June 4, 2004

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

Roy Schepens, Manager U. S Department of Energy, Office of River Protection P.O. Box 450 Richland, WA 99352

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

Linda Hoffman, Director Washington State Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600

Re: Risk Based End States and IAMIT End States Workshops

Dear Messrs. Klein, Schepens, Iani, and Ms. Hoffman,

The Hanford Advisory Board (Board) held a Committee of the Whole meeting in May 2004. The meeting addressed how best to deal with both the Department of Energy's (DOE) Risk Based End States (RBES) process and the emerging Tri Party Interagency Management Integration Team (IAMIT) End States process. This letter is intended to outline the Board's participation in these end state discussions.

Board's Reaction to RBES:

The Board is a staunch advocate of a risk-based Hanford cleanup (see advice numbers 129, 131, 132). However, the Board has resisted efforts to categorize decisions as "risk-based" without scientifically rigorous risk assessments and adequate public process (see advice numbers 129, 131, 132).

In November 2003, the Board expressed concerns about RBES (see advice number 151). The Board acknowledges DOE providing additional time for stakeholder input

to the RBES document. Despite this, the scope of work associated with developing end states for Hanford cannot realistically be completed by the beginning of September. As a result, the Board remains dubious of the RBES process, product and premise – that existing cleanup decisions are, by definition, not risk-based, and that the RBES effort would necessarily result in better risk-based decisions.

Board supports IAMIT end states process:

While not being supportive of the current incarnation of RBES, the Board does support Tri Party efforts to discuss end states in the context of making sound cleanup decisions. The IAMIT End States work group appears to be such an effort.

What the Board will do:

- ➤ Because of the value the Board sees in this IAMIT work group, Board members will begin observing IAMIT work group meetings (in person or by phone). These Board members will not provide Board input to the IAMIT process; rather, they will serve as issue managers to ensure the Board is informed of work group activities.
- ➤ The Board will provide support for the upcoming Tri Party end state workshops. The Board considers these workshops as part of a continuing dialogue on end states at Hanford.
- ➤ The Board will assist the agencies in designing workshop agendas and presentation materials through committee member feedback.
- ➤ The Board will consider requests for Board member assistance during the workshops (e.g. facilitating small groups).

The committee discussion process is often used to gauge opinions of Board members. Such discussions represent the positions of individual Board members, not the Board.

What the Board will not do:

The scope outlined in the Hanford End States IAMIT Team Charter is a reasonable starting point for end states discussions. However, the Board will not:

Consider or discuss the "acceptable" level of waste left in high-level waste tanks prior to release of the Tanks Closure Environmental Impact Statement. This does not preclude discussions of how to strategically address tank closure with other Central Plateau waste sites.

- ➤ The Board will not endorse the RBES product as a result of participating in this process nor should its participation be construed as endorsement of the RBES process or the final RBES product. Rather, the Board is making a good-faith effort to work with the Tri Parties toward a common goal a fiscally responsible cleanup that protects the environment, workers and the public.
- The Board will not sponsor the Tri Party workshops.

Sincerely,

Todd Martin, Chair Hanford Advisory Board

This letter represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Howard Gnann, Deputy Designated Federal Official, U.S Department of Energy
 Michael Gearheard, U.S. Environmental Protection Agency
 Michael Wilson, Washington State Department of Ecology
 Sandra Waisley, U.S. Department of Energy Headquarters

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