

HANFORD ADVISORY BOARD

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

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US Dept of Energy
US Environmental
Protection Agency
Washington State
Dept of Ecology

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February 4, 2016

Stacy Charboneau, Manager

U.S. Department of Energy, Richland Operations Office

P.O. Box 550 (A7-75)

Richland, WA 99352

Dennis Faulk, Manager

U.S. Environmental Protection Agency, Region 10

825 Jadwin Ave., Suite 210 (A1-43)

Richland, WA 99352

Re: PW 1/3/6 Operable Units

Dear Ms. Charboneau and Mr. Faulk,

Recognizing that the Tri-Party Agreement (TPA) 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 (Board) 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 Board proposes that the TPA 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 the U.S. Department of Energy (DOE) about how much deeper than the fifteen-feet-plus-two feet below grade level will be considered for further material removal. The Board advised the TPA 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 Board proposes that the most reasonable approach is to

Hanford Advisory Board

Subject: PW 1/3/6

Adopted: February 4, 2016

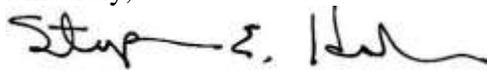
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use surgical removal techniques as much as possible to keep the overall volume of material to a minimum. Per regulations, the Board has always supported the concept that all transuranic waste that is removed should be disposed in deep geologic burial at the Waste Isolation Pilot Plant.

The Board stands behind all prior Board advice on this issue, but is providing these 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 decision. The Board has previously provided advice to the associated draft Proposed Plan in Board Advice #177, #188, #207 and #247. Board Advice #207, in particular, expresses the Board values for the remedial treatment of these waste sites. The Board would appreciate a meeting with the TPA agencies, once the negotiations over the remediation of these waste sites is done, to explain what U.S. Environmental Protection Agency's comments to this important issue were and what DOE responses were in return.

Sincerely,



Steve Hudson, Chair
Hanford Advisory Board

cc: Monica Regalbuto, Assistant Secretary of Environmental Management, U.S. Department of Energy, Headquarters
Charlotte Bertrand, Acting Director, FFRRO, U.S. Environmental Protection Agency Headquarters
Kevin Smith, Manager, U.S. Department of Energy, Office of River Protection
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Joanne Grindstaff, Co-Deputy Designated Federal Official, U.S. Department of Energy Office of River Protection
Jane Hedges, Washington State Department of Ecology
David Borak, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations