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US Environmental Protection Agency

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November 4, 2005

Jim Rispoli, Assistant Secretary for Environmental Management (EM-1) U.S. Department of Energy, Headquarters 1000 Independence Avenue Washington, D.C. 20585

Re: Plutonium Finishing Plant

Dear Mr. Rispoli,

The Hanford Advisory Board (Board) has long taken the position that consolidation of plutonium storage and permanent disposition of plutonium is of great importance to the nation. Development of a credible national strategy for disposition of this material and a timely decision for implementation of that strategy is essential for insuring the continued success of cleanup efforts at Hanford and throughout the Department of Energy (DOE) complex.

The Board is anxious to participate in the dialogue for consolidation of plutonium into national storage and voices the following concerns:

- Dollars are coming out of the Environmental Management (EM) cleanup budget to fund the increased security measures now required by our federal government. Successful, ongoing cleanup at the Plutonium Finishing Plant (PFP) at Hanford has been stopped, in large part due to this mandate. Non-cleanup funding sources should be used for storage and security upgrades for Hanford plutonium.
- National consolidation of plutonium storage across the DOE complex has not occurred. National consolidation of this material would reduce the costs of storage, safeguards and security by eliminating the need for multiple high-security facilities scattered around the country.
- Retrofitting an old, radiologically contaminated facility (such as 241-Z)
 to temporarily house plutonium at Hanford is a poor fiscal decision and
 increases hazards to the workers.

Reallocation of cleanup funs to storage has a negative impact on PFP cleanup.

 Massive layoffs of trained workers with security clearances at PFP have effectively stopped all cleanup work at the plant. Loss of these

HAB Consensus Advice #179 Subject: Plutonium Finishing Plant Adopted: November 4, 2005 Page 1 Enviroissues Hanford Project Office 713 Jadwin, Suite 4 Richland, WA 99352 Phone: (509) 942-1906 trained workers with the necessary security clearances has guaranteed escalation of future cleanup costs. When PFP cleanup resumes, new workers will have to be trained at significant cost and with extended time delays due to the need to obtain Q Clearances.

- The experience possessed by the current workers can't be replaced. The PFP work crews have been an innovative work force. They have developed specialized equipment to facilitate cleanup and have an excellent safety record. It makes little sense to lose the stability of this team with its institutional knowledge. Despite the best training, new, inexperienced workers lacking the historic knowledge of hazards have an increased risk of injury and accidents.
- Because of the accelerated cleanup schedules, many PFP systems were planned to run until failure. This short term "solution" was allowed on the assumption that the facility would be quickly torn down. Now that PFP cleanup has been stopped, with cleanup completion perhaps many years away, we are concerned about worker safety and impacts on the environment due to the potential failure of equipment. The cost of retrofitting ventilation systems takes additional money, which should be supporting the Decontamination and Decommissioning of this facility.

The Board understands that the solution for permanent disposition of plutonium remains elusive. National consolidation of plutonium seems to makes fiscal sense, though, as an interim step toward permanent disposition. The Board continues to place a high priority on maintaining adequate budgets for the continued cleanup of DOE sites such as Hanford and strongly objects to the diversion of funds to creation of new, local high-security storage facilities.

Board Advice:

- Proceed promptly with developing a national strategy and implementation plan for consolidation of plutonium storage.
- Cleanup funding sources should not be used for increased plutonium storage and security measures.
- Fully fund the continued decontamination and decommissioning of PFP to keep cleanup on schedule, while maintaining workforce and facility safety.

HAB Consensus Advice #179 Subject: Plutonium Finishing Plant Adopted: November 4, 2005 Page 2 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

Roy Schepens, Manager, U.S. Department of Energy Office of River

Protection

Michael Bogert, U.S. Environmental Protection Agency, Region 10

Jay Manning, Washington State Department of Ecology

Howard Gnann, Deputy Designated Federal Official, U.S. Department of Energy

Nick Ceto, Environmental Protection Agency

Michael Wilson, Washington State Department of Ecology

Melissa Nielson, U.S. Department of Energy Headquarters

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