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US Environmental Protection Agency

Washington State Dept of Ecology

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April 7, 2006

Roy Schepens, Manager

U.S. Department of Energy, Office of River Protection

P.O. Box 450

Richland, WA 99352

Jay Manning, Director

Washington State Department of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Re: Tank Waste Systems Integration

Dear Mssrs. Schepens and Manning,

Background

The Hanford Advisory Board (Board) continues to be very concerned about the future storage, retrieval, treatment, disposal and closure of high level tanks and tank wastes. These concerns have been heightened by recent budget shortfalls and increased costs and delayed startup for the Waste Treatment Plant (WTP).

All parts of the tank waste program are interrelated. There is a complex set of relationships between the parts of the whole. Problems or failures in any part could cripple the rest of the program.

The potential cessation of single shell tank (SST) retrieval is one of the highest impact areas associated with the delay of the WTP. In order to continue SST retrievals, the WTP must be operating to empty double shell tanks, thereby providing tank space for waste being retrieved out of the single shell tanks. In this case, the "ripple effect" from WTP delays is slowing and could stop SST retrieval or create the need to build new double shell tanks. Both of these are difficult decisions that would signal a dramatic change of direction in the tank program away from the current cleanup strategy.

The Board understands that the Department of Energy-Office of River Protection (DOE-ORP) is completing a thorough review of the current baseline assumptions and Tri-Party Agreement (TPA) milestones associated with Hanford's tanks, and developing a new baseline based upon more realistic assumptions and dates.

HAB Consensus Advice #189 Subject: Tank Waste Systems Integration Adopted: April 7, 2006 Page 1 Envirolssues Hanford Project Office 713 Jadwin, Suite 4 Richland, WA 99352 Phone: 5091 942-1906 Fax: 5091 942-1926 The Board is very protective of the TPA and is against altering TPA milestones for reasons other than legitimate technical limitations. That said, the Board cautions DOE-ORP and the Washington State Department of Ecology (Ecology) to avoid taking significant safety, technical and/or programmatic risks in attempting to meet TPA milestones, particularly those associated with the WTP.

Advice

In view of the above, the Board advises both DOE-ORP and Ecology to cooperate in completing and documenting a thorough, disciplined systems engineering review and update of the baseline assumptions and TPA milestones associated with Hanford's tanks. The goal of this review is to ensure that the TPA and related baselines outline a realistic, achievable plan for completing cleanup of Hanford's tanks and tank wastes before the tanks fail. Emphasis on meeting current milestone dates is not as important as having an integrated systems approach to ensure quality work and to meet regulatory requirements.

Further, the Board advises DOE-ORP to develop and document detailed plans for the workflow and requirements of the tank cleanup system to enable DOE-ORP personnel, DOE Headquarters personnel and decision-makers in Congress to understand the "ripple effects" that budget and schedule decisions for a single part of the project will have on the entire tank waste cleanup system.

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: Keith Klein, Manager, U.S. Department of Energy, Richland Operations Office

Michael Bogert, U.S. Environmental Protection Agency, Region 10 Shirley Olinger, Co-Deputy Designated Federal Official, U.S. Department of Energy, Office of River Protection

Dave Brockman, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office

Nick Ceto, Environmental Protection Agency Jane Hedges, Washington State Department of Ecology Doug Frost, U.S. Department of Energy Headquarters The Oregon and Washington Congressional Delegations

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