



April 7, 2000

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Seattle, WA 98101

Tom Fitzsimmons, Director  
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Keith Klein, Manager  
U.S. Department of Energy, Richland Operations  
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Richland, WA 99352

Subject: 618-10 and 618-11 Burial Grounds

Dear Messrs. Clarke, Fitzsimmons, and Klein:

The Hanford Advisory Board (HAB) has an acute concern with regard to the remedial actions for the 618-10 and 618-11 burial grounds. The HAB supports the preferred alternative to remove-treat-dispose these wastes. We encourage the Tri-Party agencies to expeditiously move this proposal into public comment and on to a September 2000 Record of Decision.

The draft preferred alternative was developed through a process with active stakeholder participation. This process dates back to the 1988 Hanford Defense Waste Environmental Impact Statement in which remove-treat-dispose was identified as the preferred alternative for the 618-11 burial ground with the 618-10 burial ground to be treated as an analogous site. The preferred alternative has the support of the citizens and governments in the Northwest.

The location of one of these burial grounds is just off a road to which the public has access. The other is next to a public parking lot for a commercial nuclear reactor. This site is also close to the Columbia River which is a national treasure.

There are several reasons to move forward with a remove-treat-dispose alternative for the 618-10 and 618-11 burial grounds. First, we foresee other uses besides waste management for the area. It could be released from institutional controls as it is outside the 100, 200, and 300 Areas. Indeed, this area is within the Columbia River corridor for which the U.S. Department of Energy (DOE) Richland Manager is proposing an accelerated cleanup to free it for other uses.

Second, the recent finding of high levels of tritium near the 618-11 burial ground indicate there are wastes in that burial ground which were not previously known or expected. The tritium is a warning that

other contaminants may be migrating from the burial ground. Groundwater is a Trust resource that may be injured by the tritium. This is a potential threat to the river and to Richland's drinking water supply. These issues support the need to exhume these burial grounds.

DOE needs to address final disposition of wastes removed from the 618 burial grounds as soon as possible. The M-91 milestone addresses the treatment and disposal requirements for transuranic waste and should address wastes from the 618-10 and 618-11 burial grounds. It is imperative that an aggressive technology development effort begin now to ensure that the technology for safe retrieval and treatment is in place to meet the timeframes for disposal at the Waste Isolation Pilot Plant.

The HAB strongly supports the remove-treat-dispose alternative for the 618 burial grounds pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act and the Washington State Model Toxics Control Act.

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

/s/Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: Carolyn Huntoon, Department of Energy Headquarters  
Dick French, Department of Energy-ORP  
Wade Ballard, Deputy Designated Federal Official  
The Oregon and Washington Congressional Delegations  
Michael Gearheard, Environmental Protection Agency  
Dan Silver, Washington Department of Ecology

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*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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*For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford\_Advisory\_Board@rl.gov  
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