



Thomas Grumbly
Office of Environmental Restoration Management
US Department of Energy
1000 Independence Avenue SW
Washington DC 20585

December 12, 1994

RE: Systems Requirements Review Team's review of the Tank Waste Remediation System at Hanford within the context of the Tri-Party Agreement Consensus Advice adopted December 1, 1994.

Dear Mr. Grumbly:

The process that led to the development of the current Tri-Party Agreement (TPA) and its tank waste treatment and disposal plan was the most successful public involvement process conducted at Hanford. What it did that most other processes don't succeed at was (1) provide sound technical data to the public in a timely manner and (2) provide a forum in which the public can express its views. Far from "decide, announce, defend", the Tank Waste Task Force process provided a voice for stakeholders in decision-making. Local stakeholders, DOE-RL, DOE-HQ, and the regulators all played prominent roles in the development of the TPA.

When the new TPA was released, a broad regional consensus hailed it as very responsive to the following public values (excerpted from the Tank Waste Task Force Final Report):

- "Get on with the cleanup to achieve substantive progress in a timely manner."
- "The high cost and uncertainty of high-tech pretreatment and R&D threatens funding for higher performance low-level waste form, vitrification, and cleanup."
- "Use the most practicable, timely, available technology, while leaving room for future innovation. Keep a folio of technological options and make strategic investments over time to support a limited number of promising options. Give up further research on unlikely options. When a better option becomes known through an open and credible systems design and R&D process, be willing to adopt it."
- "Put wastes in an environmentally-safe form, using retrievable waste forms when potential hazards from the waste may require future retrieval and when retrievability does not cause inordinate delays in getting on with cleanup."
- Do not let "the size nor timing of a national repository" ultimately drive waste decisions.
- "Accept the fact that interim storage, at least, of the waste in an environmentally-safe form will occur for some time at Hanford. Select a waste form that will ensure safe interim storage of this waste."

The widespread support for the agreement focused future stakeholder attention on one of the most important values: "get on with it". The stakeholders realized that the agreement set out a very aggressive technical schedule. We also realized that, although the chosen path forward represented an option with

relatively little technical risk, it was not a risk-free endeavor. We realized that committed agencies and contractors, along with the accountability provided by a vigilant stakeholder community, was the only hope for the TPA's provisions becoming reality. The Hanford Advisory Board has formally adopted the above values and has subsequently supported the TPA.

Now, nearly one year later, we have the opportunity to look back at progress toward meeting the TPA milestones. While it is too early to definitively say the program's deadlines are slipping, there is a rapidly rising concern that a lack of progress is threatening the TPA milestones. It is here that we hope the Systems Requirements Review Team (SRR) will be of great help. If the team can help to establish a systems engineering infrastructure at Hanford which will provide for sound timely information and the early identification of problems it will be a success. We have not yet seen any technical showstoppers in the program. Our hope is that the SRR Team will help instill the capability to identify and resolve issues before they cripple the program.

In spite of a rigorous and disciplined rebaselining, the Hanford Advisory Board realizes that the TPA can always be improved upon. Therefore, we strongly support critical reviews of the program within the context of the TPA's requirements. However, a critical pillar in the HAB support for the TPA is a belief that it is time to go forward. Our support demonstrates that the technical risk inherent in the program is acceptable, given that activities have begun to minimize risk within the context of the program. Understanding this, we hope that the intention of the SRR Team is not to spend an inordinate amount of time challenging the decisions laid out in the TPA at this late date. In a skeptical and wary stakeholder community, such reexamination would certainly be viewed at best as a DOE delay tactic, or at worst, an attempt to circumvent the provisions of the TPA. Such an approach runs directly counter to the "get on with it" value, would epitomize stakeholder fears of "studying to death", and would threaten the viability of the program.

To summarize, this letter expresses the HAB's resolve in holding DOE accountable for milestone commitments in the TPA. Systems engineering should be utilized to identify and resolve technical and schedule problems related to TPA milestones. The TWRS systems engineering approach should not unnecessarily revise and revisit decisions made on sound technical and public policy grounds.

Sincerely,

Merilyn B. Reeves, Acting Chair
Hanford Advisory Board

cc: Chuck Clarke, EPA
Jim Daily, DOE-RL
Jill Lytle, DOE
John Wagoner, DOE-RL
Jim Werner, DOE-HQ
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HAB Consensus Advice #7

Subject: System Requirements Review of Tank Waste Remediation System (Health, Safety & Waste Management Committee)

Adopted: December 1, 1994, Letter to T. Grumbly