



December 4, 1998

Mr. James Owendoff, Assistant Secretary
Office of Environmental Management
U.S. Department of Energy
1000 Independence Ave. 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: Office of River Protection Management Plan

Dear Mr. Wagoner:

The Hanford Advisory Board (HAB) recognizes that the stated objective of the Congressional legislation creating the Office of River Protection (ORP) is to establish for the Tank Waste Remediation System (TWRS) the credibility it needs to succeed. The intent is to have a small, focused, self-contained office of top level professionals whose manager would report directly to the Assistant Secretary of Environmental Management (EM-1). We question whether the ORP will succeed. However, we provide the following advice to be considered during the development of the ORP management plan that is to be submitted to Congress in mid-January 1999.

1. The management plan for the ORP should be made available for HAB and public review prior to its finalization.
2. Ensure that the ORP scope of work is holistic and looks beyond the footprint of the tank farms so that it lives up to the excellent name, the Office of River Protection. The ORP must consider the impacts of the tank wastes on the vadose zone, groundwater and, ultimately the River itself on which the people, salmon, and regional economy depend.
3. Provide accessibility to and responsiveness from the ORP decision makers to regional stakeholders, the HAB, Native American Nations, and regulators.
4. Ensure ORP compliance with the Tri-Party Agreement milestones relating to the tank wastes.
5. The Integrated Management Plan should address how DOE will effectively integrate two functions of the Project Hanford Management Contract (i.e., a TWRS portion reporting to ORP and the remainder reporting to the Site Manager) into one contract. Staffing, multi-year work plans, Integrated Priority Lists (IPLs), performance agreements, and schedules must be integrated between the ORP and other site activities.
6. Clearly delineate budget authority and decision making for the development and management of the IPL. The Hanford IPL is the funding decision for the entire site.

7. Do not allow ORP to negatively impact integration efforts for other Hanford cleanup and waste stabilization programs.
8. Provide integration between the institutional knowledge of current TWRS staff and the new management of the ORP to ensure that near-term and future decisions are sound and timely.
9. A clear integration of staffing and tank waste treatment schedules must be developed. Currently, ORP staff requirements overlap with important decision points on tank waste treatment. This makes two difficult activities even more daunting.

The success of the tank waste project is critical to meeting HAB values and we commit to help you in the development and implementation of an effective ORP management plan.

We request a written response to the above comments prior to submission of the plan to Congress.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Alice Murphy, Designated Federal Official
Chuck Clarke, Regional Administrator, U.S. EPA
Tom Fitzsimmons, Director Washington Department of Ecology
The Oregon and Washington Congressional Delegations
Michael Gearheard, Environmental Protection Agency
Dan Silver, Washington Department of Ecology

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 #88
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