April 5, 2002

Keith Klein, Manager U.S. Department of Energy, Richland Operations P.O. Box 550 (A7-50) Richland, WA 99352

Harry Boston, Manager U.S. Department of Energy, Office of River Protection 2440 Stevens Richland, WA 99352

John Iani, Regional Administrator U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue Seattle, WA 98101

Tom Fitzsimmons, Director Washington State Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

Subject: 200 Area Change Package

Dear Mssrs. Klein, Boston, Iani, and Fitzsimmons,

The Hanford Advisory Board (Board) endorses the proposed Tri Party Agreement (TPA) changes for the 200 Area as a first step in what should be an integrated comprehensive effort.

The Board is encouraged by the cooperation of the TPA agencies in seeking improvements to the Hanford cleanup program. This letter does not recommend any delay to ongoing work or the implementation of the 200 Area change package, but rather it encourages integration of necessary long-term cleanup activities. However, the Board finds the following key areas of concern outstanding.

• This change package only includes non-tank farm operable units (OU). There is an extensive inventory of remediation needs that must be resolved on an integrated, consistent basis for all operable units.

- The Board advises that a comprehensive risk assessment, including quantitative analyses be developed to guide cleanup decisions. The current change package claims a "risk based" approach to prioritizing remediation work, but no risk analysis is shown.
- The Board advises that the groundwater program immediately be incorporated as an integrated part of the cleanup program. The Agencies assert a commitment to focus on ground water remediation, but ground water units are excluded from the proposed change scope.
- The role of long-term Waste Management, and ultimate closure of sites and facilities, needs to be identified and addressed in the Central Plateau and integrated with the remediation program.

The Board advises the Agencies to establish an integrated plan and concept, bringing together a consistency of remedial approaches and schedules for the full scope of 200 Area cleanup.

Sincerely,

Todd Martin, 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: Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Martha Crosland, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations

<u>U.S. Senators (OR)</u> Gordon H Smith Ron Wyden

U.S. Senators (WA) Maria Cantwell

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U.S. Representatives (OR) Earl Blumenauer Peter DeFazio Darlene Hooley Greg Walden

U.S. Representatives (WA) Norm Dicks Jennifer Dunn Richard Hastings George Nethercutt

<u>State Senators (WA)</u> Pat Hale Mike Hewitt

<u>State Representatives (WA)</u> Jerome Delvin Shirley Hankins