

HANFORD ADVISORY BOARD

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

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US Environmental
Protection Agency
Washington State
Dept of Ecology

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November 5, 2010

Dave Brockman, Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450 (H6-60)
Richland, WA 99352

Jane Hedges, Program Manager
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

Re: System Planning Process

Dear Mr. Brockman and Ms. Hedges,

Background

The System Plan integrates various Single-Shell Tank (SST) retrieval scenarios with potential treatment options for the waste from those SST retrievals. There is little of greater consequence to the cleanup of the Hanford Site than the retrieval and treatment of these wastes.

Comprehensive system planning is a critical element in retrieving and treating Hanford's tank waste and in operating the Waste Treatment Plant (WTP). The choices made from the insights gained in systems planning can shift the Hanford cleanup mission by billions of dollars and nearly a decade. These choices also have large impacts on how waste is retrieved that in turn impact operations, safety and cost. The best case options for WTP operations could result in tank retrievals that cause the retrieval contractor to move repeatedly from farm to farm. At the other extreme, the best case options for tank waste retrieval, doing one farm at a time, could lead to problems in the composition of the waste fed to the WTP, extending its mission by nearly a decade and causing safety and operational issues.

Since 2000, the Department of Energy - Office of River Protection (DOE-ORP) has invited members of the Tank Waste Committee (TWC) of the Hanford Advisory Board (Board) to participate in a series of discussions and planning by DOE-ORP and its contractors on systems planning, secondary wastes and waste retrieval, processing and disposal. This historical involvement has led to significant participation and has stimulated advice from the Board to DOE-ORP and Washington State Department of Ecology (Ecology).

These discussions and resulting studies culminated in a series of system plans, folding existing data and modeling efforts into one comprehensive framework that DOE-ORP updates and revises annually, the most recent being System Plan Revision 4.

DOE-ORP now begins this system planning process each October; it takes approximately a year from start to finish. To be meaningfully involved and to provide meaningful advice, Board members need to have access to preceding plans and assumptions. DOE-ORP has not released the recent plan (revision 5), and recently released the assumptions the plan was based upon to the TWC in October. As a result, the Board cannot provide comment on the current plan in preparation for the next plan (revision 6).

With the latest Tri-Party Agreement changes, Ecology is now formally involved in developing planning scenarios every third year, with revision 6 the first of these opportunities. This timing is difficult. Due to the late release of the assumptions, the Board will not be able to participate or comment meaningfully on revision 6.

The Hanford Federal Facility Agreement and Consent Order (HFFACO), Milestone M-062-40, requires that the U.S. Department of Energy, Office of River Protection (ORP) issue a System Plan beginning October 31, 2011, and every three years thereafter. To support the modeling necessary to develop the System Plan, Milestone M-062-40 also requires that, *“One year prior to the issuance of the system plan, DOE and Ecology will each select the scenarios (including underlying common and scenario-specific assumptions) that will be analyzed in the system plan, with DOE and Ecology each having the right to select a minimum of three scenarios each.”*

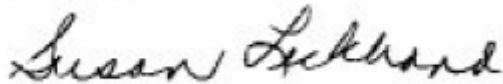
Adequate integrated system planning and future funding requirements are not identified and transparent to the Board and the public. We believe early information and dialogue are necessary to build the collective vision for the successful planning and development of retrieval, processing and disposal of the SST wastes; this includes the processing of secondary waste streams from the WTP. The magnitude of funding requirements and the scale of facilities necessary for retrieval, processing and disposal of these wastes are daunting. Transparent integration is the linchpin that will determine the success of Hanford Site cleanup.

Advice

- The Board advises DOE-ORP and Ecology to conduct the system planning process in a manner that is as open and transparent as possible. Early and collaborative committee dialogue with DOE-ORP and Ecology on the assumptions will ensure the concerns of the Board and public are considered before the revision to the system plan begins.

- The Board requests that DOE-ORP and Ecology identify the specific decision point(s) in the system plan timeline for the Board to provide meaningful input on the scenarios under consideration for revision 7.
- The Board advises the agencies to engage the Board in early dialogue regarding the system plan development to enable meaningful and timely participation and potential advice development.
- The Board advises DOE-ORP and Ecology to consider the Board's previous advice (Advices #233, #209 and #189) in developing the system plan process and future system plans.

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: Matthew McCormick, Manger, U. S. Department of Energy, Richland Operations
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