

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

Jay Manning, Director
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Updated Tank Waste System Plan

Dear Ms. Olinger and Mr. Manning,

Tank waste retrieval, treatment and immobilization at Hanford continues to be the Hanford Advisory Board's (Board) number one cleanup priority. The Board has emphasized the need for a clear, credible, integrated path forward to be defined and maintained as in Board Advice #192, September 8, 2006. The Board appreciates the Department of Energy's (DOE) and its contractor's efforts in generating such planning documents as the River Protection Project System Plan Revision 3.

The Board feels it must restate, in the face of studies, events, delays, emerging technical issues, and lack of funding that have occurred since Revision 3, the ongoing need for a clear, credible, comprehensive, integrated path forward for retrieving, treating and disposing of tank waste in a timely way and addressing tank farm closures. All waste streams, processes, products, and facilities must be addressed. The process path, disposal path, and cleanup of facilities and supporting infrastructure must be included.

The Board, in Advice #203 (November 2, 2007), reflected upon the delays contained in the then current baseline and advised that a Hanford Lifecycle Scope, Schedule and Cost Report should be created to report the lifecycle and annual costs of cleanup projects. The Board further advised an update of that report should be issued annually. In Board Advice #205 and #206 (April 4, 2008), the Board reiterated the strong desire to move forward with timely tank waste retrieval, treatment and disposal even as particularly troublesome shortfalls in budget were forecast for 2009 and 2010.

The Board is pleased at the initiation of the Single Shell Tank Integrity studies in Fiscal Year 2009. These studies will provide an updated understanding of the risk to human health and the environment of the extended storage of highly radioactive waste in these non-compliant vessels. However, the Board is concerned some technical issues have emerged such as the total quantity of sodium needing to be processed and the retrieval problems associated with Tank S-102. Furthermore, promising initiatives to support acceleration of waste retrieval and processing before 2019 are no longer actively being pursued, primarily for funding reasons.


Advice

- The Board advises DOE to annually prepare and issue an Updated System Plan to Retrieve, Treat, and Dispose of Tank Waste and Close Tank Farms (Updated Tank Waste System Plan) and make this report publicly available. The Updated Tank Waste System Plan should:
 - provide a basis for identifying and mitigating potential negative impacts to human health and safety, including characterizing and reducing worker exposure to chemical vapors, and environmental impacts;
 - identify the basis of programmatic cost and schedule issues associated with tank leaks and contaminant spread, for each alternative discussed;
 - include an analysis of the interconnectedness of the entire tank farm and waste treatment plant system and the far-reaching impacts of further delays to infrastructure or any single component of the plan; and
 - provide criteria that guide the option selection process and disposal options for all waste streams.
- The Updated Tank Waste System Plan should address the programmatic risks and any other risks associated with additional delays.
- The Updated Tank Waste System Plan should also provide a basis for communicating the ability to successfully remove, treat and dispose of all of Hanford's tank wastes to garner the support of a broad regional and national audience to ensure continued funding.
- The Updated Tank Waste System Plan should include not only the baseline case reflecting current DOE target budget guidance, but also the case or cases reflecting technically achievable and legislatively reasonable incremental funding. It should also include a full funding case, unconstrained by DOE's target budget.

- Risk information utilized should include, but not be limited to, information available in the Tank Closure and Waste Management Environmental Impact Statement and the recently authorized Single Shell Tank Integrity Study.
- This Updated Tank Waste System Plan should also estimate the lifecycle cost of completing the work for each of the alternatives considered.

The Updated Tank Waste System Plan would be innovative, building on legal requirements to report the lifecycle and annual costs of cleanup projects. It would be an important step forward by providing analyses of what is possible to accomplish if DOE's inadequate funding plans were not the basis for scheduling. It would quantify cost, schedule, and risk impacts of funding inadequacies.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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.

cc: David Brockman, Manager, U.S. Department of Energy Richland
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