



Proposed Tri-Party Agreement Changes to Prioritize Additional Cleanup Work

The U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology) -- the Tri-Party Agreement (TPA) agencies -- recently completed negotiations and are proposing changes to the TPA. These proposed changes affect several Hanford cleanup projects managed by DOE's Richland Operations Office (RL) and prioritize an expanding scope of cleanup work. The agencies want your input on these proposed TPA changes before they are finalized.

U.S. Department of Energy • Washington State Department of Ecology • U.S. Environmental Protection Agency

Background

The Hanford Site is located in southeastern Washington along the Columbia River. This 586-square-mile former plutonium production complex is currently engaged in the world's largest environmental cleanup project overseen by DOE.

The *Hanford Federal Facility Agreement and Consent Order* (also known as the Tri-Party Agreement or TPA), a legal agreement between DOE, EPA, and Ecology, identifies cleanup actions and schedules, called milestones. Changes can be made to the TPA with the approval of the three agencies, and the agreement outlines the process for changing, removing, or adding milestones.

The TPA agencies recently completed negotiations on several Hanford Site cleanup projects managed by DOE-RL. The agencies signed a tentative agreement proposing TPA changes that:

1. Revise the schedule for completion of 100 Area decision documents to complete additional groundwater monitoring in the 100-B/C Area.
2. Recognize more time is needed to address numerous additional waste sites and more extensive contamination discovered on Hanford's River Corridor.
3. Recognize the current schedule for completing "hot cell" remediation at the 324 Building will impact the demolition work in the 300 Area due to the discovery of highly radioactive contamination below the building.
4. Extend the schedule for completion of 100 K East Reactor interim safe storage (ISS) to do additional characterization work and incorporate additional soil-sampling data into the selection of a cleanup approach. It also enables the K East and K West reactors to be placed into ISS simultaneously, an approach that may provide a more efficient use of resources.
5. Delay the completion of Central Plateau canyon area decision documents and cleanup actions to incorporate lessons learned from the U-Plant Canyon disposition that will be used to validate approaches and set realistic schedules.

Why should you care about these proposed changes to the TPA?



The Tri-Party agencies propose to delay some Hanford cleanup due to the discovery of additional contamination along the river and to revise the decision document schedule for work being done along the river and in the center of the site.

Why Now?

Progress continues to be made cleaning up the 220-square-mile River Corridor including treating groundwater across the site to protect the Columbia River and cleaning out and demolishing the Plutonium Finishing Plant – Hanford's highest risk nuclear facility. Even though cleanup is progressing, new challenges have come about including the discovery of large, deep chromium waste sites in the 100-B/C and 100-D Areas in the River Corridor and much higher radioactivity than anticipated below the 324 Building, which necessitate schedule changes for Hanford cleanup work.

Public Comment Period

The Tri-Party Agencies want your feedback on the proposed Tri-Party Agreement changes. The public comment period will run from December 10, 2012 through January 24, 2013.



What changes are being proposed?

The draft TPA change packages propose to:

1. Add six new interim milestones and delete two target milestone dates for the River Corridor decision documents. (M-15-12-03)
2. Extend the completion date for three existing milestones and establish nine new interim milestones to remediate contamination that is more extensive than originally expected and address 154 newly discovered waste sites at Hanford's reactor areas (the 100 Area). (M-16-12-06)
3. Extend the closure date for the 324 Building B-Cell due to the discovery of contaminated soil underneath the structure. Also, this change will result in extending the date for completing demolition of all 300 Area surplus facilities. (M-89-12-02 and M-94-12-04)
4. Provide a revised schedule for placing the K East and K West reactors into Interim Safe Storage (ISS), also called "cocooning," (M-93-12-02)
5. Revise interim milestones for the disposition of the canyon facilities on the Central Plateau and their associated waste sites and facilities to incorporate lessons learned from the demolition work at U Plant Canyon. (M-85-12-02)

In addition, the agencies have agreed to pull forward the investigation of deep vadose zone contamination in the Central Plateau, due to the potential threat to groundwater.



The K Reactor Area near Hanford's northwest border.

The following provides a more detailed discussion of each draft change package:

River Corridor

1. **River Corridor Decision Documents.** The TPA agencies are proposing to add six new interim milestones and delete two target dates for River Corridor Decision documents, and revise interim milestones regarding documents for the 100 and 300 Areas at the Hanford Site.

The TPA agencies believe that two years of additional groundwater monitoring data would be beneficial at Hanford's B/C Area. It would enable the agencies to evaluate the impact of recent work removing sources of hexavalent chromium before a remedy is proposed.

2. **Extending the completion date of three existing milestones and establish nine new interim milestones for Hanford's reactor area (100 Area) remediation.** The TPA agencies propose to extend the completion date of three existing milestones where contamination was more extensive than expected and to establish nine new interim milestones to address remediation of 100 Area waste sites, including 154 newly discovered

waste sites. The original milestone date was to complete all interim cleanup actions by December 31, 2012; the agencies propose to extend it to March 31, 2017 for completion of final actions.

