

June 7, 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: Exposure Scenarios Task Force on the 200 Area

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

The Exposure Scenarios Task Force was formed by the Tri-Party Agreement (TPA) agencies to provide them with a broad range of stakeholder values specific to the development of exposure scenarios and risk analyses to support future cleanup decisions. As a secondary product, the Hanford Advisory Board (Board) members on this Task Force were asked to develop advice for the TPA agencies covering the risk framework for the 200 Area.

The Board acknowledges that some waste will remain in the core zone when this cleanup effort is complete. However, the core zone should be as small as possible and should not include contaminated areas outside the 200 Area fences. The waste within the core zone should be stored and managed to make it inaccessible to inadvertent intruding humans and animals.

A continued human presence in the core zone would provide an ongoing, active institutional interest vested in future management of the risks posed by Hanford waste. One way to ensure this continuous human presence is to maximize

the potential for any beneficial use of the accessible areas of the core zone, rather than rely only on long-term government control of these areas.

Groundwater remediation must be an integral part of source term remediation. This effort should include aggressive technology development and implementation. Risk assessments must include all aspects of groundwater and vadose zone. Groundwater is a valuable resource with beneficial future uses that must not be restricted outside of the individual waste management unit points of compliance within the core zone.

The Board believes that sound management, stewardship, and cleanup decisions must begin now to build equity over generations. The Tri-Parties need to engage immediately in developing robust, flexible, and creative management systems to address long-term stewardship. The Board recommends that a coalition of groups, to include the Tribes, local government, and other affected entities as appropriate be created to administer the long-term stewardship responsibilities for this site. Stewardship should be an active process involving the entire spectrum of management, education, and protection activities.

For the Central Plateau, the Board advises the agencies to analyze a range of potential human health and ecological risks, including the reasonable maximum risk expected over time. The stakeholder community will use this analysis to advise the agencies on appropriate cleanup decisions. The risk analysis should include: a reasonable maximum exposure to a resident and/or Native American, including groundwater use, in what is currently labeled the buffer zone and in areas freed up for use as the core zone shrinks. For the waste management areas within the core zone, exposure scenarios should include a reasonable maximum exposure to a worker/day user, to possible Native American users, and to intruders.

The Board also recommends that DOE continue to refine its ability to make accurate risk projections by continuing efforts to gather the data necessary to accurately characterize waste inventories and locations. The results of these analyses should be provided as soon as possible and in a publicly useful format that depicts geographic variations of risks over time.

Finally, the Board believes the values expressed by the Future Site Uses Working Group are still applicable. These values should continue to be used as a guide for making cleanup decisions.

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.S. Senators (OR)

Gordon H Smith
Ron Wyden

U.S. Senators (WA)

Maria Cantwell
Patty Murray

U.S. Representatives (OR)

Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden

U.S. Representatives (WA)

Norm Dicks
Jennifer Dunn
Richard Hastings
George Nethercutt

State Senators (WA)

Pat Hale
Mike Hewitt

State Representatives (WA)

Jerome Delvin

Shirley Hankins