



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

02-HAB-0011

AUG 28 2002

Mr. Todd Martin, Chair
Hanford Advisory Board
1933 Jadwin Avenue, Suite 135
Richland, Washington 99352

Dear Mr. Martin:

CONSENSUS ADVICE #133: HANFORD SOLID WASTE ENVIRONMENTAL IMPACT STATEMENT

Thank you for your continued interest and comments regarding the Draft Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement (HWS EIS). We heard many of the ideas and issues contained in your advice #133 echoed across the region at our public meetings.

To address the Hanford Advisory Board's and others' concerns, we have decided to issue a supplement to the Draft HSW EIS (see attachment). This supplement will contain information referred to in the HSW EIS but found in other sources, including that related to transportation from the 1997 Waste Management Programmatic Environmental Impact Statement. The supplement will further illuminate cumulative impacts by incorporating information from Hanford's Systems Assessment Capability. We will also add some information included in our Performance Management Plan, which lays out our larger waste management strategy. We hope to provide this supplemental information to the public by October 1, 2002, with a 45-day comment period. We urge the Hanford Advisory Board to provide us feedback on the supplemental information during that time.

Again, we appreciate your advice and intend to address much of it via the supplemental information package. Specific issues raised in advice #133 and in any further advice resulting from your review of the supplement and responses to those issues will become part of the final HSW EIS. If you have further questions about the HSW EIS, please contact Michael Collins, Document Manager for the HSW EIS, at (509) 376-6536.

Sincerely,

W. Wade Ballard

W. Wade Ballard
Deputy Designated Federal Officer

COM:YTS

Attachment

cc: See page 2



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

August 22, 2002

Attachment

Dear Regulators, Tribal Nations, and Members of the Public:

For the past three months, we have been seeking your input on our draft Hanford Solid Waste Environmental Impact Statement (HSW EIS). Your response made it clear that we need to provide you more information and better explain the entirety of our waste program at Hanford, including how it fits into the larger picture of waste management across the Department of Energy complex. I am writing this letter to do that and explain how we plan to supplement the draft HSW EIS to address comments we've received in writing and at public meetings. I also want to share with you information from our *Performance Management Plan for the Accelerated Cleanup of the Hanford Site* (PMP), which was not available when we issued the draft HSW EIS. Together, these documents and new changes to the Tri-Party Agreement we are working on with the Washington State Department of Ecology and Environmental Protection Agency, will provide a comprehensive vision that assures the safe treatment, storage and disposal of all of our waste.

First, we plan to provide by October 1, 2002, an information package as a supplement to the draft HSW EIS. This supplement will contain further information and analysis on our planned alternatives for the treatment and disposal of solid wastes, including our plans from the PMP to move to more modern waste disposal facilities, such as trenches with liners and leachate (e.g. rainwater) collection systems to monitor for potential contamination.

This supplement will explain more clearly how the draft EIS "bounds" the environmental impacts of our actions by evaluating and describing treatment and disposal options with the worst, or most significant, environmental impacts and comparing that with the best, or least significant, environmental impacts. This "bounding approach" may not provide the specificity many readers were used to seeing in Hanford EISs, but it gives decision makers an excellent analytical tool.

The supplemental package will also add existing information from the sources referred to in the HSW EIS, such as transportation analyses from the 1997 Waste Management Programmatic EIS and other environmental documents. It will include analysis of the site wide cumulative groundwater impacts using Hanford's newly developed Systems Assessment Capability. The supplemental information will address how we expect to incorporate the above information and respond to other comments in the final EIS. To ensure interested parties are able to respond to the supplemental information, we will provide additional public meetings and a new, 45-day comment period.

