

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

Linda Hoffman, Director  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

John Iani, Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Re: K Basins Change Package

Dear Mssrs. Klein, Schepens, Iani and Ms. Hoffman,

The project to remove and safely store the spent fuel from the K Reactor storage basins has been of interest and concern to the Hanford Advisory Board (Board) since the inception of the project. During the ten years this project has been underway, the Board has closely followed progress on the project and has, on a number of occasions, expressed concern. (See Board Advice #6, 72, 107, 113, & 148.) The Board has always stated that the safe and cost-effective removal and disposal of the spent nuclear fuel from the K Basins was one of its highest priorities due to the threat this improperly stored fuel posed to the Columbia River.

At this time, work on the project has progressed to the point that the majority of the fuel has been removed, processed, and safely placed in interim dry storage pending its ultimate disposal. This phase of the project is currently scheduled for completion by July 2004. The remaining work includes the removal, treatment, and packaging of the sludge and broken fuel particles from both the K East (KE) and K West (KW) basins, the dewatering, hydrolasing of vertical wall surfaces, and

demolition and removal of the storage basin structures. The project completion date is March 31, 2009.

### **Proposed Path Forward**

Initially, sludge from the North Loadout Pit (NLOP) will be transported to the 325 Building in the 300 Area for treatment and packaging for Waste Isolation Pilot Plant (WIPP) disposal. Once the above-ground KE-KW sludge pumping system is in operation, the remaining KE NLOP sludge and the sludge from the KE basin floor will be pumped to KW for consolidation with the KW sludge, for treatment and packaging at KW for WIPP disposal. Following completion of the sludge removal operation, the storage basin structures and their equipment will be dewatered, cleaned, demolished, and disposed of in the Environmental Restoration Disposal Facility (ERDF) or other suitable repositories.

### **Advice on K-Basin Sludge and K-Basin Cleanup Milestones Change Package**

The Board supports the completion of the project in a timely and cost-effective manner and encourages the Tri-Parties to ensure the commitment of adequate management, engineering, and operations attention to ensure the successful completion of the project.

More specifically, project management should take effective action to ensure there is adequate integration between the engineering and operations/maintenance staffs in the development, installation and operation/maintenance of the sludge removal, transfer, and packaging systems; i.e., fully implement the use of the existing Integrated Safety Management (ISM) and Enhanced Work Planning (EWP) processes as the basic strategy for accomplishing the recommendations. Worker requests for ergonomic tools should be carefully considered, in compliance with the principles of ISM. Following the above advice is necessary to alleviate the equipment and operations problems that have been experienced on this project to date and minimize potential risks to personnel and the environment.

The Board is pleased the change package includes a commitment to treat the K-Basins sludge and send the treated material to a permanent, approved, off-site waste repository, but issues related to the classification of the packaged waste have not been resolved. The Board expects to have continuing interaction on this issue.

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: 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

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Jim McDermott  
George Nethercutt

Adam Smith

State Senators (WA)

Pat Hale

Mike Hewitt

State Representatives (WA)

Jerome Delvin

Shirley Hankins