



Advice # 91

Ms. Marilyn Reeves, Chair
Hanford Advisory Board
723 The Parkway, Suite 200
Richland, Washington 99352

May 3, 1999

Dear Ms. Reeves:

RE: Hanford Advisory Board Consensus Advice #91 dated February 12, 1999.

Your letter of February 12 raises many issues that have long been of concern to Ecology and EPA. We share your concern that DOE move forward in characterizing wastes within tank 241-Z-361, and that it develop and approve a comprehensive, facility wide baseline for Plutonium Finishing Plant (PFP) activities. We would hope that an approved baseline would aid DOE and the Defense Nuclear Facilities Safety Board (DNFSB) in stabilizing PFP special nuclear materials. However, any such baseline must be developed with the full participation and approval of DOE HQ and RL management. In addition, and as you know, we have urged DOE to formally designate PFP wastes and materials so that the agencies can move forward with the scheduling of necessary environmental compliance work. DOE has not done so.

In as much as PFP related Tri-Party Agreement (TPA) compliance negotiations are concerned, please recall that Ecology and EPA suspended attempts at negotiations due to DOE's seeming inability (and in some cases refusal): 1) to clearly identify the scope of negotiations it proposed (i.e., which specific PFP units and activities it proposed be covered), 2) to identify DOE supported schedules (i.e., the lack of an agency approved PFP baseline), and 3) to make timely and definitive waste and material determinations in accordance with Washington's delegated hazardous waste management program. As we noted within our December 11, 1997 letter to DOE (enclosed), negotiations will not be productive ". . .until each of these issues is adequately resolved". Unfortunately, Mr. Knollmeyer chose to not respond to these criteria in his letter to you of April 15¹, and his letter to EPA and Ecology of April 19, 1992².

Until each of these criteria have been specifically responded to and adequately resolved, hazardous waste management concerns at PFP will continue to be addressed through Ecology's compliance assurance program. TPA negotiations are currently neither planned or expected. We note however, that if as part of meeting the preceding criteria, DOE designates each PFP waste and material stream in accordance with Washington's delegated hazardous waste management program and our December 11, 1997 letter, we would be willing to develop a TPA Agreement In Principle and move forward with PFP transition negotiations. Prior to designation the development of compliance schedules is simply not possible.

In addition, we would like to point out an additional major obstacle to agreement between DOE, Ecology, and EPA i.e., the obstacle posed by current Hanford site budget expectations. In short, Hanford

cleanup under the TPA is at a point where the success of its three major projects (acquisition of tank waste treatment facilities, K basin remediation, and environmental restoration) depend in large part on adequate funding over the next few years. Ecology and EPA can not, and will not, support an accelerated PFP cleanout if that support jeopardizes in any way, the success of these three major TPA efforts. Based on budget information DOE has provided us, it appears that PFP stabilization can not move ahead effectively without the infusion of significant additional monies beyond those presently expected for the Hanford site.

We also note our concern that despite the fact that some activities at PFP may be categorized as special nuclear material stabilization and attendant SNM management, funds for nearly all activities are planned to be derived from the DOE's Environmental Management budget. This does not appear to be appropriate in light of the facts that: (i) some facilities at PFP will continue to have a mission for a number of years, and (ii) DOE evidently hopes to move ahead with stabilization under the assumption that the various accumulations at PFP are SNM rather than wastes subject to federal and state environmental law. Until PFP wastes and materials have been properly designated pursuant to hazardous waste management requirements, we expect that stabilization and associated PFP facility operations will be funded through DOE's Office of Defense Programs.

1. Letter, 99-EAP-243, Peter M. Knollmeyer, Assistant Manager for Facility Transition, U.S. Department of Energy, Richland Field Office, to Marilyn B. Reeves, Chair, Hanford Advisory Board, April 15, 1999.
2. Letter, 99-EAP-241, Peter M. Knollmeyer, Assistant Manager for Facility Transition, U.S. Department of Energy, Richland Field Office to Douglas R. Sherwood, Hanford Project Manager, U.S. Environmental Protection Agency, and Micheal Wilson, Manager, Nuclear Waste Program, Washington Department of Ecology, April 19, 1999.

[Hanford Home Page](#) | [HAB](#) | [Advice Index](#)

For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov

Response to HAB Consensus Advice #91 (February 12, 1999)

Subject: HAB Consensus Advice on Plutonium Finishing Plant

Letter from Tom Fitzsimmons, dated May 3, 1999

URL: <http://www.hanford.gov/boards/hab/response/091.htm>

Last Updated: 08/04/2003 14:38:57