

Apr. 4, 2003

Roy Schepens, Manager
U. S Department of Energy, Office of River Protection
P.O. Box 450
Richland, WA 99352

Subject: Technetium Removal at WTP

Dear Mr. Schepens,

Recently the Department of Energy Office of River Protection (DOE-ORP) announced the decision to eliminate technetium (Tc-99) pretreatment from the tank waste pretreatment plant (WTP). The Hanford Advisory Board (Board) has several concerns with this decision.

The current Tri Party Agreement (TPA) baseline, which includes Tc-99 removal capability in the WTP, resulted from a detailed technical analysis and public vetting. Any proposed change to that baseline must undergo an equally detailed technical analysis and thorough public vetting. To date, such an analysis has not been presented to the public or the Board. Therefore, the Board neither sees nor understands a compelling reason to eliminate Tc-99 pretreatment capability from the WTP. In fact, at this time, it appears the adverse effects may outweigh the benefits.

- Both the 1998 and 2000 Immobilized Low Activity Waste (ILAW) Performance Assessments identify Tc-99 as the primary long-term contributor to ground water contamination. What are the increased impacts to groundwater caused by elimination of Tc-99 pretreatment?
- How will elimination of Tc-99 pretreatment impact the concentration of Tc-99 in various waste discharge and process streams? What are the consequences?
- What are the impacts on permitting of removing Tc-99 pretreatment? Will permitting consequences and delays offset the cost savings of eliminating Tc-99 pretreatment?
- What are the impacts of eliminating Tc-99 pretreatment on existing and future Nuclear Regulatory Commission incidental waste rulings?
- Are there other resins or technologies that, while not being quite as efficient

as the current baseline, could still achieve significant Tc-99 removal and significant cost savings?

Absent new data and a clear, compelling rationale, the Board advises DOE-ORP that Tc-99 pretreatment should remain part of the WTP project. The Board requests that DOE-ORP provide the supporting data and rationale for the decision to eliminate Tc-99 pretreatment. We request this information be presented at the May 2003 Tank Waste Committee meeting.

The Board also advises the Washington Department of Ecology, the Washington Department of Health, and the Environmental Protection Agency to ensure the decision to eliminate Tc-99 removal receives a rigorous review. The Board requests these agencies provide results of their reviews to the May 2003 Tank Waste Committee Meeting.

Sincerely,

Todd Martin, Chair
Hanford Advisory Board

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.

cc: Keith Klein, Manager, U.S. Department of Energy Richland Operations Office
John Iani, U.S. Environmental Protection Agency, Region 10
Tom Fitzsimmons, Washington State Department of Ecology
Marla Marvin, Deputy Designated Federal Official, U.S. Department of Energy
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Sandra Waisley, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations

U.S. Senators (OR)
Gordon H Smith
Ron Wyden

U.S. Senators (WA)

Maria Cantwell
Patty Murray

U.S. Representatives (OR)

Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden
David Wu

U.S. Representatives (WA)

Brian Baird
Norm Dicks
Jennifer Dunn
Jay Inslee
Richard Hastings
Rick Larsen
Jim McDermott
George Nethercutt
Adam Smith

State Senators (WA)

Pat Hale
Mike Hewitt

State Representatives (WA)

Jerome Delvin
Shirley Hankins