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A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

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Washington State
Dept of Ecology

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September 9, 2011

Scott Samuelson, Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450 (H6-60)
Richland, WA 99352

Re: Waste Management Area C Performance Assessment

Dear Mr. Samuelson,

Background

The Waste Incidental to Reprocessing (WIR) Process Plan [*Radioactive Waste Determination Process Plan for Waste Management Area C Tank Waste Residuals, RPP-PLAN-47325, Revision 0, September 2010*] listed the following completion dates for C-Farm closure:

- February 2012: Waste Management Area (WMA) - C Performance Assessment (PA).
- December 31, 2014: Resource Conservation and Recovery Act, Comprehensive Environmental Response, Compensation, and Liability Act and U.S. Department of Energy (DOE) Closure Documents (M-45-61).
- September 30, 2015: Submittal of Closure Application to Washington State Department of Ecology (M-45-82).
- June 30, 2019: C-Farm tank closure completed (M-45-83).

The WMA-C PA depends on the conclusions of the Tank Closure & Waste Management Environmental Impact Statement (TC&WM EIS). With the TC&WM EIS delayed into 2012, the WMA-C PA appears to be delayed into late 2012 or early 2013, almost a year behind the schedule published in September 2010. This delay compresses the schedule for the tank closure documents due by December 31, 2014 and September 30, 2015, which could result in missing those milestones.

Another potential for delay is the WIR-determination process which involves obtaining approval from the Nuclear Regulatory Commission by December 31, 2014. Hanford has

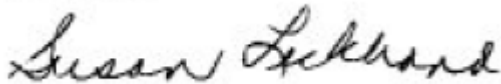
minimal experience with WIR determination and the uncertainties associated with that process.

Another potential for delay is the tank closure process itself. Hanford also has little experience in closing half-million gallon tanks; therefore, planning would be expected to contain a large amount of time for unanticipated delays.

Advice

- The Board advises DOE to update the schedule for issuing the WMA-C PA as potential delays become apparent.
- The Board advises DOE to explain the impact of the WMA-C PA delay on the schedules for the closure documents due to be issued on December 31, 2014 and September 30, 2015.
- The Board advises that DOE should routinely communicate the potential mission impacts of schedule delays and programmatic uncertainties to the Board and other stakeholders at least every six months until the completion of C-Farm tank closure activities.
- The Board advises DOE to include time for unanticipated events in future schedules associated with C-Farm closure.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Matt McCormick, Manager, U. S. Department of Energy, Richland Operations
Stacy Charboneau, Deputy Designated Official, U.S. Department of Energy, Office of River Protection
Dennis Faulk, U. S. Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Catherine Brennan, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations

