

Draft HAB Letter Regarding the PW-1,3,6/CW-5 Record of Decision¹

[Address]

Dear _____:

The Hanford Advisory Board (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. In the 17 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 responses to the 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). It is universally understood that the Board is not the public, nor do we represent them.

In light of this expectation, we were taken aback to learn that HAB Advice 247 (Proposed Plan for PW-1/3/6 and CW-5 Operable Units) had been classified by DOE as a public comment letter on the Proposed Plan and that, contrary to past responses to HAB policy advice, we are not going to receive a direct response from any agency to HAB Advice 247 on a point-by-point basis. We believe that our advice points, now rolled into the Response to Comment document attached to the final ROD, were not adequately addressed. Nowhere within the ROD or the Response to Comments attachment can we find an articulation of DOE's or EPA's concurrence, or not, directly to our policy concerns. Further, without direct posting of agency responses to advice on the Board's website, it is difficult to track the agencies' response to the Board. We reiterate our expectation to have our advice as a Board documented, along with direct agency responses to the points within our advice.

Our level of dissatisfaction, disappointment and concern is heightened by the fact that the site addressed by this ROD contains a very large volume of plutonium in the soil; the final ROD fails to reflect Board advice and public sentiment concerning its disposition. The volumes of plutonium, 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." Advice 247 further states: "DOE policy should opt to ship eligible plutonium-contaminated soil to WIPP 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 in development of the Work Plan for this ROD.

Sincerely,

Susan Leckband
Hanford Advisory Board Chair

¹ *Record of Decision, Hanford 200 Area Superfund Site 200 Area CW-5, and 200 Area PW-1, 200 Area PW-3 and 200 Area PW-6 Operable Units, September 2011*