

Final Meeting Summary

**HANFORD ADVISORY BOARD
July 10-11, 2002
Richland, Washington**

EXECUTIVE SUMMARY 1
ANNOUNCEMENTS 4
INTRODUCTIONS..... 5
JUNE MEETING SUMMARY..... 5
HANFORD SOLID WASTE ENVIRONMENTAL IMPACT STATEMENT (SW-EIS) 5
ADVICE ON INTEGRATED SAFETY MANAGEMENT SYSTEM (ISMS)..... 14
GROUNDWATER UPDATE 16
EXPOSURE SCENARIOS TASK FORCE UPDATE 17
HANFORD ADVISORY BOARD LEADERSHIP RETREAT 17
COMMITTEE UPDATES 19
RESPONSES TO BOARD ADVICE..... 21
AGENCY UPDATES 21
BUDGET CONFIDENTIALITY 24
C3T/PMP UPDATE 25
BOARD BUSINESS 28
PUBLIC COMMENT 28
ATTENDEES 29

This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.

EXECUTIVE SUMMARY

Board Actions

The Hanford Advisory Board (HAB or Board) adopted two pieces of advice at the July, 2002 meeting.

Hanford Site Solid Waste Environmental Impact Statement (HSW-EIS)

The Board felt the EIS was inadequate. Major recommendations included in the advice were:

- Listing the scoping expectations and needs for this EIS
- The need for an overarching document that pulls together all the analyses done to this point for all wastes on the site
- The need for sufficient analyses to support the action proposal scientifically
- The need for compliance with National Environmental Policy Act (NEPA) requirements and processes.

The advice was adopted.

Integrated Safety Management System (ISMS)

Key points in this advice are:

- Future contracts include the requirement that the workers be under the umbrella of the ISMS program, including the site-wide medical monitoring program
- Workers under the Bechtel National, Inc. be placed under that umbrella when they enter the transition from construction to hot testing and operations
- Allowing contractors to opt out of the site-wide medical monitoring system undermines the integrity of the program and places workers at risk.

The advice was adopted.

OTHER BOARD BUSINESS

HAB Leadership Retreat

Todd Martin, Chair, presented the proposals from the Leadership Retreat. The proposals include:

- Re-establishing the Board's independence
- Increasing Board success by recommitting to the personal responsibility that makes everything work
- Chairs, vice chairs, issue managers, and members need to do their jobs
- Decreasing burnout by focusing on a narrower set of priorities

The Board will improve communication with the agencies and improve the impression that the Board is unfriendly to agency representatives. A 12- to 18-month set of performance priorities will be established and shared with the agencies.

HAB Exposure Scenarios Task Force Update

The task force met on June 10 and 11 to hear presentations and to discuss the river corridor and B/C pilot assessment. The next meeting on these topics will be held July 16 and 17. It is expected that advice will be developed from this meeting.

Groundwater Update

Jane Hedges, Washington Department of Ecology (Ecology), reported on a meeting Tuesday evening, July 9th, to introduce the public to groundwater activities on the site and to do a better job of communicating on the work being done on groundwater. A brochure was shared with Board members. The priorities covered at the meeting were:

- Address the key contaminants
- Source removal with accelerated river corridor work
- Immobilize contaminants in the vadose zone
- Riparian zone cleanup
- Well decommissioning and drilling
- Characterization
- Technology development

Agency Updates

Steve Veitenheimer, Department of Energy – Richland Office (DOE-RL), gave an update on the K-Basins. Equipment issues are being resolved. There are ongoing concerns about the robustness of the equipment. The manufacturer is keeping an eye on it. The December 2002 deadline is in doubt, but the final July 2004 date for removing all fuel from both basins is achievable.

Construction on the fuel transfer system is done at both basins. The system is now in testing and should be turned over for operations by July 18th. Reviews will be done in August and September, and fuel will be moved beginning in late October, ahead of the November 30th milestone. 511 empty canisters have been removed from the canister storage facility to make room for waste coming from K-East Basin.

Cleanup Constraints and Challenges Team (C3T)/Performance Management Plan (PMP) Updates

There were seven C3T teams that addressed different issues. The teams were:

- Cesium and Strontium Capsule Team
- Integrated Groundwater Monitoring Assessments and Protection Team
- Central Plateau Strategy and Vision Team
- Waste Tank Retrieval and Closure Demonstration Team
- ORP Baseline Opportunities Team
- Baseline Integration and Optimization Team
- Waste Disposal Options Team

These teams are continuing their discussions and the collaborative team process has been fruitful. The agency executives plan to meet on a quarterly basis to improve dialog.

The PMP process is ongoing. Comments from the regulators have been incorporated. A draft is due out July 11th with the final draft going to Headquarters on July 17th. Between July 17th and August 1st, DOE will be looking for agreement from the regulators and Headquarters. The regulators are hopeful about this document.

Draft Meeting Summary

HANFORD ADVISORY BOARD Draft Meeting Summary July 10-11, 2002 Richland, Washington

Todd Martin, Chair (Public-at-Large), called the meeting of the Hanford Advisory Board (HAB or Board) to order. The meeting was open to the public and offered three public comment periods, two on Thursday, and one on Friday.

Board members in attendance are listed at the end of this summary, as are members of the public. 6 boards seats were not represented: Richard Berglund, Central Washington Building Trades Council (Hanford Work Force); Jerry Peltier, City of West Richland (Local Government); Michael Farrow, Confederated Tribes of the Umatilla Indian Reservation (Tribal Government); Mark Beck, Citizens for a Clean Eastern Washington (Regional, Citizen, Environmental, and Public Interest); Patrick Sobotta, Nez Perce Tribe (Tribal Government) and David Cortinas, Public-at-Large.

ANNOUNCEMENTS

Penny Mabie, EnviroIssues, announced that changes to committee calls will be sent via email and fax in the events-at-a-glance update that is sent to members. Members who aren't receiving these notices should notify the facilitation team. Comments or suggestions about this method of keeping members informed are welcome.

Dennis Faulk, Environmental Protection Agency (EPA), and Amber Waldref, Heart of America Northwest (Regional Citizen, Environmental, and Public Interest Groups), are arranging tickets to the Mariners game before the September Board meeting in Seattle.

Greg Jones, Department of Energy – Office of River Protection (DOE-ORP), announced that new ORP Manager Roy Schepens was unable to attend this Board meeting because of a family obligation. Roy plans to attend the September meeting.

A card with best wishes for Pete Knollmeyer, previously with DOE-RL, was available for people to sign.

Susan Leckband, Non-Union/Non-Management (Hanford Work Force), informed the Board that her alternate, Fred Roeck, is seriously ill and asked members to keep him in their thoughts.

The Hanford Solid Waste Environmental Impact Statement (HSW-EIS) public meeting dates and locations were made available.

Tom Carpenter, Government Accountability Project (Hanford Work Force), offered a summary of a new study by EPA, the Columbia River Basin Fish Contaminant Survey, showing a cancer risk of 1 in 50 for Native Americans eating fish from the Columbia River. He wants more discussion on this later.

A copy of the testimony of Christine Gregoire before the Senate Energy and Natural Resources Committee hearing was available.

INTRODUCTIONS

Dennis Faulk introduced Nick Ceto who will become the new EPA Hanford Project Manager at the end of July. Nick comes from the Seattle EPA office where he was regional mining coordinator. Before that he managed Superfund projects, worked for CH2M Hill, EPA Region 4 in Atlanta, the USDA Natural Resource Conservation Service in Vermont, and on overseas projects. He looks forward to meeting with Board members to get perspectives on the Hanford site and to learn how to work together.

Keith Smith, Hanford Atomic Metal Trades Council (Hanford Work Force), introduced Becky Holland who may become an alternate to the Board.

Tom Carpenter introduced Claire Gilbert, an attorney for the Government Accountability Project and a recent graduate from UW law school, as an alternate for his seat.

JUNE MEETING SUMMARY

The summary was accepted with some comments from Ken Bracken, Benton County (Local Government Interests), and Leon Swenson, Public-at-Large.

HANFORD SOLID WASTE ENVIRONMENTAL IMPACT STATEMENT (HSW-EIS)

Mike Collins, (DOE-RL), the document manager for the HSW-EIS, presented issues of interest to the Board from the document.

The purpose of the HSW-EIS is to support cleanup at Hanford and throughout the complex by building treatment facilities for mixed low-level waste (MLLW), adding disposal space for MLLW and low-level waste (LLW), and certifying transuranic waste (TRU) going to the Waste Isolation Pilot Plant (WIPP).

