



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 30, 2011

11-NWP-158

Ms. Susan Leckband, Chair
Hanford Advisory Board
713 Jadwin, Suite 4
Richland, Washington 99352

Re: Hanford Advisory Board Advice # 252 "Hanford's 2011 Lifecycle Scope, Schedule, and Cost Report"

Dear Ms. Leckband:

Thank you for the Hanford Advisory Board (Board) advice on the *2011 Hanford Lifecycle Scope, Schedule and Cost Report* (Lifecycle Report). The Department of Ecology (Ecology) considered your comments, and we appreciate the opportunity to share our views.

We are pleased with the first report that the United States Department of Energy (USDOE) provided us to comply with *Hanford Federal Facility Agreement and Consent Order* (HFFACO) Milestone M-036-01. The report meets the requirements of Milestone M-036-01A.

The Board advised that the Executive Summary should "include an overall total cost summary of reasonably anticipated costs of work which are missing from the current estimate." The advice lists some examples, which Ecology believes the Lifecycle Report addresses in Appendix A.

- Tables A-2 and A-3 list cleanup actions and plausible alternatives for clean up in the River Corridor and Central Plateau.
- Table A-4 lists the same information for cleanup of tank waste.
- Table A-5 is a schedule for USDOE to complete detailed analyses of cleanup actions in subsequent reports.

As USDOE completes the detailed analyses, the Board will have the opportunity to review more definitive information about future cleanup efforts.

You advised that the Lifecycle Report should contain sufficient information to understand the impacts of delaying or accelerating individual projects. Such analyses are not within the scope of the Lifecycle Report. Milestone M-036-01 requires that the report reflect all "actions necessary for the USDOE to fully meet all applicable environmental obligations including those under the HFFACO, the Consent Decree in *Washington v. DOE*, Case No. 08-5085-FVS, and the Hanford RCRA/HWMA Permit."

Requirements for the Lifecycle Report do not include analyses of delays and acceleration of individual projects. However, Ecology intended the report to serve as the basis for annual discussions among USDOE, the United States Environmental Protection Agency, and Ecology that include schedules for cleanup, effects of Congressional appropriations, and changes and adjustments in HFFACO milestones. We will work with USDOE to make it more useful in that respect.



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The Board cites previous advice about the Solid Waste Burial Grounds (200-SW-2) and devotes a significant portion of this advice to 200-SW-2. Ecology has long understood and acknowledged the Board's interest in this topic. We will continue our dialogue on this issue with the Board, the public, tribal nations, and Oregon. You advised that the Report include all work and costs presented in the examination of 200-SW-2. Ecology will continue to work with USDOE to make available both summary-level information and more detailed information requested by interested parties.

In the Lifecycle Report, the detailed analysis of the lower and upper bound estimates for remediating the 200-SW-2 landfills and caissons provide a useful reference for cleanup consideration. The information in the report presents an approach that Ecology and USDOE can use for discussion about the work scope, schedules, and costs as the Tri-Parties formalize the cleanup actions that USDOE must complete.

You advised that the Lifecycle Report present alternative costs for storage of high-level vitrified waste at Hanford. You also requested that the report provide a summary to help you understand tank waste system plan issues. The 2012 Lifecycle Report will include a detailed analysis of cleanup action alternatives, including tank waste retrieval and single-shell tank closure, tank waste treatment, and secondary tank waste treatment. The basis for analysis in the 2012 Lifecycle Report will be the *River Protection Project System Plan*, Revision 6 (see 2011 Lifecycle Report Table A-5). It would be appropriate for the Board to pose those questions to USDOE when the 2012 Lifecycle Report is released on January 31, 2012.

You advised that the Lifecycle Report include an appendix listing safe and compliant costs for major facilities. A near-term opportunity for the Board to discuss these details, which appear in the task descriptions supporting USDOE Project Baseline Summaries, will be during discussions of budget submissions. Ecology will also work with USDOE to develop additional details of safe and compliant costs for major facilities, to be included in the 2013 revision of the Lifecycle Report.

We appreciate the Board's interest in the first Lifecycle Report. If you have any questions, please contact John Price at 509-372-7921 or John.Price@ecy.wa.gov.

Sincerely,



Jane A. Hedges
Program Manager
Nuclear Waste Program

mb/dbm

cc: Dennis Faulk, EPA
David Einan, EPA
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN

Ken Niles, ODOE
Oregon Hanford Cleanup Board
Administrative Record
Environmental Portal
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