

HANFORD ADVISORY BOARD

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

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US Environmental
Protection Agency
Washington State
Dept of Ecology

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EnviroIssues

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February 5, 2010

Inés Triay, Assistant Secretary for Environmental Management
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U.S. Department of Energy, Office of River Protection
P.O. Box 450 (H6-60)
Richland, WA 99352

Re: Independent Review of Beryllium Program

Dear Ms. Triay, Mr. Krahn, Mr. Brockman and Ms. Olinger,

Background

On April 3, 2009 the Hanford Advisory Board (Board) provided Advice #217 and #218 to the U.S. Department of Energy (DOE) on the beryllium situation at Hanford.

In July 2009, Assistant Secretary Inés Triay met with the Board's Executive Issues Committee. In that meeting, members discussed the Board's advice on beryllium. Members expressed concerns that recommendations and commitments from two prior independent reviews of the site's beryllium programs had not been implemented. Ms. Triay committed to a review of those past recommendations and commitments. Separately, we understand that DOE made a promise to the affected beryllium workers to have an independent review of the beryllium program, and for the beryllium workers to participate in the selection of the review team. These commitments have not been met. Furthermore, as noted in the Board's letter recently submitted to DOE, there is significant concern that the new

beryllium program is not entirely adequate.

DOE has not implemented previously agreed to recommendations from prior independent reviews, including full characterization of facilities and individually communicating the risks of exposure from specific facilities or locations to workers whose work may include those sites. Prior reviews found that elements of the site's beryllium program existing at that time did not fully meet regulatory requirements or best practices.

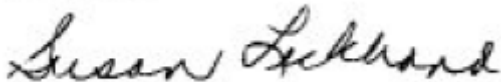
A truly independent review of the recently implemented program is essential to establish its adequacy and protectiveness as DOE moves forward to implement the new Chronic Beryllium Disease Program Plan.

DOE has recently indicated that it plans to replace the promised independent review with one conducted by personnel from DOE-Headquarters (HQ). That plan does not meet the Board's definition of independent and is not likely to attain the confidence of the workforce.

Advice

- The Board advises DOE to move forward, expeditiously, with a review of the Hanford beryllium program carried out by a well-credentialed panel independent of DOE (not DOE employees). Such a review might be expedited by recruiting experts who have participated in prior reviews or reports on Hanford's beryllium programs and who have attained the confidence of the affected worker group.
- Independent reviewers, selected with the participation of the beryllium affected workers, should be able to establish the scope and design of the review based on scientific methods and input from affected workers and others knowledgeable of the subject. Furthermore, input by the workforce should be taken under the assurance of strict confidentiality.
- The Board believes this review is essential to ensure the adequacy of the Hanford Site's beryllium program.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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

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