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Draft Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington

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Cover Sheet

Responsible Agency: U.S. Department of Energy (DOE)

Cooperating Agency: Washington State Department of Ecology (Ecology)

Title: *Draft Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington* (*TC & WM EIS*) (DOE/EIS-0391)

Location: Benton County, Washington

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Abstract: The Hanford Site (Hanford), located in southeastern Washington State and situated along the Columbia River, is approximately 1,518 square kilometers (586 square miles) in size. Hanford's mission from the early 1940s to approximately 1989 included defense-related nuclear research, development, and weapons production activities. These activities created a wide variety of chemical and radioactive wastes. Hanford's mission now is focused on the cleanup of those wastes and ultimate closure of Hanford. To this end, several types of radioactive waste are being managed at Hanford: (1) high-level radioactive waste (HLW) as defined in DOE Manual 435.1-1; (2) transuranic (TRU) waste, which is waste containing alpha-particle-emitting radionuclides with atomic numbers greater than uranium (92) and half-lives greater than 20 years in concentrations greater than 100 nanocuries per gram of waste; (3) low-level radioactive waste (LLW), which is radioactive waste that is neither HLW nor TRU waste; and (4) mixed low-level radioactive waste (MLLW), which is LLW containing hazardous constituents as defined under the Resource Conservation and Recovery Act of 1976 (42 U.S.C 6901 et seq.). Thus, this *TC & WM EIS* analyzes the following three key areas:

1. **Retrieval, treatment, and disposal of waste from 149 single-shell tanks (SSTs) and 28 double-shell tanks (DSTs) and closure of the SST system.** In this *TC & WM EIS*, DOE proposes to retrieve and treat waste from 177 underground tanks and ancillary equipment and dispose of this waste in compliance with applicable regulatory requirements. At present, DOE is constructing a Waste Treatment Plant (WTP) in the 200-East Area of Hanford. The WTP would separate waste stored in Hanford's underground tanks into HLW and low-activity waste (LAW) fractions. HLW would be treated in the WTP and stored at Hanford until disposition decisions are made and implemented. (The analyses in this EIS are not affected by recent DOE plans to study alternatives for the disposition of the Nation's spent nuclear fuel and HLW because the EIS analysis shows that vitrified HLW can be stored safely at Hanford for many years.) LAW would

be treated in the WTP and disposed of at Hanford as decided in DOE's Record of Decision (ROD) issued in 1997 (62 FR 8693), pursuant to the *Tank Waste Remediation System, Hanford Site, Richland, Washington, Final Environmental Impact Statement* (DOE/EIS-0189, August 1996). DOE proposes to provide additional treatment capacity for the tank LAW that can supplement the planned WTP capacity in fulfillment of DOE's obligations under the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) as soon as possible. DOE would dispose of immobilized LAW and Hanford's (and other DOE sites') LLW and MLLW in lined trenches on site. These trenches would be closed in accordance with applicable regulatory requirements.

2. **Final decontamination and decommissioning of the Fast Flux Test Facility, a nuclear test reactor.** DOE proposes to determine the final end state for the aboveground, belowground, and ancillary support structures.

3. **Disposal of Hanford's waste and other DOE sites' LLW and MLLW.** DOE needs to decide where to locate onsite disposal facilities for Hanford's waste and other DOE sites' LLW and MLLW. DOE committed in the ROD (69 FR 39449) for the *Final Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement, Richland, Washington* (DOE/EIS-0286F, January 2004) that henceforth LLW would be disposed of in lined trenches. Specifically, DOE proposes to dispose of the waste in either the existing 200-East Area Integrated Disposal Facility (IDF) or the proposed 200-West Area IDF.

DOE has identified Preferred Alternatives for two of the three program areas and a range for the three key activities, as presented in this *TC & WM EIS*.

Public Comments: Comments on this draft EIS may be submitted during the 140-day comment period, which will begin when the U.S. Environmental Protection Agency publishes a Notice of Availability in the *Federal Register*. Public meetings on this EIS will be held during the comment period. The dates, times, and locations of these meetings will be published in a DOE *Federal Register* notice, and will also be announced by other means.

Draft Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington (Draft TC & WM EIS)

Washington State Department of Ecology (Ecology) Foreword

Note: Ecology, as a cooperating agency, reviewed, provided comments on, and participated in the comment resolution process for the "preliminary draft" of this *Draft TC & WM EIS*. However, this foreword should be considered draft and subject to revision until Ecology has reviewed this *Draft TC & WM EIS* and, if necessary, supporting information.

Summary

Ecology believes that the U.S. Department of Energy (DOE) and its contractors have prepared a *Draft TC & WM EIS* that presents many important issues for discussion. Ecology's involvement to date shows that this document has benefitted from quality reviews and quality assurance procedures. The information in this document will help shed light on many key decisions that remain to be made about the Hanford Site (Hanford) cleanup.

Ecology expects DOE to consider our input through this foreword, as well as through any further comments made during the public comment process. We expect DOE to provide written responses to the major issues and comments prior to completion of the *Final TC & WM EIS*. Ecology will continue to work with DOE with the intent of helping to produce a final environmental impact statement (EIS) that fully informs future decisionmaking.

I. Introduction

Ecology has been a cooperating agency with DOE in the production of this *Draft TC & WM EIS*. DOE prepared this EIS to meet the requirements of the National Environmental Policy Act. In addition, Ecology will review this EIS to determine if it can be adopted in whole or in part to satisfy the requirements of the State Environmental Policy Act (SEPA). The information in this EIS will help inform Ecology and others about critical future cleanup decisions impacting Hanford's closure.