The Hanford SW-EIS updates some outdated documentation of NEPA activities, documents planned waste management activities, looks at more cost-effective alternatives, and deals with all the waste. It follows on the Waste Management Programmatic EIS (WM PEIS) that was completed in 1997 and led to Records of Decision (RODs) on TRU waste, LLW, and MLLW. The scoping for the HSW-EIS started in 1997.

The three types of wastes covered in this EIS are solid LLW (radioactive waste), mixed solid low-level waste (LLW with chemically hazardous constituents), and TRU (containing alpha-emitting radionuclides that must be dealt with separately). Waste from buildings being cleaned out is also included. Among wastes not included are high-level waste (HLW), spent nuclear fuel, cesium, strontium, submarine reactor compartments, non-radioactive hazardous waste, waste that does not contain radioactive or hazardous constituents, and most "pre-1970" waste, with the exception of TRU waste retrieved from the 618-10/11 burial grounds.

Most of the pre-1970 waste is covered by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). When a decision is made, assuming the waste is retrieved, the LLW and MLLW will be sent to the Environmental Restoration Disposal Facility

(ERDF). The 618-10 and 11 burial ground TRU waste will be part of Hanford's 46,000 cubic meters of waste.

Low-level waste alternatives include a "no action" alternative to deal with 140,000 cubic meters of Hanford waste by burying it in shallow, narrow trenches like those used now. The first action alternative is to dispose of the Hanford waste and 340,000 cubic meters of off-site waste in deeper, wider trenches. The second action plan is to dispose of those two waste streams in existing-size trenches. The total amount of waste remains the same in either size trench.

The no action alternative for the 70,000 cubic meters of Hanford MLLW is to treat and dispose of it in existing facilities under existing contracts. Since space is limited, the rest would be stored in perpetuity in the Central Waste Complex (CWC) in new buildings.

No one currently has facilities to treat MLLW. The EIS assumes capability sometime in the future. The transportation analysis assumes all waste will go to Oak Ridge. When those facilities come on line, they will need their own NEPA documentation. If those facilities never come on line, all the waste will be treated on site at Hanford.

The first action alternative for MLLW is to send contact-handled MLLW to an off-site treatment facility and have it sent back for disposal. Waste that is harder to treat -- remote-handled, odd-size or big packages -- would be treated in an M-91 (the milestone that covers the handling of different types of TRU and MLLW) facility. Bigger, wider, deeper trenches would be built for that waste.

The second action alternative would be to build a new facility to treat all MLLW. It would be disposed of in low-level and mixed waste burial grounds the same size as current trenches 34 and 31.

The 46,000 cubic meters of TRU waste includes retrievable stored waste in the burial grounds and 618-10 and 11 TRU waste. The no action alternative is to treat as much as possible in the waste receiving and processing facility that is already on line. A few shipments have already been made to WIPP. A big portion of TRU waste would be untreated because of a lack of facilities and would be stored in the CWC in perpetuity in additional buildings.

George Sanders, DOE-RL, said the issue of mixed waste treatment at commercial sites as well as government sites is a department-wide problem.

All alternatives in the HSW-EIS assess short-term impacts through the closing of the low-level burial grounds. The current baseline is 2046, which is different from what is in the PMP. The HSW-EIS includes an analysis for the long-term impacts of waste in the burial grounds for 10,000 years.

The Board's advice on a megatrench has been noted. A megatrench could be used for LLW and MLLW, and there are benefits, but the megatrench is not directly analyzed in this EIS, which analyzes deeper, wider trenches that maximize the impacts of increasing surface area, rain infiltration, and capping costs.

Gerry Pollet, Heart of America Northwest (Regional Citizen, Environmental, and Public Interest Groups), asked if there was any analysis of disposing of mixed waste with radioactive wastes. Mike said no, but if that happened, it would all be in a lined trench. MLLW and LLW trenches have to be lined by regulation. Although lined trenches delay entry of contaminants into the

groundwater for some time, their design life is short compared to the 10,000-year analysis in the HSW-EIS. Liners are not accounted for even when they do exist. The unlined analysis encompasses lined trenches.

Only one kind of cap was considered in the HSW-EIS. Any cap would have to meet Resource Conservation and Recovery Act (RCRA) requirements, so the performance would be the same with any type used.

Transportation to and from the site was not directly addressed in this EIS because the Programmatic EIS (PEIS) made those decisions. It analyzed shipment of LLW and MLLW waste to Hanford and TRU to WIPP. In this HSW-EIS, transportation analysis is limited to sending MLLW for treatment and sending it back, intra-site transfer of waste, and shipping of construction and capping materials to Hanford.

There is no analysis of accepting off-site and LLW, however, an analysis of not accepting off-site waste is included. The lower volumes, 140,00 LLW and 70,000 MLLW, is Hanford waste.

There have been several suggestions in the Top-to-Bottom review and the PMP that some TRU waste should be left in place. This HSW-EIS assumes current decisions stand, that we do retrieve 618-10 and 11 and the LLW burial grounds. If a decision is made to leave waste there, another analysis will have to be done.

There are plans for some industrial generators to send waste to our facilities to be treated and certified and sent to WIPP, avoiding the expense of developing their own treatment facilities. The 46,000 cubic meters was based on a very conservative estimate of Hanford generators. That number should hold true regardless of the generators. As long as the total amount does not increase, it is covered by the HSW-EIS. Transportation of off-site waste is not covered.

Greg deBruler, Columbia Riverkeeper (Regional Citizen, Environmental, and Public Interest Groups), questioned the disposition of the pre-1970 TRU waste and where it is covered. It is covered by CERCLA, but what CERCLA will do with it is unknown and is not covered in this HSW-EIS. The only CERCLA decision at this time is to remove, treat, and dispose of the TRU waste in 618-10 and -11. Any further decisions will have to be analyzed.

Wade Riggsbee, Yakama Nation (Tribal Governments), said there was an EIS that defined removal and treatment of pre-1970 TRU: the Hanford Defense Waste EIS. He didn't understand why that whole process is being ignored. Mike Wilson, Ecology, said the ROD in that EIS only addressed taking out the low-level burial ground TRU waste and 618-11 TRU waste.

HSW-EIS DRAFT ADVICE - IDENTIFICATION OF KEY ISSUES

Gariann Gelston, Non-Union/Non-Management (Hanford Work Force), coordinated the Issue Manager work for this analysis of the HSW-EIS. Gariann began with a brief overview of the steps leading up to the issuance of this HSW-EIS. She listed past Board advice referenced in the this advice, including Advice Nos. 98, 103, and 132.

The key points in the advice are:

- Listing the scoping expectations and needs for this HSW-EIS
- The need for an overarching document that pulls together all the analyses done to this point for all wastes on the site

- The need for sufficient analyses to support the action proposal scientifically
- The need for compliance with NEPA requirements and processes.

The advice stated the HSW-EIS must support proposed actions and decisions. Over the course of this process, conditions have changed. New realities need to be taken into account. Past advice of the Board has not been incorporated, such as independent regulation of MLLW, analysis of potential hazardous or dangerous wastes in the LLW and MLLW, and the presence of highly radioactive mixed low-level hazardous waste in the burial grounds.

Other concerns include:

- Increased volumes of waste identified over the five years of work on the HSW-EIS.
- Impacts on human health and groundwater at points of compliance for waste management units.
- No analysis to accompany assertion of irretrievably and irreversibly impacted groundwater.
- Endangered Species were looked at as a whole, not individually.
- Inconsistent and unexplained modeling and inventory assumptions.
- More discussion of the "no action" alternative is needed: what it means, what constitutes compliance.
- No alternative to end the use of unlined trenches.
- No analysis of cumulative impacts of all Hanford wastes.
- No accident analysis for malevolent events.
- No analysis of cumulative and route-specific impacts of importing wastes from multiple sites.
- No accounting for impacts of delayed M-91 milestone requirements.
- Include high-level tank waste disposed of in soil and K-Basin sludge.
- Include cumulative impacts of reactor components and naval reactor compartments.
- Address pre-1970 TRU waste and hazardous wastes in the burial grounds.
- Include impacts of possibly not retrieving or shipping post-1970 TRU waste to WIPP.
- Inadequate cap performance analysis. Include all caps that are in the Washington State HSW-EIS.
- No support for the assertion the use of megatrenches is bounded by the analysis of shallow trenches.
- No long-term stewardship considerations.
- No Environmental Restoration waste included.
- More specifics on preserving money for other Hanford needs are needed.
- The assumption that all waste will be shipped to WIPP in every case is not certain. Other options need to be included.
- Documents referred to in the HSW-EIS need to be included. There is not enough technical information in the HSW-EIS to analyze it.
- There are concerns about the level of required consultation in this process.
- There was an expectation that this HSW-EIS was being delayed so that it would be an overarching document. If this is not going to be such a document, the Board needs to see another document that fills that need. An overarching document would include groundwater impacts, the burial grounds, and tanks.

