



September 10, 1999

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U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
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Keith Klein, Manager
U.S. Department of Energy, Richland Operations
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Dick French, Manager
Office of River Protection
2440 Stevens Center
Richland, WA 99352

Subject: TPA Agency Processes for Responding to HAB Consensus Advice

Dear Messrs. Clarke, Fitzsimmons, Klein and French:

The primary function of the Hanford Advisory Board (HAB) is to provide informed recommendations through consensus advice to the Tri-Party agencies (DOE, Ecology and EPA) on major policy issues relating to the cleanup and safe management of waste at the Hanford Site. The HAB's consensus advice is developed through a deliberative process, with advice originating in committee and typically going through several iterations before coming before the full HAB for consensus. Only after HAB approval is the advice submitted to the Tri-Party agencies.

The Tri-Party agencies historically respond to the HAB's advice in writing. While most responses are timely and directly address the HAB's advice, on some occasions a response has been neither timely nor responsive.

To help address this concern, the HAB recommends Tri-Party agencies respond to consensus advice directed to their respective agencies in a manner consistent with HAB expectations as listed in the HAB charter:

1. Written responses are appropriate and should continue. The HAB suggests these responses be direct and to the point, and use clear, simple language. If the advice has several questions or parts,

the responding Tri-Party agency should address each specific question and issue. When a portion of the Board advice stresses a principle or value, the agency's response should indicate how the principle or value will be implemented or, if not, why not. If an agency disagrees with an issue in the HAB's advice, the agency should state its disagreement, and its reasons for disagreement.

2. If an agency is not able to make a timely response to a piece of consensus advice, the agency should notify the HAB in writing that a response will be delayed and explain the reason for the delay.
3. Time will be allowed on HAB meeting agendas for Tri-Party agency representatives to make a verbal response to consensus advice. The responding agency should send a representative who can discuss the response in detail and the rationale for the response.

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

/s/Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Carolyn Huntoon, Department of Energy Headquarters
George Sanders, Acting Deputy Designated Federal Official
The Oregon and Washington Congressional Delegations
Michael Gearheard, Environmental Protection Agency
Dan Silver, Washington Department of Ecology

Note: Emmett Moore, Washington State University, abstained from this advice, and Norm Buske, Government Accountability Project, dissented from this advice.

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

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*For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov
HAB Consensus Advice #100
Subject: TPA Agency Processes for Responding to HAB Consensus Advice
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