

# 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

February 10, 2012

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Susan Leckband

**VICE CHAIR:**

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Matt McCormick, Manager  
U.S. Department of Energy, Richland Operations  
P.O. Box 550 (A7-50)  
Richland, WA 99352

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Department of Health

Dennis Faulk, Manager  
U.S. Environmental Protection Agency, Region 10  
309 Bradley Blvd., Suite 115  
Richland WA 99352

Jane Hedges, Program Manager  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA 99354

Re: PW 1,3,6 and CW-5 Record of Decision

Dear Messrs. McCormick, Faulk and Ms. Hedges,

The Hanford Advisory Board (HAB or Board) is a Federal Advisory Committee Act (FACA) board chartered by the U.S. Department of Energy (DOE), and representing multiple constituencies within the northwest. The Board membership represents many sectors of the public, and it is universally understood that the Board provides a specific, direct, and vital Tri-Party Agreement (TPA) agencies advisory board function.

In the 18 years of its existence, the Board has developed and delivered consensus advice to DOE, the Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA) on a wide breadth of issues concerning the cleanup of the Hanford Nuclear Reservation. This includes advice on proposed plans that define final records of decisions (RODs). The Board expects to receive point-by-point response to all future policy concerns expressed in its advice from the agencies to whom the advice is directed (responses to HAB Advice 246 are a good example of this). This system improves our communication with the agencies, clarifies intent, and provides historical documentation.

In light of this expectation, we were taken aback at the December 7, 2011 River and Plateau (RAP) Committee meeting, to learn that HAB Advice 247 (Proposed Plan for PW-

**EnviroIssues**  
**Hanford Project Office**  
713 Jadwin, Suite 3  
Richland, WA 99352  
Phone: (509) 942-1906  
Fax: (509) 942-1926

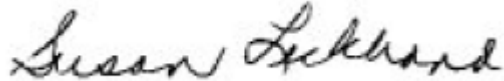
**Hanford Advisory Board**  
**20120-01**  
Subject: PW 1,3,6 and CW-5  
February 10, 2012  
Page 1

1,3,6 and CW-5 Operable Units) had been identified by the TPA agencies as a public comment letter on the Proposed Plan and that, contrary to past responses to HAB policy advice, the Board was not going to receive a direct response from any agency to HAB Advice 247 on a point-by-point basis. During a discussion of this subject at the January 10, 2012 RAP Committee meeting, we were gratified to hear that the TPA agencies would respond (and did), point-by-point, to our advice with excerpts from the Responsiveness Summary (ROD, Part III), suitable for posting on the HAB website. This action alleviates our concern that without posting agency responses directly to the HAB website it is difficult for anyone to track agency response to the Board's advice. In the future, we request the TPA agencies craft a direct response to our advice points to ensure the Board and the public can easily follow HAB advice and responses.

Additionally, whenever referencing Board advice, the Board would appreciate that the TPA agencies identify all relevant HAB advice, and do so by number. The PW-1,3,6 and CW-5 ROD mentioned HAB Advice 132 (2002), and HAB Advice 207 (2008), but failed to mention or reference HAB Advice 247 (2011), which directly addressed this ROD. We reiterate the goal of having Board advice posted on the HAB website, along with documentation of direct agency responses to the points within our advice. The Board's goal is clear communication with no misrepresentation of intent.

The Board believes that public and Board values and advice points within HAB Advice 247 were not addressed with sufficient specificity in the Responsiveness Summary. Our level of dissatisfaction, disappointment and concern is heightened by the fact that the sites addressed by this ROD contain very large volumes of plutonium-contaminated soil and the final ROD fails to reflect Board advice and public sentiment concerning its disposition. The volume of plutonium-contaminated soils, other radionuclides, and chemicals within these waste sites are inadequately defined. HAB Advice 247 advises DOE and EPA to "get as much plutonium out of these waste sites as possible." HAB Advice 247 further states: "DOE policy should opt to ship eligible plutonium-contaminated soil to WIPP [Waste Isolation Pilot Plant] for geologic disposal, permanently removing it from Hanford." The majority of people who spoke at the public meetings expressed this same sentiment. Therefore, we cannot, in good conscience, remain silent. The Board will be weighing in with further concerns during the development process of the Work Plan for this ROD.

Sincerely,



Susan Leckband, Chair  
Hanford Advisory Board

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

cc: Stacy Charboneau, Deputy Designated Official, U.S. Department of Energy  
Dennis Faulk, U. S. Environmental Protection Agency  
Jane Hedges, Washington State Department of Ecology  
Catherine Brennan, U.S. Department of Energy, Headquarters  
The Oregon and Washington Delegations