

HANFORD ADVISORY BOARD

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

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State Dept
of Ecology

Dec 6, 2002

Keith Klein, Manager

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Subject: Long-Term Stewardship Program Plan

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Dear Mr. Klein,

The working draft of the Hanford Long Term Stewardship (LTS) Program is a good start but it needs to include many key changes to reflect a holistic approach to Hanford clean-up decisions and long-term stewardship applications. Common themes and values identified by many stakeholders and that the Hanford Advisory Board (Board) expects to see as part of or addressed in decisions that are precursors to the Hanford Long Term Stewardship Program are listed below.

Effective Long Term Stewardship requires that cleanup decisions have sound bases to protect human health and the environment. If residual contamination remains or is discovered after cleanup, the LTS plan must contain a clear process to address additional remediation in accordance with the applicable laws and regulations.

A key step toward informed cleanup decision-making includes using an analysis of the residual contamination that may remain after completion of remediation to determine appropriate long-term stewardship. The analyses should include a comparison of cost vs. actual risk reduction over time. As an example, if the analysis demonstrates that spending \$1 million dollars more today for a higher or equal risk reduction as opposed to less or equal risk reduction resulting in a longer stewardship phase that will cost more later, the prudent decision becomes obvious; clean it up now! Cleaner now = less risk and less required stewardship with associated costs = everybody wins.

Other steps must be performed before a comprehensive, values-based Long Term Stewardship Plan for the Hanford Site is finalized. Requirements for other Federal Agencies and local governments who may accept land transfers from DOE must be identified. Development of expected end states must be a collaborative effort. Beginning with a dialogue between stakeholders, regulators, the public and the DOE, end states must be determined by using a values-based process in concert with good technical and scientific data. A good starting point for the end states discussions is the output of the recent Hanford Advisory Board Exposure Scenario Task Force.

HAB Consensus Advice #141

Subject: Long-Term Stewardship Program Plan

Adopted: December 6, 2002

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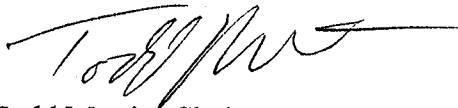
The long-term vision for Hanford is a site that has been cleaned up in a manner and to a point sufficient to protect and preserve human, biological, natural and cultural resources in a sustained manner for future generations and where current and past activities do not impose a burden on future generations.

The Board looks forward to a continuing, positive working relationship with DOE in crafting a stewardship program appropriate to the Hanford site and the lower Columbia Basin.

- A funding source to manage Long Term Stewardship activities must be identified and ensured through continuing commitment from DOE.
- The LTS Plan should not presuppose end states not agreed to by the regulatory agencies through formal agreement. Example...the use of waste site caps or an assumption that significant contaminated groundwater will remain...”
- LTS should not end until there is reasonable confidence that no credible natural or man-made event or process will cause unacceptable harm even with no active control.
- DOE (or its successor agencies) is responsible for residual contamination until such time as it is no longer a risk to human health and the environment. A clear path to additional mitigation must be identified if discovery of further or previously unidentified contamination occurs.
- The LTS Plan should determine if cleanup goals are met.
- The Plan must include roles and responsibilities regarding current and planned disposal sites as they apply to stewardship.
- The Plan must comply with all applicable federal, state, and county laws and treaty rights.
- A comprehensive communication plan must be part of the LTS Plan and effective public communication must include identification of long-term risks during long-term stewardship.
- Risk analyses must include a model that recognizes that all institutional controls are expected to fail – and the accompanying consequences.
- The Plan must include real, holistic integration that includes local, county, and state governments and other federal agencies.
- Data relevant to LTS must be identified and stored redundantly in readily accessible formats that will be maintained and accessible over time.

- Performance assessments must be done for as long as waste remains hazardous.
- The goals identified in the Plan need to be more active and tied clearly to the mission and vision.
- An interface process must be established between the Long-term Stewardship Program and ongoing Waste Management Operations on-site.
- Institutional controls do not constitute stewardship.
- The Long Term Stewardship Program Plan must be a values-based document.

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.

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