

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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June 12, 1996

Ms. Marilyn Reeves, Chair  
Hanford Advisory Board  
Confluence Northwest  
800 NW Sixth Ave., Suite 342  
Portland, OR, 97209-3715

Dear Ms. Reeves: *Marilyn*

Ecology is pleased to submit the following response to the Hanford Advisory Board's supplementary advice on the U.S. Department of Energy (USDOE) Richland Operations Office (DOE-RL) Fiscal Year (FY) 1998 budget (HAB Advice #48).

**High-Level Nuclear Waste Tanks/Tank Waste Remediation System (TWRS)**

Ecology agrees with the Board's "insurance pool" proposal. We are also pleased by Under Secretary Grumbly's positive response to such a proposal and his willingness to immediately evaluate the implementation of this concept for Hanford.

Ecology also agrees with the Board's recommendations that USDOE seek advice from the Office of Acquisition Policy (OFAP) regarding disclosure of privatization reserve-related funding/costs, and the Board's request for disclosure of cost/benefit comparisons for the privatization initiative path versus similarly configured options for vitrification utilizing performance-based contracting.

We particularly agree with the Board's concerns regarding achievability of Tank Waste Remediation System (TWRS) Tri-Party Agreement (TPA) milestones for characterization. USDOE believes that its FY 98 Internal Review Board (IRB) decisions are supportive of all TPA compliance requirements. However, we are concerned that the planning assumptions applied by DOE-RL in its latest, approved Integrated Priority List (IPL) do not meet current, specific requirements for the characterization program.

Our involvement in DOE-RL's Multi-Year Work Plan (MYWP) should help to clarify or focus our concerns regarding TPA achievability.

Regarding DOE-RL's initial decision not to fund Tank C-103 organic layer removal, we are concerned that a serious worker health and safety concern would be allowed to exist if the organic layer is left in place. We have urged DOE-RL to reconsider this decision.



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May 28, 1996  
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### **Independent Cost Reviews & Overhead Costs**

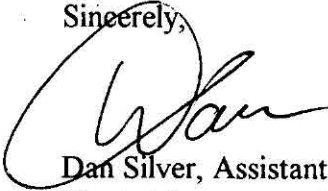
Ecology agrees with all of the Board's recommendations in this area. Additional discussion may be needed with DOE-RL to clarify what in fact would constitute a truly external review.

### **Environmental Restoration**

We also agree with the Board's concerns regarding lack of funding for the Environmental Restoration program at the "decrement" level. However, DOE-RL has, in its latest IPL submission to USDOE Headquarters, deleted the decrement level distinction.

We are prepared to further clarify or discuss, at the Board's discretion, any of the above areas. Please contact Dan Josue at (360) 407-7111 or any of our Hanford project managers if further information is required.

Sincerely,



Dan Silver, Assistant Director  
Waste Management Division

cc: Alvin Alm, Assistant Secretary for Environmental Management (EM-1)  
Cynthia Kelly, Office of Accountability  
Mike Grainey, Oregon Department of Energy  
John Wagoner, Manager, Richland Operations Office  
Ron Izatt, Deputy Manger, Richland Operations Office  
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