



April 4, 1997

Al Alm, Assistant Secretary
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Washington, DC 20585

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Subject: Ten Year Plan

Dear Messrs. Alm and Wagoner:

The Board has continued to track and advise on Hanford's budget. This advice should be taken in context with the Board's budget advice.

Unfortunately, information we have seen regarding the direction of the national Ten Year Plan seems out of step with ongoing cleanup at Hanford. For example, Hanford does not plan for or assume that it will be receiving huge amounts of waste during the next ten years. The draft assumptions for the Environmental Management Integration Initiative and the national Ten Year Plan show Hanford as receiving, treating and disposing a substantial portion of DOE's waste. Within the DOE complex, Hanford would share low-level waste disposal activities with the Nevada Test Site. In addition, Hanford would be alone in disposing of all the mixed low-level waste. Needless to say, these two items represent a great increase in Hanford responsibilities. While these decisions are not final, the ongoing internal DOE discussions without a clearly defined public process, alarms the Board. Disposition decisions such as these should be part of a national dialogue on disposition of nuclear materials, as previously recommended by the Hanford Advisory Board (see Consensus Advice #13, February 3, 1995; #29, August 3, 1995; #34, November 3, 1995; #38, December 8, 1995; #43, February 2, 1996; #46, May 3, 1996; #51, September 6, 1996; #66, February 7, 1997; February 7, 1997 letter to Secretary PeZa, synopsis attached).

It appears that the draft Ten Year Plan will be finalized by DOE and released in September without adequate public process. In addition to an unrealistic timeline, DOE is not providing any feedback mechanisms for response to public comments. The relationship between the National Dialogue on Nuclear Materials Disposition and the Ten Year Plan is not clearly defined. These two processes are inseparable and their relationship must be clarified before intersite community workshops are held.

The obviously deficient public involvement process is worsened by two other factors. First, DOE was made aware of the problems with last year's Ten Year Plan public process and DOE made a promise to fix them (see Consensus Advice #51, September 6, 1996, and DOE's November 5, 1996, response). It is

clear, based on this year's process, that DOE has once again missed the boat. Second, the release of the Ten Year Plan has been delayed twice, throwing the already overly-compressed public participation process into limbo.

DOE would clearly benefit from improved public process regarding the Ten Year Plan. By accepting a six month delay in the Ten Year Plan implementation process and integrating that process with the National Dialogue on Nuclear Materials, DOE would greatly increase the likelihood of success of each of these important efforts to improve public participation in nuclear materials decisions.

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Tom Fitzsimmons, Washington Department of Ecology
Chuck Clarke, Environmental Protection Agency
Alice Murphy, Designated Federal Official
The Oregon and Washington Congressional Delegations
Randy Smith, Environmental Protection Agency
Dan Silver, Washington Department of Ecology

Attachment

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.

SUMMARY OF HAB ADVICE ON NUCLEAR MATERIALS DISPOSITION

- Advice 13** Eleven criteria for acceptance of off-site Mixed Wastes at Hanford.
(3Feb95) To Tri-parties. Followed by H&S/WM.
- Advice 29** Inadequate involvement of Northwest Stakeholders in public scoping
(4Aug95) meetings on Stockpile Stewardship and Management PEIS in light of
disposition implications for Hanford. Requested a NW hearing and
noted that the lack of regard for NW interests in this issue as another
example of the need for an integrated approach to disposition of nuclear
materials.
To Stephen Sohinki, Director USDOE Office of Reconfiguration.
- Advice 34** Poor public involvement process on WM-PEIS and Tom Grumbly's
(3Nov95) commitment to integrate impact and alternative analyses into single
public process utilizing, "independently facilitated inter-site stakeholder
planning process to: cooperatively develop a meaningful integrated
public participation process on the Department's proposed actions to
ship for storage, treatment or disposal of DOE's nuclear and hazardous

wastes and nuclear materials.”

To Tom Grumbly.

Advice 38
(8Dec95) Reiterates criteria of advice 13 pertaining to Draft WM-PEIS, raises concern that BEMR as source for waste volume estimates and refers to integration of multiple EISs. Copies of Stakeholder values enumerated in FSUWG and TWRS TF documents.

To Tom Grumbly.

Advice 43
(2Feb96) Decries poor public involvement in Fissile Materials PEIS, supports "ongoing dialogue on improving public involvement opportunities regarding the disposition regarding the disposition of the nation's nuclear materials."

To Tom Grumbly.

Advice 46
(3May96) Notes implication of Fissile Materials PEIS for disposition of Plutonium at Hanford and continued piecemeal approach to nuclear materials disposition. "Therefore, a ROD on the narrow choices presented in this EIS is premature pending the National Equity Dialogue."

To Dave Nulton (NEPA Compliance for Fissile Materials Disposition. Followed by H&S/WM.

Advice 51
(6Sep96) Requests public involvement and reflection of HAB values 10YP. Cautions about reliance upon "major new assumptions (e.g. changed cleanup standards, restricted land use, offsite waste import)... Cross-DOE complex issues such as the transfer of waste between sites must be included in the National Equity Dialogue."

To Al Alm and John Wagoner.

Advice 66
(7Feb97) Advice on Nov. 18, 1996 Draft National Dialogue on Nuclear Materials and Waste. Specific concerns were raised regarding these components of the draft: 1) level of DOE commitment to the Dialogue, 2) goals to address equity issues and data quality, 3)scope definitions, 4) guidance regarding data access, role of states and tribes, 5) products section needs specification of data quality assurance process, 6) approach/process section needs further definition of terms and notes USDOE's poor record utilizing mass media, 7) schedule is too compressed and doesn't allow for adequate data quality assurance, 8) participation in steering committee needs to be broadened and must include both shippers and receivers.

To Jill Lytle, cc: Tom Grumbly and Al Alm.

**Letter to
Sec. Peña**
(7Feb97) Letter describing value of national dialogue on nuclear materials. Notes importance of "meld[ing] local and regional principals and values with national and international considerations", and Sec. O'Leary's commitment to "work toward a national dialogue process on the disposition of nuclear materials."

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For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov
HAB Consensus Advice #68

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