

HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State
Dept of Ecology

September 4, 2009

CHAIR:

Susan Leckband

VICE CHAIR:

Bob Suyama

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

Shirley Olinger, Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450 (H6-60)
Richland, WA 99352

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Washington State
Department of Health

Subject: Fiscal Year (FY) 2011 Hanford Clean-Up Budgets and Priorities

Dear Mr. Brockman and Ms. Olinger,

Background

The Hanford Advisory Board (Board) wishes to express its appreciation to Assistant Secretary Inés Triay for her commitment that the Department of Energy (DOE) will develop a Hanford Site life cycle cost and schedule report to identify the cost and schedule estimates for complete cleanup of the Hanford Site. The Board has previously urged that current Tri-Party Agreement (TPA) milestones not be delayed pending the availability of this report as it would provide invaluable information in establishing site funding priorities.

DOE-Headquarter (DOE-HQ) Budget Guidance to the field offices for preparation of the Fiscal Year (FY) 2011 Environmental Management budgets calls for increasing transparency. The Board strongly supports this policy guidance and looks forward to its full implementation by the Hanford field offices, DOE-Richland Operations (DOE-RL) and DOE-Office of River Protection (DOE-ORP). The Board is also heartened to learn that the combination of American Reinvestment and Recovery Act (ARRA) funds and the target budget requests for FY 2011 will permit the attainment of all but one of the TPA compliance milestones contained in the current TPA agreements. We understand that the one missed milestone is the DOE-ORP Single Shell Tank (SST) retrieval milestone. In 2012, when ARRA funds have been expended, a significant increase in annual Environmental Management funding will be required to meet TPA schedules.

However, the Board continues to have an overarching concern that the FY 2011 funding requests in the Priorities listings do not reflect full compliance with the TPA milestones as they currently exist, but rather reflect possible relaxations of the current commitments. The Board has repeatedly advised that budgets must be fully compliant based on the then current TPA agreements. One example is that retrieval and treatment of transuranic (TRU) and mixed wastes is not funded at the level of activity required by current TPA requirements, but rather on the basis of reduced annual expenditures as proposed by DOE. Without ARRA funding, this would have reduced the annual TRU retrieval rate by as much as tenfold.

An additional concern of the Board is the lack of adequate funding for characterization of existing waste sites. Several times in the past, the Board has strongly recommended that decisions to leave waste in the soil beneath caps should not be made without sufficient characterization to fully understand the risks of such actions. Without adequate characterization of the waste sites planned for cleanup to support the 2015 closure strategy, work will not be ready to proceed on schedule when the current stimulus funds run out.

Envirolssues
Hanford Project Office
713 Jadwin, Suite 3
Richland, WA 99352
Phone: (509) 942-1906
Fax: (509) 942-1926

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DOE-HQ Budget Guidance to the field offices calls for the baseline budgets to fully fund the “minimum safe” activities for all projects and categories. It is important for the public to understand that this consumes a very large portion of the field offices’ budgets, before funds are applied to cleanup work activities. For DOE-RL, base operations are projected to cost \$607 million out of annual funding of \$1.095 billion for 2011. For DOE-ORP, tank operations are shown as costing \$239 million out of \$404 million for non-Waste Treatment Plant (WTP) prioritized work. The large proportion of annual funding used for “base” or “minimum safe” operations shows the importance of integrating ARRA funding of \$2 billion for the field offices between now and the end of FY 2011.

In choosing priorities for the use of limited funds, public input is vital. Having an existing public process for obtaining budget prioritization input allowed the Hanford field offices to be ready to seek ARRA funding with a degree of confidence that the request reflected public priorities. DOE-ORP’s decision to change its ARRA spending plans (e.g. eliminating ARRA funding for Canister Storage expansion) shows that public input can lead to stronger decisions.

Prioritization choices are more difficult in the face of inadequate information or characterization of the waste. The delay in the Tank Closure & Waste Management Environmental Impact Statement would seem to indicate that prioritization activities continue on the basis of current regulatory strategies and public values.

