

# 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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April 13, 2012

David Huizenga

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Richland, WA 99354

Re: Fiscal Year 2013/2014 Budget Requests

Dear Messrs. Huizenga, Samuelson, McCormick, Faulk and Ms. Hedges,

## **Background**

The Hanford Advisory Board (Board) thanks the U.S. Department of Energy (DOE) and their field offices, the Richland Operations Office (DOE-RL) and the Office of River Protection (DOE-ORP) -- as well as the Tri-Party Agreement (TPA) regulatory agencies -- the Washington State Department of Ecology (Ecology) and the Environmental Protection

**HAB Consensus Advice # 254**

Subject: FY 2013/2014 Budget Requests

Adopted: April 13, 2012

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Agency (EPA) -- for the development and presentation of the Fiscal Year (FY) 2013 President's Budget and the FY 2014 Budget Request.

The Board understands the complexity of the budget preparation and planning process that DOE goes through each year. However, the Board believes current budgets should be a result of long term planning and scheduling as reflected in the 2012 Lifecycle Scope, Schedule, and Cost Report (Lifecycle Report) and the Consent Order requirements in the TPA as amended. It was the Board's understanding that meeting TPA Milestones and compliance obligations presented in the Lifecycle Report would become the foundation for the out year budgets. Recently, a memorandum from the DOE Acting Deputy Assistant Secretary for Program Planning and Budget, subject FY 2014 through FY 2018 Initial Budget Formulation, recommends three scenarios for future budget planning: Level Base funding, Full Compliance Case funding, and an Optional Investment Case (a 10% uplift in funding) funding.

Similarly, the DOE-RL budget which is designed to be regulatorily compliant for FY 2013 and FY 2014, does not reflect several potential regulatory and compliance efforts, and the overall funding level is several hundred million dollars below cost estimates projected in the 2012 Lifecycle Report. The Nuclear Materials Stabilization and Disposition and the Soil and Water Remediation Programs, which are priorities to the Board, are not funded in accordance with 2012 Lifecycle Report. Funding does not appear to be adequate for characterizing and treating dangerous wastes in storage – which have been the source of recent leaks -- as well as for retrieval and treatment of transuranic waste (TRU) and Mixed Wastes. Additionally, the budget request does not address deep vadose zone technology development and remediation.

Community and Regulatory Support funding (RL PBS-100) is proposed to be cut to fifty percent of identified needs. This is unacceptable. Cuts have already eliminated public meetings around the region on the budget status and priorities, undercutting regional public support for efforts to increase funding for cleanup.

In general, the DOE-ORP level funding budget presentation is disappointing because the \$50 million dollar reduction for 2013 and 2014 is not funding projects that will remove wastes from tanks, while serious safety and engineering design problems for Vitrification Plant's Pretreatment Facility are resolved. It is noted that DOE originally planned to spend \$940 million on the project in 2013, but the 2013 budget, once reduced to \$740 million, is now reduced to \$690 million. Furthermore, the announcement that Bechtel National Incorporated has been asked to re-baseline the project by August of this year concerns the Board. The previous WTP (Waste Treatment Plant) project re-baselining of the project resulted in doubling the cost and extending the startup of operations by several years. Bechtel instructions from DOE for the re-baseline effort asks for estimates to complete technical and design issues, but does not request construction costs to complete the

Pretreatment Facility. The overall impacts to the 2013 and 2014 budgets will affect Consent Order Milestone and Lifecycle Reports which will then trigger a major revision to the TPA. The Board believes it is vital that delays in the WTP project be coupled with efforts to retrieve tank wastes and to promote the examination of alternative means of treating small, discrete low activity or TRU waste streams, which will both reduce risks and demonstrate progress on tank waste stabilization. In addition, provision for funds and planning need to be performed to address long term/interim storage of waste produced by the WTP pending identification of a national high level waste repository.


Overall, the Board, the public, and the regulators should review the proposed “integrated priority list” for DOE-RL and DOE-ORP to establish how the offices would spend funding consistent with target budgets – which are hundreds of millions of dollars lower than the regulatory compliance budget scenario presented to the Board and public. Prior to field office submission, further Board and public comment should occur on how priorities will be set within, and the adequacy of, the target budget scenarios.

### **Advice**

- The Board advises that DOE field and Headquarters future budget planning and budget requests should be based on full compliance with regulatory and Consent Order requirements.
- The Board advises that prior to submitting proposed budgets to Headquarters, DOE-RL and DOE-ORP should present to the Board, stakeholders, and the public the alternate budget scenarios, including integrated priority lists, consistent with the DOE Headquarters’ budget guidance to the sites. The Board believes it is essential that DOE consider the budget levels as called for in the Lifecycle Report as the foundation for the out year budgets.
- The Board advises that funding should be identified to accelerate the schedule to bring stored mixed wastes into compliance before there are additional leaks or a more serious accident, as urged in HAB Advice 252. Since that advice was issued, there have been additional serious leaks from drums which are not legally supposed to have liquids.
- The Board advises DOE-RL to develop and fund characterization, including remediation technologies, for the vadose zone. See previous Board Advice 231.
- The Board advises DOE to fund and implement the plan to characterize in order to retrieve, remediate, and dispose of pre-1970 TRU waste. See previous Board Advice 234

- The Board advises that funding for resuming TRU retrieval and treatment should be restored, rather than kept on hold.
- The Board advises that DOE work with the Board to develop Priority Lists based upon risk, plus other factors, for the future work since, overall, there never appears to be enough money to do everything required.
- The Board advises funding the costs of the Pretreatment Facility construction following resolution of safety and engineering concerns.
- The Board recommends that the 2014 budget request include funding to begin efforts to have specific waste streams from Single Shell Tanks treated in order to make progress towards the required removal and treatment of wastes prior to the Pretreatment Facility becoming operational in the coming decade.
- The Board advises DOE-RL to request, and the regulators to ensure funds for identified regulatory and community support activities, including public involvement programs.
- The Board advises funding should be identified within the target budget for groundwater action to meet TPA and regulatory schedules, including at 200 UP-1, K Area, and the 300 Area.

Sincerely,



Susan Leckband, Chair  
Hanford Advisory Board

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*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: Stacy Charboneau, Deputy Designated Official, U.S. Department of Energy, Office of River Protection  
Catherine Brennan, U.S. Department of Energy, Headquarters  
The Oregon and Washington Delegations