

June 4, 2004

Keith Klein, Manager  
U.S. Department of Energy, Richland Operations  
P.O. Box 550 (A7-50)  
Richland, WA 99352

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

Re: Request for Technical Assistance

Dear Mssrs. Klein and Schepens,

On February 13, 2004 the Department of Energy (DOE) issued the Final Hanford Site (Radioactive and Hazardous) Waste Program Environmental Impact Statement (Final HSW-EIS). The Final HSW-EIS contained major new analyses that were not presented in the draft for comment, and which have not been reviewed, e.g., analyses of cumulative impacts to groundwater from existing wastes and wastes yet to be disposed. Two new analyses with major site implications are expected to be released for comment later this year. These documents include the draft Hanford Site Composite Analysis (Composite Analysis) and the draft Tank Closure Environmental Impact Statement (Tank Closure EIS). These reports form the basis on which major policy issues will be decided and the Hanford Advisory Board (Board) believes independent technical advice and review prior to the Board issuing advice is warranted.

These documents are technically complex, and beyond the expertise of the vast majority of Board members. The Board requests funding for technical assistance sufficient to conduct an independent technical review of the Final HSW-EIS, the Composite Analysis, and the Tank Closure EIS. The *Hanford Advisory Board Charter*, Section VII, *Funding Considerations*, states in part, "The Department of Energy commits to provide funding levels adequate to cover or provide technical assistance sufficiently adequate for independent review of all major policy issues that the Board believes warrant independent technical advice or review prior to the Board rendering advice."

This technical assistance will result in a report detailing the following:

- What analytical models are used in the documents?
- Are these analytical models consistent with the professional standards or best industry practices?
- What assumptions are made in the documents and in the analytical models?  
For example:
  - Are these assumptions reasonable and consistent with relevant cleanup standards and requirements?
  - Are the assumptions consistent with reasonable maximum exposure scenarios?
- Are the analytical models and assumptions consistently and/or reasonably applied to the three documents?
- Do the results of the modeling indicate whether proposed actions or cumulative impacts will exceed relevant standards or be in compliance with Federal and State laws and regulations?

This report will be presented to the Board as an analysis of the technical documents, and as an educational tutorial about the documents' contents, types and uses of analytical modeling used, assumptions made, and compliance issues. The Board will then have sufficient understanding of the technical issues and assumptions to be able to facilitate meaningful public dialogue for future Board advice.

The process used will be as follows:

- A Board subcommittee will develop a detailed Statement of Work including the amount of time allotted. DOE and the Board will work together to assess what contract vehicles are available and to determine which will be used in awarding the contract.
- The subcommittee will review applicant's documentation and conduct interviews as appropriate to select the person(s) to conduct the tasks.
- The person(s) awarded the contract will conduct the review, with guidance from the subcommittee as needed.
- The final products will include the written report described above, and presentation(s) of the contents to Board members.

Sincerely,

Todd Martin, 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.*

cc: John Iani, U.S. Environmental Protection Agency, Region 10  
Linda Hoffman, Washington State Department of Ecology  
Howard Gnann, 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