

# 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

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April 7, 2006

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Michael Bogert, Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue  
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Re: FY 2008 Budget

Dear Mssrs. Rispoli, Klein, Schepens, Manning and Bogert,

The following advice has consensus of the full Hanford Advisory Board:

The Hanford Advisory Board (Board) is disappointed the proposed Fiscal Year 2008 (FY08) target funding profile is too low to accomplish key required cleanup activities on the Hanford Site in FY08.

The Board applauds the proposed Department of Energy (DOE) "over-target" requests for additional funding that recognizes the inadequacy of the target budget. However, the Board believes additional funding, beyond the over-target request, is required to realize the risk reductions committed to by the DOE. Requesting

“over-target” funding does not make the budget Tri Party Agreement (TPA) compliant. Some of the over-target items are currently in the TPA and should be included in the baseline – not “over-target.” TPA negotiations of milestones should not be based on changing milestones to meet available funding.

DOE Office of River Protection (DOE-ORP) out-year budget numbers are not based on the current TPA path forward nor are they provided in enough detail to help the public provide appropriate comments. The proposed budget suggests that single shell tank (SST) retrieval will be reduced to 1 or 2 tank retrievals per year, which will not meet TPA milestones. The longer the waste remains in the SSTs the greater the risks of new or continued waste leaking to the soil and groundwater.

The DOE Richland Operations (DOE-RL) budget request is not enough to do the substantive cleanup work in the Central Plateau to significantly reduce risk.

### **Board Advice/Priorities/Concerns:**

#### **Central Plateau**

- Milestones for cleanup activities in the 200 Areas of the Hanford Site need to be developed and documented in the TPA and should include inventory, characterization and retrieval/remediation of pre-1970 buried waste.
- Cleanup activities should be prioritized along with Plutonium Finishing Plant (PFP), 100 and 300 Areas – do not wait for plutonium (Pu) shipment.
- DOE-RL resource-loaded critical path (and funding) relies on completing shipment of Pu and assumes there is/will be a facility. DOE should provide a clearer picture for the public on how/when the Pu would leave the site for disposal. Putting PFP on the resource critical path could end up delaying everything following on the critical path.

#### **Integration**

- Integration between DOE-RL and DOE-ORP is extremely important to the overall success of cleanup activities. It is unclear in the budget scenario how integration is funded or what mechanism causes it to happen. What integration

work needs to be done to support the Tank Closure & Waste Management Environmental Impact Statement? Where is the funding for characterization for waste sites, groundwater, and vadose zone?

### **Direct and indirect funding**

- Overall site safety and infrastructure maintenance should be direct funded to make these costs more visible. Understanding how much it costs to maintain systems, buildings, roads, etc. can be important when prioritizing cleanup activities.

### **Safeguards and securities**

- Funding for safeguards and securities should not come from the cleanup budget; instead it should come from the Defense Program for which plutonium is being guarded as an asset. Failing that, an additional, equivalent amount of funding should be requested to replace the cleanup money being spent on safeguards and securities. Safeguard and security costs should not be indirectly funded.

### **Waste Treatment Plant (WTP)**

- Funding for the low-activity waste (LAW) vitrification plant, which does not suffer from the degree of safety questions and cost increases experienced by the high-level and pre-treatment plants, should be at a level to remain on a path for 2011, while studying how to provide LAW feed directly for vitrification directly from the tank farms without first going through the pre-treatment plant.
- DOE should ensure that spending on the Demonstration Bulk Vitrification System does not impact tank waste retrieval or prevent start up of LAW vitrification in 2011.
- Identify the cost for administration of the newly added five control points to the WTP Project Baseline Summary. It appears this strategy could seriously impact flexibility for moving funds, if needed, in the future. The Board believes that two control points would provide needed checks, balanced with flexibility that may be needed.
- DOE should ensure that correct funding information is provided to the public to help the public develop appropriate comments.

## **Tank Farm Operations**

- Single shell tank retrieval should continue to be funded and performed at the pace required to meet the TPA milestone completion of 2018 regardless of WTP schedule delays.

Additionally, the Board is concerned that the FY08 budget does not fully address the following items:

- K-Basins and PFP path forward for D & D.
- PFP maintenance is in over-target funding instead of within-target funding
- Cesium/strontium capsules – dry storage may make fiscal sense if the path forward requires interim storage onsite for longer than in the current baseline
- No funding is identified in FY08 for Central Plateau cleanup, including the U Plant Record of Decision work. It is supposed to be a model for the country
- Natural Resource Damage Assessment

Sincerely,



Todd Martin, 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.*

The following paragraph did not achieve Board consensus:

The Board supports the identification of Fast Flux Test Facility (FFTF) Decontamination and Decommissioning (D&D) as a lower priority activity assuming the reactor is placed in interim safe configuration.

Standing aside or blocking deletion of this paragraph from the advice:

Block - Benton County  
Block - Benton-Franklin Council of Governments  
Block - Benton-Franklin Public Health  
Block - TRIDEC

Standing aside or blocking inclusion of this paragraph in the advice:

Block - Heart of America Northwest

Block - Government Accountability Project

Stand aside, not block – Washington League of Women Voters

Stand aside, not block – Physicians for Social Responsibility

cc: Shirley Olinger, Co-Deputy Designated Federal Official, U.S. Department of Energy, Office of River Protection  
Dave Brockman, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office  
Nick Ceto, Environmental Protection Agency  
Jane Hedges, Washington State Department of Ecology  
Doug Frost, U.S. Department of Energy Headquarters  
The Oregon and Washington Congressional Delegations

U.S. Senators (OR)

Gordon H Smith

Ron Wyden

U.S. Senators (WA)

Maria Cantwell

Patty Murray

U.S. Representatives (OR)

Earl Blumenauer

Greg Walden

Peter DeFazio

David Wu

Darlene Hooley

U.S. Representatives (WA)

Brian Baird

Cathy McMorris

Norm Dicks

Jim McDermott

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