Ecology provides the following comments regarding this *Draft TC & WM EIS* to document areas of agreement or concern with this EIS and to assist the public in their review. Public and regulator input on this *Draft TC & WM EIS* are critical for the completion of an acceptable *Final TC & WM EIS*. Ecology encourages tribal nations, stakeholder groups, and the public to participate in the public comment process for this draft document.

When the *Final TC & WM EIS* is issued, Ecology will include a revised foreword to comment on the EIS conclusions. The foreword will also include the disposition of the comments we provided during the *Draft TC & WM EIS* review process.

II. Ecology's Role as a Cooperating Agency

Ecology is a cooperating agency in the preparation of this EIS. A state agency may be a cooperating agency on a Federal EIS when the agency has jurisdiction by law over, or specialized expertise concerning, a major Federal action under evaluation in the EIS.

As a cooperating agency, Ecology does not coauthor or direct the production of this EIS. Ecology does have access to certain data and information as this document is being prepared by DOE and its contractors. Our roles and responsibilities in this process are defined in a Memorandum of Understanding (MOU) between Ecology and DOE.

DOE retains responsibility for making final decisions in the preparation of the *Final TC & WM EIS*, as well as for determining the preferred alternative(s) presented in the EIS. However, Ecology's participation as a cooperating agency enables us to help formulate the alternatives presented in this *TC & WM EIS*.

Ecology's involvement as a cooperating agency—and the current scope of the *Draft TC & WM EIS*—is grounded in a series of events.

In February 2002, DOE initiated the "Environmental Impact Statement for Retrieval, Treatment, and Disposal of Tank Waste and Closure of Single-Shell Tanks at the Hanford Site, Richland, Washington," known as the "Tank Closure EIS." On March 25, 2003, Ecology became a cooperating agency for the "Tank Closure EIS." DOE and Ecology developed an MOU outlining respective agency roles and responsibilities.

While the "Tank Closure EIS" was being developed, another DOE EIS, the *Draft Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement, Richland, Washington (HSW EIS)*, was in the review stage. Among other matters, the HSW EIS examined the impacts of disposal at Hanford of certain volumes of radioactive waste and mixed radioactive and hazardous waste, including waste generated from beyond Hanford.

In March 2003, Ecology filed a lawsuit in the U.S. District Court seeking to prevent the importation and storage of certain offsite transuranic (TRU) and mixed TRU wastes that DOE had decided to send to Hanford prior to issuance of the *Final HSW EIS*. Ecology and intervening plaintiffs obtained a preliminary injunction against these shipments.

In January 2004, DOE issued the *Final HSW EIS*. Based on the *Final HSW EIS*, DOE amended a Record of Decision that directed offsite radioactive and hazardous wastes to Hanford (within certain volume limits) for disposal and/or storage. In response, Ecology amended its lawsuit to challenge the adequacy of the *HSW EIS* analysis.

In May 2005, the U.S. District Court expanded the existing preliminary injunction to enjoin a broader class of waste and to grant Ecology a discovery period to further explore issues with the *HSW EIS*.

In January 2006, DOE and Ecology signed a Settlement Agreement, ending litigation on the *HSW EIS* and addressing concerns found in the *HSW EIS* quality assurance review during the discovery period. The Settlement Agreement called for expanding the scope of the "Tank Closure EIS" to provide a single, integrated set of analyses of (1) tank closure impacts considered in the "Tank Closure EIS" and (2) the disposal of all waste types considered in the *Final HSW EIS*. The Settlement Agreement also called for an integrated cumulative impacts analysis.

Under the Settlement Agreement, the "Tank Closure EIS" was renamed the *TC & WM EIS*. Ecology's existing MOU with DOE was revised along with the Settlement Agreement so that Ecology remained a cooperating agency on the expanded *TC & WM EIS*.

The Settlement Agreement defined specific tasks to address concerns Ecology had with the *HSW EIS*. DOE has now revised information and implemented quality assurance measures used in this *TC & WM EIS* related to the solid waste portion of the analysis. Ecology has performed discrete quality

assurance reviews of that information to help confirm that the quality assurance processes of DOE's EIS contractor have been followed.

Based on Ecology's involvement to date, we believe that positive changes have been made to address data quality shortcomings in the *HSW EIS*. These specifically relate to the following:

- The data used in analyzing impacts on groundwater
- The integration of analyses of all waste types that DOE may dispose of at Hanford
- The adequacy of the cumulative impact analysis

Ecology will review this *Draft TC & WM EIS* to confirm that the terms of the Settlement Agreement have been addressed to our satisfaction.

III. Regulatory Relationships and SEPA

After this *TC & WM EIS* is finalized, Ecology will proceed with approving regulatory actions required to complete the Hanford cleanup. These include actions under the Hanford Federal Facility Agreement and Consent Order (HFFACO, or Tri-Party Agreement) and actions that require state permits or modifications to existing permits, such as the Hanford Sitewide Permit. This permit regulates hazardous waste treatment, storage, and disposal activity at Hanford, including actions such as tank closure and supplemental treatment for tank waste.

Ecology must comply with SEPA when undertaking permitting actions. It is Ecology's hope that the *Final TC & WM EIS* will be suitable for adoption in whole or in part to satisfy SEPA.

In addition, Ecology will have a substantial role in establishing standards and methods for the cleanup of contaminated soil and groundwater at Hanford. These include areas that are regulated under hazardous waste corrective action authority and/or under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) through a CERCLA Record of Decision. Information developed in this EIS will thus be useful in other applications for the cleanup of Hanford.

