities include, but are not limited to, periodic reactor assessments, reactor re-entries, and required radcon monitoring of remediated waste sites. One of the primary objectives of the Hanford LTS Program is to manage and monitor cleanup completed in the River Corridor.

The Hanford LTS Program is also working directly with the DOE Headquarters (DOE-HQ) LTS Program and the DOE-HQ Legacy Management Program to better align programmatic processes, find efficiencies, and to benchmark site transition requirements, both in records

Mr. S. E. Hudson
13-HAB-0026

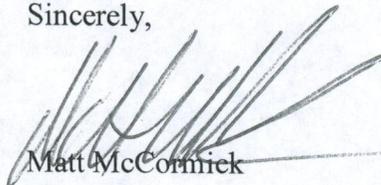
-3-

AUG 7 2013

storage and external communications. Starting the Hanford LTS Program early in the transition process with an integrated contractor and DOE team is helping to ensure that there is time to work through details on the completed remediation of the areas being transitioned, record documentation and storage for the future, and is an opportunity for the program to mature through the experiences that will be gained by implementing LTS program activities over time.

Thank you again for your advice on this subject. If you have any questions, you may contact me or Kim Ballinger at (509) 376-6332.

Sincerely,



Matt McCormick
Manager

OCE:KSB

Enclosure

cc w/encl: See page 4

Mr. S. E. Hudson
13-HAB-0026

-4-

AUG 7 2013

cc w/encl:

C. B. Alexander, EM-3.2
J. A. Frey, RL/ORP-DDFO
D. A. Faulk, EPA
M. A. Gilbertson, EM-10
T. Gilley, Enviroissues
S. Hayman, Enviroissues
J. A. Hedges, Ecology
W. M. Levitan, EM-10
K. W. Smith, ORP
T. L. Sturdevant, Ecology
S. G. Van Camp, EM-23
M. Zhu, EM-11
Administrative Record
Environmental Portal
The Oregon and Washington
Congressional Delegations

U.S. Representatives (WA)

R. Hastings
J. Herrera Beutler
R. Larsen
J. McDermott
C. McMorris Rodgers
D. Reichert
A. Smith

State Senators (WA)

M. Hewitt

State Representatives (WA)

L. Haler
B. Klippert

U.S. Senators (OR)

J. Merkley
R. Wyden

U.S. Senators (WA)

M. Cantwell
P. Murray