

June 7, 2002

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Subject: Performance Measurement Plan

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

The Hanford Advisory Board (Board) recognizes the Performance Measurement Plan (Plan) as a work in progress and applauds the effort to advance cleanup of the Hanford Site. However, there are a number of issues that must be addressed as the Plan evolves. It appears the Plan may sacrifice quality and rigor for cleanup required by current laws and regulations for the sake of expediency. We rely on the regulatory agencies to ensure this is not the case. The Board has a number of concerns that it expects to see addressed in the August version. On issues that require detailed technical analysis, we ask that the Department of Energy (DOE) define the path forward. DOE has committed to the Board that the Plan will specify how risk evaluations will be performed in implementing the Headquarters Top-to-Bottom Review recommendations (response to Board advice #129, dated June 6, 2002, signed by Keith Klein and Harry Boston). The Board expects to see these three points incorporated in the August 1 Plan.

Board Supports Accelerated Cleanup That Is Safer-Better-Faster

For the Board to support implementation of the initiatives outlined in the Plan, the initiatives must be shown to result in a quality cleanup that is fiscally and technically responsible. Currently, the Board defines compliance with the Tri Party Agreement (TPA) and its processes as the blueprint for responsible cleanup. Specifically this means:

- Integrated Safety Management Systems (ISMS) must be the foundation for conducting activities in the plan.
- To show equal or better quality of cleanup, or in accordance with appropriate risk assessments, show no unacceptable additional harm to health and the environment. Changes to waste treatment technologies chosen through National Environmental Policy Act (NEPA) reviews must be subject to similar scrutiny and scientific analysis.
- The Plan should identify acceleration proposals not in compliance with current orders, rules and laws, or in keeping with the TPA.

Reduce Highest Risks First

The Board reiterates its priorities for cleanup, which are identified in the TPA. These priorities should not be jeopardized by this Plan.

- Tank waste retrieval and increased throughput for vitrification is one of our top priorities.
- Exploring new technologies for site cleanup and technology alternatives to vitrification are supported by the Board if dollars for these purposes do not reduce baseline funding for or delay cleanup of tanks, groundwater, K Basins, Plutonium Finishing Plant (PFP), and the other baseline cleanup activities across the site.
- Risk assessments of environmental and worker/public safety concerns must incorporate public input regarding, among other concerns, methodology of risk assessment and relative weight of perceived risks which are assessed.
- Credible and timely risk assessments must be performed to provide necessary input to the cost/risk trade-off evaluations of accelerated clean-up alternatives. Some suggested performance metrics are: integrated cumulative Hanford worker risk; integrated ecological impact value (to include environmental monitoring data for all hazardous and mobile contaminants); resource value and loss of use; risk reduction versus cost; regulatory authorizations; permits; and long-term human health risk.
- Developing plans for groundwater cleanup and pre-1970s transuranic (TRU) waste remediation are priorities for the Board. There should be initiatives addressing these in the Plan. The Board's recent advice (#125) regarding groundwater remediation is an excellent place to start.
- Board advice on Offsite Mixed Waste Acceptance is not reflected in this plan. The Board has stated, "Acceptance of off-site waste must be contingent

on existing facility capacity and on availability of funding to handle processing and storage needs, while having a neutral or positive impact on Hanford cleanup.” Adding large quantities of waste without performing an environmental impact statement (EIS) (which must include the cumulative risk of proposals added to the risks from the existing burden of wastes in Hanford’s soil and groundwater) is not consistent with our priorities.

Plan Assumptions Need Clarification

The assumptions upon which the Plan seems to be based are not clearly stated. More details are needed to understand the assumptions. Please identify the assumptions in the August draft and explain why DOE believes they are reasonable. Examples:

- Tank closures – an action plan for defining and setting regulatory criteria for “closure” is needed.
- Plutonium (Pu) and high-level waste (HLW) – uncertainties regarding disposition of Pu and HLW indicate that a backup plan for long term storage of these materials at Hanford should be developed.

Funding for the Plan May be Problematic

To accomplish the Plan, initial funding demands are significant. The Board is concerned that ongoing additional funding may not be available for these initiatives. The Board does not agree with the proposal to eliminate separate budget control points between DOE’s Office of River Protection and Richland Operations Office.

Public Involvement is Critical

This is our first opportunity to comment. We do not have adequate information to know if the plan embraces our values (as stated on page 4 of the Plan). DOE should reaffirm in the Plan its commitment to public involvement.

- Effective public involvement should be integrated with development of the Plan, written into the Plan, and included in any long-term decision processes.
- The Plan should provide for development and implementation of specific plans for broad, inclusive, regular, substantive and formative public involvement activities to ensure the public is informed and provided with opportunities for meaningful input.
- Public involvement activities must also consider the Community Relations Plan that guides TPA involvement.
- Proposals to change classifications for tank wastes and the nature of the Resource Conservation and Recovery Act (RCRA) permits for tank closure by October 31 are not consistent with our values to ensure public disclosure of impacts and informed comment on major decisions.

Policy Advice Specific to the Plan's Strategic Initiatives:

The Plan's strategic initiatives represent a positive approach to potentially accelerating cleanup, if implemented with appropriate regulatory oversight. The following are some specific improvements that must be contained in the August Plan.

Strategic Initiative 1 - Accelerate the Columbia River Corridor Cleanup by more than 20 Years to 2012

The Plan must address the most urgent risks first. Funding for accelerated cleanup along the river must not come at the expense of reducing dollars for higher risk work.

Strategic Initiative 2 - Accelerate Tank Waste Treatment Completion by 20 Years

After baseline requirements are met, the Board's priority for additional funding is new technology development for increasing retrieval and throughput for vitrification.

DOE must perform risk assessments and appropriate NEPA analyses before:

- proceeding to reclassify wastes;
- deciding that wastes do not require "permanent isolation from the environment";
- determining if alternative waste forms will add unacceptable risks to groundwater or exceed cumulative health risk standards; or
- determining if "closure" of tanks as proposed would leave unacceptable risks.

Strategic Initiative 3 - Accelerate the Stabilization and De-Inventory of Nuclear Materials

Removal of Spent Nuclear Fuel and cleanout of K-Basins and stabilization of plutonium at PFP remain very important. Safe acceleration of these schedules is an important goal.

Strategic Initiative 4 - Accelerate Waste Disposal and Source-Term Remediation

This initiative appears aimed at using Hanford to dispose of offsite wastes regardless of cumulative impacts and other concerns that may be documented in comments on the Solid Waste EIS. Pre-1970 buried TRU waste is not addressed and must be.

Strategic Initiative 5 - *Accelerate the Decontamination and Decommissioning of Excess Central Plateau Facilities*

There must be appropriate NEPA or Comprehensive Environmental Resources Compensation and Liability Act (CERCLA) analyses and risk assessments for use of canyons to permanently dispose of wastes. Site infrastructure must be maintained to ensure worker safety.

Sincerely,

Todd Martin, Chair
Hanford Advisory Board

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

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