IV. Ecology Insights and Alternatives Considered

This *Draft TC & WM EIS* considers 17 alternatives. DOE has not identified a specific preferred alternative. However, for the many decisions that are addressed in this EIS, DOE has selected a set of preferred alternatives. Ecology understands that the selection of a smaller number of preferred alternatives, or of a specific preferred alternative from that set, will be considered by DOE throughout public review of the *Draft TC & WM EIS*. When the final EIS is prepared, a preferred alternative will be identified by DOE.

The alternatives and tank closure options considered in this draft EIS include the following key decision areas:

- Additional tank waste treatment options (in addition to the Hanford Waste Treatment Plant [WTP] as provided in the *Tank Waste Remediation System, Hanford Site, Richland, Washington, Final Environmental Impact Statement)*
- Tank farm closure options
- Waste management options for the Central Plateau (including disposal of offsite defense wastes)
- Fast Flux Test Facility (FFTF) decommissioning

Ecology will update this foreword in the *Final TC & WM EIS* and will express its agreement or disagreement with DOE's preferred alternative for specific decisions in the foreword. In the interim, Ecology's insights, technical perspectives, and legal and policy perspectives are provided below. Areas of agreement with DOE and points of concern are noted.

Single-Shell Tank Retrieval Options

Ecology believes that DOE has presented an appropriate range of alternatives for evaluating tank waste retrieval and tank closure impacts. However, based on the hazardous waste tank closure standards of the "Dangerous Waste Regulations" (WAC 173-303-610[2]) and the HFFACO requirements, Ecology supports only alternatives that involve the retrieval of 99 percent or more of the waste from each of the 149 single-shell tanks (SSTs).

High-Level Radioactive Waste Disposal

High-level radioactive waste (HLW) associated with the tank waste includes, but may not be limited to, immobilized high-level radioactive waste (IHLW) and HLW melters (both spent and failed). It has been DOE's longstanding plan to store these wastes at Hanford and then ship and dispose of them in a deep geologic repository. The idea was that the nature of the geology would isolate the waste and protect humans from exposure to these very long-lived, lethal radionuclides. The Nuclear Waste Policy Act indicates that these waste streams require permanent isolation. By contrast, the immobilized low-activity waste (ILAW) glass, and perhaps other waste streams, may not require deep geologic disposal due to the level of pretreatment resulting in radionuclide removal and the degree of immobilization provided for in the ILAW glass.

However, the final decision on HLW disposal has recently become an issue with significant uncertainty. The *Draft TC & WM EIS* contains the following statement:

> As indicated in the Administration's fiscal year 2010 budget request, the Administration intends to terminate the Yucca Mountain program while developing nuclear waste disposal alternatives. Notwithstanding the decision to terminate the Yucca Mountain program, DOE remains committed to meeting its obligations to manage and ultimately dispose of HLW and SNF. The Administration intends to convene a blue ribbon commission to evaluate alternative approaches for meeting these obligations. The commission will provide the opportunity for a meaningful dialogue on how best to address this challenging issue and will provide recommendations that will form the basis for working with Congress to revise the statutory framework for managing and disposing of HLW and SNF.

Ecology reminds the readers that the Nuclear Waste Policy Act requires permanent isolation of these most difficult waste streams. Leaving these wastes stored at Hanford indefinitely is not a legal option, nor an acceptable option to the State of Washington.

Ecology is concerned about the glass standards and canister requirements for the IHLW. These standards were developed based on what was acceptable to Yucca Mountain. Now that Yucca Mountain is no longer the assumed disposal location, Ecology is concerned about what standards for glass and canisters will be utilized by the WTP. Ecology insists that DOE implement the most conservative approach in these two areas to guarantee that the glass and canister configurations adopted at the WTP will be acceptable at the future deep geologic repository.

In addition, Ecology maintains that DOE should build and operate adequate interim storage capacity for the IHLW and the HLW melters in a manner that does not slow down the treatment of tank waste.

This *Draft TC & WM EIS* assumes that the used (both spent and failed) HLW melters are HLW and, therefore, should be disposed of in a deep geologic repository. This EIS also assumes that the used HLW melters will stay on site before shipment to such a repository. DOE has not requested, and Ecology has not accepted, long-term interim storage of failed or spent HLW melters at Hanford.

Ecology does not agree that the HLW melters will or should stay on site. We do agree with the final disposal in a deep geologic repository. The disposal pathway for both the failed and the spent melters will require further evaluation than is presented in this *Draft TC & WM EIS*. Ecology and DOE will need to reach a mutual understanding and agreement on the regulatory framework for disposal.

Pretreatment of Tank Waste

This *Draft TC & WM EIS* includes numerous alternatives that pretreat tank waste to separate the high-activity components and direct them to a HLW stream. The HLW stream will be vitrified, resulting in a glass waste product that will be sent to a deep geologic repository. However, this draft EIS has one alternative that provides no pretreatment for some portion of the waste in the 200-West Area.

As a legal and policy issue, Ecology does not agree with alternatives that do not require pretreatment of the tank waste. Such alternatives do not meet the intent of the Nuclear Waste Policy Act to remove as many of the fission products and radionuclides as possible to concentrate them in the HLW stream. For this reason, Ecology requests that DOE rule out any alternative that does not pretreat tank waste.

TRU Tank Waste

This *Draft TC & WM EIS* considers the option of treating and sending waste from specific tanks to the Waste Isolation Pilot Plant (WIPP) as mixed TRU waste. This draft EIS also considers WTP processing of the waste from these specific tanks.

