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July 11, 1997

Chuck Clarke, 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

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

Subject: TPA Change Package for M-34, K Basins

Dear Messrs. Clarke, Fitzsimmons and Piper:

The Hanford Advisory Board believes that moving spent fuel and related materials away from the River on an expedited schedule is an important issue that needs clear definition in the Tri-Party Agreement (TPA). The Board agrees with the integrated approach to removal of spent fuel, sludge and water from the K Basins and stabilization of the Basins themselves that is contained in the April 24, 1997, proposed change package for milestone M-34.

The Board recognizes that the new TPA milestones for this program prescribe a fast-track effort with little or no contingency for unforeseen technical problems or safety issues, even though several of these have already been identified. Therefore, the Board urges that all parties monitor this program closely for signs of such problems to allow early intervention to minimize schedule slippage.

The Board offers the following additional advice related to the change package:

- 1. The TPA agencies should consider adding target dates to provide early warning of impending technical problems that could jeopardize project schedules and budget.
- 2. The TPA agencies need to work together to quickly resolve the technical and regulatory issues associated with PCB-contaminated sludge in the K Basins. The Board does not want these issues to delay removal of these sludges from the Basins at the earliest possible time because they present such a significant potential threat to public and worker health and safety and the environment.

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

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Very truly yours,

Merilyn B. Reeves, Chair Hanford Advisory Board

cc: Al Alm, DOE-HQ

Alice Murphy, Designated Federal Official The Oregon and Washington Congressional Delegations Randy Smith, Environmental Protection Agency Dan Silver, Washington Department of Ecology

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.

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For questions or comments, please send email to Hanford\_Advisory\_Board@rl.gov HAB Consensus Advice #72

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