

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

November 4, 2005

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the Umatilla
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Re: 200 BC Cribs Focused Feasibility Study and Proposed Plan

Dear Messrs. Klein and Bogert,

Background

The Hanford Advisory Board (Board) recognizes that the Environmental Protection Agency (EPA) and the Department of Energy (DOE) are currently in a disagreement over resolving comments on Draft A of the Focused Feasibility Study and Proposed Plan (FFS/PP) for the 200 Area BC Cribs and Trenches Waste Sites. This disagreement centers on whether several cribs should be partially retrieved prior to capping (EPA's position), or capped without retrieval (DOE's position). DOE believes that worker exposure during retrieval would be too great to justify the environmental benefits of retrieval. EPA disagrees.

In this disagreement, both EPA and DOE cite their position as being responsive to Board advice. The Board thanks the agencies for directly considering the Board's values in considering remedial alternatives. It appears that EPA's position is more consistent with the Board's advice in that it places a higher priority on the Retrieve, Treat and Dispose (RTD) option (see Board Advice #173). However, further examination of the information underlying this disagreement is necessary to reach a final decision.

The Board continues to prefer the RTD alternative for all cleanup activities (See Advice #173). The Board recognizes that in some cases complete RTD may be technically impracticable, and that capping may be required.

The Board believes the decision to cap without retrieval is premature. The Board also believes worker safety is a very important factor in any project and deserves the most accurate data and careful calculations in determining worker risk. DOE should analyze worker dose during excavation, packaging, and disposal operations in greater detail using more appropriate As Low As Reasonably Achievable (ALARA) practices as well as better source term information. The Board acknowledges DOE has the capability to successfully manage worker radiation exposure and safely retrieve and dispose of highly radioactive waste while protecting workers. Removal activities in the N-Area have demonstrated that capability.

Better analyses of, and support for, Institutional Control (IC) assumptions are necessary. DOE's assumption of ICs for 150 years is not supported by current experience with IC failures in this country. It might be safe to assume DOE will remain in active control for the next 50 years, but to assume successful passive control for another 100 years is not credible. The Board would like to see and understand DOE's plans for ICs at the Hanford Site for the next 150 years.

All DOE-Environmental Management decisions that defer to ICs should include the full integration of all appropriate DOE organizations to ensure all long-term stewardship needs are met. The integration should include, but not be limited to, preplanning, implementation and all follow-on activities, for example security, monitoring/surveillance, remedial actions, and failures.

Board Advice:

Because DOE did not assess Best Available Technologies (BAT) and realistic probable exposure scenarios and has not proven RTD is technically impracticable, the Board advises DOE reevaluate the FFS/PP to include:

- Full evaluation of Best Available Technologies following the decision tree set forth in Advice #173;
- Reanalysis of worker dose using realistic, probable exposure scenarios while ensuring adequate worker protection;
- Full integration of all appropriate DOE organizations to ensure all long-term stewardship needs are addressed; and,
- Analysis of the reasonable likelihood and consequences of failure of institutional controls during and after an active control period.

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: Jay Manning, Washington State Department of Ecology
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