Regulator Background

Max Power, Ecology, gave some background on the sequence of events for the HSW-EIS going back to the PEIS. Max said that there is a significant perception problem associated with the HSW-EIS. There seems to be a gap between expectations by the State and stakeholders that came from the scoping process and the discussions on the PEIS.

The PEIS was conducted with the assumption the site EIS would tier off it, and analysis not included in the PEIS would be done in the site EIS. Regulator and public comments on the PEIS resulted in a DOE commitment to delay shipping any additional off-site waste to Hanford until the Hanford EIS was done and the impacts of accepting those wastes were analyzed.

The expectation was this document would compare the relative advantages, disadvantages, benefits, and potential harm of disposing of waste from other parts of the DOE complex at Hanford. Instead, it says Hanford is going to get the waste and looks at how to dispose of it.

This sequence of EISs presents problems with CERCLA, NEPA and equivalency. At this point, the PMP and some of the C3T work bridges some of the questions, but this document doesn't give a very good basis to talk about bridging some of the regulatory problems.

Ecology Perspective

Ecology is cooperating with the Department of Health, the Nuclear Waste Program, and other parts of Ecology in reviewing the HSW-EIS to see if they are accurately reading the document and their own regulations. There are several significant areas of concern to Ecology.

The scope is too narrow. The assumption that the PEIS did the comparison of various places doesn't stand up.

The lower estimate of low-level waste is not just Hanford waste as Mike Collins stated. It is true for the LLMW. The estimate assumes taking on approximately 4,000 cubic meters from elsewhere.

The scope doesn't allow evaluating options being discussed in the C3T process and PMP context. It doesn't deal with the significance of potential CERCLA decisions that would cause retrieval of more TRU waste than 618-10 and 11.

The impact analysis appears to be too limited. It lacks sufficient information to show the chemical as well as radiological characteristics of waste already disposed. It lacks adequate information about vadose zone/groundwater transport. The analysis of the impact on ecological receptors is limited, focusing only on a few species, not on the ecosystem. There is no uncertainty or dominance analysis to support any modeling or estimation work, so uncertainty or key factors are unknown.

The cumulative impact assessment and information are not credible to a public audience. There is insufficient information to support the conclusions. Regulatory analysis is insufficient. A lot of work is still needed to make the site as compliant as any other entity would have to be. The burial grounds are a particular challenge. This HSW-EIS doesn't acknowledge these challenges and how this document overlays them.

This doesn't appear to be compliant with requirements of the Endangered Species Act. Long-term care and maintenance, monitoring requirements and costs, correcting failures is not included. It only covers the operations period.

EPA Perspective

Dave Einan, EPA, agreed with Gariann's and Max's observations. EPA's comments are still being drafted. EPA thinks it is important to include the megatrench in the HSW-EIS.

All of the proposed options have some impact on groundwater, but none of the alternatives attempt to mitigate it. Many comments made during the scoping process are not addressed, nor were importation issues. The PEIS and HSW-EIS reference one another on some issues, although neither document covers the issues. Waste sites going through the CERCLA process will be analyzed during that process, but the HSW-EIS needs to address the cumulative impacts.

EPA doesn't believe there is enough information to properly analyze impacts. The EPA has the role of rating EISs, and right now they are leaning toward a rating of Environmentally Objectionable 2, which means there are environmental objections and there is insufficient information to do an analysis.

Dennis Faulk said NEPA talks about adequacy, not compliance. The rating Environmentally Objectionable 2 is the worst rating EPA can give without going to the national level and getting the Council Of Environmental Quality involved.

Discussion

Ken Bracken asked if the regulators worked with DOE to assure the HSW-EIS would address the State Environmental Policy Act of 1970 (SEPA) actions at the same time. Max said Ecology was a cooperating agency on the Tank Waste Remediation System (TWRS) EIS because they were going to do substantial permitting on tank waste treatment. On this HSW-EIS, Ecology told DOE that insofar as DOE would need permitting action from Ecology, they should use a SEPA checklist and make sure to include information to support those issues. DOE said they would do the HSW-EIS and then do a SEPA checklist based on it. Ecology has to evaluate the adequacy of that checklist. At this time, this HSW-EIS does not provide a sufficient basis to approve that. A final HSW-EIS should incorporate the necessary information.

Jeff Luke, Non-Union/Non-Management (Hanford Work Force), asked if the Board could or should comment that the HSW-EIS is not compliant with NEPA. Jeff thought that compliance with the Endangered Species Act fell under SEPA rather than NEPA. Keith Klein, DOE-RL, said they do have a NEPA compliance officer (CO) who has worked closely on it and has worked with other NEPA CO's around the complex and lawyers at Headquarters. It would not have been issued if they did not consider it compliant. For Ecology, the NEPA concern was related to the consultation issue pursuant to exposure scenario assessment. NEPA is specific in the role of other agencies. The issue is one of process rather than substance.

Dave Einan said EPA doesn't look at the draft in terms of compliance. This is a DOE document. EPA's review is of their environmental analysis. The concern is a lack of information on environmental impacts and alternatives.

Keith Klein asked the Board to consider what the real issues are: Is the Board concerned about the adequacy of the paper, or does the Board dislike what DOE is trying to do? Is the Board concerned that the actions will cause harm to the environment? He reminded the Board that before DOE takes any action, they will go through a permitting process that will include a performance assessment to determine the safety. DOE wants to use permit-compliant facilities.

The concern about importation of waste is really an equity issue. The HSW-EIS does not address chemical issues. Keith suggested that if the Board asks DOE to do a lot more work on this HSW-EIS, it will delay action.

If the real concerns of the Board are about something else, those should be addressed separately. The HSW-EIS is a bounding analysis. The Board should be very specific about what they want. The final HSW-EIS is due out in December. A ROD will be issued in the December/January time frame followed by a 30-day comment period.

Gerry Pollet said the problem is the decision has already been made, and DOE is trying to make the HSW-EIS fit the decision. Assistant Secretary Jessie Roberson has said she will begin moving waste to Hanford in January. The Board needs to make a clear statement that this process is flawed and the document is legally inadequate. We need to go back to the scoping discussions and public comment and do the necessary analyses.

Gerry said cost studies comparing the alternatives for disposal locations the Board asked for have not been done. The performance assessment for the burial grounds is not publicly available. Other documents that were relied upon are not available to the public.

Responding to Keith's question about the real concerns, Paige Knight listed the following:

- What are the cumulative impacts on groundwater of bringing in more waste and leaving waste in place?
- Overall safety.
- Costs and timing.
- How is bringing in more waste going to affect funding of Hanford waste cleanup?
- How can Hanford waste be cleaned up while bringing in more waste from off site?
- If this HSW-EIS is inadequate, is another draft done or is it corrected in the final version?
- Will there be an opportunity for comment on the next version?
- What are the guarantees? The vitrification plant isn't up and running and we are acting as though it is a done deal.

Although he thought those were important questions, Keith said the HSW-EIS is not the appropriate vehicle for addressing them. They are equity issues.

Groundwater contamination is being addressed in the C3T groundwater protection strategy and by the Exposure Scenarios Task Force.

There are legacy wastes that have been disposed of in ways not compliant with today's regulations. Imported waste will be disposed in modern, protective ways that won't impact Hanford cleanup.

All imported waste will have to bring in its full cost. To the degree that taking waste from small sites precludes their having to develop their own capabilities, it saves the complex money and thus benefits Hanford funding. Hanford is one of the main beneficiaries of moving waste in that our high-level waste will go to other sites. The most imminent importation of MLLW is from Rocky Flats. Until that waste leaves Rocky Flats, the \$600 million a year it costs to maintain it will continue.

Independent regulators are the best guarantee. Decisions will be made in open processes. Today's technology for isolating and monitoring MLLW is good. This HSW-EIS does not address cleaning out tanks.

Pam Brown, City of Richland (Local Government) expressed her profound disappointment that this document fell far short of expectations raised over the past five years. The fundamental concern is the safety of what is left at Hanford for people and the environment. This HSW-EIS lacks enough information to make that determination and does not address the preferred alternative. The River and Plateau Committee did not object to the preferred alternative; it makes sense.

The Board advice from 1995 said Hanford needs a capacity to handle and store off-site waste before it arrives, and we need to be sure it is going to leave. A mobile facility to treat the imported waste and send it away would be consistent with that advice. Alternative No. 1 makes sense. The Board needs more information about the cap.

Gerry Pollet said this HSW-EIS process is the one process that definitely should not be a paper exercise. There is a legal duty to use an interdisciplinary approach. The permitting process depends on the analyses in this HSW-EIS and the public comment on it. This HSW-EIS is inadequate for permitting decisions.

Gerry said a Federal Court issued the opinion that the WM PEIS is legally inadequate for leaving out the cumulative impacts of CERCLA wastes. NEPA says the full range of reasonable alternatives and potentially foreseeable impacts must be included in the scope of the HSW-EIS.

Gerry quoted a document obtained through the Freedom of Information Act that says, "An agreement with DOE-RL will be reached to facilitate the transfer of remote-handled TRU to the Hanford site for interim storage. Hanford will make receiving remote-handled TRU from off-site generators a priority over award/fee work scope." That is not in this EIS.

Tim Takaro, University of Washington (University), said the premature RODs of the 1990s are coming home to roost. The national expectations for the western states and South Carolina have increased, but we don't have firm numbers on what is coming to Hanford. In order to have a credible bounding document we need to know how much waste Hanford will keep, how much will be exported, and how much will come here from other parts of the world. Given the lack of treatment capability for some waste streams coming to Hanford, it seems unlikely that Congress will appropriate money for new treatment facilities in light of the high cost of the vit plant. Tim said Board advice should say we need a coherent national nuclear materials disposition strategy.

Greg deBruler referenced the efforts to create the Columbia River Comprehensive Impact Assessment (CRCIA). The CRCIA team produced a guiding document and DOE said in 1997, "We will be using this as a template for all assessments on site." This HSW-EIS has failed to live up to these commitments.

Leon Swenson said although the HSW-EIS may not be the appropriate place to address some of the overarching questions, it is the only place the Board currently has to do so. There doesn't appear to be any other upcoming opportunity for addressing them. The HSW-EIS appears to be driven by decisions that have already been made. C3T is not a NEPA or public process for dealing with groundwater. We need a process for moving forward with all these concerns. Keith Klein said advice on how to address these other issues would be helpful.

Leon Swenson asked if there will be an opportunity for public comment if substantial changes are made. DOE will have to look at the Board's comments and determine the next step. Keith Klein

said there will be further iterations of this document, and he will carry the message back to the Secretary that public input needs to be worked into the process.

Max Power clarified that this HSW-EIS will provide the basis for a ROD to be issued by DOE to construct additional LLW disposal trenches in some configuration. There is no further permitting required for DOE to build those trenches. Keith Klein said those trenches will be lined.

Keith Smith said he is not opposed to taking waste to help the whole complex providing it is done safely and disposed of safely. Keith Klein said that the curie level of the site is now 400 million curies and the goal is to get to 20 to 30 million curies. What remains will have to be in a form that is protective of groundwater.

Harold Heacock, TRIDEC (Local Business Interests), asked what happened to the environmental assessment of K-Basin sludge. It is not included in this EIS. Two sentences say it will be disposed of, but there is no assessment, no evaluation of alternatives, and no path forward. George Sanders, DOE-RL, said the K-Basin sludge is remote-handled TRU waste that will go to WIPP in containers.

Wade Riggsbee indicated that the Tribe had not been consulted to the extent required by NEPA. They are working on resolving that now.

Bob Larson, Benton-Franklin Council of Governments (Local Government Interests), said it is unlikely the Board will have a second chance to comment on this HSW-EIS, and we should address ourselves to this draft.

A group met after the first day of the meeting ended to edit the advice. A few clarifications were made. The tone was made more positive and sentences at the beginning of paragraphs stated clearly what the Board wants to see in the HSW-EIS. The advice was adopted.

Gariann Gelston thanked everyone who helped her as issue manager on this piece of advice. Paige Knight noted the significant growth this piece of consensus advice represents for the Board and the power that comes from this kind of effort. Pam Brown emphasized the impersonal nature of the Board's criticism of this HSW-EIS, saying that the disappointment came from the difference between the Board's expectations and the actual document.

Gerry Pollet suggested that this advice could be a good tool to help the public comment on the HSW-EIS and should be made available at public meetings.

Agency/Board Relations Concerns

Agency representatives expressed a common perception that coming before the Board is an unpleasant experience. They feel the Board can be very aggressive in its questioning. The Board members asserted that their tone comes from their passion for the issues and is not meant as a personal attack. The agencies requested that the tone of advice be kept positive with specific requests for specific actions rather than just blanket disapproval. The Board agreed to be more specific in their advice. The HSW-EIS advice was edited to reflect this. The point-by-point responses to Board advice have been helpful to the Board in continuing dialog.

Max Power said he finds it helpful when people have that feeling about the Board to remind them of the differing roles that the Board and the agency people fill. The Board has a role to be a watchdog. Tone is important. It is important that agency people and Board people sit down

together and talk more than in the past so they understand each other's perspectives and roles. Sometimes strong language is required, but it should be used with discretion.

ADVICE ON INTEGRATED SAFETY MANAGEMENT SYSTEM (ISMS)

Tim Takaro presented advice from the Health Safety and Environmental Protection Committee on ISMS. By law, DOE must establish and carry out a program for the identification and on-going medical evaluation of current and former workers. A year and a half ago, the Board heard from a panel of workers how important the ISMS is to them. This program provides for medical surveillance of workers. Tim explained the cycle of hazard identification, hazard control, work performance, feedback and work scope definition. Medical surveillance occurs during hazard identification, hazard control, and feedback. Employee task analysis specific to worker exposures is done about once a year, defining what medical testing is required to protect them from the effects of those exposures. These analyses force the system to make corrections, to change work practices, and to mitigate hazards.

DOE needs to know who is working on the site, what population is at risk, and what the risks are. This allows documentation of potential exposures and insures proper medical attention and determination of workers' fitness for duty. The committee's goals are to ensure that all workers are included in the ISMS, to ensure its implementation is transparent, and to track the system to know when it is working and when it isn't. Worker involvement is key. The committee wants to be sure that a health screening program is maintained so that workers are given the right exams to prevent medical complications from exposures. To do these things, every worker needs to be covered by the program.

The Bechtel National, Incorporated (BNI), contract allowed BNI to opt out of the DOE medical monitoring program and use their own. The committee is concerned that this sets a precedent for future contracts and undermines the ISMS program. All workers should be under the same surveillance system.

Al Hawkins, (DOE-ORP), stated DOE is going to be assessing the adequacy of BNI's program beginning August 12th. The committee's involvement is welcome.

Ken Bracken pointed out the advice says BNI is "soon" to be involved in hot operations, when, in fact, it will not happen for a number of years. He questioned the relevance of this advice at this time if that is the only issue. Tim said the integration of emergency services is a concern as well. If one group is following their own procedures, the potential for communication failure is increased. He stressed that this advice speaks to future contracts and making sure they include the same language as other contracts relative to the ISMS.

Greg Jones, DOE-ORP said the contractor did not opt out only because they were going to be working in a nonrad environment, but also to utilize commercial standards and reduce DOE requirements. Bechtel has been using its own program for years around the world, and they have a good track record. DOE's job is to make sure their program is safe, effective, and implemented.

Margery Swint, Benton-Franklin Public Health (Local and Regional Public Health), described the level of medical testing done during the years she worked at Hanford as being far more comprehensive and inclusive than the present system. She asserted that the present system does not fit the definition of a preventive system, but is a monitoring system. DOE should have the flexibility to treat contractors individually. She said each area should have "first responders" for emergency situations and not depend on a designated team to respond to their emergency. It is

improper to issue advice in anticipation of DOE or BNI mishandling worker health and safety. BNI workers may not end up doing the testing anyway, and the workers who do will be brought into the ISMS program.

Tim said the committee wants the workers under the ISMS program before there is risk. Margery suggested asking for notice when these workers are going into this transitional period of work. If the workers come from other areas of the site, they may already be in the ISMS program.

Susan Leckband pointed out that the only thing separating the construction site from the rest of the site is a fence. Fences don't stop hazards. An emergency would affect the entire site. Evacuation procedures need to be coordinated.

Harold Heacock pointed out most major construction contractors have a cost-effective health and safety program for their workers that meet the principle requirements. Asking contractors to switch to our program will drive up costs and delay work. Harold has observed the Bechtel program around the world and has found it to be excellent. In the past on the Hanford site, construction workers and teams working with hazardous material have been managed under different programs, and both programs had good records.

Keith Smith said there is nothing magical about commercial practices. He has seen accidents go unreported for three days when it became a Labor & Industries issue. In commercial practices, workers sometimes have a reckless attitude on the job. Some contractors are unwilling to pay the costs of safety. Employee Job Task Analyses (EJTA) cover all types of hazards for all kinds of workers.

Tom Carpenter said ISMS works, and he has been a supporter of it. His observation of Bechtel's response to whistle blowers, subcontractors, and health and safety issues has not been very impressive. He believes Bechtel was docked on its performance awards last year for this reason. Their opting out of ISMS is very disturbing to him.

Bob Larson pointed out that contractors cannot just opt out of ISMS. It is DOE that writes the contracts and either requires participation or not. Our advice is to DOE, not the contractor.

Al Conklin, Washington State Department of Health (Ex-Officio Representatives) suggested that we wait for Al Hawkins' evaluation. Unless there is a known problem, the advice is not warranted.

Tim said the concern is the undermining of the current system by having some workers outside of it. It wasn't until October 31st, 1999 that there was a comprehensive list of everyone who was working on the Hanford site. There are more subcontractors now than during the period Margery Swint described. The idea is to assign risk to workers on the site based on their task, not who they work for. Workers got unnecessary tests for many years. This monitoring program assures that people get tested appropriately.

The advice was shortened and focused to make it clear that the concern is for future contracts for work done in contaminated areas and the integrity of the ISMS. Tim pointed out that the committee has assured itself that BNI's system adequately covers the workers. They are not sure how well it integrates with the site-wide system. That will be verified soon.

Wade Ballard, DOE-RL, clarified that in DOE contracts, the prime contractor is required to subscribe to the core principles in ISMS. He didn't know how far down the subcontractor chain

that requirement went, but the primary contractors are required to have subcontractors working under the ISMS umbrella.

GROUNDWATER UPDATE

Jane Hedges, Ecology, briefed the Board about the meeting Tuesday evening, which was a primer for the public on the whole groundwater issue. About 36 people attended, including Board members, some agency representatives, and some contractors. Illustrative maps were posted from the meeting, and Mike Thompson, Ecology, gave an historical presentation on how contamination occurred and how it is moving, what the interim actions are, and what will happen in the future.

A brochure was prepared for the meeting. Input received will be incorporated, and a new version will be available to Board members before the end of the meeting.

The priorities for groundwater that were presented at the Tuesday night meeting were:

- Address the key contaminants: carbon tetrachloride characterization, uranium, technetium 99 from tank farms, chromium, strontium
- Source removal with the accelerated river corridor work
- Immobilize contaminants in the vadose zone
- Riparian zone cleanup
- Well decommissioning -- dry wells are conduits for pollution
- Well drilling
- Characterization
- Technology development

Greg deBruler's film of the meeting is available. CDs of the annual groundwater monitoring plan are also available.

Gerry Pollet asked where the investigation of releases from low-level burial grounds, the associated adequate monitoring systems, and RCRA closure requirements for contaminant removal for single-shell tanks (SSTs) was classified. Jane said it is lumped in the characterization category. SSTs are under the M-45 milestone. Although it is closely linked, it is under a different umbrella.

Jane said DOE does not do a very good job of telling the story of what is going on, let alone where they are going. The Tuesday night meeting was a very basic level presentation to help bring the general public up to speed. DOE is getting good input on how to do a better job of this.

Gerry pointed out that the Board's advice to clean up groundwater along the 100 Areas as soon as the soil was cleaned up was rejected. Todd Martin added that the Board's advice not to use industrial cleanup standards outside the fence in the 300 Area was also rejected.

Tim Takaro asked that DOE consider climate changes and changes in the hydrologic cycles that are predicted because of global warming. Tim asked about a reservoir proposal up-gradient. This idea has been floating for quite a while, but there are no actual plans at this time.

Tom Carpenter asked about tritium. Jane said a milestone requires them to look at it every two years, but there is currently no technology to address the tritium plume.

Greg DeBruler was concerned that the presentations could give people a false sense of security about conditions on the site. Contaminants in the river itself were not mentioned: nitrate, iodine 129, U238. Mike Thompson expressed confidence in knowing what is in the groundwater, but not for the inventory in the vadose zone. An expert panel recommended a \$20 million aggressive characterization program for the tank farms. There will be cribs and trenches; we do not know how deep that vadose zone is contaminated; we do not know what the source term is and how we are going to protect groundwater. Those things should be included in the presentations.

Jim Curdy, Grant & Franklin Counties (Local Government), said for years the US Geological Survey went through the whole state sampling the water every month. Knowing the original water standards will tell us what the goal is for groundwater.

EXPOSURE SCENARIOS TASK FORCE UPDATE

The task force met June 10 and 11 to discuss the river corridor. There were presentations of what risk analyses are, what risk analyses have been done, what analyses are planned in the future, and what is being done on groundwater. Discussion groups talked about the future uses of the river corridor and the B/C pilot assessment. The next meeting, likely the last one, will be held July 16 and 17 at Columbia Basin College in Pasco. The discussions will continue on the shoreline, the riparian zone, and groundwater. The Board has asked for advice from these meetings, so Board members should keep that in mind during the meeting. Greg DeBruler encouraged members to attend the meeting to give input into the B/C pilot project assessment.

Dennis Faulk said there was a first discussion about the 100 Area cleanup in 1999. Dennis thinks the reason for the delay to get to this current discussion is the funding cycle. They knew this was a good discussion to have, but they had to get it into the detailed work breakdown to get the work done. The future use of the shoreline will drive cleanup. DOE has made it clear they want the EPA to delete these sites from the National Priorities List as soon as possible.

Jim Curdy asked if anyone has looked into the Navigable Rivers Act, which guarantees the right to move any ship on a navigable river and dock in any place that is necessary for commerce. The Act was reaffirmed in 1994 for the indefinite future, so that should be a foreseeable future use for the river.

A letter was available from the Umatilla Tribe to Keith Klein that talks about Native American exposure scenarios. That issue will be part of the discussion at the next task force meeting.

HANFORD ADVISORY BOARD LEADERSHIP RETREAT

Todd Martin, the Board vice-chairs, and the committee chairs and vice-chairs attended a leadership retreat in Leavenworth on June 24th and 25th. Dee Willis was the facilitator. Todd prepared a summary of recommendations from the retreat. He asked the Board for general agreement on these points:

- Re-establish the Board's independence
- Increase Board success by recommitting to the personal responsibility that makes everything work

- Chairs, vice chairs, issue managers, and members need to do their jobs
- Decrease burnout by focusing on a narrower set of priorities

To address these areas, Todd presented action plans in three major areas.

Improve relationships with the agencies. Build bridges, particularly on the principal level with Tom Fitzsimmons, Ecology, Roy Schepens, DOE-ORP, and Mike Gearheard, EPA. Develop a 12- to 18-month set of performance priorities. Communicate with the agencies on what we are working on and get buy-in on those issues. Work on improving the impression that interaction with the Board is a bad experience. Increase face time between the agency folks and the Board leadership. The first meeting with Keith Klein under this plan resulted in his attendance at today's meeting. Todd will prepare one-page-or-less summaries of Board direction for the agencies.

What we oughta be doing. The charter does not really go far enough in terms of a vision for what the Board is trying to accomplish. We do not need a mission statement, but each Board member is asked to submit a short statement of what the Board is trying to accomplish to the Executive Issues Group in the next couple of weeks. The Issues Group will look at them and decide what to do with them. Submit those statements to Tammie Holm at EnviroIssues.

Board processes. There was agreement that the wordsmithing process is painful. People can show up at the Board meeting without having read their Board packet and derail the advice process by bringing up something conceptual that could have been handled at an earlier point. If, after preparing the advice, a committee member gets input from their constituency that causes the member to change their opinion on the advice, that is a valid reason to oppose the advice at the Board meeting.

The leadership is suggesting that anyone on the committee presenting the advice cannot block the advice at a Board meeting simply because they failed to exercise their right to participate at the committee level. When advice is brought to the full Board, committee members should have an opportunity to offer supporting comments for the advice. Other Board members can submit changes to the advice in the same way they always have. Anyone who has changes is automatically volunteering to participate in the editing work before the second day of the Board meeting.

The leadership proposes that the Board enforce the rule that says if a seat is not represented at three consecutive Board meetings without valid excuse, that seat be dropped and one found to replace it. A letter will be written to all agencies explaining that rule will be enforced as of July.

Committee chairs should be sure that each issue the committee is working on has an issue manager.

