



February 12, 1999

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U.S. Department of Energy, Richland Operations  
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Subject: Plutonium Finishing Plant

Dear Messrs. Clarke, Fitzsimmons and Hall:

The Plutonium Finishing Plant (PFP) contains 17.8 metric tons of plutonium bearing material in various forms and locations. This inventory is housed in an aging facility that was originally scheduled for decommissioning in the 1970's. This highly-toxic, mobile material represents one of the greatest risks to Hanford workers, the public, and the environment. The Hanford Advisory Board has identified a long list of issues pertaining to PFP and advises DOE to ensure PFP has the high priority it deserves. While the Board will continue its work on these issues, including advice on budget, it offers the following advice as a necessary and fundamental base for a successful PFP cleanup.

TPA milestones that comprehensively regulate PFP are needed. As the Board advised previously (Consensus Advice #44, March 14, 1996), DOE should resolve the dispute over "material" versus "waste." This issue has blocked progress on developing a set of TPA milestones for PFP. The Board finds it imperative that the TPA agencies enter negotiations and work out a solution that removes obstacles to regulation and ensures independent oversight of RCRA chemical hazards.

The Board sees the recent restart as a positive step forward and commends DOE and its contractors for their hard work. PFP operations have, in the past, been plagued with problems and mis-steps. Progress on cleaning up PFP has been slow. An integrated baseline is absolutely critical for cleanup to be successful. The Board calls for DOE, contractors, and the regulators to cooperate in expeditiously completing the baseline.

It is important to continue the positive momentum and move on. The Board urges DOE to continue to do breakthrough thinking for cost reductions. This should include consideration of life-cycle costs. Completing the PFP cleanup and stabilization will result in significantly reduced mortgage costs for DOE and greatly reduced risks. Documentation of these cost savings and where these are reallocated is needed.

The situation at PFP is unique in that no new research or technologies are needed to accomplish the tasks at hand. The Board urges DOE to work collaboratively with the regulators in technological decisions. The Board recommends DOE and its contractors continue to make deliberate and careful progress towards the eventual final disposition of the plutonium at PFP and the decontamination and decommissioning of the plant. In making this progress, the Board advises DOE to ensure it taps the wealth of institutional knowledge still available around the site and in the community. This knowledge could greatly improve the efficiency of the stabilization and cleanup efforts.

The Board recommends that characterization efforts for Tank 241-Z-361 be given high priority and be safely and expeditiously completed.

The Board applauds the DOE and contractor worker training efforts with respect to lessons learned. The video distributed following the explosion at the Plutonium Reclamation Facility (PRF) is an excellent example. Had such a video been available following the similar Savannah River event, PRF's event might have been avoided.

Creating open lines of communication and informing the Tribes, the States, local communities, and other stakeholders of all activities at PFP and elsewhere on the site is essential. The Board believes it is incumbent upon DOE and the TPA regulatory agencies to provide an educational process to inform the public of the risks associated with PFP and its cleanup. It is imperative that DOE and the regulators are forthright regarding the uncertainties, safety issues, regulatory issues, and hazards associated with activities at PFP.

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

Very truly yours,

Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: James Owendoff, Department of Energy Headquarters  
Paul Kruger, Deputy Designated Federal Official  
The Oregon and Washington Congressional Delegations  
Michael Gearheard, Environmental Protection Agency  
Dan Silver, Washington Department of Ecology

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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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*HAB Consensus Advice #91*

*Subject: Plutonium Finishing Plant*

*Adopted: February 12, 1999*