3. **Extension of 324 Facility Closure due to contaminated soil encountered under B-Cell.** The existing milestone requires closure of non-permitted, mixed-waste units in the 324 Building Radiochemical Engineering Complex B-Cell and D-Cell, the high-level vault, and the low-level vault by September 30, 2012. The TPA agencies recognize additional time will be required to complete this milestone.

While preparing the 324 Building for demolition, a breach was identified in the stainless steel liner on the floor of the research room known as B-Cell. Subsequent characterization of the soil beneath the facility confirmed that contamination had leaked into the soil through the breached liner and concrete floor during prior facility operations. This

contamination is at very high radiation levels and requires extensive preparations and operations by a specialized contractor. The highly contaminated soil below B-Cell will require re-evaluation of planned demolition and closure activities at the 324 Building.

This proposed change creates an interim milestone for submitting a closure plan to include the 324 Building Radiochemical Engineering Cells, high- and low-level vaults and associated area into the Hanford Facility Dangerous Waste Permit by June 30, 2016. A second proposed change is to extend the completion date of 300 Area surplus demolition activities from September 30, 2015 to September 30, 2018.

4. Provide a revised schedule for placing the K East and K West Reactors into Interim Safe Storage (ISS), a process also referred to as “cocooning.”

Existing interim milestones require completion of ISS of the K East Reactor by July 31, 2014 and K West Reactor by December 31, 2019, respectively. The TPA agencies agree that additional soil characterization in support of the 100 K Area integrated source and groundwater operable units remedial investigation/feasibility study is necessary prior to initiating the K East Reactor interim safe storage work. Therefore, the scope of the existing K East Reactor milestone is being combined with the K West Reactor



The 324 Building at Hanford's 300 Area.

milestone, requiring that ISS of both reactors be complete by December 31, 2019. The agencies agree that additional interim milestones are necessary to support the combined scope. A new milestone has been added to provide a change package that proposes a revised schedule with interim milestones to be established by December 31, 2015.

Central Plateau

5. Revise interim milestones for the canyon facilities on the Central Plateau to incorporate lessons learned from the demolition work at the U Plant Canyon. The existing milestone requires DOE-RL to submit a change package to establish a date for completing cleanup of canyon facilities by March 31, 2013.

The agencies propose to extend this milestone by 10 years to allow the response actions for the canyons and associated waste sites to achieve the full benefit of the lessons learned from the remediation of the U Plant Canyon, the first of the five canyon facilities on the Central Plateau to be remediated. Remediation of the U Plant Canyon, including barrier placement, is scheduled to be completed in 2021.

How You Can Become Involved

A 45-day public comment period on *proposed changes to prioritize additional cleanup work* will run from **December 10, 2012 through January 24, 2013**. At this time, no public meeting is scheduled. To request a public meeting, please contact Tiffany Nguyen by **December 27, 2012**. The TPA agencies would like your feedback on these draft change packages and will consider all comments before finalizing them. For more information please contact: Tiffany Nguyen, DOE-RL, 509-376-3361.



Please submit comments by January 24, 2013 to:

Tiffany Nguyen
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P.O. Box 550, A7-75
Richland, WA 99352
Email: TPACH@rl.gov

The Draft Change Packages can be viewed at www.hanford.gov/?page=86

The documents are also available for review at the Public Information Repositories listed below.

HANFORD PUBLIC INFORMATION REPOSITORY LOCATIONS

Portland

Portland State University
Government Information
Branford Price Millar Library
1875 SW Park Avenue
Portland, OR 97207-1151
Attn: Claudia Weston (503) 725-4542
Map: <http://www.pdx.edu/map.html>

Richland

U.S. Department of Energy Public Reading Room
Washington State University, Tri-Cities
Consolidated Information Center, Room 101-L
2770 University Drive
Richland, WA 99352
Attn: Janice Parthree (509) 372-7443
Map: <http://www.tricity.wsu.edu/admission/contact/campusmap.html>

Seattle

University of Washington
Suzzallo Library
Government Publications Department
Box 352900
Seattle, WA 98195
Attn: Hilary Reinert (206) 543-5597
Map: <http://tinyurl.com/m8ebj>

Spokane

Gonzaga University
Foley Center Library
East 502 Boone Avenue
Spokane, WA 99258
Attn: John Spencer (509) 313-6110
Map: <http://tinyurl.com/2c6bpm>

Administrative Record and Public Information Repository:

Address: 2440 Stevens Center Place, Room 1101, Richland, WA.

Phone: 509-376-2530

Web site address: <http://www5.hanford.gov/arpir/>

TPA Change Package Fact Sheet

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