

HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

0053729

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State Dept
of Ecology

June 2, 2000

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Richland, WA 99352

Subject: 100 Area Burial Grounds Focused Feasibility Study and Proposed Plan

Dear Messrs. Clarke, Fitzsimmons, and Klein:

This letter responds to the request for public comment on the Focused Feasibility Study and Proposed Plan for the 100 Area burial grounds. For the record, enclosed is a copy of previous advice from the Hanford Advisory Board (HAB) relating to cleanup of the 100 Area burial grounds. The enclosed HAB Advice #23, 100 Area Cleanup (May 4, 1995), supported unrestricted use of the 100 Area as a fundamental value of the HAB.

The HAB understands that the Proposed Plan for burial grounds in the 100 Areas is to remove, treat and dispose of materials from the 100 Area burial grounds at the Environmental Restoration Disposal Facility. The recommended remove, treat and dispose option has been performed very successfully in the 100 Areas for liquid waste disposal sites. The HAB believes that this proposed plan is also consistent with our previous advice. We support the remove, treat and dispose option for the 100 Area burial grounds.

Sincerely,

Marilyn B. Reeves

Marilyn B. Reeves, Chair
Hanford Advisory Board

Enc: HAB Advice #23, 100 Area Cleanup

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June 2, 2000

**HAB Consensus Advice #23
CURRENT TRI-PARTY PLANNING FOR 100 AREA CLEANUP¹**

1. The Hanford Advisory Board recommends that the Department of Energy (DOE) continue to place a high priority on cleanup of the 100 Area operable units, in accordance with the schedules established in the Tri-Party Agreement (TPA). The goal of this cleanup should be to release a high percentage (~95%) of the 100 Area corridor for fully unrestricted surface use² by 2018. Earlier phased release of significant portions of the corridor should also be considered.
2. The Board supports plans to initiate cleanup of several sites in the B-C Area this summer. Specific plans for these actions should be reviewed with the Hanford Advisory Board, Indian Tribes and other affected stakeholders when they are available.
3. Deferring cleanup of some areas that might be impacted by eventual removal of the reactors appears appropriate subject to the following: (a) The area not cleaned up should be kept to a minimum contiguous configuration, (b) Any loose or mobile surface contamination that might be transportable to surrounding areas should be appropriately removed or stabilized, (c) Appropriate methods for isolation of these areas from unrestricted areas should be provided.

Specific identification of these uncleaned areas should be defined by the December 1996 date for agreeing on a schedule for cleanup and removal of the reactor cores. This information should be reviewed with the Hanford Advisory Board, Indian Tribes and other affected stakeholders as it is being developed.

4. Cleanup levels for all areas that are released for fully unrestricted use should meet cleanup standards established by the responsible regulatory agencies. The Board concurs with the proposed use of the Washington Model Toxic Control Act (MTCA) as the basis of establishing cleanup. Department of Health is currently developing standards that should also guide cleanup.

Notes:

1. Use of groundwater is not addressed in this advice, but will be considered in future advice.
2. Fully unrestricted surface use means that full-time access to the surface, and to a depth of 15' below the normal surface elevation, is assumed without exceeding the specified post-release risk level.