

# HANFORD ADVISORY BOARD

*A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act*

February 6, 2009

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US Dept of Energy  
US Environmental  
Protection Agency  
Washington State Dept  
of Ecology

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1000 Independence Avenue  
Washington D.C. 20585

Re: Priorities for Fiscal Year 2010, Out-Year and Economic Stimulus Budgets

Dear Ms. Olinger, Mr. Brockman, and Ms. Triay,

## Background

The Hanford Advisory Board (Board) has consistently emphasized its commitment to the timely and effective cleanup of the Hanford Site in compliance with the Department of Energy's (DOE) commitments under the Tri-Party Agreement (TPA). The Board has also on a number of previous occasions expressed its concerns regarding the inability of DOE's field offices – the Richland Operations Office (DOE-RL) and the Office of River Protection (DOE-ORP) - to meet binding programmatic requirements for the Hanford Site cleanup program due in part to the continuing inadequacy of funding provided to the DOE's Environmental Management (EM) program. The TPA is a legally binding commitment by DOE for the cleanup of the Hanford Site.

In the development of their Fiscal Year (FY) 2010 Budget and out-year requests, and in any stimulus package, the Board urges DOE to request adequate funding to

achieve compliance with existing TPA milestone commitments and to make adequate progress towards existing out-year milestone commitments.

The Board has already identified \$220 million in specific additional priority funding needed for FY 2009, which would provide concrete cleanup advances to protect the Columbia River, groundwater and improve safety (Advice #205). That additional \$220 million, if appropriated, would be less than half the amount of funding which DOE reports would be needed to meet existing TPA schedules and its own baseline. Our advice on the FY 2009 budget provides a basis to guide prioritizing additional funding by DOE's field offices and Congress for FY 2010 through 2012.

Our goal of accelerating reduction of the contamination footprint and reducing safety risks is not new. DOE committed to Congress, tribes, the states and the public to request that the funding which had been going to the smaller DOE sites cleaned up under the "2006 Closure Account" would be dedicated to cleaning up the remaining large sites, including Hanford. Instead, following Office of Management and Budget direction, DOE's congressional budget requests were for those funds to be spent on other programs starting in FY2006. Hanford delayed work, and milestones were relaxed while funds were concentrated on closing the smaller sites. DOE's commitment to increase funding was not honored. Now is the time to accelerate the cleanup of the most contaminated areas of the nation, including Hanford.

Remedial investigation and feasibility studies are required by law, and the TPA must receive funding for proposals to "shrink the footprint," and to proceed to be "shovel-ready." Thus, additional funds for projects should be authorized and appropriated to be obligated over several years. The Board recommends that DOE request such supplemental funding as may be available from part of the national economic stimulus program. In addition to accelerating the cleanup of the Hanford Site, such supplemental funding would meet the national goals of expediting shovel-ready, job-creating programs. Both field offices have a number of programs and projects for which the planning and initial regulatory requirements have been met to allow their early initiation. The undertaking of additional site cleanup programs and the expediting of currently funding limited programs would, in addition to meeting economic stimulus goals, help resolve many of the concerns regarding the relatively slow rate of progress on Hanford Site cleanup.

The recommendations we make would, if followed, accelerate protection of the environment from spreading contamination and reduce serious risk and have the important benefit of actually lowering the total cost and liability of the federal

government for cleanup of Hanford. A very large proportion of funding for Hanford cleanup goes to simply maintaining safety envelopes, dangerous facilities and waste sites.

For example, the site spends over \$50 million a year simply to maintain “minimum safe and secure services” for the Plutonium Finishing Plant (PFP), with numerous serious risks. Accelerating clean out and demolition is an investment which will actually save taxpayers hundreds of millions of dollars in long-term liability, while improving safety.

The bullets included within the following Board advice are not listed in priority order.

### **Advice**

Both field offices are advised to consider using the following general principles in developing their supplemental funding requests and budget planning for FY 2009, 2010 and out-years, and to develop a multi-year Integrated Priority List (IPL) for utilization in funding allocations, which must be done in collaboration with the regulators, the Board and based on public input.

- Allocate funding by general program priorities rather than specific tasks.
- Identify early start programs and the resulting benefits, starting with shrinking the contamination footprint and making the Columbia River Corridor available for safe public and tribal use pursuant to treaty rights and plans for the Hanford Reach National Monument by 2012.
- Ensure worker health and safety.

Identify the impact the proposed expenditure would have on the following objectives.

- Protect the Columbia River.
- Reduce the footprint of the Hanford Site.
- Stop or reduce the spread of groundwater contamination.
- Complete decontamination and removal of contaminated unused facilities.
- Reduce risk and future costs.
- Accelerate cleanup of specific sites to reduce long term maintenance and surveillance costs.
- Advance scientific understanding of and develop engineering and scientific solutions for identified cleanup problems.

