

# 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 8, 2013

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U.S. Environmental Protection Agency, Region 10  
309 Bradley Blvd., Suite 115  
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Jane Hedges, Program Manager  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA 99354

Re: Tri-Party Agreement Change Package

Dear Messrs. Smith, McCormick, Faulk and Ms. Hedges,

**Background:**

The Hanford Advisory Board (Board) is appreciative of the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) for agreeing to consider and respond to this advice on the currently proposed changes to the Tri-Party Agreement (“Hanford Federal Facility Agreement and Consent Order Proposed Revisions Pertaining to 100 Area Waste Site Remediation, 300 Area Surplus Facilities, 200 Area RI/FS, and Canyon Facilities Response Actions”), although this advice will be received after the public comment period has closed.

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**HAB Consensus Advice # 264**  
Subject: TPA Change Package

Adopted: February 8, 2013  
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Since its inception, the Board has supported and relied on the Tri-Party Agreement as a living document and guiding force for Hanford cleanup. The Board applauds DOE, EPA and Ecology for continuing work to find common ground on cleanup choices, and to reach agreement on changes to the Tri-Party Agreement as they become necessary.

Although the Board does have some concerns about an established pattern of delaying cleanup activities through changes to the Tri-Party Agreement, we recognize that the modifications contained within this proposed change package represent the reality of where we are today. While milestones are the very backbone that supports strategically planned cleanup work and track progress as the cleanup activities continue to completion, the ultimate goal is safe and effective Hanford cleanup.

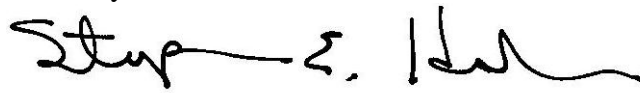
On some occasions, discovery of previously unknown contamination has demanded our immediate attention and redirected even the best planning efforts. Examples include the large expansions of chromium VI removal efforts in the 100 Area. The most recent example is the discovery of an area of very highly radioactive soil contamination beneath B Cell of the 324 Building in the 300 Area during ongoing decontamination and decommissioning activities.

Cesium and strontium contamination under the 324 Building pose a high dose risk to workers (approximately 9000 rad/hour at the source) and a potential risk to the public if that contamination reaches groundwater and the Columbia River. Because of these risks, and because delaying 324 Building cleanup will further delay completion of 300 Area cleanup and closure, the Board believes remediation of the contaminated soil under the 324 Building should not be delayed.

**Advice:**

- The Board believes that risk reduction through cleanup along the Columbia River is central to meeting the goals identified in DOE's 2015 Vision. To that end, the Board advises DOE to seek and provide additional funding, separate from the DOE-Richland Operations Office compliance budget request, to remediate the 324 Building contaminated soil now instead of delaying the work to out-years.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve E. Hudson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steve Hudson, Chair  
Hanford Advisory Board

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*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: Jeff Frey, Deputy Designated Official, U.S. Department of Energy, Richland  
Operations Office  
Catherine Alexander, U.S. Department of Energy, Headquarters  
The Oregon and Washington Delegations