

September 5, 2003

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

Re: Transuranic (TRU) Waste in the Tanks

Dear Mr. Schepens,

The Department of Energy-Office of River Protection (DOE-ORP) is in the process of determining whether some of the wastes in the 177 underground storage tanks on site are actually transuranic mixed (TRU-M) wastes, not high-level wastes. DOE-ORP proposes to verify this statement, retrieve these wastes and process them as TRU-M waste instead of vitrifying them in the Waste Treatment Plant. DOE-ORP claims this could result in cost savings and accelerated risk reduction. The Hanford Advisory Board (Board) is very interested in seeing data that support these claims.

The Board is generally supportive of performing the characterization necessary for this proposal, and urges DOE-ORP to proceed. If it is successful, some of Hanford's tank wastes could be placed in deep geologic disposal earlier than currently planned, and not be stored on the Hanford site. This support specifically applies to tanks B-201, 202, 203, 204 and tanks T-201, 202, 203, and 204. The Board is skeptical of the possibilities for success in the other tanks discussed by DOE-ORP. The Board also shares the Washington Department of Ecology's concern as expressed in their comments on the draft Hanford Solid Waste Environmental Impact Statement (EIS) that this waste might constitute a waste stream with no path forward to disposal.

1. To alleviate concerns over the path forward for this waste, the Board advises DOE-ORP that the Waste Isolation Pilot Plant and the State of New Mexico should be heavily involved in this process as it proceeds.
2. The legal issues surrounding radioactive waste classification are complex. We advise DOE-ORP to make a rigorous effort to resolve these issues before taking any irreversible actions. The Board specifically advises DOE-ORP to consult with the Nuclear Regulatory Commission and obtain their concurrence with this process and its outcomes.
3. DOE-ORP should evaluate what National Environmental Policy Act analyses are needed to support this effort and ensure they are completed.

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
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
Martha Crosland, 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
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