

April 5, 2002

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Tom Fitzsimmons, Director  
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Subject: Top-to-Bottom Review

Dear Mssrs. Klein, Boston, Iani, and Fitzsimmons,

The Hanford Advisory Board (Board) has always endorsed the risk-based approach to prioritizing activities and milestones. This approach is reflected in the Hanford Federal Facilities Compliance Agreement (Tri-Party Agreement or TPA) and the Single Shell Tank Retrieval Consent Decree. The Board has a long tradition of supporting the concept of a more economical and expeditious cleanup, provided that applicable environmental standards are maintained. Human health, worker safety, and environmental and native habitat quality must not be sacrificed by relaxed standards or accelerated cleanup.

However, the recommendations set forth in the Top-to-Bottom Review are based on risk evaluations for which the criteria and process are not evident. This concern combined with the failure to address the following items could prevent the Review from serving as an effective roadmap for successful accelerated cleanup.

1. Any decisions to relax current standards to accelerate cleanup and reduce costs must be supported by credible risk assessments, for example, leaving waste in tanks, reclassifying wastes, and possible increases in soil disposal.
2. There must be a public dialogue with discussions of risk in appropriate environmental impact statements in the regions affected by the proposals.
3. The U.S. Department of Energy (DOE) and its regulators must consider all hazardous waste risks, as well as radiological risks.
4. The regulatory agencies must continue to uphold regulatory requirements. It is imperative to maintain a state regulatory role.

These concerns apply not only to the Top-to-Bottom review, but also to ongoing agency efforts toward a Hanford work plan as outlined in the Tri-Party's Letter of Intent. The Board remains keenly focused on ensuring any alterations to Hanford cleanup are consistent with values expressed in this and other Board advice.

The Hanford Advisory Board looks forward to continuing to work with DOE and the regulators to safely and expeditiously clean up the Hanford site.

Sincerely,

Todd Martin, Chair  
Hanford Advisory Board

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*This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.*

cc: Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy  
Michael Gearheard, Environmental Protection Agency  
Michael Wilson, Washington State Department of Ecology  
Martha Crosland, U.S. Department of Energy Headquarters  
The Oregon and Washington Congressional Delegations

U.S. Senators (OR)  
Gordon H Smith  
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U.S. Senators (WA)

Maria Cantwell  
Patty Murray

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