HANFORD ADVISORY BOARD

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

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Re: Criteria for Development of the Proposed Plan for 200-PW-1, 3, and 6

Dear Messrs. Brockman and Ceto and Ms. Olinger and Ms. Hedges,

The Hanford Advisory Board (Board) wishes to thank the Tri-Party Agreement (TPA) agencies for the early, collaborative, and interactive discussion employed in the April 15th workshop, "Cleanup Alternatives for Waste Sites near the Plutonium Finishing Plant." We appreciate the commitment to continue this open dialogue process. These plutonium-rich waste sites are particularly important because they pose unique environmental and security risks.

The Board's Central Plateau Remedial Action Values Flowchart (Advice #173) and the Groundwater Values Flowchart (Advice #197) collectively present a decision flow path for remedial decision-making applicable to these waste sites. Neither document is meant to be prescriptive, but they do outline the Board's values and principles.

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Advice

At this early juncture, we have the following advice:

- The early, iterative process which engaged the Board, the tribes and the public should be a model for future decision-making.
- The Board believes that the TPA agencies should commit to adequate characterization of the 200 Process Wastes (PW) 1, 3, and 6 and the removal, treatment and disposal to the extent practicable of all these plutonium-rich wastes.
- The TPA agencies should ensure that soils contaminated with transuranic elements disposed of prior to 1970, post-1970 transuranic (TRU) waste, and mixed TRU waste will be retrieved and have a pathway for disposal into the Waste Isolation Pilot Plant.

An attachment to this advice contains a number of considerations the Board believes are important to the development of the Proposed Plan for remediation of the PW-1, 3, and 6 waste sites.

Sincerely,

Susan Leckband

Susan Leckband, Chair
Hanford Advisory Board

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Doug Shoop, Co-Deputy Designated Federal Official, U.S. Department of Energy, Office of River Protection
Steve Wiegman, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office
Nick Ceto, Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Doug Frost, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations

ATTACHMENT TO ADVICE #207

Considerations important for 200-PW-1, 3 and 6 Proposed Plan development

(Not in order of importance)

Decision Process

1. Use this model of collaborative decision-making with early Board (Committee of the Whole), public and tribal involvement in future cleanup decisions, especially at the scale of zone closure.
2. Use all pertinent Board advice to define the extent to which remediation is necessary and to develop remediation alternatives. In particular, use the Central Plateau Remedial Action Values Flowchart in Hanford Advisory Board Advice #173 and #174, and the Groundwater Values Flowchart in Hanford Advisory Board Advice #197.
3. Apply the requirements of all applicable regulations in one process to meet the requirements and goals of each (e.g. Comprehensive Environmental Compensation and Liability Act; Resource Conservation and Recovery Act).
4. Integrate remediation actions on these waste sites with neighboring sites and facilities utilizing the "zone closure" concept. Ensure that the decisions integrate well both in timing and in actions.

Analysis and Data Quality

1. Evaluate and include the full range of life-cycle costs for each alternative.
2. Assess available science and technologies and assess needs for additional technologies. See related Board Advice #156 and #204.
3. Identify and evaluate the implications of uncertainties inherent in the data and analytical procedures used.
4. Use validated modeling tools that incorporate all significant fate and transport effects known or suspected to occur at Hanford.
5. Ensure that assumptions inherent to the alternatives are validated. Do not bias alternatives on expected outcomes.
6. Evaluate the effect of alternative discounted cash flow values, including non-discounted values in life-cycle cost analysis.
7. Use good science to determine whether plutonium is mobile and ensure groundwater is not an exposure pathway.
8. Run hazard analyses for long-lived radionuclides out to 1000 years.
9. Evaluate implementation of mining and construction technologies and techniques rather than assuming that large lay-backs of soil are required.

Decision Criteria

1. Decisions should be based on adequate characterization. Retrieve and treat wastes and contaminated soils (especially long-lived radionuclides with transuranic elements such as plutonium) to meet goals for permanent remedies consistent with our prior advice and values.
2. Do not rely on institutional controls or physical barriers to human intrusion unless there is no other practicable remedial option.
3. Do not rely on barriers to prevent the migration of contaminant plumes unless there is no other practicable current remedial action.
4. Do not leave wastes in the soil that pose any significant risk for use in nuclear weapons or dirty bombs.