Ecology has legal and technical concerns with any tank waste being classified as mixed TRU waste at this time. DOE must provide peer-reviewed data and a strong, defensible, technically and legally detailed justification for the designation of any tank waste as mixed TRU waste, rather than as HLW. DOE must also complete the WIPP certification process and assure Ecology that there is a viable disposal pathway (i.e., permit approval from the State of New Mexico) before Ecology will modify the Hanford Sitewide Permit to allow tank waste to be treated as mixed TRU waste.

Supplemental Treatment

In this *Draft TC & WM EIS*, DOE considers changes to the treatment processes that the WTP would use. Specifically, this draft EIS considers technologies to supplement the WTP's treatment of low-activity waste (LAW). The WTP as it is currently designed does not have the capacity to treat the entire volume of LAW in a reasonable timeframe.

Ecology agrees on the need to evaluate supplemental LAW treatment. An additional supplemental LAW treatment system is necessary to treat all the tank waste in a reasonable amount of time. Ecology fully supports the *Draft TC & WM EIS* alternative that assumes a second LAW Vitrification Facility would provide additional waste processing. Building a second LAW Vitrification Facility has consistently been Ecology's baseline approach. We would prefer a second LAW Vitrification Facility as the preferred alternative for the following reasons:

- LAW vitrification is a mature technology that is ready to be implemented with no further testing.
- LAW vitrification produces a well-understood waste form that is extremely protective of the environment (the bulk vitrification waste form is not as protective).

- Negative data from the last bulk vitrification experimental testing indicate waste form performance and technology implementation issues.
- There has been a lack of significant progress on advancing a bulk vitrification test facility for actual waste.
- The environmental results from the waste performance presented in this *Draft TC & WM EIS* indicate that LAW vitrification is superior to bulk vitrification.
- A recently published DOE report indicates that a second LAW Vitrification Facility would be preferable.

Consistent with the standard of HFFACO Milestone M-62-08, Ecology will analyze the information from the bulk vitrification alternative. From this analysis, Ecology will determine if the performance of the waste forms is comparable with WTP borosilicate glass. Ecology's measuring stick for a successful supplemental treatment technology has always been whether it is "as good as glass" (from the WTP).

As a technical issue, Ecology does not think that the waste treatment processes of steam reforming and cast stone would provide adequate primary waste forms for disposal of tank waste in onsite landfills. This has already been the subject of a previous DOE down-select process, in which Ecology and other participants rated these treatment technologies as low. This draft EIS shows that the waste form performance would be inadequate for both cast stone and steam reforming. These alternatives do not merit any further review.

Specifically related to the steam reforming alternative, Ecology has technical concerns about the *Draft TC & WM EIS's* assumptions for contaminant partitioning and its effects on waste form performance. It is inappropriate to assign the same assumptions to steam reforming as those used for bulk vitrification, given the different maturities of the two technologies.

Secondary Waste from Tank Waste Treatment

This *Draft TC & WM EIS* evaluates the impacts of disposing of secondary waste that results from tank waste treatment. Ecology agrees with DOE that secondary waste from the WTP and supplemental treatment operations would need additional mitigation before disposal. This assumption is not reflected in (and, in fact, is contradicted by) the current DOE baseline, which does not assume such additional mitigation. DOE has not determined what the secondary waste treatment would be, but DOE and its contractor are evaluating various treatment options.

Tank Waste Treatment Flowsheet

In preparing this *Draft TC & WM EIS*, some assumptions were made about highly technical issues such as the tank waste treatment flowsheet, which is a representation of how much of which constituent ends up in which waste form and in what amount.

Certain constituents such as technetium-99 and iodine-129 are significant risk drivers because they are mobile in the environment and have long half-lives. This draft EIS assumes that 20 percent of the iodine-129 from the tank waste would end up in vitrified glass and 80 percent in the grouted secondary waste. The same assumption is made for bulk vitrification and the WTP LAW Vitrification Facility.

Based on its review of the *Draft TC & WM EIS's* contaminant flowsheets for the WTP and bulk vitrification, Ecology has technical concerns with this approach. The design configuration for the WTP indicates that iodine-129 recycles past the melter multiple times, which leads to a higher retention in the glass and less in the secondary waste. Therefore, Ecology believes the retention rate of iodine-129 in the

ILAW glass may be higher than that in bulk vitrification glass. However, Ecology is aware that there is uncertainty in the actual glass retention results.

Through our cooperating agency interactions, DOE has agreed to run a sensitivity analysis to show the information under a different approach. The sensitivity analysis in this *Draft TC & WM EIS* shows that if recycling of iodine-129 is as effective as the WTP flowsheets indicate, then the WTP with a Bulk Vitrification Facility alternative would place 80 percent of iodine-129 in secondary waste (a less-robust waste form). This compares to an alternative that includes a second LAW Vitrification Facility in addition to the WTP, which would place 30 percent of the iodine-129 in secondary waste. This 50 percent difference in capture reinforces Ecology's opinion that choosing Tank Closure Alternative 2B, which would use the WTP and a second LAW Vitrification Facility, would be best from a tank waste treatment perspective.

Waste Release

This *Draft TC & WM EIS* models waste releases from several different types of final waste forms, including the following:

- ILAW glass
- Failed and spent LAW melters
- Waste in bulk vitrification boxes
- Steam reformed waste
- Grouted LAW from tank waste
- Grouted secondary waste
- Waste left in waste sites
- Grouted waste in the bottom of tanks
- Direct buried waste in landfills
- Waste that has been macroencapsulated

Ecology understands the methods and formulas used for the waste form release calculations (for all waste types). However, we will need to see the modeling results and complete our technical review before we can validate this portion of this EIS.

