Department of Energy
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SEP 1 2 2014

14-HAB-0028

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 4, 2014, CONSENSUS ADVICE #278, "100 D/H RI/FS DRAFT A"

The U.S. Department of Energy (DOE) wants to thank the HAB for providing consensus advice #278 on the Remedial Investigation/Feasibility Study and Proposed Plan DRAFT A for the 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, and 100-HR-3 Operable Units.

These Draft A documents are currently being revised based on discussions with Washington State Department of Ecology (Ecology). The current HAB advice is being considered through these discussions with Ecology.

The revised Proposed Plan will be issued for public comment as a revision 0 document. DOE encourages the HAB to review and issue advice on the revision 0 document during the public comment period. Your advice, along with public comments received on the proposed plan, will be considered before the Record of Decision (ROD) is issued. The ROD will contain a responsiveness summary that addresses substantive comments received during the public comment period.

Again, thank you for your advice on this subject. If you have any questions, you may contact me or you may contact Kristen Skopeck at (509) 376-5803.

Sincerely,

Doug S. Shoop
Acting Manager

OCE:KPS

cc: See page 2

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July 29, 2014 14-NWP-153

Mr. Steve Hudson, Chair
Hanford Advisory Board
713 Jadwin Avenue, Suite 3
Richland, Washington 99352

Re: Hanford Advisory Board Advice #278, "100 D/H RI/FS, Draft A"

Dear Mr. Hudson:

Thank you for the Hanford Advisory Board (Board) advice on Draft A of the 100 D/H Remedial Investigation and Feasibility Study (RI/FS). The Department of Ecology (Ecology) would like to provide our perspective on your advice points.

Board Advice

- Of the alternatives provided in the Proposed Plan, the Board supports Alternative 3, if the following remedial actions are added:
    - Include analysis, removal and treatment of all contaminants of concern, including chromium, that exceed drinking water standards before re-injection.
    - Install a Permeable Reactive Barrier (PRB) at the down-gradient end of the 100-H strontium plume that is appropriately sized to capture Strontium-90 contamination from the groundwater and prevent it from entering the river.

Ecology response:

- All contaminants of concern are reduced to within acceptable cleanup levels prior to re-injection.
- Ecology does not agree that a PRB is necessary. The existing pump-and-treat system currently provides capture of the Strontium 90 plume along the river. In addition, Strontium 90 is relatively non-mobile in groundwater.

Board Advice

- The Board continues to advise RTD as the preferred approach. The Board believes that Institutional Control periods that equal or exceed 100 years defy the reasonable ability to maintain the surveillance that will be necessary to keep intruders and other people from harm. The Board advises the Tri-Party agencies to remove, treat and dispose contaminants at the seven deep decision unit waste sites.

Ecology response:

- Ecology agrees that retrieve, treat, and dispose (RTD) is the preferred method of cleanup. However, our primary goal is to ensure regulatory cleanup levels are met, whether that is through RTD or other approved methods.

  Regarding deep dig sites, Ecology has insisted on digging waste sites that would impact groundwater as deep as necessary. For example, two sites in the 100 D Area were excavated all the way to groundwater to address hexavalent chromium contamination.

Board Advice

- The Board advises the Tri-Party agencies to request a full review of the 100-D/H RI/FS and Proposed Plan by the National Remedy Review Board rather than seeking an exemption.

Ecology response:

- Ecology does not agree that a full review by the National Remedy Review Board is necessary. We believe there are enough similarities with 100-K, which was already reviewed. In addition, the U.S. Environmental Protection Agency, Region 10 still has the legal responsibility to review and approve the associated Record of Decision.

Ecology appreciates the Board's timely input on this proposed plan. We look forward to continuing discussions with you as we work to address concerns and identify the best path forward for this important cleanup decision.

If you have any questions, please contact Nina Menard at Nina.Menard@ecy.wa.gov or (509) 372-7972.

Sincerely,

Jane A. Hedges
Program Manager
Nuclear Waste Program

cc electronic:
Dennis Faulk, EPA
Doug Shoop, USDOE
Ken Niles, ODOE
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