



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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2007I-290

July 3, 2007

Ms. Susan Leckband, Chair
Hanford Advisory Board
713 Jadwin, Suite 4
Richland, WA 99352

Re: HAB Consensus Advice #199 – Costs and Baseline Schedules

Dear Ms. Leckband:

Thank you for the advice concerning the U.S. Department of Energy's (USDOE) Office of River Protections (ORP) costs and baseline schedules. Ecology agrees with the points in your advice. We are concerned that ORP's baseline was changed without the proper review by the regulators.

The Tri-Party agencies must have mutual agreement and understanding of the baselines developed and used by USDOE. That agreement is critical to our ability to regulate the cleanup at Hanford.

- When a baseline is revised, it needs to be done in a manner consistent with the Tri-Party Agreement.
- Baselines, work plans, and contracts need to reflect all regulatory requirements and agreed upon milestones and commitments.
- When those commitments cannot be met, USDOE needs to clearly identify the compliance gap and request sufficient funding to accomplish work to close the gap.
- Baseline changes, especially those that result in proposed changes to TPA schedules, need to be fully disclosed to regulators and the public.

If you would like more information about Ecology's viewpoints on ORP's revised baseline, please contact Nolan Curtis at 509-372-7954.

Sincerely,

Jane A. Hedges
Program Manager
Nuclear Waste Program

cc: Elin Miller, EPA
Nick Ceto, EPA

Shirley Olinger, USDOE-ORP
Mike Weis, USDOE-RL

