

# HANFORD ADVISORY BOARD

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

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US Environmental  
Protection Agency  
Washington State Dept  
of Ecology

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April 4, 2008

James Rispoli  
Assistant Secretary for Environmental Management  
EM-1/Forestal Building  
U.S. Department of Energy  
1000 Independence Avenue  
Washington, D.C. 20585

Re: FY 2010 Budget Requests for US Department of Energy

Dear Mr. Rispoli,

## **Introduction**

The timely and effective cleanup of the Department of Energy's (DOE) Hanford Site is of significant concern to the residents of the Pacific Northwest. Protection of the Columbia River resource is a high priority. The Hanford Advisory Board's (HAB or the Board) initial comments regarding the development of the Fiscal Year 2010 (FY 2010) cleanup budget are provided in this advice.

The 2010 budget continues a pattern of under-funding seen since at least 2005. The Department of Energy-Richland Operations Office (DOE-RL) and the Department of Energy-Office of River Protection (DOE-ORP) will fall hundreds of millions of dollars short of meeting the agreed upon schedules for some of the TPA milestones. The shortfalls have led to delays and schedule extensions of the site cleanup program required by the Tri-Party Agreement (TPA).

At a recent public meeting on the FY 2010 budget planning by the DOE field offices, it was apparent that additional delays are expected to occur in the Hanford Site cleanup program as a result of inadequate funding to meet program commitments and TPA milestones. In previous years, DOE proposed the major cleanup sites accept reduced funding so that the funds made available could be utilized to expedite the cleanup of a number of the smaller DOE sites around the country. The cleanup programs at these smaller sites have largely been completed, but a commensurate increase in funding for the Hanford Site has not been realized.

DOE should work closely with the Environmental Protection Agency and the Washington State Department of Ecology in a publicly transparent process to identify and prioritize the various elements of the cleanup program to ensure its timely completion. We repeat our advice from November 2007 (HAB Advice #203) that a lifecycle cost and schedule report be provided showing how fast each cleanup project could be accomplished if planning were not constrained in DOE's adopted baselines and Five Year Plan.

The Board strongly believes that, as a minimum, the FY 2010 budget request must meet TPA commitments. Initial comments regarding specific FY 2010 cleanup program elements are provided below.

### **Advice**

As DOE prepares the FY 2010 budget, the Board advises that consideration be given to the following comments:

#### *Tank Waste Treatment*

The safe storage and monitoring of the 53 million gallons of high level tank wastes are of the highest concern.

DOE-ORP should ensure that these tank wastes can be safely stored until they are retrieved for processing in the Waste Treatment and Immobilization Plant (WTP). DOE-ORP should evaluate the integrity of existing single shell tanks (SSTs) and a consideration of options for obtaining additional double shell tank (DST) space.

The Board advises that DOE should be prepared in 2010 to move ahead in 2008 and 2009 on recommendations of the feasibility of an early startup of the WTP Low Activity Waste (LAW) facility and the addition of a third melter to the LAW facility. The former will need significant additional funding, which has not been identified. However, early LAW startup will lower the overall WTP costs and overall costs and schedule for treating tank wastes by billions of dollars and many years. Likewise, the third melter may also provide significant benefits and contingency when the LAW facility starts up in 2013 or 2014. Additionally a supplemental treatment decision needs to be made regarding the provision of a second LAW facility and the need and location of any required pretreatment facility and supporting tank farm facility upgrades.

Every feasible effort should be made for an early startup of the WTP.

### *Tank Waste Retrieval*

DOE should increase the current SST retrieval rate to minimize the risk posed by the wastes in the aging tanks. Once the WTP is operational, a higher rate of retrieval can be achieved. The minimum rate of retrieval should be four to five tanks per year. Proposals to go from one retrieval per year to two are not an acceptable response to the concerns for the environment and safety voiced by the public.

Characterization of soils contaminated by leaks should begin to increase in 2010. As wastes are retrieved from tank farms, it will be imperative to stem the spread of contamination from past leaks (or from leaks during retrieval) and begin active cleanup.

### *Groundwater and Vadose Zone*

Additional funding should be provided for the characterization and necessary remediation of both the shallow and deep vadose zone contamination in the Central Plateau, waste sites adjacent to the Columbia River, and in the 300 Area.

The remediation of the carbon tetrachloride, chloroform, uranium, and technetium contamination in various locations on the site should receive additional funding to permit greater progress in the remediation of these specific groundwater contaminants.

Remediation of the vadose zone and the groundwater in the Central Plateau, other than the tank farms, must be completed by 2024 to comply with the TPA. This remediation would provide protection of the regional water resource.

Sufficient funding should be provided for the groundwater program without a reduction in facilities decontamination and decommissioning and soil remediation programs.

### *Central Plateau Soil and Waste Management*

Cleanup work scheduled to start this year on the Central Plateau should be funded. Planning for retrieval and disposal of transuranic (TRU) wastes should include transuranic elements disposed of prior to 1970. This work will require a significant increase in funding. DOE's baseline assumes that immense areas of land - covered by 43 lineal miles of unlined disposal trenches and many more lineal miles of liquid

waste disposal trenches - will simply be capped without adequate characterization. The Board instead favors retrieving waste for treatment and proper disposal.

The retrieval, treatment and certification of TRU wastes for offsite disposal need to be adequately funded. Any additional facilities required for the TRU waste program should be provided. Remote-handled TRU facilities need to be available for operations to begin in 2012 in accordance with Waste Isolation Pilot Plant schedules. Treatment of mixed wastes cannot continue to be deferred, without creating a backlog of dangerous wastes stored without treatment.

The costs for Canister Storage Building maintenance and operation appear to be excessive at over \$20 million per year. The building is designed to store spent nuclear fuel and vitrified waste with minimal surveillance costs.

#### *River Corridor Cleanup*

Remaining cleanup work in the River Corridor including ground water, facility decontamination and decommissioning, and remediation of waste disposal sites must be completed by 2024 to comply with the TPA and to protect regional water resources. Funding for the completion of the K Reactor fuel storage basins and groundwater cleanup is currently inadequate.

Sincerely,



Susan Leckband, Chair  
Hanford Advisory Board

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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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