Advice

DOE-RL and DOE-ORP

- DOE-RL and DOE-ORP should develop and submit fully compliant Integrated Priority Lists (IPLs) that identify and request all the funds necessary to meet existing TPA milestones and regulatory requirements.
 - Where DOE reasonably believes that a relaxed milestone may replace current requirements, it can identify that in a footnote, rather than reducing the funding request and failing to identify the existing compliance requirements.
 - All funding required to meet the TPA and regulatory requirements should be within the target budget, and requested by both field offices and by DOE-HQ to Congress.
- DOE-RL and DOE-ORP should plan for characterization of waste sites (e.g. tank releases for DOE-ORP and the 40 miles of unlined trenches of buried wastes on the Central Plateau) and identify funding to carry out characterization activities on a pace supporting remediation of all non-tank farm units by 2024 and meeting other pertinent milestones.
 - DOE-RL’s funding should ensure that Central Plateau and remote-handled TRU waste sites are characterized to meet new proposals for acceleration, as well as existing milestones. Without ARRA funds in 2012 to 2015, it is vital that River Corridor work be completed on time and on budget so that base funding can move to these other projects.
 - Groundwater funding should include accelerating 300 Area groundwater remediation to match the public expectation fostered by DOE that the River Corridor will be cleaned up by 2015.
- Multiple Records of Decision are needed to ensure proper characterization of waste sites and work plans that take into account potentially dramatic differences between units on the Central Plateau (Inner and Outer Areas). Budget and schedule baselines should not be based on assuming that there will be a single Record of Decision for the Central Plateau Inner and Outer Areas.

DOE-RL

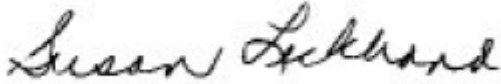
- DOE-RL should budget using assumptions that significant portions of pre-1970 buried or disposed TRU wastes will be retrieved. This requires adequate funding for characterization of scores of waste sites. Therefore, the IPL should include identification of funding necessary for characterization of these sites – even if it places the total DOE-RL budget above the target budget.
- DOE-RL should request an increased target budget to include all funds needed to meet the current TPA milestones and other compliance requirements for:
 - Contact-handled TRU retrieval
 - Beginning the retrieval of remote-handled TRU
 - Having a facility capable for treating remote-handled TRU
 - Mixed waste treatment
 - Characterizing waste sites with chemical and pre-1970 TRU
- Fully funding 618-10 and 11 burial ground remediation planning and startup to meet TPA milestones.
- DOE-RL is making good progress at the K Basins with removal of the K East Basin to be complete this year. New TPA milestones have been adopted and a new technical approach has been developed to characterize the remaining sludge material so that it can be removed from K West Basin. This project should be adequately funded to meet the milestones and complete the project.
- DOE-RL should apply lessons learned from K Basins and other complex decommission and demolition projects to the Plutonium Finishing Plant cleanout and demolition.

DOE-ORP

- DOE-ORP should make available a more detailed breakout of its IPL, rather than showing the majority of all of its non-WTP funding as a single line item in the IPL at \$239 million.
- DOE-ORP should develop technologies viewed as having significant potential to make additional space available in double shell tanks (with ARRA funding in FY 2009 and FY 2010). DOE-ORP should request additional funding in the FY 2011 budget to deploy multiple units (e.g. wiped film evaporators) to enable DOE-ORP to make additional space available for SST waste retrieval. These funds should be included in the IPL now to avoid a year of delay after testing is completed. The Board also urges DOE-ORP's investment in projects to accelerate the retrieval, processing and disposal of wastes from the existing SSTs.
- DOE-ORP should begin funding in FY 2010 for the work required to define the path forward and support a decision on supplemental treatment facility by 2012 to assist in completing its mission. Having a supplemental vitrification facility available shortly after WTP begins operations is important for processing that portion of low activity waste for which the WTP Low Activity Waste facility will not have capacity. Additionally the Board suggests the inclusion of over target proposed expenditures based on need and public priorities if additional funds become available.
- DOE-ORP should involve the Washington State Department of Ecology in setting priorities for the development and deployment fund of \$50 million in technology development. The Board supports DOE-ORP's request for this investment in waste processing technology development.

- DOE-ORP should include planning and design funds for a waste blending facility for WTP. DOE-ORP should continue to conduct pilot scale testing of processing simulants in existing facilities, and moving on to test real waste in pilot scale facilities.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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

cc: Michelle Pirzadeh, U.S. Environmental Protection Agency, Region 10
Jay Manning, Washington State Department of Ecology
Doug Shoop, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office
Steve Pfaff, Co-Deputy Designated Federal Official, U.S. Department of Energy, Office of River Protection
Dennis Faulk, Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Catherine Brennan, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations