



00-ERD- 114

[Advice # 106](#) From: Keith A. Klein

Ms. Marilyn B. Reeves, Chair
Hanford Advisory Board
723 Parkway Suite 200: B1-41
Richland, Washington 99352

Dear Ms. Reeves:

RESPONSE TO THE HANFORD ADVISORY BOARD (HAB) ADVICE ON THE 618-10 AND 618-11 BURIAL GROUNDS

Thank you for the clear HAB position and advice spelled out in your April 7, 2000, letter addressing the 618-10 and 618-11 Burial Grounds. I appreciate your concern regarding these two significant sites.

To address the board's main concern, I would like to make it clear that the U.S. Department of Energy (DOE) will support Remove-Treat-Dispose as the preferred remedial alternative for the 618-10 and 618-11 Burial Grounds in the 300-FF-2 Operable Unit Comprehensive Environmental Response, Compensation, and Liability Act of 1980 documents. We are working closely with the regulatory agencies to finalize the documents for public comment.

The recent findings of high levels of tritium near the 618-11 Burial Ground emphasize the need to address these burial grounds. We have completed the Phase 1 sampling of the groundwater near 618-11 and are presently working with interested parties on the draft Phase II Characterization Plan for Plume Investigation.

We recognize that the excavation and subsequent management of transuranic (TRU)-contaminated waste from these burial grounds will present challenges and require complex technologies to ensure protection of workers and the public during remediation. Excavation, retrieval, characterization, treatment, packaging, transportation, and disposal technologies for TRU-contaminated waste have yet to be fully developed within the DOE Complex. Within the past several years, the issues associated with TRU-contaminated waste have been recognized and are now being addressed on a complex-wide basis. The program is still relatively new, and no definitive solutions have been established other than to identify the Waste Isolation Pilot Plant as a final disposal site. The estimated wastes from 618-10 and 618-11 are included in the draft "M-91-03 Project Management Plan for Transuranic/Transuranic-Mixed Waste."

Due to the complexities mentioned above, full remediation of the 618-10 and 618-11 Burial Grounds is not anticipated to begin until sometime after 2010. The excavation, retrieval, characterization, treatment, packaging, and transportation technologies established through development efforts at the Hanford Site and within the DOE complex will be used to help prepare remediation plans for the burial grounds. We will develop a technology program to evaluate the state of required technology and ensure that the

appropriate investment for development occurs either at Hanford, or in conjunction with another site. We will work with the regulators to ensure commitments necessary to track the development of retrieval technology are made. In the meantime, access restrictions, maintenance of existing cover systems, and environmental monitoring will be continued at the two burial ground sites to ensure interim safety of the burial grounds and protection of the public and environment. Further actions may also be required to address the tritium at 618-11 based on information gathered during the Phase II characterization.

In the future, the DOE Richland Operations Office, U.S. Environmental Protection Agency, State of Washington Department of Ecology will review the 618-10 and 618-11 remediation plans using the information obtained through technology development efforts. If new information suggests a change to the remedy selected for these two burial grounds, the remedy change would again go through public comment and be documented in an amendment to the Record of Decision.

We look forward to your comments on the "300-FF-2 Proposed Plan," during public review and will give periodic progress updates through the HAB Environmental Restoration Committee meetings.

If you should have any questions, please contact me, or your staff may contact Bob McLeod, Environmental Restoration Division, on (509) 372-0096.

Sincerely,

Keith A. Klein
Manager

ERD:RGM

cc: Seepage 3

cc: C. Fitzsimmons, Ecology
D. Silver, Ecology
C. C. Clarke, EPA
M. Gearheard, EPA
D. R. Sherwood, EPA
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J. A. Turi, EM-43
Admin Record, H6-08 (300-FF-2)

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For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov

Response to HAB Advice #106 (April 6-7, 2000)

Subject: HAB Consensus Advice on 618-10 and 618-11 Burial Grounds

Letter from Keith Klein, dated June 22, 2000

URL: <http://www.hanford.gov/boards/hab/response/106.htm>

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