Priorities. The Board is experiencing burnout because it tries to tackle every issue that comes along. The leadership chose the umbrella topic of "Acceleration" to use as a focus. This year, DOE will have to demonstrate that each acceleration proposal will maintain the integrity of the Tri-Party Agreement (TPA), meet the requirements of applicable laws, and reflect the values and principles of the Northwest stakeholders. The following key questions will be used by the Board to evaluate acceleration proposals:

- What is the proposal?

- How will the acceleration be accomplished?
- What are the environmental and health impacts of the acceleration proposal?
- What are the priority, budgetary, and integration impacts of the proposal?
- What are the impacts of the proposal on both Hanford and the DOE complex?

Todd presented an example of a brief statement about the Board's priorities concerning groundwater. He said that if the Board does this prioritizing, it will give the Board something to present to the agency heads in September.

Other participants in the retreat expressed their appreciation for it and said it was an energizing activity.

There was some mention of the Board's past skepticism of prioritizing for fear of being too restricted. The leadership felt that "Acceleration" was a broad enough umbrella to be nonrestrictive.

One other concern was member participation. People whose organizations pay them for Board work are free to give more time than those who are purely volunteers. Also, some members do things that support their Hanford work in other arenas. The Board does not want to be a professional group. That said, organizations that do not participate on an ongoing basis should yield their seats to organizations that want to take an active role.

Max Power said that it is important for the Board to participate in setting the work priorities because often the agencies' agenda tends to be set by bureaucratic considerations. If the Board comes to the agencies with an issue they think is really important, it is hard for the agencies to ignore it. If something is important to the Board and they do intense work on it, the agencies appreciate the products that come out of that. The Board should also be responsive to agency priorities. Dennis Faulk agreed that the Board's priorities need to mesh with the agencies' priorities. It will be important for the Board to be engaged on the issues being addressed in the C3T process.

In terms of communication on the Board, Todd said committee chairs need to be sure they are using their conference calls effectively and not wasting people's time with unnecessary calls.

Shelley Cimon, Oregon Hanford Waste Board (State of Oregon), said Site Specific Advisory Board chairs' meetings happen a couple of times a year. Most boards bring more than just their chair and vice-chair. We need to bring new energy at that level. There is funding for it. The leadership is not going to be here forever. We need to bring other people up to speed at the programmatic level.

COMMITTEE UPDATES

Budgets and Contracts

They are still waiting for budget information.

Health Safety

Keith Smith said the committee is trying to prepare advice on ISMS. It will be good for the committee to reprioritize their work. The committee may also have some advice on the PMP as it affects health and safety.

Public Involvement

There is nothing new to report since the last Board meeting. The committee is keeping an eye on the B/C pilot assessment and public involvement.

Tim Takaro brought up recent discussion between the Washington State Senators that indicated that a large part of Hanford's high-level waste will not be given space at Yucca Mountain. The public should know that and was probably misinformed about it prior to this July debate in the Senate. He hopes the public involvement committee will address that.

River and Plateau Committee

Pam Brown was not sure if the committee would have additional work to do on the HSW-EIS. The committee asked DOE-RL not to issue the stewardship plan this summer because the committee was at capacity for issues to deal with. It will be coming out shortly, and the committee is very interested in proposing a committee-of-the-whole discussion of the plan. The previous workshop with Jim Daley, DOE-RL, was very constructive, so that suggestion will be coming to the Executive Issues group. Board members should let Susan Leckband know if that is a good idea. This month's committee meeting has been given up for the task force. There is a lot of committee work coming up on groundwater, accelerated cleanup, and so forth.

Tank Waste

Doug Huston, Oregon Office of Energy (State of Oregon), reported there is a meeting scheduled for July 17th. The agenda is available. One of the things the committee will be doing is looking at the task force model to see if that can be used for the committee to become more productive.

Other Updates

Todd reported on a lunch meeting with Jessie Roberson last week in conjunction with the C3T meeting. Board members expressed dissatisfaction with lack of budget information and the HSW-EIS. They talked about the environment. They explained the tough questions this Board asks Keith Klein so that when Jessie goes back to Washington, D.C., she has some understanding of the community Keith is dealing with and the Hanford experience represented on the Board.

Norma Jean Germond, Public-at-Large, asked what the responses were to the issues raised at the lunch. Todd said one response to the budget issue was that two years ago, the election problems interfered with the budget. This year it was the Office of Management and Budget that caused the problem with the acceleration fund. Jessie gave a commitment that it will work correctly next year.

Jessie asked if our advice on the HSW-EIS was asking for access to more of the analyses done to support it or for more analyses to be done. She said there was room to negotiate on providing more information, but they probably would not be willing to do additional analyses.

Tim Takaro pointed out that while the Board has been meeting in an air conditioned room all day, workers were pouring concrete for the vit plant in the 105-degree heat. Paige Knight asked that the Board write a letter of thanks to the workers. A letter was written to Roy Schepens and copied to Jessie Roberson and the workers who poured the concrete.

RESPONSES TO BOARD ADVICE

There was response to the advice on the 100/300 Area change package. Ken Bracken reviewed the response and said he liked the format, which responded point by point. There were no comments on the substance of the response.

The response to the top-to-bottom review advice, #129, was very brief. Todd said this response includes things the Board will want to keep track of when it reviews the next revision of the PMP, particularly the advice point that there will be credible risk assessments.

Dennis Faulk asked that the response to the 100/300 Area change package be given serious consideration so that dialog and understanding can continue, particularly on the groundwater issue.

Gerry Pollet said the response to the 100/300 Area advice was extremely poor. The Board proposal to start remediation of groundwater a year after soil units were done was rejected without meaningful explanation. The response had nothing to do with the Board advice. There needs to be a fundamental discussion of what groundwater remediation priorities are. The response appears to ignore Model Toxic Control Act (MTCA) requirements. It relies on CERCLA for rejecting the advice about the inappropriate use of the industrial cleanup standards for the 300 Area, especially outside the fences. There is no response to the specific comments submitted about the clarity of the State laws about industrial/commercial/recreational uses.

Pam Brown said DOE has said that none of the buildings in the 300 Area can be used for industrial use. This puts a new issue on the table.

Greg DeBruler was disappointed in the response because DOE picked which things it wanted to respond to and omitted the rest.

AGENCY UPDATES

Steve Veitenheimer, DOE-RL, the director of the Richland Office of Spent Nuclear Fuels, gave an update on the K-Basins. Currently, the K-West Basin and the Cold Vacuum Drying Facility are in scheduled maintenance outages. Eighty multi-canister overpacks (MCO) of spent fuel have been removed from the K-West Basin, the equivalent of 380 metric tons of heavy metal. The project is 63 days or 30 MCOs behind schedule due to equipment reliability issues, primarily at K-Basin. The Cold Vacuum Drying Facility has had some equipment problems.

The original baseline for fuel removal was 957 metric tons by Dec. 31, 2002. The contractor has a recovery plan that calls for removing 4.5 MCOs per week. This can be done if the equipment operates at 100 percent capacity. A week or two after this outage is over, the contractor will be able to tell if he can meet this schedule.

Fluor has tackled the equipment issues and made improvements. They have done productivity enhancement and analysis. K-West is one of the best areas on site for looking at and fixing equipment problems. The equipment in K West is not as robust as DOE would like it to be to maintain good productivity over the next couple of years.

K West has been staffed to 24/7 operations since January. When the equipment is running, the workers do very well at moving fuel. The hiring and training process has been good. DOE will keep a watch, making sure BNI questions everything they are doing to maximize efficiency. Even though the December 2002 date is in jeopardy, the July 2004 removal of all fuel from both basins is achievable. To do it, they have to maintain a 3.4-MCO-per-week rate.

Of concern is the K Basin Fuel Transfer system that will move the fuel from the east basin to the west basin for processing. Shielded transfer casks are loaded and covered and put on a straddle carrier that takes it to the platform where it is covered and loaded onto a truck. The transfer system was begun in Jan. 2001, and was completed this week.

Construction is done at both K East and K West. The system is being tested now and should be done July 18th and turned over to operations. Operators will do dry runs to get ready for the readiness review in August and the DOE review in September. The first fuel will be moved in late October, ahead of the November 30th milestone. All targets should be met.

Subcontractors are currently manufacturing the containers in which the sludge water will be removed from the K Basin. The sludge will go into casks that will house the containers during transport to T plant. Delivery of the first transportation system is scheduled for September of this year. Completion of construction of the sludge water system is scheduled for September 30th. Next Monday an award will be given for the in-Basin work: the vacuum cleaner system, hoses, and things that will suck the sludge out of the basin. The TPA milestone for the sludge water system is to have operation by the end of December this year.

