

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

June 4, 2010

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Re: Fiscal Year 2012 Budget Requests

Dear Ms. Olinger, Messrs. Brockman, Faulk and Ms. Hedges,

Background

The Hanford Advisory Board (Board) wishes to express its appreciation to the U.S. Department of Energy (DOE) field offices, the Richland Operations Office (RL) and Office of River Protection (ORP), and the Tri-Party Agreement (TPA) regulatory agencies, the Washington State Department of Ecology (Ecology) and the Environmental Protection Agency (EPA), for their development and presentation of the Fiscal Year (FY) 2012 budget requests to the Board and the public. The Board acknowledges the efforts made by the Tri-Party agencies to keep their stakeholders informed on the future of the Hanford Site cleanup program. Additionally, the Board recognizes the excellent progress both field offices made on the site cleanup program through the use of nearly \$2 billion in American

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HAB Consensus Advice #234
Subject: FY 2012 Budget Requests
Adopted: June 4, 2010
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Recovery and Reinvestment Act (ARRA) funding. This supplemental funding assisted in achieving an increased momentum in the cleanup of the Hanford Site.

The DOE-RL and DOE-ORP proposed budgets for FY 2012 appears to be sufficient to meet TPA requirements under the site cleanup program. However, it is noted that DOE's approved five year target budget falls short of meeting the regulatory compliance plan by up to \$500 million in FY 2012.

Advice

- DOE should adjust the budget targets for FY 2012 to fully fund the work proposed by DOE-RL and DOE-ORP to assure regulatory compliance and to support the TPA for an increase of \$500 million above the previously approved target level.
- DOE-RL and DOE-ORP should request funding for all the work identified in Activity Building Blocks (ABBs) for FY 2012. In 2012, almost all of the ARRA funding for cleanup projects will have been used, requiring significant increased commitment in annual base appropriations requests for DOE to meet TPA schedules, rather than seeking additional deferments and delays in those schedules.
- DOE-RL and DOE-ORP should each submit requests to DOE-Headquarters for adequate funding, of \$1.6 billion for DOE-RL and \$1.2 billion for DOE-ORP, to meet all requirements for safe operation and regulatory compliance of the Hanford Site.
- DOE should develop and fund characterization and remediation technologies for the deep vadose zone. (see Advice #231 regarding TPA change packages).
- DOE-RL should request adequate funding for the characterization and/or removal, treatment, and disposal of pre-1970 transuranic (TRU) wastes sites (e.g. Purex Tunnel). The Board shared this similar concern in Advice #231.
 - To reduce potential risks to the public and the environment from the various waste sites, DOE-RL should identify the funding required for characterization and initiation of actions to remove, treat (as necessary), and dispose of chemical and pre-1970 disposed TRU radioactive wastes, including radioactive waste burial grounds, and non-radioactive dangerous

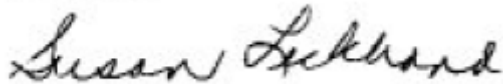
waste and solid waste landfills. This will require funding above the levels identified in the ABBs as well as above target funding levels since DOE assumes that capping will be an adequate remedy. The Board reminds the Tri-Party agencies that DOE's analyses in the draft Tank Closure and Waste Management Environmental Impact Statement show that capping remedies, rather than retrieval, will result in unacceptable levels of risk and contamination.

- DOE should initiate action to remove and dispose of materials with pre-1970 disposed TRU radioactive wastes for disposal in approved disposal facilities.
- The Tri-Party agencies should try to achieve a balanced approach with additional characterization as needed to move forward with actual cleanup of the waste sites. As demonstrated in the River Corridor, extensive characterization costs may be avoided by simply adopting a retrieval or partial retrieval remedy.
- DOE-RL should continue to request adequate funding for TRU waste retrieval and mixed waste treatment rates to achieve compliance with the existing TPA milestones (as shown in the ABBs). The Board is pleased that these retrieval rates are ahead of the TPA schedule adjusted last year to reflect prior budget reductions. The Board adopted parallel advice on the proposed changes to the TPA, which advises on the Tri-Party agencies to not further relax the TPA schedule. Funding for this activity may not be available if schedules are relaxed or made into unenforceable targets. The funding required to maintain the current pace is reasonable as shown in the ABBs.
- The Board repeats our prior advice that safeguards and security funding should not come from the DOE-Environmental Management budget, which could reduce funds for cleanup. The Board requests DOE to explain why safeguards and security funding increase is sought for FY 2012 after wastes were consolidated and plutonium removed from the Hanford Site.
- DOE-ORP should request adequate funding for technology development in support of low activity waste (LAW) supplemental treatment processes that create a safe and stable waste form to meet requirements. Currently there is inadequate funding in the base program for LAW supplemental treatment. Technology for

supplemental treatment should be available in time to support processing large amounts of LAW which will require treatment prior to disposal. LAW vitrification remains the best available process and satisfies regulatory requirements. Therefore, funding for exploring alternative treatments should not detract from the funding needed to provide supplemental treatment on the agreed upon schedule.

- DOE should provide, and make available to the public, a five year integrated priority list, including those projects receiving ARRA funding. This list should be made available to the public for information and review purposes to illustrate the significant cleanup progress which is being accomplished through the availability of ARRA funding.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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: David Brockman, Manger, U. S. Department of Energy, Richland Operations
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