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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 28, 2011

11-NWP-32

Ms. Susan Leckband, Chair
Hanford Advisory Board
713 Jadwin Avenue, Suite 3
Richland, Washington 99352

Re: Hanford Advisory Board Consensus Advice #244 "Cleanup Budget Priorities for Fiscal Year 2012, 2013, and Ensuing Years," dated April 1, 2011

Dear Ms. Leckband:

Thank you for the Hanford Advisory Board's (HAB) advice regarding Cleanup Budget Priorities for Federal Fiscal Year (FFY) 2012, 2013, and ensuing years. The Washington State Department of Ecology (Ecology) commends the HAB for the expedited development of this advice. We appreciate your continued commitment to the cleanup of the Hanford Site.

The HAB identified "concerns" in addition to the advice. Ecology generally shares these concerns. In particular, we share your concern about maintaining funding for decontamination, deactivation, and decommissioning and demolition activities at the Plutonium Finishing Plant (PFP). Ecology notes that while the Tri-Party Agreement (TPA) milestone compliance date for PFP is 2016, there are substantial benefits to completing those activities early.

Ecology offers the following responses to the advice directed to the TPA Agencies or to our agency alone:

- The HAB advised the agencies that a lack of budget does not justify changing TPA milestones. Ecology agrees in part with the advice about retrieval and treatment of transuranic (TRU) waste.

Ecology agrees that the United States Department of Energy (USDOE) should not suspend retrieval entirely. Ecology encourages USDOE to provide enough funding to maintain its capability to retrieve and manage TRU.

However, Ecology reiterates that the TPA agencies agreed to *non-enforceable* target M-91 series milestones from FFY 2012 to FFY 2014. Those target milestones were consistent with the five-year priorities identified in Ecology's June 1, 2010, letter to USDOE regarding FFY 2011 and FFY 2012 budget priorities (see enclosure to Ecology response to HAB advice #232 and #234, dated June 29, 2010).

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- The HAB also advised Ecology, as the regulator, to ensure that USDOE meets mixed waste treatment requirements. We assure the HAB that we will continue to fulfill our regulatory responsibilities.

Enclosed is a copy of Ecology's recent letter to USDOE regarding FFY 2011, 2012, and 2013 Hanford budget proposals and the state's priorities.

If you have additional comments or questions, please contact John Price at (509) 372-7921 or john.price@ecy.wa.gov.

Sincerely,



Jane A. Hedges
Program Manager
Nuclear Waste Program

Enclosure

cc w/enc: Dennis Faulk, EPA
Catherine Brennan, USDOE-HQ
Stacy Charboneau, USDOE-ORP
Matt McCormick, USDOE-RL
Nick Ceto, USDOE-RL
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