

HANFORD ADVISORY BOARD

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

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US Environmental
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Washington State
Dept of Ecology

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April 9, 2010

David Brockman, Manager
U.S. Department of Energy, Richland Operations Office
P.O. Box 550 (A7-75)
Richland, WA 99352

Re: Hanford Long-Term Stewardship Program Plan

Dear Mr. Brockman,

Background

The Hanford Advisory Board (Board) appreciates the opportunity to provide early input into the development of, and to provide comments on, the Preliminary Draft of the Hanford Long-Term Stewardship (LTS) Program Plan (Plan), Revision C, dated February 25, 2010.

Over seven years ago, on December 6, 2002, the Board provided Advice #141, Long-Term Stewardship Plan¹ which provided the Board's comments on the previous version of this program plan. The principles expressed in that advice and other related Board advice² remain appropriate and valid today. The basis for the Board's advice has been consistent and unwavering for the permanent retrieval, treatment and disposal of all production mission hazards, and to protect and preserve human, biological, natural and cultural resources in a manner that does not impose a burden on future generations.

Under DOE current plans there will be areas used for waste disposal that will require surveillance and maintenance controls, access control and safeguards, system updates and periodic reviews for periods far into the future. We hope that future technological development could address our goal for retrieval, treatment and disposal.

This advice reiterates and augments past advice, tailoring it to this Preliminary Draft of the Plan. The Board recognizes that the Plan is not a "decision document;" rather it describes stewardship obligations and how decision documents "hand off" property and those responsibilities to the LTS Program. The Board also recognizes that some of the comments on the Plan may need to be further addressed in U.S. Department of Energy (DOE) decision documents, national agency policy, through interagency efforts, or subsequent implementation documents. Nonetheless, we believe it is appropriate to address them here as a part of this Plan review.

Envirolssues

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Advice

Site Ownership

- The Plan should address the possibility that federal ownership and/or control of the Site in perpetuity may not be realistic. The Board advises that the Plan and related decision documents offer, in addition to the assumption of perpetual federal ownership, scenarios that assume a loss of federal control/ownership. The viability of the Plan should be evaluated under these scenarios.

Federal Management of Long Term Stewardship Property and Mobile Hazards

- The LTS Plan should address DOE responsibility, obligations and plans to respond to contamination that, over time, may migrate beyond the Site boundaries. This discussion should also include the response for credible natural or man-made events or processes. Any previous agreements or future plans to coordinate with local and state governments regarding monitoring and emergency response procedures should be discussed.
- The Plan should clarify actions that will be taken to address changes in the Site mission, including an expanded role as an interim or long-term storage site for the Waste Treatment Plant produced glass logs and the spent nuclear fuel currently in storage at the Canister Storage Building.
- The Plan should clarify the process of transitioning land between managing agencies, between DOE offices and site contractors. This process should be fully explained and illustrated in the Plan.
- The Plan should clarify actions that will be taken and the capability it will have to address the discovery of further or previously unidentified contamination after remediation activities have been completed and the area turned over to the LTS Program. These actions would include potential future record of decision (ROD) amendments to return areas to an active remediation status.
- The Plan should fully explain the implications of Natural Resource Damage Assessments decisions to LTS operations and remedy cost.

Funding Long Term Stewardship Obligations

- The Plan should thoroughly detail all stewardship-related costs, and develop specific procedures for a real cost accounting (e.g. cumulative non-discounted cost) in addition to the Net Present Value (NPV) approach. DOE is required by Office of Management and Budget to perform an NPV analysis of the costs of LTS. The effect of this NPV method is that stewardship actions beyond thirty years will appear to cost

nothing. This approach is clearly inconsistent with our vision of reducing or eliminating costs to future generations. Given the extremely long periods involved with LTS and the annual nature of the Congressional budget process, an improved method which accurately describes the real costs of LTS should be adopted for use in the remedy selection process.

- The Plan should review other methods to fund LTS actions over the period of performance, i.e., alternatives to annual Congressional appropriations. The Board would like assurance that LTS responsibilities of federal and state agencies will be adequately funded in the future.
- If significant levels of plutonium contamination are present in areas under LTS, the Plan should reflect the need and the associated costs for active security or continuous human presence on the Site. (The Plan primarily discusses routine passive surveillance and maintenance.) Importantly, the Board reasserts its vision that all hazards be removed.

Remedy Reviews: New Information and Technologies

- The Plan should ensure new information and technologies that could improve the remedy be periodically assessed, possibly as part of the five-year review process. The Plan should discuss how it would support these technology developments, identification and implementation activities.
- The Plan should describe the process for adopting newly developed remedial and monitoring technologies into existing RODs, especially those that involve returning to an active restoration phase.
- The Plan should describe the processes for estimating the reliability of institutional controls and adopting new mechanisms in a manner analogous to failure analyses for engineered controls. The Plan should ensure incorporation of these processes into existing RODs and inform successive remedy revisions.

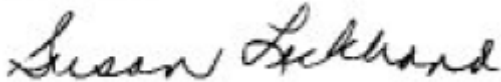
Information/Knowledge Management

- The Board advises accelerated development of the Hanford Long-Term Stewardship Information Management Plan (LTS IM Plan). The Plan recognizes that a viable information management program is a critical component of the LTS Program. The LTS IM Plan should:
 - Actively involve tribes and stakeholders in its scope and development.

- Seek opportunities to pool resources and integrate with existing legacy waste information management programs. These efforts should reflect an awareness of potential benefits/costs of collaborative strategies.
- Identify and pursue strategies that take advantage of significant historical facilities that could perpetuate public memory of past production, remediation, and future stewardship of the Site. The National Park Service study to establish a Manhattan Project National Historic Park is such an opportunity.
- In order to ensure that LTS information is not lost to future generations, DOE should continue the moratorium on record destruction and develop a plan to preserve historical records.

The Board looks forward to continuing to work with the Tri-Party agencies to assist with the determination of cleanup decisions. The Board's goal is to support implementation of a LTS Program that is protective of the environment and will not burden future generations.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Steve Pfaff, Co-Deputy Designated Official, U.S. Department of Energy, Office of River Protection
Doug Shoop, Co-Deputy Designated Official, U.S. Department of Energy, Richland Operations Office
Dennis Faulk, U. S. Environmental Protection Agency
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The Oregon and Washington Delegations

¹ Hanford Advisory Board Consensus Advice #141, Subject: Long-Term Stewardship Program Plan, Adopted: December 6, 2002

² Hanford Advisory Board Letter, Subject: Institutional Controls & their Impacts on the Long Term Stewardship of the Hanford Site, dated: February 6, 2009