



U.S. Department of Energy  
~~Office of River Protection~~

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Richland, Washington 99352

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MAR 25 2010

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

Dear Ms. Leckband:

**RESPONSE TO HANFORD ADVISORY BOARD (HAB) ADVICE #214, "SYSTEM CRITERIA TO GUIDE SELECTION OF OPTIMUM PATHS FOR TREATING HANFORD WASTES"**

Thank you for your Advice #214 letter to the Tri-Party agencies, dated February 6, 2009, on "System Criteria to Guide Selection of Optimum Paths for Treating Hanford Wastes." This advice represents a very thoughtful, holistic approach to Hanford cleanup while reiterating long-standing HAB values. The integrated systems approach in the HAB advice aligns very closely to the U.S. Department of Energy's (DOE), Office of River Protection (ORP) project management approach. Under ORP's guidance, an established set of methods and tools are utilized to plan, implement, and complete projects using Systems Engineering processes, including a Risk Management Plan. This plan identifies, quantifies, and develops management strategies for federal level risks associated with the River Protection Project (RPP), thus ensuring that these critical risks, managed at the federal and contractor level, are integrated and comprehensive.

In addition to following system engineering approaches, the Hanford Site operation is governed under approved procedures, with adherence to Occupational Safety and Health Administration rules, state-approved environmental operating permits, regulatory requirements, and other standards as applicable to protect worker health and safety, public health and safety, and the environment. Concerns related to human health, safety, and the environment are more appropriately addressed in other RPP documents. Some examples, although not all-inclusive, include performance assessments, the Tank Closure and Waste Management Environmental Impact Statement, Tank Farm Safety Basis, Tank Waste Retrieval Work Plans, Notice of Construction Applications for air operating permits, Washington State wastewater discharge permits, and the 242-A Resource Conservation and Recovery Act permit.

ORP works to mitigate project risks using systematic approaches. One example is the Secondary Waste Workshop and the subsequent Secondary Waste Roadmap. This process uses a disciplined, consensus building, analysis, solution development, and decision-making methodology supporting strategic programmatic and project planning. The roadmap preparation focused all parties on the needs, risk-reduction alternatives, desired end-states, and the paths that will lead to efficient and timely resource investment. Representatives from DOE, U.S. Environmental Protection Agency, State of Washington Department of Ecology, Oregon Department of Energy (ODOE), Nuclear Regulatory Commission (NRC), technical experts from

Response to HAB advice #214  
HAB Consensus Advice: System Criteria to Guide Selection of Optimum Paths Treating Hanford Wastes  
Letter from Shirley Olinger dated 3/25/10

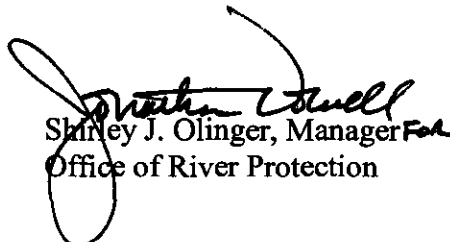
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the DOE national laboratories, academia, and private consultants participated in the workshop to identify the risks and uncertainties associated with the treatment and disposal of the secondary wastes. From the identified uncertainties, a roadmap was developed outlining the technical and programmatic steps necessary to design, develop, demonstrate, and accept a baseline waste form for the treatment and disposal of secondary wastes associated with the treatment of tank wastes. This roadmap is utilized as we move forward in testing materials for disposal of the secondary waste.

The HAB's elaboration of the three levels of system planning criteria in the Appendix of your advice is helpful and has been applied recently to efforts to improve the ORP system planning and development of potential technologies that can improve cleanup completion dates. Examples include a recent tank waste hard heel technology review with experts from across the country to identify promising technologies that require funding now to bring to maturity. ORP efforts to reduce worker exposure to tank farm vapors represent a balanced risk approach to avoid creating additional worker hazards from excessive personal protective equipment. Efforts are underway to install a much larger 200-West Area pump and treat system to address contaminated groundwater as soon as possible. ORP is carefully considering new technologies to remove the inert materials in the tank waste, such as the sodium and aluminum to improve the Waste Treatment and Immobilization flow sheet. ORP will continue to review and apply your advice in our ongoing system planning and technology development work.

ORP is committed to following sound system engineering approaches and appreciates participation from interested parties including the HAB, the Tribes and the public, and believes it is essential to addressing complex cleanup issues. Opportunities for involvement will continue to exist as demonstrated by the two recent Single Shell Tank Integrity Project Expert Panel workshops, and the ongoing Waste Management Area C Performance Assessment working sessions. These substantial and collaborated efforts represent a practical and achievable approach to move the Hanford cleanup mission forward.

If you should have any questions, please contact Lori Gamache, (509) 372-9130.

  
Shirley J. Olinger, Manager  
Office of River Protection

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