



U.S. Department of Energy Hanford Site

20-PFD-0013

JAN 17 2020

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Addressees:

RESPONSE TO GAPS IN PLANNING DEACTIVATION, DECOMMISSIONING, DECONTAMINATION AND DEMOLITION PROJECTS

This letter is in response to the December 12, 2019, letter 19-NWP-201, "Gaps in Planning Deactivation, Decommissioning, Decontamination and Demolition Projects" regarding your concerns with perceived gaps in planning Deactivation, Decommissioning, Decontamination, and Demolition (D4) projects. The U.S. Department of Energy, Richland Operations Office (RL) does not agree with your assertion that there are "significant gaps" in our planning for D4 of buildings, specifically the 224B Building and Fast Flux Test Facility (FFTF). Specific responses to your concerns are addressed below.

Planning for ERDF Disposal:

Your letter states that disposal of D4 debris in the Environmental Restoration Disposal Facility (ERDF) "requires concurrent disposal of contaminated soil to obtain the required 1:1 mix between D4 debris and contaminated soils." RL agrees that contaminated soils should be used to meet debris compaction requirements and optimize the space available for waste disposal; however, the use of contaminated soil is not a requirement.

The 140,000 tons of waste disposed of at ERDF in 2019 represents less than one percent of the over 18 million tons of waste disposed at ERDF since start of operations in 1996. Plutonium Finishing Plant demolition and other demolition activities were the primary sources of debris disposed of at ERDF during Calendar Year 2019. As shown in the table below, for the first six months of the year, clean soil usage was less than five percent, as the 100-K soil remediation sites were providing adequate waste volumes to meet compaction requirements.

Addressees

-2-

JAN 17 2020

Remediation activities slowed in August-November 2019 due to subcontractor performance issues and the award of the remediation contract to a new subcontractor. Training of the new contractor took longer than anticipated, but 100-K soil remediation will resume the week of January 20, 2020. Based on the forecasted volume of ERDF waste disposal in Fiscal Year (FY) 2020, approximately 100,000 tons, RL considers there will be more than adequate contaminated soil to meet the debris compaction requirements. RL also notes that with the completion of the Plutonium Finishing Plant (PFP) demolition this year, there will be significantly less debris disposed at ERDF this year.

2019	Clean Loads	Waste Loads*	Ratio Clean: Waste	%
Jan - Jul	192	4187	0.046	4.4
Aug	162	553	0.293	22.7
Sept	225	312	0.721	41.9
Oct	300	247	1.215	54.8
Nov	240	125	1.920	65.8

* waste load may be soil or debris

RL will continue to plan D4 and soil remediation activities to ensure adequate contaminated soil volumes are available to meet ERDF compaction requirements.

Planning for Multi-Year Funding:

As of December 20, 2019, the FY 2020 budget appropriation was enacted which provided the full year funding amount for RL. RL is evaluating the milestone impacts of the budget and will brief Ecology and EPA as soon as possible. RL notes that we have briefed the Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) several times on the FY 2020 Assistant Manager for River and Plateau (AMRP) Execution Integrated Priority List as well as provided the 2019 AMRP Lifecycle Strategy and obtained feedback from your staffs. RL will continue to work with Ecology and EPA to meet the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Article XLVIII, Paragraph 149.I. However, as you are aware the existing language in the Tri-Party Agreement is out of date and needs to be revised to reflect the current Federal budgeting processes.

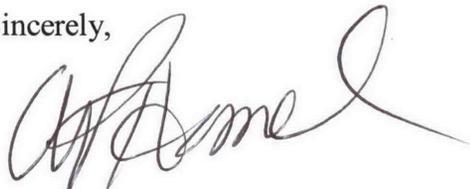
Public Involvement Planning:

In regards to the time between the 224B Action Memorandum (DOE/RL-2004-36), signed June 2, 2004, and the planned initiation of fieldwork in FY 2020, RL agrees that some form of public communication would be appropriate prior to commencing facility demolition. RL will work with your staffs to develop a plan for appropriate public communication. Additionally, an action specific administrative record file-in accordance with 40 CFR 300.415 (n)(3)(iii), will be established.

JAN 17 2020

If you have any questions, please contact me or your staff may contact Mark French, of my staff, on (509) 373-9863.

Sincerely,



William F. Hamel, Assistant Manager
for the River and Plateau
Richland Operations Office

PFD:MSF

cc: S. G. Austin, CHPRC
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Environmental Portal
Administrative Record (M-016-250, M-016-255, M-016-256, M-085-100)