## OFFICE OF RIVER PROTECTION

The Board's overarching values and funding priorities for DOE-ORP are summarized as follows:

- Provide adequate funding to continue construction of the Waste Treatment Plant (WTP) to meet the 2019 start-up date.
- Upgrade the tank farm infrastructure. Upgrades are needed to protect the environment and to prepare to transfer waste to WTP.
- Remove waste as soon as possible from corroding and leaking single shell tanks (SSTs).
- Begin design and engineering of a second Low Activity Waste (LAW) facility and/or supplemental treatment immediately. WTP is not designed to treat all of Hanford's tank waste.
- Address technical issues such as reducing the sulfur and aluminum content in tank waste and treatment of secondary waste. These types of issues must be addressed soon so WTP can function appropriately.

## SUGGESTED AREAS FOR SUPPLEMENTAL DOE-ORP FUNDING

- Upgrade site infrastructure to facilitate site compliance with hazardous waste law standards and to prepare for transferring waste to WTP.
- Accelerate waste retrieval from SSTs. With 140 SSTs remaining to be emptied, DOE must accelerate retrieval beyond one or two tanks per year.
- Upgrade and/or create additional waste evaporator capacity to make space available for retrieval.
- Reinitiate planning for the early start-up of the LAW portion of the WTP evaluation of options for a second LAW vitrification facility.
  - These studies should include the evaluation of alternative LAW treatment and processing options including sodium wastes treatment, LAW waste melter life and capacity and supplemental waste stream processing options.
  - Decisions regarding the treatment of the LAW wastes should be made by 2012 with a goal of achieving processing operations by 2022 for the second LAW facility.
- Accelerate characterization of the contaminated soils (vadose zone) beneath the tank farms to support cleanup decisions.
- Conduct SST structural assurance studies and characterization of wastes.

- Upgrade Effluent Treatment Facility to treat secondary waste from WTP.
- Design and construct the high-level glass storage facility.
- Continue the Pretreatment Engineering Platform Phase 2 testing to assist the development of a sodium management strategy.

## **RICHLAND OPERATIONS OFFICE**

The Board's overarching values and funding priorities for DOE-RL Operations Office are summarized as follows:

- Remediate groundwater and vadose zone contamination to protect the Columbia River, starting with groundwater along the Columbia River.
- Fund retrieval and treatment of wastes from soil sites, and treatment of the backlog of mixed wastes.
- Complete groundwater and soil remediation.
- Remove and treat all transuranic waste (TRU), including waste with TRU characteristics in the soil buried or discharged before 1970.
- Complete cleanup of the Columbia River Corridor, including 618-10 and 11 burial grounds and K Basin sludge.
- Maintain adequate site infrastructure to support all site functions.
- Characterize waste sites and issue investigation and cleanup proposals to meet the 2011 deadline in the TPA for these plans.
- Accelerate decontamination and decommissioning of PFP and the surrounding area.

## **SUGGESTED AREAS FOR SUPPLEMENTAL DOE-RL FUNDING**

DOE's IPL for FY 2010 identifies \$685 million in specific cleanup work required by the TPA or in DOE's baseline which would not be funded at the request/target level for 2010. We commend DOE-RL for providing an IPL with transparency for the cost of each 'activity building block' to allow the regulators, the Board and the public to review and advise on funding priorities, as well as assist in making difficult choices.

Our advice prioritizes funding choices within the context of DOE having inadequate 'target' funding to meet all requirements:

- Accelerate cleanup of the Columbia River Corridor soil and groundwater – reversing the delays towards meeting the goals of completion by 2012.
  - Install or expand groundwater pump and treat and other remediation projects for areas along the river including 100 K Area and 100 BC Area.
  - Continue removal of K-Basin sludge and removal of pools.
- Resume and fully fund TRU retrieval and treatment to meet TPA milestones.
- Treat the backlog of mixed wastes stored on site.
- Provide remote-handling capability to address 618-10 and 11 burial grounds; including, packing, treatment and size reduction of remote-handled TRU.
- Complete cleanup of 618-10 and 618-11 burial grounds and K Basin sludge by 2015.
- Provide for maintenance and upgrade of site infrastructure to support cleanup mission.
- Characterize and issue plans for waste sites surrounding PFP and canyons to support an integrated cleanup approach for PFP and nearby areas beginning in 2010; including full funding of the 200-ZP-1 operable unit pump and treat system for cleanup of groundwater.
- Completely fund National Resource Damage Assessment program requirements.
- Continue and expand vadose zone and groundwater characterization program to meet schedules for issuing cleanup decisions.

The Board strongly supports the provision of adequate funding to achieve the above programmatic goals and objectives. Providing the additional funding to fully support the above objectives will materially support the goals of reduction of the Hanford Site footprint, and reduce the risk that Hanford poses to the regional environment. The provision of economic restoration or stimulus funds above the normal Hanford DOE-EM budget allocations will also support the national economic stimulus objectives of employment enhancement and economic recovery in the near term.

Sincerely,



Susan Leckband, 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.*

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