



U.S. Department of Energy
Office of River Protection
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

AUG 28 2009

09-ORP-011

Ms. Susan L. Leckband, Chair
Hanford Advisory HAB
713 Jadwin, Suite 4
Richland, Washington 99352

Dear Ms. Leckband:

RESPONSE TO HANFORD ADVISORY HAB (HAB) ADVICE #209

Reference: HAB Letter from S. Leckband, to S. J. Olinger, ORP, "Updated Tank Waste System Plan," dated December 5, 2008.

Thank you for your interest in Hanford's ongoing efforts to safely store, retrieve, treat, and immobilize tank waste. The U.S. Department of Energy (DOE), Office of River Protection (ORP) appreciates the Hanford Advisory HAB's (HAB) input and understanding of the complexities involved in this process.

The River Protection Project (RPP) System Plan Revision 4 (System Plan) is already in progress. Two cases are completed and ORP is working on a third case with the final report expected to be completed by late summer 2009. This revision will introduce a more advanced approach to long-range planning.

The System Plan will address several planning improvements such as evaluation of efficiency in waste retrieval & treatment process in farm-based retrieval sequences; evaluation of farm-based retrieval sequences to improve waste retrieval and treatment processes; identifying known programmatic risk areas along with proposed alternate operating strategies to reduce or eliminate those risks; and improving planning bases for waste retrieval from the Integrated Miscellaneous Underground Storage Tanks, as well as the 149 single-shell tanks and 28 double-shell tanks. This revision reflects funding allocations for the current fiscal year (FY) and all subsequent revisions will reflect projected funding allocations for future years.

At the highest level, the System Plan will integrate with several other key planning documents, including the Tank Farm Operating Contractor's Performance Measurement Baseline (PMB), as well as the Integrated Single-Shell Tank Waste Retrieval Plan and the Integrated Waste Feed Delivery Plan. In addition, the System Plan will connect program scope and schedule to cost at the Work Breakdown Structure level.

DOE recognizes the importance of incorporating regulatory milestones into long-term plans such that operating strategies can be developed and implemented to meet those commitments. DOE has ongoing discussions with the Washington State Department of Ecology to solicit their input into the system planning process. Pending the finalization of the proposed settlement agreement for the Hanford Federal Facility Agreement and Consent Order, also known as the Tri-Party Agreement (TPA) or consent decree, DOE will use selected "success criteria" as proxy dates

for new regulatory milestones.

DOE has carefully considered each of the HAB's specific recommendations contained in Advice #209. The System Plan will address many of the recommendations, and those not included will be addressed in the following responses, organized in a point-by-point manner.

HAB Advice: HAB advises DOE to annually prepare and issue an Updated System Plan to Retrieve, Treat, and Dispose of Tank Waste and Close Tank Farms (Updated Tank Waste System Plan) and make this report publicly available.

DOE Response: Annual updates of the System Plan are now included as contract deliverables. The new ORP Tank Operations Contract, No. DE-AC27-08RV14800, Deliverable C.2.3.1-1 states: "The Contractor shall update the RPP System Plan and submit it to DOE-ORP for approval." Each approved revision of the System Plan will be made available to the public.

HAB Advice: The Updated Tank Waste System Plan should provide a basis for identifying and mitigating potential negative impacts to human health and safety, including characterizing and reducing worker exposure to chemical vapors and environmental impacts.

DOE Response: All work on the Hanford Site is conducted under approved procedures, with adherence to Occupational Safety and Health Administration rules, state-approved environmental operating permits, regulatory requirements, and other standards as applicable to protect worker health and safety, public health and safety, and the environment. The System Plan is an upper-tier planning document. Concerns related to human health, safety and the environment are more appropriately addressed in other RPP documents. Some examples, although not all-inclusive, include performance assessments, the Tank Closure and Waste Management Environmental Impact Statement (TC & WM EIS), Tank Farm Safety Basis, Tank Waste Retrieval Work Plans, Notice of Construction Applications for air operating permits, Washington State waste water discharge permits, and the 242-A Resource Conservation and Recovery Act permit.

HAB Advice: The Updated Tank Waste System Plan should identify the basis of programmatic cost and schedule issues associated with tank leaks and contaminant spread, for each alternative discussed.

DOE Response: The Integrated Single-Shell Tank Waste Retrieval Plan incorporates appropriate individualized plans for each tank regardless of former known or suspected leakage history, as well as addressing the unique characteristics of the waste in each tank. Appropriate waste retrieval techniques and technologies will be deployed to maximize waste retrieval, while minimizing risk to the environment. The System Plan does not replace the need to conduct performance assessments for contaminant spread from previous tank leaks.

HAB Advice: The Updated Tank Waste System Plan should include an analysis of the interconnectedness of the entire tank farm, waste treatment plant system, and the far-reaching impacts of further delays to infrastructure or any single component of the plan.

DOE Response: The System Plan will include an analysis of the interconnectedness. The facility descriptions will highlight the interfaces and interdependence of the various facilities in the RPP System.

HAB Advice: The System Plan should provide criteria that guide the option selection process and disposal options for all waste streams.

DOE Response: The System Plan will reflect the current operating strategies for treating and disposing the various waste streams within the RPP System. Detailed analysis of alternative treatment options are best addressed in separate documents.

HAB Advice: The System Plan should address the programmatic risks and any other risks associated with additional delays.

DOE Response: The System Plan will address risks associated with additional delays.

HAB Advice: The System Plan should also provide a basis for communicating the ability to successfully remove, treat and dispose of all Hanford's tank wastes to garner support of a broad regional and national audience to ensure continued funding.

DOE Response: The System Plan will address Hanford's achievements to date: the successful transfer of liquid wastes from SSTs, completion of waste retrieval from seven SSTs, completion of bulk waste retrieved from an additional four tanks, current and future waste retrieval efforts in C-Farm, status of the various Waste Treatment and Immobilization Plant facilities, and schedules for additional work. Feedback received from DOE's internal review indicates the System Plan is well written and organized.

AUG 28 2009

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09-ORP-011

-4-

The System Plan will serve as a useful communication tool for distributing information to the intended audience to capture regional and national support.

HAB Advice: The Updated Tank Waste System Plan should include not only the baseline case reflecting current DOE target budget guidance, but also the case or cases reflecting technically achievable and legislatively reasonable incremental funding. It should also include a full funding case, unconstrained by DOE's target budget.

DOE Response: The System Plan will address three cases: the Planning Case, the Unconstrained Case, and the PMB Case. The Planning Case represents DOE's current funding profile and operating plans for the next 10 years (FYs 2009-2019), and projected funding allocations for future years. Evaluation of this case will determine whether some activities may be delayed based on anticipated funding levels. The Unconstrained Case will use selected success criteria as proxy dates for regulatory milestones, pending agreement on new TPA milestones. Evaluation of this case will determine adequate funding requirements to meet the success criteria, impacts to risk reduction, program execution, and mission end-date. The PMB Case further synthesizes the Planning and Unconstrained Cases with additional funding realities and incorporating potential benefits of the sodium management program and waste feed blending. This case could be used to provide the technical basis for the lifecycle PMB.

HAB Advice: Risk information utilized should include, but not be limited to information available in the Tank Closure and Waste Management Environmental Impact Statement, and the recently authorized Single Shell Tank Integrity Study (SST).

DOE Response: The Record of Decision for the Tank Closure and Waste Management Environmental Impact Statement TC & WM EIS is unpublished, so the data is unavailable. The SST Integrity Study is still in progress and its results will be addressed in subsequent revisions of the System Plan.

HAB Advice: This Updated Tank Waste System Plan should also estimate the lifecycle cost of completing the work for each of the alternatives considered.

DOE Response: Life cycle costs will be calculated for the Planning Case, Regulatory Case, and PMB Case. Life-cycle costs will be documented in the baseline management system and not in the System Plan.

DOE looks forward to sharing the approved RPP System Plan Revision 4 with the HAB.

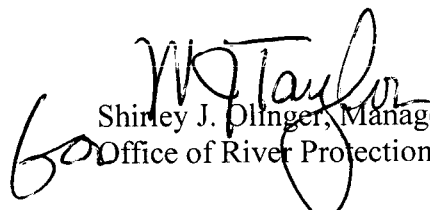
Ms. Susan L. Leckband
09-ORP-011

-5-

AUG 28 2009

If you have any questions, please contact me, or you may contact Lori Gamache,
(509) 372-9130.

Sincerely,


Shirley J. Olinger, Manager
Office of River Protection

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