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November 4, 2005

Roy Schepens, Manager

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

P.O. Box 450 (H6-60) Richland, WA 99352

Jay Mannning, Director

Washington State Department of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Re: Bulk Vitrification

Dear Messrs. Schepens and Manning,

Background

The Hanford Advisory Board (Board) is concerned that decision criteria do not exist for determining whether the Department of Energy-Office of River Protection (DOE-ORP) should continue funding the Bulk Vitrification Demonstration Project. At some point, it may be less expensive to build additional capacity for Low Activity Waste (LAW) vitrification at the Waste Treatment Plant (WTP) than to continue to invest in other alternatives.

The Bulk Vitrification Demonstration Project was funded and permitted as a research and development project. The project was down-selected as the most viable alternative to the WTP to start treating low activity tank wastes earlier than other proposed processes, and to enable DOE-ORP to meet the 2028 milestone for vitrifying all tank waste. The Board has supported the demonstration project so far, but expects the resulting product to be "as good as glass," and expects no money or energy be diverted from continued work on the WTP.

The current cost estimates for the Bulk Vitrification Demonstration Project have now increased to over \$150 million and may be increased significantly in order to resolve safety issues. This is a significant fraction (25%) of the baseline cost for construction of the existing LAW Vitrification Plant. Full scale bulk vitrification production may cost more than a LAW vitrification plant of similar capacity. At the same time, construction and commissioning of the initial LAW vitrification plant, which is not affected by design delays for safety, is on the 2011 pace. Bulk vitrification funding is competing with waste retrieval work for scarce dollars.

HAB Consensus Advice #183 Subject: Bulk Vitrification Adopted: November 4, 2005 Page 1 Envirolssues Hanford Project Office 713 Jadwin, Suite 4 Richtand, WA 99352 Phone: (509) 942-1906 Statements made to the Board by Washington State Department of Ecology (Ecology) officials indicated that Ecology believes insufficient funds in 2006 are available to meet all Tri-Party Agreement milestones.

The Board reaffirms support of the original goal of exploring options to provide a less costly, yet equally safe, alternative to expanded LAW WTP capacity. This support will continue only if the resulting waste product meets or exceeds the performance specifications for waste from the LAW vitrification facility, and does not divert funds or energy from completion of the WTP.

Board Advice:

- The Board advises DOE-ORP to develop decision criteria for determining whether to continue financial support for the Bulk Vitrification Demonstration Project. Decision criteria should be based on the "as good as vitrified glass" standard meaning the waste products meet or exceed the disposal performance of waste from the LAW vitrification facility. At a minimum, additional criteria should include consideration of cost per unit of waste treated, radioactive exposure to workers, ability to satisfy TPA milestones compared to other LAW treatment, environmental releases and risks from disposal in the Integrated Disposal Facility. Finally, bulk vitrification should not continue to be pursued if it will adversely affect the start date for retrieving and processing wastes in the WTP.
- The Board understands that the Bulk Vitrification Demonstration Project
 test will not be completed in time to prepare a final report to satisfy TPA
 Milestone M-62-08 for June 2006. However, DOE-ORP should still
 produce a June report evaluating available data, including comparative cost
 analyses for the Bulk Vitrification Demonstration Project facility, a
 production Bulk Vitrification Plant, and expansion of the current LAW
 WTP capacity.
- The Board advises Ecology provide its criteria for weighing the following
 activities: deciding between support for continued funding of the Bulk
 Vitrification Demonstration Project or funding for retrieval activities;
 expanded capacity for the LAW vitrification facility; having the LAW
 vitrification plant operating sooner than 2011; and whether the
 programmatic risks justify continued investment toward a full scale
 production facility for bulk vitrification instead of an expanded LAW
 vitrification capacity.

HAB Consensus Advice #183 Subject: Bulk Vitrification Adopted: November 4, 2005 Page 2 The Board also advises the agencies make available their respective criteria
for public discussion in Spring 2006, following preliminary design
completion for the Bulk Vitrification Demonstration Project and in time for
public and regulator input to budget decisions for the Fiscal Year 2007
requests and Fiscal Year 2008 development.

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 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 The Oregon and Washington Congressional Delegations

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