

# 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

November 6, 2009

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Margery Swint

Re: Lifecycle Cost and Schedule Report of the Proposed Consent Decree and the Tri-Party Agreement (TPA) Modifications

**University**

Doug Mercer  
Gene Schrekhise

**Public-at-Large**

Norma Jean Germond  
Keith Smith  
Bob Parazin  
Bob Suyama

Dear Mr. Brockman, Ms. Olinger, Ms. Zehm and Ms. Pirzadeh,

## Background

**Regional Environ-  
ment/Citizen**

Todd Martin  
Greg deBruler  
Paige Knight  
Gerald Pollet

The Hanford Advisory Board (Board) previously provided advice to the Tri-Party Agencies to not negotiate any delays to cleanup milestones prior to preparing a Lifecycle Cost and Schedule Report (Advice #203).

**State of Oregon**

Barry Beyeler  
Ken Niles

“The Board believes that the Tri-Parties should not agree to significant delays in existing TPA milestones until the proposed Hanford Lifecycle report is issued.”

**Ex-Officio**

Confederated Tribes  
of the Umatilla  
Washington State  
Department of Health

The Board recommended that the report be the basis for any negotiations because it was intended to provide a review of all work required for Hanford cleanup, with the costs of

**EnviroIssues**

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**HAB Consensus Advice # 223**  
Subject: Life Cycle Cost & Schedule Report of the Proposed Consent Decree & TPA Modifications  
Adopted: November 6, 2009

alternatives (e.g., retrieving wastes from soil sites or tank farms) identified. This report would allow for public review of the potential for accelerating the schedules, discussion of the scope of work required, and comparison of Department of Energy's (DOE) baselines and TPA proposed long-term milestones.

The description of the report in the settlement package with the consent decree and TPA modifications would require DOE to present project specific cost, assumptions and data only on alternatives for those projects in a two to five year window. Longer term projects (those that start or take longer than the upcoming five years) in the report would reflect only the current DOE baseline, about which the Board has raised serious concerns. Excluding detail for all longer term projects (over five years out) would not allow the Board, the regulators, or the public to review assumptions for projects of high concern and to examine the potential to accelerate major milestones for those projects.

Under the current description, the report would not allow examination of:

- the costs, assumptions and potential to accelerate cleanup of contaminated Central Plateau soils for units which are not slated to begin cleanup in the next five years;
- if DOE's plans for these units include retrieving plutonium or transuranic wastes disposed in the soil prior to 1970;
- whether tank closure includes cleanup of contamination from leaks and discharges in tanks farms (rather than capping), what the costs of alternatives would be, and whether the work or portions of it may be accelerated to be completed faster than proposed.

## **Advice**

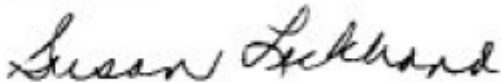
The Board advises that the proposed Lifecycle Cost and Schedule Report should be adequately described in the settlement package with the consent decree and TPA to accomplish the following:

- Provide adequate information for the public and the regulators to review the long-term costs, schedule, and assumptions on which these are based for each project and milestone.
  - To serve the stated goal, the report should provide more information on alternatives and assumptions for all cleanup projects in addition to the full project cost and annual budget projected which DOE is required to report to Congress pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act.
  - The description of the report in the settlement package with the consent decree and TPA modifications should include DOE providing project specific cost,

assumptions, schedules and dates beyond a two to five year window for all elements necessary to complete the cleanup mission.

- Provide the information necessary to determine if schedules and milestones could be accelerated through review of project schedules and annual costs.
- Update the report annually. Where possible, connect project specific costs, schedules and assumptions to the milestones or other regulatory requirements. This should allow the public to ascertain what it would cost to accelerate a project to accomplish a specific, understood outcome.
- Provide enough information to help the public assess whether proposed delays to TPA milestones could be avoided or reduced if budgets were not constrained, or if work were re-prioritized.
- Allow for public review of DOE's baseline assumptions to see if public values are reflected in accomplishing cleanup; such as the degree of cleanup, whether wastes are retrieved instead of capped in place, and whether structures are removed instead of being left in place. This would allow the public, the regulators and the tribes to offer informed alternatives with cost estimates and potential schedules.

Sincerely,



Susan Leckband, Chair  
Hanford Advisory Board

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*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: Steve Pfaff, Co-Deputy Designated Official, U.S. Department of Energy, Office of River Protection  
Doug Shoop, Co-Deputy Designated Official, U.S. Department of Energy, Richland Operations Office  
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The Oregon and Washington Delegations