Offsite Waste

DOE is decades behind its legal schedule in retrieving tank waste from SSTs and years behind its legal schedule in completing construction of the WTP. DOE has not even begun treating Hanford's 200 million liters (53 million gallons) of tank waste.

At its current pace, DOE is in danger of falling years behind its legal schedule in processing contact-handled TRU waste for disposal at WIPP. DOE has not yet even completed planning for a facility to process remote-handled TRU waste for such disposal. Massive areas of Hanford's soil and groundwater are contaminated, and many of these areas will likely remain contaminated for generations to come, even after final cleanup remedies have been instituted.

The State of Washington is aware that under DOE's plans, more curies of radioactivity would leave Hanford (in the form of vitrified HLW and processed TRU waste) than would be added to Hanford through proposed offsite waste disposal. However, based on the current state of Hanford's cleanup and the analysis in this *Draft TC & WM EIS*, the State of Washington objects to the disposal at Hanford of additional wastes that have been generated from beyond Hanford.

As this *Draft TC & WM EIS* shows, disposal of the proposed offsite waste would significantly increase groundwater impacts to beyond acceptable levels. Such disposal would add to the risk term at Hanford today, at a time when progress on reducing the bulk of Hanford's existing risk term has yet to be realized. DOE should take a conservative approach to ensure that the impact of proposed offsite waste disposal,

when added to other existing Hanford risks, does not result in exceeding the "reasonable expectation" standard of DOE's own performance objectives (see DOE Manual 435.1-1, Section IV.P[1]) and of other environmental standards (e.g., drinking water standards).

The State of Washington supports a "no offsite waste disposal" alternative as its preferred alternative in the *Final TC & WM EIS*, to be adopted in a Record of Decision. DOE should forgo offsite waste disposal at Hanford (subject to the exceptions in the current *State of Washington v. Bodman* Settlement Agreement), at least until such time as it has made significant progress on SST waste retrieval and the tank waste treatment process. If DOE wishes to use Hanford as an offsite waste repository after that point, DOE should then re-evaluate the potential impacts of any proposed offsite waste disposal in light of the then-existing Hanford risk term.

Waste Disposal Location Alternatives

Ecology agrees with DOE that a preferred alternative locating the Integrated Disposal Facility in the 200-East Area appears better for long-term disposal of waste than in the 200-West Area because of the faster rate of groundwater flow in the 200-East Area.

Black Rock Reservoir

This *Draft TC & WM EIS* considers the groundwater impacts of locating Black Rock Reservoir upgradient of Hanford. This is noteworthy because leakage associated with the reservoir could have impacts on Hanford groundwater contamination. Ecology has reviewed the evaluation basis assumed in this draft EIS. On a technical basis, Ecology accepts that potential groundwater impacts of the proposed reservoir could (or likely would) adversely impact human health and the environment at Hanford.

Vadose Zone Modeling

This *Draft TC & WM EIS* uses the STOMP [Subsurface Transport Over Multiple Phases] modeling code for vadose zone modeling. Based on its current review, Ecology believes that the Hanford parameters used with this code are adequate for the purposes served by this EIS. Ecology notes that the *TC & WM EIS* STOMP modeling code parameters are based on a regional scale and may not be appropriate for site-specific closure decisions or other Hanford assessments. Use of STOMP in other assessments requires careful technical review and consideration of site-specific parameters. Further revisions of these STOMP parameters may be necessary.

Risk Assessment and Cumulative Impacts

This *Draft TC & WM EIS* evaluates risk under the alternatives and in the cumulative impact analyses. The risk assessment modeling presented in this draft EIS should not be interpreted as a Hanford sitewide comprehensive human health and ecological risk assessment, applied to the river corridor or other specific Hanford areas. Specific Hanford areas will require unique site parameters that are applicable to that area's specific use.

This *Draft TC & WM EIS* presents an evaluation of the cumulative environmental impacts of treatment and disposal of wastes at Hanford. The cumulative impact analyses allow DOE to consider the impacts of all cleanup actions it has taken or plans to take at Hanford.

V. Noteworthy Areas of Agreement

Ecology and DOE have discussed and reached agreement on the following significant issues and parameters for the purposes of this *Draft TC & WM EIS*:

- The manner in which DOE presents groundwater data and information (i.e. with pictures).

- The quality assurance requirements that DOE and Ecology identified in the *HSW EIS* (*State of Washington v. Bodman*) Settlement Agreement
- The Technical Guidance Document for *Tank Closure Environmental Impact Statement Vadose Zone and Groundwater Revised Analyses* Agreement, which focused on parameters shown to be important in groundwater analysis
- The location of calculation points for contaminant concentrations in groundwater
- The use of tank farm closure descriptions and alternative analysis
- The use of tank waste treatment descriptions and alternative analysis
- Inclusion of the US Ecology site and the cocooned reactors transported to the Central Plateau in the comprehensive cumulative impacts assessment
- Overall modeling approaches for vadose zone and groundwater
- The use of modeling assumptions for the double-shell tanks
- Alternative assumptions about how processes would treat existing wastes and generate other wastes during treatment processes, and how DOE would dispose of all of the wastes.
- The methods for evaluating and using waste inventory data
- Release mechanisms for contaminants from various waste forms
- An alternative in this *Draft TC & WM EIS* that evaluates impacts of treating and disposal of all tank waste and residue to meet the Resource Conservation and Recovery Act / Hazardous Waste Management Act HLW treatment standard of vitrification
- The inventory assumptions used for the pre-1970 burial grounds

Ecology's agreement on these issues and parameters is specifically for the purposes of this *Draft TC & WM EIS* and is based on Ecology's current knowledge and best professional judgment. Ecology's agreement should not be construed as applicable to any future documents, evaluations, or decisions at Hanford.

