



November 8, 1996

Al Alm, Assistant Secretary
Office of Environmental Management
U.S. Department of Energy
1000 Independence Avenue S.W.
Washington, DC 20585

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

Subject: FY 1997 Budget Allocation

Dear Messrs. Alm and Wagoner:

Hanford faces a serious shortfall in FY '97 funds required to meet Tri-Party Agreement (TPA) requirements, and safety and environmental priority work scope. This shortfall and uncertainty as to the final allocation of funds is due both in part to DOE-RL's failure to estimate total required funding (e.g., TWRS funding) and Headquarters' delay in allocation of additional funds appropriated by Congress.

The HAB is concerned with the length of time before Headquarters makes allocation decisions after the start of the fiscal year. The Board would like to emphasize the difficulty faced at the field level when the process of allocating the overall DOE appropriation is lengthy, and uncertainty constrains new legally-required fiscal-year activities. We are also concerned with DOE-RL's delay in informing the Board and regulators of this shortfall.

The Board is concerned about several specific areas of shortfall, and recommends the following:

1. The \$15 million reduction in TWRS privatization funding, deleted from the overall program and earmarked for technology development, should be allocated to DOE-RL in total. Due to public concern, Congress reduced the funds authorized for Hanford's TWRS privatization reserve for 1997, while appropriating this \$15 million to the EM account. This provides the Department with an additional \$15 million, which should be used for legally required Hanford work scope.
2. Approximately \$8 million additional dollars are needed to fund the 324 Building "B Cell" cleanout, a serious safety risk and a late 1998 TPA milestone. We urge allocation of that funding from closure fund resources as appropriated by the FY97 Energy and Water Development Appropriations bill.
3. Vadose zone characterization funding and scope are inadequate and should be addressed per our attached "Vadose Zone Characterization" advice.

4. The Board endorses cost efficiency activities that are ongoing to meet the TWRS privatization shortfall. The Board recommends utilizing funds that had been budgeted in FY '97 for workforce separation, but are not expected to be expended.
5. To ensure that the FY '97 TWRS work scope will be accomplished as mandated by the TPA, DOE should direct the contractor to expedite review of TWRS schedule and milestones in light of the proposed budget baseline. Efforts to reduce TWRS management costs (potential \$15 million effect) and reduce G&A overheads (potential \$15 million effect) should be pursued.

These recommendations are consistent with the Board's earlier advice to DOE on TWRS funding levels to maintain consistency with TPA milestones.

We look forward to your response and to receiving further information as soon as it is available on the final disposition of the FY '97 headquarters budget allocation.

Very truly yours,

Merilyn Reeves, Chair
Hanford Advisory Board

cc: Alice Murphy, Designated Federal Official
Linda Lingle, Site Representative
The Oregon and Washington Congressional Delegations
Chuck Clarke, EPA Region X
Mary Riveland, Washington Department of Ecology

ISSUES WITH VADOSE ZONE CHARACTERIZATION

PRINCIPLE:

Characterization of the vadose zone at the tank farms needs to continue to provide an adequate understanding of the extent to which soil and groundwater beneath the tank farms have been contaminated and to quantify additional releases during SST retrieval. As recommended by the National Research Council of the National Academy of Sciences in its review of the TWRS DEIS, vadose zone characterization is needed to support selection of a preferred tank waste retrieval and treatment alternatives.

The NRC report explicitly states;

"An important component of a long-term commitment to remediating the single-shell tanks at the Hanford Site is an adequate understanding of the nature of the present contents in the tanks and the extent to which the soil and ground water beneath the tank farms have been contaminated. Characterization should continue until such an understanding has been obtained."

"It is not at all evident how a preferred tank waste retrieval and treatment remediation alternative can be selected rationally without simultaneously considering what is to be done with the contamination left behind." (As stated in the NRC report)

RECOMMENDATIONS:

1. DOE needs to get and respond to comments from Washington Department of Ecology on the TWRS Vadose Zone Characterization Project Baseline Plan.
2. In addition to funding in FY97 for the Second SX Tank Farm Borehole (as described in the TWRS Vadose Zone Characterization Project Baseline Plan), additional funding for a Third SX Tank Farm Borehole should be provided in FY97. It is important for the future of this program that the Third SX Farm Borehole be a sonic-drilled, slant well with core sampling every 10 feet, that a complete suite of radiation, chemical, and moisture analyses be performed on each sample. This third borehole is in addition to the existing well-logging program.
3. Budgets for the TWRS Vadose Zone Characterization project need to be reviewed by the Dollars & Sense Committee of the HAB.
4. DOE needs to insure that the PHMC Contractor recognizes its responsibility for the vadose zone under the tanks.
5. As DOE proceeds to prepare and implement an overall work plan for vadose zone characterization, there should be continued consultation with the independent expert panel already established. A steering panel should also be formed to advise on the components of the vadose zone characterization program in a manner compatible with the work of the Columbia River Comprehensive Impact Assessment Team.
6. Coordination is needed within the Site Technology Coordinating Group regarding which subgroup (i.e., Tanks or Plumes and Landfills) is responsible for identifying technology needs and evaluating innovative technologies for vadose zone characterization.

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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 #54

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