There are 80 MCOs in the canister storage building. Caps have to be welded on top of the MCOs before they can be stored for long periods in the canister storing building. The welding contract was awarded at the end of May. Welding will begin by Feb of 2003 on schedule.

As fuel is removed from canisters in K West, the empty canisters have to be removed to make room for K-East fuel as it is moved over. A canister cleaning machine has been installed well ahead of target. Five hundred-eleven empty canisters have been removed. There is room to start receiving K East canisters this October.

Tim Takaro asked what the hourly worker radiation dose will be for the fuel transfer and for the sludge water systems. For fuel movement, the worst case is a contact reading on the outside of the cask of 10 MR per hour. Steve didn't recall the numbers for the sludge.

Ken Bracken referenced a letter from the Defense Nuclear Facility Safety Board (DNFSB) that challenged the complexity of the equipment and the ability of Fluor to maintain it. Ken's concern is dollar impact to the life-cycle cost and to the FY 2003 and 2004 budget. Steve said that letter was the result of a maintenance review that was done by DNFSB support staff in the last maintenance outage. There were issues with outage, work package preparation, and procedural compliance issues. The DNFSB and DOE are worried about equipment reliability and the robustness of the equipment to make it from here to the end point. DOE agreed with the conclusions. DOE staff and factory representatives are keeping a close eye on it. Some of the

equipment issues have been improved. Some of the early issues have been resolved. As far as dollar impact, DOE is going to hold Fluor to the contract.

Ken was also skeptical about running things at 100 percent for months at a time. There will be time and money impacts. Steve said they are reasonably optimistic about the 2004 date, but not the end of this year. Fluor has to look for efficiencies and question everything they do -- design and operations.

Keith Smith was concerned about the lack of receptivity of management to technical ideas from the workers. Keith also brought up concerns about the procedures that were written in a vacuum. The workers only got to look at a small portion of them. Steve said Fluor is looking at all their procedures and he hopes they would include the workers in that. He will look into it.

Pam Brown asked about the MCO that had a leak. Fluor just sent the analysis and proposed resolution to DOE. They are evaluating it now. Fluor wants to take it to the canister storage building and put it in an overpack under a helium blanket until welding and then weld a cap on it. The purpose of overpacks is to take care of leaky canisters.

Pam asked what the people who are working 24/7 are doing when the equipment is down. Bob Heck, Fluor, said people are doing procedure reviews and certification training. During recovery plans for each piece of equipment, maintenance people and operators are required to be present because they work the equipment, so there is a concern about using the people effectively. As long as the July 2004 date is met, there will be no increase in budget or a slipped schedule.

Pam asked if the emergency drill in June involving a truck moving an MCO to the canister storage building, a fuel truck with a fire, and an MCO breach was a useful drill and what lessons were learned. Steve said all drills are useful to get people thinking. More drills could be done. The more practice with abnormal events the better. The contractor has to increase their drill schedule as part of the readiness plan to operate the fuel transfer system.

Todd asked if employee concerns are being filed. Tom Carpenter said the DOE employee office has not seen any issues from spent fuel. He does not know about the contractor employees.

Tom Carpenter asked about the gas leak he heard about from opening canisters. Bob Heck replies they gave a full briefing to employees about it, and there have been no environmental or health problems from the incident.

Bob Parks was concerned that safety not be sacrificed to meet a schedule.

Larry Romine, DOE-RL, gave an update on the Plutonium Finishing Plant TPA change package. The tri-parties reached agreement in May, signed it June 12th, and put it out for public comment for the period from June 17th to July 31st. There have been four comments received that have been addressed. All comments received will be addressed and incorporated if appropriate. The package should be finalized in early August.

The agencies like the package.

BUDGET CONFIDENTIALITY

Ken Bracken wanted to discuss a letter from the Board meeting packet from EPA and Ecology signed by Mike Gearheard, EPA, and Mike Wilson, Ecology, about meeting the intent and requirement of TPA section 149. This letter has a statement, "We will comply with the confidentiality provisions if it assists US DOE Environmental Management in developing budget requests." In the past, confidentiality issues have been of concern, particularly to Ecology. Ken asked if this represents a change in policy. At this moment, this might be necessary, but at some point the stakeholders need to get the information.

Mike Wilson said the ability of Ecology to hold confidential information is limited. The TPA says if the information is embargoed by the federal government, Ecology can hold it in confidence until DOE releases it. Because of the Freedom of Information Act, Ecology cannot hold information confidential for any period of time. This was compromise language in 1989 that allows the regulators and the Board to get budget information far in advance of any other site or any other agency budget in the country. It was acknowledged that it would be impossible for DOE to get a court to stop release by Ecology of any information they get on the budget.

Dennis Faulk said it is the TPA language that allows the Board and the agencies to have the information. This is an unusual provision. This letter was written because DOE has not been following the TPA process for the last couple of years.

Gerry Pollet asked if this is a compliance order letter. Mike Wilson said this is to put DOE on notice that they did not follow the requirements and that Ecology cannot let it slide. It seems that DOE local offices did the best they could under the current administration budget process and the situation at Headquarters. Gerry said it was very important for the agencies to go on record. Mike said the TPA agreement is a bit out of date with the current process. He thinks it would be in the interest of everyone to talk about the language in 148 and 149 and reach an agreement on a mutually beneficial process.

Pam Brown said Congress wants a detailed plan from DOE on how the money will be spent by August 1st before they appropriate the funds, so that is when we will get the budget numbers. Mike Wilson said that is when the PMPs are due, but did not know whether there would be numbers attached to them.

Wade Ballard believed the numbers should be in the plans August 1st for sites across the complex. He is trying to validate that expectation.

Jim Trombold, Physicians for Social Responsibility (Local and Regional Public Health), asked for an explanation of the term "embargo." Wade said the rule of thumb has been that budgets are formed by field offices; it is pretty available. Headquarters makes a determination for the agency, and that is pretty open information. When it goes to OMB, it is embargoed. Agencies don't find out what the numbers are until the Administration decides how it wants to divide up the money. It usually becomes available about Thanksgiving. By the end of the year, there is a response and some budget has been developed. That is submitted as a presidential budget. It continues to be embargoed until the President releases it on the 1st of February. The administration wants the flexibility to make changes before it becomes public. Jessie Roberson has said that once the PMPs are in place and we have a five- or six-year funding profile and it becomes public information, then she will release the information and defend it for the next few years.

C3T/PMP UPDATE

The C3T and PMP processes are beginning to merge. The last meeting of the C3T team was on June 27th and 28th. The focus of that meeting was to get the seven teams to present the results on their work and to get agreement on a path forward.

There are draft team reports that will be available by August 1st. The results of these seven teams will be incorporated into the next version of the PMP.

Cesium and Strontium Capsule Team. There will be a one-year study that will gather information about alternative regulatory pathways and get a better idea of what the team should continue to focus on and evaluate.

Integrated Groundwater Monitoring Assessments and Protection Team. As a result of the work of this team, there was a sixth initiative added to the PMP.

Central Plateau Strategy and Vision Team. The work of this team encompasses the risk/exposure scenario work being done by the Exposure Scenario Task Force and the task force conducted by Moses Jarayssi, Bechtel.

Waste Tank Retrieval and Closure Demonstration Team. This team is looking at how to approach these demonstrations and which tanks to look at. These are still ongoing discussions.

ORP Baseline Opportunities Team. They looked at technology for enhancing the production of the current vit plant design, and alternative technologies for low-level waste coming out of the plant.

Baseline Integration and Optimization. This team focused on infrastructure issues and how to integrate them among the various organizations.

Waste Disposal Options. This team framed the waste disposal issues.

The C3T process will continue, perhaps in a different format. Major successes from the C3T process that should be continued include having collaborative teams including DOE, contractors, and the regulators; looking at a range of issues; and having the executives of the agencies get together about once a quarter.

PMP Update

Wade Ballard said the PMP process is ongoing. There will be substantial changes as a result of comments received from many sources. Comments by Ecology and EPA have been incorporated in revisions and have improved the document. The final draft to Headquarters will be out on July 17th. Between then and August 1st, they will be looking for agreement from the regulators and Headquarters.

DOE expects the budget numbers to be sufficient to meet these proposals. They are balancing new ideas to stay within the budget.

In the past, DOE baselines reflect what the contractors are going to do for DOE. DOE has been looking at the government requirements to get these things done properly. This is a major new piece to the document.

The feedback from all the public meetings was that groundwater was not specifically called out. That has been changed in the next version.

