



HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

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US Environmental
Protection Agency

Washington State Dept.
of Ecology

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ProSidian Consulting

Richland Office
713 Jadwin, Suite 3
Richland, WA 99352
Phone: (509) 588-7010

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Brian Vance, Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450 (46-60)
Richland, WA 99352

Brian Vance, Manager
U.S. Department of Energy, Richland Operations Office
P.O. Box 450 (46-60)
Richland, WA 99352

Dave Einan, Manager
U.S. Environmental Protection Agency, Region 10
825 Jadwin Avenue, Suite 210 (A1-43)
Richland, WA 99352

Alex Smith, Manager
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

Re: Managing the Risk of Aging Structures and Keeping the Public and Stakeholders Engaged

Dear Mr. Vance, Mr. Einan, and Ms. Smith,

Background:

The mission at Hanford shifted from plutonium production to environmental cleanup more than thirty years ago, and the remaining facilities and structures are showing their age. These aging structures present an evolving need to conduct unplanned stabilization or demolition to protect workers and prevent a release to the environment. The nature of each aging structure, the protective action, the level of contamination, and the associated regulatory framework vary widely across the Hanford Site.

The Hanford Advisory Board (HAB; The Board) appreciates that DOE has a desire, responsibility, and obligation to protect its workforce, the health of the general public, and prevent releases to the environment. We also recognize that there are instances that require rapid response to fulfill that obligation. It is absolutely critical that DOE has the ability to take actions to protect workers and prevent a release of contamination.

The Board is invested in a consistent public involvement process that prioritizes transparency and meaningful engagement even as DOE responds to unanticipated cleanup and stabilization challenges. The Board supports an approach that ensures that the DOE chooses the appropriate administrative action to address immediate risks while also allowing

an appropriate level of public comment and regulatory review. Of special interest in this advice is the comparison of time-critical and non-time critical removal actions. Stabilizations conducted under Time-Critical actions provide less information for public review and input.

Three waste sites near the Plutonium Finishing Plant (PFP) are currently scheduled to undergo expedited stabilization or removal activities as CERCLA Time Critical Removal Actions (TCRAs). TCRAs require less analysis of lifecycle costs and fewer alternatives than a Feasibility Study associated with a remedial action or an Engineering Evaluation/Cost Analysis (EE/CA) associated with a Non-Time Critical Removal Action. The Board has reviewed a number of recent stabilizations as well as the current time-critical proposal to stabilize aging underground structures adjacent to the PFP. A more thorough public involvement process with site-specific information and deliberation provides a better grounding for evaluating the proposed action.

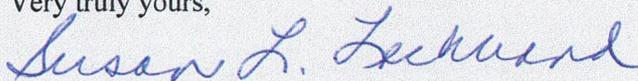
We suggest improvements that the Tri-Party Agreement (TPA) agencies can adopt in order to effectively communicate strategies for addressing emergent risks while providing meaningful community and stakeholder participation. As such, we offer the following advice:

Advice

The Board has consistently voiced a preference for Remove Treat Disposal (RTD) actions and encourages transparency, participation, and collaboration in the decision-making process.

- The Board advises DOE to default to Non-Time Critical Removal Actions or Remedial Actions, as is standard in the National Contingency Plan and statute unless a release or failure has occurred or is imminent.
- The Board advises DOE to complete site-specific deliberation prior to implementing interim actions to ensure that the anticipated final remedy will still be achievable. This process is of particular interest in the case of waste sites with a legal obligation under a Record of Decision.
- The Board advises that the public and stakeholders be involved earlier in the planning process to ensure that input is gathered prior to selecting stabilization or remediation alternatives. The public information should document that necessary analyses and deliberations were completed prior to selecting preferred alternatives for a stabilization action.
- The Board advises the agencies to evaluate additional site-specific alternatives for the three sites near PFP, including temporary covers, adding layers of sand or other appropriate geological material to prevent releases, or expediting remedial actions. Removal actions that are taken should not be used as a precedent for future decisions.
- The Board advises DOE to make available any and all assessments or documents utilized to support the decision process and selection of alternatives. The identified documents should be made available on the website page related to the decision or comment period, including a link provided in relevant fact sheets.

Very truly yours,



Susan Leckband, Chair
Hanford Advisory Board

cc: Ike White, Senior Advisor of Environmental Management, U.S. Department of Energy, Headquarters,
Dave Borak, Designated Federal Officer, U.S. Department of Energy Office of Environmental Management,
Emerald Laija, Environmental Scientist, U.S. Environmental Protection Agency
David Einan, Manager, U.S. Environmental Protection Agency,
Ginger Wireman, Marketing and Communications, U.S. Department of Ecology,
Randy Bradbury, Manager, U.S. Department of Ecology,
Alex Smith, Manager, Washington State Department of Ecology,
James Lynch, Deputy Designated Federal Officer, U.S. Department of Energy, Office of River Protection and
Richland Operations
JoLynn Garcia, U.S. Department of Energy Office of River Protection & Richland Operations,
The Oregon and Washington Congressional Delegations

REFERENCES:

Board Values

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Advice #239 Incorporating Public Involvement Strategic Planning into the Community Relations Plan, 2010 https://www.hanford.gov/files.cfm/HABAdv_239.pdf
Advice #240 U.S. DOE's Open Government Plan & the Hanford Community Relations Plan, 2011 https://www.hanford.gov/files.cfm/HABAdv_240.pdf
HAB Values, 2012 https://www.hanford.gov/files.cfm/HAB_ValuesWhitePaper_Attach.pdf

Stabilization conducted under RCRA permit

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Purex Tunnel 2 Engineering Evaluation, 2017 <https://pdw.hanford.gov/document/0069326H>
Purex Tunnel 2 Expert Panel Report, 2017
https://www.hanford.gov/files.cfm/PUREX_Tunnel_2_Expert_Panel_Final.pdf
Techical Permit Review, 2018 <https://pdw.hanford.gov/document/AR-01216>

Stabilization Under Non-Time Critical Removal Action

Proposal for Removal Action at the PUREX Complex, 2019
<https://pdw.hanford.gov/document/AR-02482>
Action Memorandum for the Plutonium Uranium Extraction (PUREX) Complex, DOE/RL-2016-53, Draft A, 2020
<https://pdw.hanford.gov/document/AR-03739>
Engineering Evaluation/Cost Analysis for the PUREX Complex, 2019
<https://pdw.hanford.gov/document/AR-02488>
milestone M-085-80; due September 30, 2020

Stabilization Under Time-Critical Removal Action

Action Memorandum for the Interim Stabilization of 216-Z-2 Crib, 216Z9 Trench, and 241Z361 Settling Tank, 2020 <https://pdw.hanford.gov/document/AR-03741>
Remedial Design Remedial Action Work Plan for the 200-CW-5 200-PW-1 200-PW-3 and 200-PW-6 Operable Units, 2016 <https://pdw.hanford.gov/document/0076381H>
Risk Matrix, 2018 https://www.hanford.gov/files.cfm/Final_8.7.18_Summary.pdf
Quantitative Structural Evaluation, Additional Quantitative Analysis for 241-Z-361, PUREX Deep Bed Filter Housing, and the REDOX Sand Filter, and Qualitative Structural Evaluation, 2019
<https://pdw.hanford.gov/document/AR-03498>, <https://pdw.hanford.gov/document/AR-03499>, <https://pdw.hanford.gov/document/AR-03500>
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216-Z-9 Documented Safety Analysis, rev 2019 https://www.hanford.gov/files.cfm/Z-9_DSA_Rev3.pdf
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