

HANFORD ADVISORY BOARD

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

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State
Dept of Ecology

June 8, 2012

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Re: Final Tank Closure and Waste Management Environmental Impact Statement

Dear Messrs. Huizenga, Samuelson, McCormick and Faulk and Ms. Hedges,

Background:

The U.S. Department of Energy (DOE) has recently announced that there will be no preferred alternative for additional tank waste treatment in the final Tank Closure and Waste Management Environmental Impact Statement (TC&WM EIS or EIS).

Envirolssues

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HAB Consensus Advice # 256

Subject: TCWM EIS

Adopted: June 8, 2012

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Previously, DOE stated that vitrification was the preferred alternative for both high-level and low-activity waste (LAW) in the 1997 Tank Waste Remediation System (TWRS) EIS and record of decision (ROD). DOE is now indicating that waste not scheduled to be treated in the LAW Vitrification Facility might be treated by some other process that will be decided at some later date.

This change in direction is of great concern to the Hanford Advisory Board (HAB or Board). It was not supported by public comment during the review of the draft TC&WM EIS, and is not supported by the actual data in the EIS. It is also not supported by the cost analysis in the Kosson Report¹ that demonstrated the alternate approaches to treatment of LAW are cost-equivalent.

DOE spent at least \$400 million examining bulk vitrification and steam reforming. Both technologies proved unsuccessful technically and financially. Funding, particularly for technology development, is extremely limited. Therefore, it is the opinion of the Board that exploration of a non-glass alternative to LAW vitrification should not be pursued. However, a replacement for the baseline borosilicate glass matrix should be fully explored and evaluated before beginning design of a second LAW Facility.

The Board reminds DOE that when the federal government proposes a major project, the purpose of an EIS is to identify environmental impacts from the proposed action, and alternatives to that action that minimize such impacts or that mitigate the environmental damage insofar as practicable.

Advice:

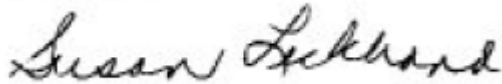
- The Board advises DOE to provide the public and the Board sufficient time (90 days) to review the final EIS and have dialogue with DOE in respect to its findings prior to DOE issuing any formal ROD based upon the EIS. One or more public meetings should be held on this topic.
- The Board supports the State of Washington in advising DOE to select and build a second LAW Facility. In designing this facility, the Board advises DOE to fully explore and evaluate the use of alternative glass matrices as a replacement for the baseline borosilicate glass in the WTP system before beginning design for the second LAW Facility.
- The Board advises DOE to discontinue efforts to utilize bulk vitrification, cast stone, and steam reforming as alternatives to vitrification. The analysis in the draft EIS shows that these methods result in an adverse environmental impact, namely,

¹ U.S. Department of Energy External Technical Report (ETR-18); November 2008

the release of unacceptable amounts of Technetium 99 and other contaminants to the groundwater.

- The Board advises DOE to select alternatives for supplemental waste treatment that result in the earliest return of the groundwater to its highest beneficial use (drinking water standards).
- The Board advises DOE to select alternatives and make decisions for supplemental waste treatment that comply to a strict application of all environmental laws and regulations. Many of the alternatives analyzed in the draft of the EIS showed contamination of groundwater at levels exceeding regulatory and drinking water standards over thousands of years.
- The Council on Environmental Quality Regulations in 40 CFR 1502.14(e) strongly advises the lead agency in the preparation of an EIS to select a preferred alternative in the final EIS if not the draft EIS. The Board recommends that DOE identify a preferred alternative in the final EIS.

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: Dana Bryson, Deputy Designated Official, U.S. Department of Energy, Richland Operations Office
Catherine Brennan, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations