



# HANFORD ADVISORY BOARD

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

**Advising:**

US Dept. of Energy

**CHAIR:**

Susan Leckband

**VICE CHAIR:**

Shelley Cimon

**BOARD MEMBERS:**

**Local Government**

Bob Suyama  
Phil Lemley  
John Trumbo  
Robert Davis  
Pam Larsen  
Richard Bloom  
Steve Anderson

**Local Business**

Tony Umek

**Labor/Work Force**

Nickolas Bumpaous  
Rebecca Holland  
Jacob Reynolds  
Emmitt Jackson

**Local Environment**

Gene Van Liew

**Regional  
Environment/Citizen**

Shelley Cimon  
Paige Knight  
Gerald Pollet  
Susan Leckband  
Todd Martin  
Tom Carpenter

**Public Health**

Antone Brooks  
Alex Klementiev

**Tribal Government**

Armand Minthorn  
Kristie Baptiste-Eke  
Laurene Contreras

**State of Oregon**

Dan Solitz  
Ken Niles

**University**

Shannon Cram  
Mohamed Osman

**Public-at-Large**

Susan Coleman  
Steve Wiegman  
Dori Luzzo Gilmour  
Tom Galioto

**Liaison**

**Representatives**  
Washington State  
Department of Health

HAB Facilitation Team  
ProSidian Consulting  
Richland Office  
713 Jadwin, Suite 3  
Richland, WA 99352  
Phone: (509) 588-7010

October 8, 2020

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

Dear Mr. Vance,

**Background:**

B Plant is a canyon facility that isolated plutonium from irradiated fuel rods from 1945 until it was taken out of service in 1957. The plutonium extraction process resulted in highly toxic waste products including highly radioactive cesium and strontium. B Plant was reactivated and operated between 1968 and 1985 to further extract cesium and strontium from the high-level waste (HLW) tanks.

The U.S. Department of Energy (DOE) has proposed using a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Non-Time Critical Removal Action supported by an Engineering Evaluation and Cost Analysis document (EE/CA) to demolish portions of B-Plant complex and prepare other portions for demolition to reduce surveillance and maintenance costs. An additionally proposed activity will entomb highly radioactive HEPA filters which were part of the ventilation system in grout. The HEPA filters are currently stored in vaults under the 291-B facility and are covered by steel plates and approximately three feet of soil. This cover prevents exposure to the estimated 71,000 curies of strontium-90 and 156,000 curies of cesium-137 trapped in the filters.

Due to the estimated high curie loading of the HEPA filters, the HAB is concerned that by grouting the HEPA filters in 291-B cell, other alternatives for final disposal may be overlooked, rendered more difficult, or impossible.

**Advice:**

- The Board advises DOE to evaluate how filters, which may be Greater Than Class C or High-Level Waste, would be dispositioned prior to stabilization.
- The Board advises DOE to proceed with investigations and consideration of alternatives consistent with the RI/FS milestones of the TPA (M-85-70 and M-15-00) to:
  - Increase confidence in cost estimates for the proposed work.
  - Ensure that any proposed removal action will not prevent characterization of RCRA wastes, compatibility assessments, and/or final remediation.

Sincerely,

Susan Leckband, Chair  
Hanford Advisory Board

---

cc: Kelly Snyder, Designated Federal Officer, U.S. Department of Energy, Headquarters  
Alexandra Smith, Manager, Washington State Department of Ecology  
David Einan, Manager, U.S. Environmental Protection Agency, Region 10  
James Lynch, Deputy Designated Federal Officer, U.S. Department of Energy  
Stanley Branch, Deputy Designated Federal Officer, U.S. Department of Energy  
Oregon & Washington Delegations