



November 7, 1997

Al Alm, Assistant Secretary
Office of Environmental Management
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, DC 20585

John Wagoner, Manager
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P.O. Box 550 (A7-50)
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Subject: Focus on 2006 Plan and Contractor Integration Report

Dear Messrs. Alm and Wagoner:

The Hanford Advisory Board has previously provided extensive comments on the Focus on 2006 Plan. The most recent summary of these comments was provided to the Department of Energy on September 5, 1997. A number of conflicting documents which provide planning for the waste clean up program have been issued. These include the Focus on 2006 Plan, Contractors Integration Report, Waste Management Programmatic EIS, Solid Waste EIS, Surplus Plutonium EIS, site implementation plans for the 2006 report, the RODs associated with the various EISs, and most recently, the draft integrated EM timeline.

The Board is confused and concerned about the role and the inter-relationship of these various planning documents, which are in various stages of preparation, review, and approval. These make a number of assumptions regarding intersite transfer and disposal of wastes which at times appear to be inconsistent and conflicting. Data should be presented in a form which is accessible to the public.

A clear and concise explanation of these planning documents has yet to be provided. Such an explanation should include the relationships between them, and plans for coordinating their assumptions and recommendations, review and public comment, and implementation or utilization.

The Board wishes to reiterate its long held value that the Tri-Party Agreement (TPA) is the primary legally controlling document for the Hanford site clean up program. Any other planning must be examined for its compliance with the TPA. Any changes must comply with NEPA or other required regulatory processes.

The Board requests that DOE address the following issues in the next draft of the Focus on 2006 Plan:

1. DOE needs to lay out a clear decision process that shows how the Focus on 2006 Plans, Contractor Integration Report, Waste Management PEIS, Solid Waste EIS, Surplus Plutonium EIS, and the various RODs associated with the EISs relate to each other.

2. DOE needs to identify what it intends to do with each of these documents, the timelines for each, and the point(s) where they coordinate with each other.
3. The time frames for decisions on the documents identified above and data used in these documents do not appear to be consistent nor in some cases appropriate for the decisions needed.
4. It is critical that decisions involving intersite transfers of waste and materials await completion of the National Dialogue. Import of offsite wastes and special nuclear materials for long-term storage or disposal at Hanford is an assumption contained in these planning documents that is not consistent with public values and the advice of the Hanford Board. The Board has previously identified criteria for accepting offsite waste, and these were reiterated in the September 5, 1997, transmittal of preliminary comments on the Focus on 2006 Plan from the Board.
5. The role of the Contractors Integration Report needs to be clarified.
6. The Board urges DOE to drop consideration of proposals to relax cleanup standards for environmental restoration or to violate TPA commitments for removal of tank wastes. These two proposals, respectively, account for 71 percent of all ER savings and 20 percent of all savings claimed.
7. There is a gap between the recommendations of the Contractors Integration Report and the assumptions and decisions in the Waste Management PEIS.
8. The Contractors Integration Report recommendations are based on unsupported economic efficiencies. They need to also consider transportation and risks to worker and public health and safety and the environment.
9. The Contractors Integration Report and Focus on 2006 Plan need to clearly explain proposals for intersite waste transfers (e.g., ship cesium and strontium capsules to INEEL for storage in exchange for an equivalent number of curies being shipped from INEEL to Hanford).
10. Currently, DOE-RL budget planning does not provide for intersite shipping and handling of wastes. Funding to cover the costs of treatment, storage, and disposal, as appropriate, should be transferred from the site of origin to the receiving site along with the waste itself. No contingency plan or funding exists to cover an accident during an intersite waste transfer.

The Board expects the Department to involve the HAB in development of waste disposition maps prior to submittal to DOE-HQ in mid-December. The Board also expects the Department to conduct an extensive public review of its plans and proposed 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: Patty Bubar, DOE-HQ
Alice Murphy, Designated Federal Official
Chuck Clarke, Regional Administrator, U.S. EPA
Tom Fitzsimmons, Director Washington Department of Ecology
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](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov

HAB Consensus Advice #78

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