Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

17-AMRP-0026

NOV 17 2016

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

PROPOSAL TO PERFORM HAZARD ABATEMENT AND DEMOLITION ACTIVITIES AT THE B PLANT COMPLEX

The U.S. Department of Energy Richland Operations Office (RL) is providing a proposal for a removal action in accordance with Executive Order 12580 and the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan Section 7.2.4. The proposal is outlined in this letter and further details are provided in the attached Engineering Evaluation/ Cost Analysis (EE/CA), DOE/RL-2014-16, Draft A for the proposed action at the B Plant Canyon Complex. The B Plant Canyon Complex initially operated as a plutonium recovery facility from 1945 to 1952. Since 1952, the B Plant Canyon Complex has operated to support other missions on the Hanford Site until it was shut down in 1995.

RL proposes to perform hazard abatement and limited demolition at the B Plant Canyon Complex. The attached draft EE/CA was produced as the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) document to define/evaluate alternatives and to recommend a preferred alternative. The reasons for this proposal are not a near-term risk, but are listed below as follows:

- To preclude the increase in cost/complexity of Surveillance & Maintenance (S&M) tasks. The CERCLA Record of Decision (ROD) is not anticipated until the 2032 time frame. Current annual S&M costs are approximately $1M/year. Experience with the Hanford canyons indicate an increasing cost of S&M.

- To perform minor activities that can be accomplished with available funds as they are identified through efficiencies or additional new funding. All actions taken would be consistent with the final remedy when identified by the ROD.

- To maintain a skilled workforce at Hanford, that is, experienced in contaminated Decontamination and Demolition (D&D) work that will be needed when future major funding becomes available.

- To stabilize legacy contamination in the retired 291-B ventilation system, located outside the B Plant Canyon.

- To submit to Ecology for approval, proposal(s) for expedited response action(s) for one or more of the Tier 1 and Tier 2 facilities in the B Plant Geographic Area listed in the Tri-Party Agreement, Appendix J per M-085-74, due 06/30/2018.

The work addressed in the EE/CA is summarized as follows:

Hazard Abatement of the 221B Canyon

- Hazard abatement differs from current S&M in that it allows for a proactive approach to mitigate or reduce risk before a major response would be required. Hazard abatement activities may range from stabilization to complete removal of selected piping, equipment and waste. The 221B Gallery areas that would receive hazard abatement are the Operating and Pipe Galleries.

Grouting of Below Grade Void Spaces within the Retired 291B Ventilation System

- All below grade void space within the retired 291B Ventilation System would be grouted. The filter cells, sand filter, and below grade ducts would be grouted in place.

Demolition of Above Grade Structures Associated with the Retired 291B Ventilation System

- Above grade structures, including support buildings, fans, ductwork, and the 291B001 Stack, would be demolished. The 296B002 Passive Vent System would be grouted/demolished, as necessary, once the HEPA filters are grouted.

Demo Prep of the 221B Canyon Building above Deck Level Areas

- Demo preparation activities such as general housekeeping, fixing/stabilization of contamination, decontamination, draining fluid from piping and equipment, and removing equipment and waste may be performed in each area.
- Demo prep would occur in all 221B above deck level areas. These areas include the Operating Gallery, Crane Cab Gallery and crane area, and Canyon Deck. The crane will not be activated or removed.

The above work will be performed based on emergent facility conditions, funding availability, craft/engineering resources availability and overall interactive site priorities. The work will continue until the issuance of a ROD, funding is available and execution is authorized. RL will attempt to provide funding of $1-$2M/year through efficiencies. Assuming that a ROD would be available in the 2032 time frame, the maximum expenditure would be in the range of $15-$30M over the 15 year time period.

As the defining CERCLA document, the attached EE/CA is written in accordance to control all activities such that no action is undertaken which would be inconsistent with the CERCLA process. The EE/CA is written from a conservative perspective since the assumption for continued S&M is 25 years, and maintenance activities during that time are assumed to be consistent with current levels.

The target funds to be identified through efficiencies are at a low value such that no substantive impact would be expected to the current schedules outlined in Appendix D of the Tri-Party Agreement.

If there are any questions, please contact me or you may contact Al Farabee of my staff, on (509) 376-8089.

Sincerely,

Ray J. Corey, Assistant Manager
for the River and Plateau

AMRP:OAF

Attachment

cc w/attach:
C. E. Cameron, EPA
G. Bohnee, NPT
R. Buck, Wanapum
D. A. Faulk, EPA
S. Hudson, HAB
R. Jim, YN
N. M. Menard, Ecology
K. Niles, ODOE
D. Rowland, YN
R. Skeen, CTUIR
Administrative Record (REDOX)
Environmental Portal

cc w/o attach:
J. V. Borghese, CHPRC
C. P. Noonan, MSA
R. E. Piippo, MSA
J. R. Stults, CHPRC
M. J. Turner, MSA