

December 8, 2000

Keith Klein, Manager U.S. Department of Energy, Richland Operations P.O. Box 550 (A7-50) Richland, WA 99352

Chuck Findley, Regional Administrator U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue Seattle, WA 98101

Tom Fitzsimmons, Director Washington Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

Subject: Hanford 2012: Accelerating Cleanup and Shrinking the Site (Hanford 2012)

Dear Messrs. Klein, Findley, and Fitzsimmons:

Cleanup along the Columbia River – primarily in the 100 Area – has been a long-time priority of the Hanford Advisory Board (HAB) and we are pleased with the progress that has been made to date. To take the next step toward Hanford's cleanup, the HAB urges the Department of Energy (DOE), the Environmental Protection Agency (EPA), and the Washington Department of Ecology (Ecology) to embrace a vision of cleanup to achieve a standard of unrestricted use along the River Corridor.

We support efforts to implement our vision which include: fully cleaning up groundwater threats to the river by 2018; accelerated remediation of burial grounds; and full remediation and elimination of safety risks from the 300 Area. The HAB supports efforts to obtain additional funding for Hanford 2012 activities. The first priority for seeking increased funding for 2002 must be full funding of the projected TPA "compliance gap" forecast to be over \$200 million.

The HAB sees the strategic benefits of a vision for the River Corridor cleanup. Hanford 2012 activities represent a priority of the HAB, although not the highest priority. The agencies must be scrupulously careful to be accurate in discussing the expectations for accomplishments that are realistic for this plan. The misinterpretation that this plan can lead to complete cleanup by 2012 must be avoided.

Hanford's tank waste stabilization and vitrification remains the HAB's highest priority. Protecting the river and resolving urgent risks (e.g. ground water, 618-10, -11 burial grounds, Plutonium Finishing

Plant (PFP), and K-Basin spent fuel) are the other high priorities of the HAB. Hanford 2012 efforts and activities must not adversely impact work toward these priorities. Measurable progress on the above high priority items is critical to Hanford cleanup being responsive to HAB values.

Hanford 2012 does not resolve HAB concerns about treatment and remediation of contaminated groundwater. It does include proposals to accelerate having final groundwater actions in place for the Hanford Site by 2012 to achieve 2018 compliance. The HAB strongly supports that goal. However, we believe current funding levels for groundwater activities are not sufficient to meet that goal.

DOE has indicated it will follow the Tri-Party Agreement (TPA) change request process prior to making any fundamental changes to the current baseline. The TPA must continue to drive work plans and schedules. Existing public processes must continue to be used to propose and justify TPA changes before beginning implementation of new plans by contract or budget activity.

Because the 618-10 and 618-11 burial grounds pose extremely high risks and threats to the river, DOE must commit to expedite technology development for their cleanup. We encourage DOE and its regulators to negotiate appropriate interim and major milestones to provide for their complete remediation. Worker safety must be maintained as the top priority and must not be compromised by goals for cleanup acceleration. DOE must provide full funding for planning and development work necessary to retrieve, transport and treat waste – including remote-handled transuranic waste – from the 618-10 and 618-11 burial grounds. DOE must also develop sufficient mixed-waste treatment capability to ensure the successful cleanup of these and other Hanford burial grounds. There also must be contingency planning and appropriate budget available to stop releases from the se burial grounds, should that become necessary.

The HAB is appreciative of DOE's continuing dialogue on Hanford 2012. Broader public involvement and continuing dialogue on key decisions are critical for achieving success.

Very truly yours,

Merilyn B. Reeves, Chair

Hanford Advisory Board

cc: Harry Boston, Office of River Protection
Carolyn Huntoon, Department of Energy Headquarters
Wade Ballard, Deputy Designated Federal Official
The Oregon and Washington Congressional Delegations
Michael Gearheard, Environmental Protection Agency
Mike Wilson, Washington Department of Ecology

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For questions or comments, please send email to Hanford_Advisory_Board@rl.gov HAB Consensus Advice #113

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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.