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List of Acronyms and Abbreviations

°C	degree(s) Celsius
°F	degree(s) Fahrenheit
AB	nuclear safety Authorization Basis
ACGIH	American Conference of Governmental Industrial Hygienists
ADD	average daily dose
AEA	Atomic Energy Act of 1954
AEGL	Acute Exposure Guideline Level
AERMET	American Meteorological Society/EPA Regulatory Meteorological Preprocessor
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AMS	articulated-mast system
amsl	above mean sea level
APL	accelerated process line
ARF	airborne release fraction
AS/RS	Automated Stacker/Retrieval System
ASCII	American Standard Code for Information Interchange
AVA	American Viticultural Area
BAF	bioaccumulation factor
BBI	Best-Basis Inventory
BCF	bioconcentration factor
BDX	Blue Dot X computer modeling code
BEIR	Biological Effects of Ionizing Radiation
BOF	balance of facilities
BOR	U.S. Bureau of Reclamation
BRR	Black Rock Reservoir
Btu	British thermal unit
BUSS	Beneficial Uses Shipping System
C3T	Cleanup Challenge and Constraints Team
CAIRS	Computerized Accident/Incident Reporting System
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	*Code of Federal Regulations*
CH	contact-handled
COPC	constituent of potential concern
CRCIA	*Screening Assessment and Requirements for a Comprehensive Assessment, Columbia River Comprehensive Impact Assessment*
CSB	Canister Storage Building
CTE	critical technology elements

CWC	Central Waste Complex
CWCE	Central Waste Complex expansion
D&D	decontamination and decommissioning
dB	Decibels
dBA	decibels A-weighted
DBVS	Demonstration Bulk Vitrification System
DCF	dose conversion factor
DG	disposal group
DHS	U.S. Department of Homeland Security
DNAPL	dense, non-aqueous-phase liquid
DoD	U.S. Department of Defense
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
DR	damage ratio
DSASW	documented safety analysis for solid waste operations
DST	double-shell tank
DUF_6	depleted uranium hexafluoride
EA	environmental assessment
EBR-II	Experimental Breeder Reactor II
ECEM	Ecological Contaminant Exposure Model
ECF	elevation correction factor
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
EM	Office of Environmental Management
EPA	U.S. Environmental Protection Agency
EPIcode	Emergency Prediction Information Code
ERDF	Environmental Restoration Disposal Facility
ERPG	Emergency Response Planning Guideline
ETF	Effluent Treatment Facility
ETTP	East Tennessee Technology Park
FBSR	fluidized-bed steam reforming
FCM	food chain multiplier
Fermi	Enrico Fermi Nuclear Generating Station
FFTF	Fast Flux Test Facility
FFTF Deactivation EA	*Environmental Assessment – Sodium Residuals Reaction/Removal and Other Deactivation Work Activities, Fast Flux Test Facility (FFTF) Project, Hanford Site, Richland, Washington*
"FFTF Decommissioning EIS"	"Environmental Impact Statement for the Decommissioning of the Fast Flux Test Facility at the Hanford Site, Richland, Washington" (rescoped in 2006 to the *TC & WM EIS*)

FIR	field investigation report
FONSI	Finding of No Significant Impact
FR	*Federal Register*
FRR SNF EIS	*Final Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel*
FTE	full-time equivalent
Gable Gap	Gable Mountain–Gable Butte Gap
GAO	U.S. General Accounting Office
GAP	Government Accountability Project
GENII	Hanford Environmental Radiation Dosimetry Software System (Generation II)
GHB	Generalized Head Boundary
GIS	geographic information system
GTCC	greater-than-Class C
GTCC EIS	*Environmental Impact Statement for the Disposal of Greater-Than-Class C Low-Level Radioactive Waste*
HAB	Hanford Advisory Board
Hanford	Hanford Site
Hanford Comprehensive Land-Use Plan EIS	*Final Hanford Comprehensive Land-Use Plan Environmental Impact Statement*
HDW	Hanford Defined Waste
HEAST	Health Effects Assessment Summary Table
HEME	high-efficiency mist eliminator
HEPA	high-efficiency particulate air
HEU	highly enriched uranium
HFEF	Hot Fuel Examination Facility
HI	Hazard Index
HIHTL	hose-in-hose transfer line
HLW	high-level radioactive waste
HMS	Hanford Meteorological Station
HQ	Hazard Quotient
HRR	high-resolution resistivity
HSGS	headspace gas sampling
HSRAM	*Hanford Site Risk Assessment Methodology*
HSSWAC	*Hanford Site Solid Waste Acceptance Criteria*
HSW EIS	*Final Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement, Richland, Washington*
HTWOS	Hanford Tank Waste Operation Simulator

