

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 HANFORD/INL PROJECT OFFICE

309 Bradley Boulevard, Suite 115 Richland, Washington 99352

December 14, 2010

Ms. Susan Leckband, Chair Hanford Advisory Board 713 Jadwin, Suite 4 Richland, Washington 99352

Re: HAB Consensus Advice #237, Engineering Evaluation/Cost Analysis (EE/CA) for

105-KE Reactor Decommissioning (DOE/RL-2009-106, Rev 0)

Dear Ms. Leckband: Sustin

Thank you for reviewing the above-referenced document and providing advice concerning the 105-KE Reactor Decommissioning. We agree with your advice encouraging the U.S. Department of Energy Richland Operations Office (DOE-RL) to proceed with analyses and planning for the dismantlement of 105-KE Reactor. A key message conveyed during formulation of HAB advice was that the amount of detail presented in the EE/CA should be proportional to the complexity of the project being evaluated.

EPA agrees that DOE-RL should provide information on the proposed action along with cost estimates that reflect the experience at Brookhaven as requested in the second bullet of Hanford Advisory Board (HAB) Advice #237; however this type of information is not typically included in an EE/CA. We have asked DOE-RL to include this information in the administrative record. It is our understanding DOE-RL has already provided this information in the form of presentations along with other pertinent documents to the HAB issue managers.

EPA agrees with the HAB advice to measure soil contaminant levels below reactors and believes additional steps should be taken. Contaminants adjacent to and under 105-KE and reactors in EPA lead operable units are covered by the current 100 Area Remaining Sites Record of Decision (ROD) or the Integrated 100 Area Remedial Investigation Feasibility Study Workplan and its Addendum and will be addressed accordingly. The results should be analyzed and considered in the final RODs for the river corridor. The effect of roof run-off should also be evaluated for any contaminants remaining in the soil for reactors that are or will be in Interim Safe Storage (ISS). While we agree with the HAB advice, this information is not typically included in an EE/CA and should be included in one of the decision documents discussed above.

If any questions arise, please feel free to contact Rod Lobos from my staff at (509) 376-3749.

Sincerely,

Dennis Faulk,
Hanford Program Manager

cc:

Nick Ceto, DOE Jane Hedges, Ecology