The PMP, which has been endorsed by Assistant Secretary for Environmental Management, Jessie Roberson, and forwarded to the Office of Management and Budget, explains more fully our waste disposal plans and will put the HSW EIS in further context. The PMP provides

balance and context for shipping our waste offsite and managing our waste onsite. The PMP is now available on our website, and in it you will find our plans to:

- Accelerate the retrieval and shipment of over 35,000 drum equivalents of Hanford contacthandled transuranic (TRW) waste from 2027 to 2015. We will start this initiative by bringing in two mobile transuranic waste characterization units, courtesy of DOE's Carlsbad (New Mexico) Field Office, over the next six to nine months that will enable us to process an additional 4,000 transuranic waste drums each year. This will be the start of a massive campaign to ship Hanford's TRU waste offsite to the Waste Isolation Pilot Project (WIPP) in New Mexico for permanent disposal.
- Accelerate from 2012 to 2008 the treatment and disposal of over 70,000 drum equivalents of Hanford's mixed low-level waste. This will virtually eliminate the huge above ground inventory of mixed low-level waste including any waste we might receive from offsite generators.
- Change the current practice of disposing of low-level waste in unlined trenches to more modern practices such as those used for mixed low-level waste disposal and those used at Hanford's Environmental Restoration Disposal Facility (i.e., the use of lined trenches with leachate collection systems).
- Complete the Hanford cleanup mission by 2035. The draft HSW EIS's impact analysis extends to 2046, so we will conduct other environmental analyses as needed to address our accelerated cleanup plans.

In addition, for the limited quantities of transuranic waste Hanford might receive for temporary storage or processing, we will ship to WIPP at least two drum equivalents for every one we receive from offsite generators within 18 months of its receipt.

To demonstrate our commitment to these and other cleanup acceleration initiatives we are negotiating changes to Tri-Party Agreement milestones with the Washington State Department of Ecology and the U.S. Environmental Protection Agency. The agencies are very close to agreement on another set of these changes -- referred to as the "M-91 series" - that will set requirements for progress in the above waste management areas. Of course, as with prior changes, we will present the entire package to the public for review and comment.

I hope the real, physical cleanup progress we have made over the last few years, coupled with our commitments for further accelerated progress, will help ease your concerns about receipt of offsite waste. The Department is committed to ensuring Hanford is cleaned up in a high-quality, safe way in full compliance with the Tri-Party Agreement and continues to invest major resources to that end. The Department is trying to accelerate cleanup throughout the complex, a difficult undertaking that illustrates our interdependency and highlights our sequencing, resource balancing and financial challenges. To achieve our accelerated cleanup plans, we will need to ship large amounts of high-level waste, spent fuel, plutonium, transuranic waste and other waste offsite to other states. Through the Waste Management Programmatic Environmental Impact Statement's Record of Decision, Hanford and the Nevada Test Site were designated in February 2000 to receive low-level and mixed low-level waste from other sites. While the HSW EIS

Stakeholders
August 22, 2002

-3-

evaluates options for implementing that decision at Hanford, it does not change the Record of Decision issued in February 2000.

Let me close by asking for something from you. I ask that you consider that we are moving past old approaches to a new, collaborative approach to cleanup, working in close partnership with our regulators and others. I ask that you recognize there are many sides to every issue and that rarely are people (or even agencies) acting in bad faith. I urge you to consider that there is a role for Hanford to play in the DOE complex and Hanford has to step up to that role in order to gain the benefits that can only come through this complex wide strategy. I appreciate your consideration of my request and hope you will continue to be part of the process to improve not only our HSW EIS, but also our entire cleanup effort.

Sincerely,



Keith A. Klein
Manager

Mr. Todd Martin
02-HAB-0011

-2-

cc w/attach:
P. Mabie, EnviroIssues
M. Crosland, EM-11

U.S. Senators (OR)

Gordon H. Smith
Ron Wyden

U.S. Senator (WA)

Maria Cantwell
Patty Murray

U.S. Representative (OR)

Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden

U.S. Representative (WA)

Norm Dicks
Jennifer Dunn
Richard Hastings
George Nethercutt

State Senators (WA)

Pat Hale
Mike Hewitt