ICRP	International Commission on Radiological Protection
ICV™	In-Container Vitrification™
IDA	intentional destructive act
IDF	Integrated Disposal Facility
IDF-East	200-East Area Integrated Disposal Facility
IDF-West	200-West Area Integrated Disposal Facility
IEM	interim examination and maintenance
IHLW	immobilized high-level radioactive waste
ILAW	immobilized low-activity waste
INEEL	Idaho National Engineering and Environmental Laboratory
INL	Idaho National Laboratory
IRIS	Integrated Risk Information System
ISCORS	Interagency Steering Committee on Radiation Standards
ISO	International Standards Organization
ITV	in-tank vehicle
Kd	standard distribution coefficient
LANL	Los Alamos National Laboratory
LAW	low-activity waste
LCF	latent cancer fatality
LDC	large-diameter container
LERF	Liquid Effluent Retention Facility
LLBG	low-level radioactive waste burial ground
LLW	low-level radioactive waste
LOAEL	lowest-observed adverse effect level
LPF	leak path factor
LUG	Local Users' Group
LWPF	Liquid Waste Processing Facility
MACCS	MELCOR Accident Consequences Code System
MAI	Mission Acceleration Initiative
MAR	material at risk
MCL	maximum contaminant level
MDSA	*Master Documented Safety Analysis (MDSA) for the Solid Waste Operations Complex*
MEDE	melt-drain-evaporator
MEI	maximally exposed individual
MeV	million electron volts
MFC	Materials and Fuels Complex
MLLW	mixed low-level radioactive waste
Modal Study	*Shipping Container Response to Severe Highway and Railway Accident Conditions*

MODFLOW	modular three-dimensional finite-difference groundwater flow model
MODPATH	MODFLOW particle-tracking postprocessing package
MOX	mixed oxide
MRS	mobile retrieval system
MTRG	MODFLOW Technical Review Group
MUST	miscellaneous underground storage tank
NAAQS	National Ambient Air Quality Standards
NAD	North American Datum
NASA	National Aeronautics and Space Administration
NDA	nondestructive assay
NDE	nondestructive examination
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NI PEIS	*Final Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility (Nuclear Infrastructure PEIS)*
NPL	National Priorities List
NRC	U.S. Nuclear Regulatory Commission
NRDWL	Nonradioactive Dangerous Waste Landfill
NRF	National Response Framework
NRIA	Nuclear/Radiological Incident Annex
NTS	Nevada Test Site
NWS	National Weather Service
OA	Office of Independent Oversight and Performance Assurance
ORIGEN2	Oak Ridge Isotope Generation and Depletion Code
ORNL	Oak Ridge National Laboratory
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PEIS	programmatic environmental impact statement
PEST	parameter estimation module
PFP	Plutonium Finishing Plant
PM_n	particulate matter with an aerodynamic diameter less than or equal to *n* micrometers
PNNL	Pacific Northwest National Laboratory
PP	Plio-Pleistocene
PPA	Property Protected Area
PPF	Preprocessing Facility

ppm	part(s) per million
PT	pretreatment
Pu-239 DE-curies	plutonium-239 dose-equivalent curies
PUREX	Plutonium-Uranium Extraction
PVC	polyvinyl chloride
R	standard retardation factor
R&D	research and development
Radioactive Material Transport Study	*Final Environmental Impact Statement on the Transportation of Radioactive Materials by Air and Other Modes*
RADTRAN 5	Radioactive Material Transportation risk assessment computer code
RCA	radiologically controlled area
RCB	Reactor Containment Building
RCRA	Resource Conservation and Recovery Act
REDOX	Reduction-Oxidation
Reexamination Study	*Reexamination of Spent Fuel Shipping Risk Estimates*
rem	roentgen equivalent man
RF	respirable fraction
RH	remote-handled
RH-SC	remote-handled special component
RISKIND	Risks and Consequences of Radioactive Material Transport computer code
RL	Richland Operations Office
RMS	root mean square
ROD	Record of Decision
ROI	region of influence
RPP	River Protection Project
RPPDF	River Protection Project Disposal Facility
RQ	reportable quantity
RSD	relative standard deviation
RSE	rubble, soil, and equipment
RSWF	Radioactive Scrap and Waste Facility
RTP	Remote Treatment Project
RWM	restricted waste management
SAIC	Science Applications International Corporation
SALDS	State-Approved Land Disposal Site
S&M	surveillance and maintenance
SC	special component
SCBA	self-contained breathing apparatus
SEIS	supplemental environmental impact statement

SIM	Soil Inventory Model
SNF	spent nuclear fuel
SNL	Sandia National Laboratories
SPF	Sodium Processing Facility
SRE	Sodium Reactor Experiment
SRF	Sodium Reaction Facility
SRS	Savannah River Site
SSF	Sodium Storage Facility
SST	single-shell tank
STAR	Science and Technology Applications Research
STOMP	Subsurface Transport Over Multiple Phases
STORM	Subsurface Transport Over Reactive Multiphase
STP	supplemental treatment process
STTS	Supplemental Treatment Technology Site
SSTS-East	200-East Area Supplemental Treatment Technology Site
STTS-West	200-West Area Supplemental Treatment Technology Site
SWB	solid-waste box
SWIFT	*Solid Waste Integrated Forecast Technical (SWIFT) Report*
SWOC	Solid Waste Operations Complex
"Tank Closure EIS"	"Environmental Impact Statement for Retrieval, Treatment, and Disposal of Tank Waste and Closure of Single-Shell Tanks at the Hanford Site, Richland, Washington" (rescoped in 2006 to the *TC & WM EIS*)
TBR	technical baseline review
TC & WM EIS	*Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington*
Technical Guidance Document	*Technical Guidance Document for "Tank Closure Environmental Impact Statement" Vadose Zone and Groundwater Revised Analyses*
TEDF	Treated Effluent Disposal Facility
TEEL	Temporary Emergency Exposure Limit
The Green Book	*Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements*
TMC	theoretical maximum capacity
TOB	top of basalt
TOE	total operating efficiency
TPA	Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)
TPQ	threshold planning quantity
TQ	threshold quantity
TRA	Technology Readiness Assessment
TRAGIS	Transportation Routing Analysis Geographic Information System