While Jessie Roberson was here for the C3T meeting, a letter was addressed to her from Ecology, EPA and State of Oregon called Support for the Performance Management Plan for the Cleanup of the Hanford Site. Wade encouraged Board members to read it.

Dennis Faulk said one of the complaints about the original draft was that there was no substance behind the claims. That has been changed in the next draft. This is an internal DOE document; EPA is looking at it to be sure it is consistent with the TPA. For EPA, the biggest issue is the groundwater initiative.

Mike Wilson said the groundwater work in the plan was the result of public and Board input. It is critical for the Board to stay involved in this process. Mike stressed that Ecology is looking at new technology with the understanding with the Assistant Secretary that the vit plant is going ahead as designed. The tank waste retrieval demonstrations will be done under the TPA process.

Tom Fitzsimmons, Ecology, has made it clear that it is not appropriate to be talking about importation of waste because we don't have the EISs to cover some of the things DOE wants to do.

Roger Stanley, Ecology, said the new version is better than the first. It is too early to say to what extent Ecology will be able to support it. Their first concern is a complete and quality cleanup of Hanford in a time and cost saving manner. Those are seemingly conflicting objectives, and have forced everyone to think in a broader way. Areas of opportunity include maximizing the capacity of the treatment plant and looking at low-level waste technologies after pretreatment.

For the Central Plateau, some of the concerns are points of compliance, where compliance is measured, and how that would impact cleanup of individual waste management units. The inclusion of groundwater is encouraging. Ecology is hopeful that they can work with this plan.

Steve Wiegman, DOE-ORP, said they are working to make the plan very clear and explicit and state the assumptions clearly. The DOE-ORP portion is larger than they hoped, but it has an appendix that has a lot of comments. It lays out the milestones and what DOE is going to do to make them work. The activities are being implemented as the document is being written.

Todd Martin said there are a lot of exciting things in the plan that follow the stated values of the Board and that the Board cares very much about. There are some things the Board has little interest in. The Board will use this plan to formulate its action plans for the coming year. The presentations given at the C3T meetings are going to be available to committee leaders as they tackle issues.

Todd asked DOE for a detailed response to our comments on the PMP so that the dialog can continue.

Pam Brown said she was impressed with the C3T process and looks forward to frequent public input to the process as advised by Christine Gregoire to Jessie Roberson and Congress. Doug Huston said the C3T process is where the energy is on Hanford cleanup right now, and it is important for the Board to stay involved.

Gerry Pollet said his main concern was that during the process there were proposals that the Board would not support. He said the C3T process has gone from discussing concepts and solutions to saying, Let's do it. We should not be leaping into agreements. The NEPA process was never defined. The C3T process seems to have gone beyond what was envisioned to trying to meet the administration's deadlines for negotiations.

Wade Ballard said the next version of the PMP does have an explicit identification of NEPA issues. The NEPA compliance officer has looked at the individual initiatives, and there will be a discussion of it in the document. The teams will continue their discussions until they reach conclusions on the issues they are looking at and their reports will be made available.

Roger Stanley said some of the products that came out of the C3T process will be going out for public comment (PMP and TPA change package). There is no agreement on importing TRU waste, however some proposals have been put forward. There are opportunities for Hanford to get rid of more TRU waste as imported TRU wastes transit through the site. (This is part of the M-91 milestone.) If there is agreement on language for that milestone, that would go out for public comment. As far as supplemental technologies, C3T discussion has focused on additional testing in the next fiscal year to see if they have merit. There are no agreements between DOE and the State on leaving waste in tanks. They are moving into tank waste retrieval and closure demonstrations for three tanks that contain high-risk waste and one tank with a low volume. This is for learning on closure processes. It would also provide data needed for a NEPA closure EIS targeted for 2006.

The result of the C3T process was not to make agreements, but to make recommendations and lay out specific actions that are going to be taken such as decommissioning wells and putting in new wells.

Todd said the Board needs to start getting involved in these issues. Amber Waldref and Bill Kinsella will get the Public Involvement Committee involved.

Paige Knight expressed concern about new initiatives interfering with existing commitments for time and money. Dennis Faulk said there will have to be a prioritization and cost benefit analysis done.

Pam Brown suggested that since the supplemental EIS looks at disposal of vitrified waste at Hanford, DOE could plug the alternative disposal into that EIS. Steve Wiegman said he would pass that along, but the supplemental EIS was limited in scope so that it could be done quickly to get the permits needed to get that facility constructed. The data is not currently available to support the NEPA documents.

Gerry Pollet was still concerned that the Board's concern about the NEPA process not being addressed is not being heard. The public comment periods on TPA change packages come too late. The concept needs to come first, followed by the related EISs, then public comment. The Board's priority is to spend any extra money on retrieval and enhancing vitrification. The Assistant Secretary's priority is reducing the scope of the vit plant.

Keith Smith reminded the agencies to use the expertise of the work force in finding better ways to do things.

BOARD BUSINESS

The Board members have been asked to write a paragraph on what the Board ought to be doing. Send them to Tammie who will send them to the leadership group.

Committees should look at the suggestions for prioritization so the committee chairs can report to the Executive Committee on the call on August 22nd.

Tank waste committee meeting is next week.

There will be a long-term stewardship workshop in September or October.

The Carlsbad Site Specific Advisory Board workshop on TRU is on Feb 1 and 2. The agenda will be sent to everyone. According to Todd, 4 or 5 people may be going.

September Board Meeting Topics

TPA

Gang of four report

Board's work plan

Check in on list of nine priorities that came last September

Coming year priorities

Task Force Advice on the 100/300 Areas

Update on HSW-EIS: comments received, proposed response

Advice #125 response to 100/300 change package

Lessons learned on task force and PMP committee of the whole

PUBLIC COMMENT

None was offered at this meeting.

ATTENDEES

HAB Members and Alternates

Ken Bracken, Member	Robert Larson, Member	Garianne Gelston, Alternate
Pam Brown, Member	Susan Leckband, Member	Jim Hagar, Alternate
Tom Carpenter, Member	Jeff Luke, Member	Dave Johnson, Alternate
Shelley Cimon, Member	Bob Parks, Member	Todd Martin, Alternate
Jim Cochran, Member	Gerald Pollet, Member	Wanda Munn, Alternate
Jim Curdy, Member	Gordon Rogers, Member	Maynard Plahuta, Alternate
Greg deBruler, Member	Leon Swenson, Member	Wade Riggsbee, Alternate
Norma Jean Germond, Member	Margery Swint, Member	Ross Ronish, Alternate
Harold Heacock, Member	Tim Takaro, Member	Keith Smith, Alternate
Doug Huston, Member	Jim Trombold, Member	Amber Waldref, Alternate
Charles Kilbury, Member	Martin Bensky, Alternate	Dave Watrous, Alternate
Paige Knight, Member	Al Conklin, Alternate	

AGENCY, CONTRACTORS, AND OTHERS

Wade Ballard, DOE-RL	Nick Ceto, EPA	Nancy Myers, BNI
Michael Collins, DOE-RL	Dave Einan, EPA	Thomas Meacher, BNI
Larry Earley, DOE-RI	Dennis Faulk, EPA	Bryan Kidder, CH2M Hill
Al Hawkins, DOE-RL	Mike Gearheard, EPA	Kim Ballinger, Critique
Stacy Hellman, DOE-RL	MichelleAnderson-Moore, Ecology	Linda Grotefendt, EnviroIssues
Marla Marvin, DOE-RL	Rick Bond, Ecology	Tammie Holm, EnviroIssues
Ed Parsons, DOE-RL	Laura Cusack, Ecology	Lynn Lefkoff, EnviroIssues
Larry Romine, DOE-RL	Dib Goswami, Ecology	Penny Mabie, EnviroIssues
Yvonne Sherman, DOE-RL	Jane Hedges, Ecology	Barbara Wise, Fluor
Steve Veitenheimer, DOE-RL	Fred Jamison, Ecology	Keith Thomson, Fluor
Janis Ward, DOE-RL	Jeff Lyons, Ecology	G Cummings, Fluor
Steve Wiegman, DOE-ORP	Max Power, Ecology	Bob Heck, Fluor
	John Price, Ecology	Kristy Collins, Informatics
	Joy Turner, Ecology	Peter Bengtson, PNNL/DOE-ORP
	Mike Wilson, Ecology	John Stang, Tri-City Herald
	Mary Anne Wuennecke, Ecology	John Carlson, WTP-WGI
		Allyn Boldt
		Lori Chafe
		Les Davenport
		Rebecca Holland
		Susan Rodebaugh
		Steve Sautter
		Doug Sherwood
		Matt Taylor
		Katherine Traux