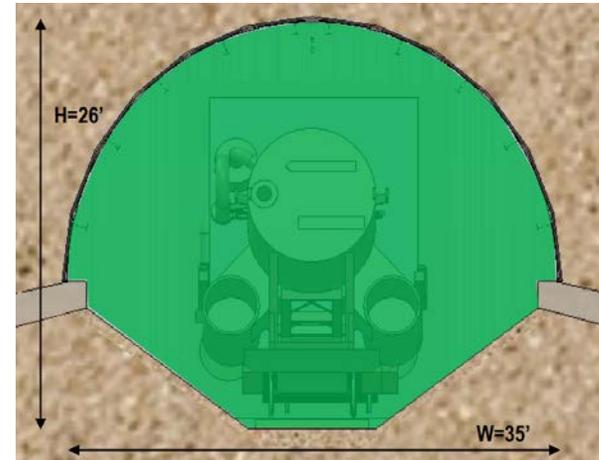


Public Involvement During Stabilization Actions

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June 2020



Overview

- The site is getting older as it waits for cleanup.
- To minimize risk of a release, facilities/structures can be managed three ways:
 - Maintain (Hotel Costs)
 - Stabilize (Grout and Wait)
 - Remove (RTD/DDDD)
- In non-emergency situations, there are a few ways to file the paperwork for Stabilizing or Removing aging structures

Why does the paperwork matter?

- The ways of filing paperwork have different levels of required analysis, timelines, and public involvement activities.
 - RCRA Permit modifications for storage units (PUREX Tunnels)
 - Technical review and public comment period by WA Ecology
 - Remedial Action
 - Complete RI/FS, RoD, and Remedial Plan with many public comment opportunities
 - Non-Time Critical Removal Action (PUREX Facility, B Plant*)
 - Public comment on Engineering Evaluation/ Cost Assessment
 - Time- Critical Removal Action (216-Z-2 crib, 216-Z-9 trench, 261-Z-361 tank)
 - Intended for action within 6 months
 - Public comment on the plan, but no requirement for site-specific alternatives

Why now?

- Since the partial collapse of PUREX Tunnel 1 in 2017, DOE has proactively evaluated risk at aging structures across the site.
- This advice was developed as a response to DOE's proposal to fill three sites near PFP on the Central Plateau with grout to stabilize them in 2020.
- The Record of Decision for these three sites has a removal, treatment and disposal plan for the plutonium-contaminated waste in the 2030 timeframe.
- There is every indication that there will be more Removal Actions as the focus shifts to the plateau.

How can we improve the process?

With aging structures and uncertain budgets, we are advising the TPA agencies to take some considerations before taking action (when there is time to deliberate)

- Default to Non-Time Critical Action, unless it is an emergency
- Determine how the action would impact the cost or implementation of a final remedy
- Start the public process earlier (Z crib actions were planned for in October, but not discussed until March)
- For the Z structures, evaluate alternatives (The only evaluation used so far was the PUREX Tunnel 2 expert panel- a very different site)
- Make sure that the webpage for the public comment period has all appropriate documents linked (critical documents relating to Z structures have not been cleared for public release yet)