TRC	total recordable cases
TRL	technology readiness level
TRU	transuranic
TRUPACT-II	transuranic waste package transporter II
TRV	toxicity reference value
TSP	total suspended particulates
TWRS EIS	*Tank Waste Remediation System, Hanford Site, Richland, Washington, Final Environmental Impact Statement*
UGA	urban growth area
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UTM	Universal Transverse Mercator
VBR	vacuum-based retrieval
VOC	volatile organic compound
WESF	Waste Encapsulation Storage Facility
WIDS	Waste Information Data System
WIPP	Waste Isolation Pilot Plant
WIPP SEIS-II	*Waste Isolation Pilot Plant Disposal Phase Final Supplemental Environmental Impact Statement*
WM PEIS	*Waste Management Programmatic Environmental Impact Statement for Managing Treatment, Storage, and Disposal of Radioactive and Hazardous Waste*
WRAP	Waste Receiving and Processing Facility
WRF	waste receiver facility
WSU Tri-Cities	Washington State University Tri-Cities campus
WTP	Waste Treatment Plant
Yucca Mountain EIS	*Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada*
HAB	Hanford Advisory Board
MTRG	Model Technical Review Group
SAIC	Science Applications International Corporation
Yucca Mountain FEIS	*Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada*

Measurement Units

The principal measurement units used in this *Draft Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington* (*TC & WM EIS*) are SI units (the abbreviation for the Système International d'Unites). The SI system is an expanded version of the metric system that was accepted in 1966 in Elsinore, Denmark, as the legal standard by the International Organization of Standardization. In this system, most units are made up of combinations of seven basic units, of which length in meters, mass in kilograms, and volume in liters are of most importance in this *TC & WM EIS*. Exceptions are radiological units that use the English system (e.g., rem, millirem).

SCIENTIFIC (EXPONENTIAL) NOTATION

Numbers that are very small or very large are often expressed in scientific, or exponential, notation as a matter of convenience. For example, the number 0.000034 may be expressed as 3.4×10^{-5} or 3.4E-05, and 65,000 may be expressed as 6.5×10^{4} or 6.5E+04. In this *TC & WM EIS*, numerical values that are less than 0.001 or greater than 9,999 are generally expressed in scientific notation, i.e., 1.0×10^{-3} and 9.9×10^{3}, respectively.

Multiples or submultiples of the basic units are also used. A partial list of prefixes that denote multiples and submultiples follows, with the equivalent multiplier values expressed in scientific notation.

Prefix	Symbol	Multiplier	
atto	a	0.000 000 000 000 000 001	1×10^{-18}
femto	f	0.000 000 000 000 001	1×10^{-15}
pico	p	0.000 000 000 001	1×10^{-12}
nano	n	0.000 000 001	1×10^{-9}
micro	μ	0.000 001	1×10^{-6}
milli	m	0.001	1×10^{-3}
centi	c	0.01	1×10^{-2}
deci	d	0.1	1×10^{-1}
deka	da	10	1×10^{1}
hecto	h	100	1×10^{2}
kilo	k	1,000	1×10^{3}
mega	M	1,000,000	1×10^{6}
giga	G	1,000,000,000	1×10^{9}
tera	T	1,000,000,000,000	1×10^{12}
peta	P	1,000,000,000,000,000	1×10^{15}
exa	E	1,000,000,000,000,000,000	1×10^{18}

The following symbols are occasionally used in conjunction with numerical expressions:

$<$ less than
$\leq$ less than or equal to
$>$ greater than
$\geq$ greater than or equal to

Conversions

English to Metric			Metric to English		
Multiply	**by**	**To get**	**Multiply**	**by**	**To get**
Area			**Area**		
square inches	6.4516	square centimeters	square centimeters	0.155	square inches
square feet	0.092903	square meters	square meters	10.7639	square feet
square yards	0.8361	square meters	square meters	1.196	square yards
acres	0.40469	hectares	hectares	2.471	acres
square miles	2.58999	square kilometers	square kilometers	0.3861	square miles
Length			**Length**		
inches	2.54	centimeters	centimeters	0.3937	inches
feet	30.48	centimeters	centimeters	0.0328	feet
feet	0.3048	meters	meters	3.281	feet
yards	0.9144	meters	meters	1.0936	yards
miles	1.60934	kilometers	kilometers	0.6214	miles
Temperature			**Temperature**		
degrees Fahrenheit	Subtract 32, then multiply by 0.55556	degrees Celsius	degrees Celsius	Multiply by 1.8, then add 32	degrees Fahrenheit
Volume			**Volume**		
fluid ounces	29.574	milliliters	milliliters	0.0338	fluid ounces
gallons	3.7854	liters	liters	0.26417	gallons
cubic feet	0.028317	cubic meters	cubic meters	35.315	cubic feet
cubic yards	0.76455	cubic meters	cubic meters	1.308	cubic yards
Weight			**Weight**		
ounces	28.3495	grams	grams	0.03527	ounces
pounds	0.45360	kilograms	kilograms	2.2046	pounds
short tons	0.90718	metric tons	metric tons	1.1023	short tons