REVIEW COMMENT RECORD (RCR)

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5. Document Number(s)/Title(s)	Project Manager Name	Reviewer Name		
DOE/RL-2011-93, Rev. 0/*2012 Hanford Lifecycle Scope, Schedule and Cost Report*	Steven Korenkiewicz (RL)	Melinda J. Brown (WA Dept of Ecology)		

	10. Agreement with indicated comment disposition(s)	
Organization Manager (Optional)	Reviewer/Point of Contract	John Roberts Reviewer/Point of Contact
	Date	Date
	Author/Originator	Author/Originator

12. Item	13. Comment(s)/Discrepancy(s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/problem indicated.)	14. Reviewer Concurrence Required	15. Disposition (Provide justification if NOT accepted.)	16. Status
1.	P. ES-4, **Table ES-1. Hanford Site Remaining Cleanup Cost Estimates by PBS.** The NM Stabilization and Disposition -- PFP estimated cleanup costs (in billion $) increased to $0.9 - $1.0 in FY 2012 from $ 0.8 billion in the FY 2011 report. Please add a footnote to explain the reasons for increases in costs remaining.			
2.	P. 4-1, item1states that the 105-KW Basin deactivation and removal project scope is being transferred to PBS RL-0041 River Corridor Closure Project. Table 4-1. **River Corridor Cleanup Key Tri-Party Agreement Milestones** lists M-016-178 to begin 105-KW Basin deactivation on 12/13/15 and M-016-181 to complete KW Basin deactivation, demolition, and removal by 09/30/19. Page D-10, Table D-6 **Near-Term Schedule and Cost, Level 3**, shows funds for KW Basin D&D in 2015 through 2017, leaving only $122,000 to cover cost and schedule in FY 2018 and no work or funds in 2019. Please explain why RL is accelerating the work but			

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	not adjusting the MS date .			
3.	OBSERVATION: P. 4-3, Sec. 4.1 ¶ 2, bullet 6 states 618-10 and 618-11 remediation will be complete by 9/30/2015. The TPA MS date for M-16-00B is 9/30/2018 (*Complete all interim 300 Area remedial actions including the 618-10 and 618-11 burial grounds but not including sites associated with retained 300 Area facilities and the utility corridors.*) Ecology noted that the earlier 9/30/2015 completion date is the RCCC Incentive Fee deadline date for 618-11 Burial Grounds (in Table B.1 of the RRCC). In future, a note explaining the accelerated schedule might be useful to the reader.			
4.	P. 4-5, **Figure 4-3. Nuclear Facility D&D – River Corridor Closure Project Remaining Cleanup Schedule** shows dates for completion of D4 Closure, Field Remediation Closure, Waste Operations, Final Closure, and Mission/General Support extended from those that appear in the FY 2011 Figure 4-3. While the change in the change appears in Sec. 1.8.1, item 3, neither the Sec. 1.8.1 item 3 nor Figure 4-3 provide information about what agreements the Tri-Parties made that allowed the extension. Please add more information to explain the schedule extension or a reference to the document that documents the Tri-Parties' decision to extend the schedule.			
5.	P. 4-9 **Figure 4-5. Nuclear Facility D&D – River Corridor Closure Project (RL-0041) Remaining Costs by Work Element** includes Indirect Costs, Cost & Schedule Uncertainty, and Management Reserve. Estimates for those categories also appear in Tables D-22 and D-23. Explanations of what those categories include do not appear in Table 4-3 or Table D-21. Please add brief			

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	explanations of those categories in both tables. Ecology appreciates inclusion of Site Services costs in Figure 4-5.			
6.	P. 4-10 ¶ 1 states that 105-KW Basin deactivation and removal work scope will be performed under PBS RL-0041, Figure 4-6 shows KW Basin D&D will begin in FY 2015 and end at the end of FY 2018. In contrast, Table D-6, p. D-11 shows funds remaining in RL-0012 for the effort. In addition, in FY 2018 the only funds planned ($ 122 K) are assigned to Management and Support. Please confirm that the funds for KW Basin D&D will move from RL-0012 to RL-0041 before FY 2015.			
7.	EDITORIAL: On Figure 4-8, add "and CVDF" after "K Basins".			
8.	P. 4-15 Sec. 4.3 ¶ 1 bullet 1 states that the USDOE assumes that cleanup levels established in interim RODs will be protective of human health and the environment. Ecology does not support that assumption for every ROD; the assumption is useful only as an assumption that may provide a basis for a for rough-order-of-magnitude estimate that appears in the Lifecycle Reports. Ecology supports inclusion of some uncertainty in estimates to address some added measures to address impact on ecological receptors.			
9.	P. 4-15 Sec. 4.3 ¶ 2 bullet 3 states that T Plant will be acceptable for sludge storage and no pretreatment will be necessary. That statement seems contradictory to the cleanup objectives in Sec. 4.2, ¶ 2, bullet 3 which states that sludge that is not KOP sludge will be retrieved and shipped to an interim onsite storage facility then treated and packaged for shipment to an offsite disposal facility. Please explain what treatment the sludge will undergo.			

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10	P. 5-1, Sec. 5.0 ¶ 2, sentence 2 states that extensive plumes of groundwater contamination that exceed drinking water standards have a combined area of 72 square miles. In the FY 2011 report, in the same paragraph, the text states that 66.5 square miles of groundwater contamination exceed the standards. The increase in area in the FY 2012 report is not accompanied by an explanation for it. Please check the total for FY 2012 and add an explanation for the increase or correct the total.			
11	P. 5-1, Sec. 5.0 ¶ 7 states that TPA milestone revisions which support the restoration of groundwater to its beneficial uses appear in HFFACO milestone changes that the Tri-Parties finalized in October 2010. A reference to the settlement order in *Washington v. Chu* appears in the text. Examination of the Order and HFFACO change packages that are appended to it show only Milestone M-045-59 is potentially applicable. Milestone M-045-59 requires the USDOE to control water surface water infiltration pathways as needed to control or significantly reduce the likelihood of migration of subsurface contamination to groundwater. Please add the MS M-045-59 reference to the text and/or another reference if applicable. (Repeat of Ecology comment on FY 2011 report.)			
12	P. 5-3, **Table 5-1. Central Plateau Key Tri-Party Agreement Milestones** M-083-43 due 9/30/2013 is no longer on the table. Ecology and the USDOE approved an HFFACO change package to delete the milestone on 09/14/2011. In the FY 2013 report, please add a table or expand Table 5-1 to show HFFACO milestones completed, changed or deleted after the previous report.			
13	P. 5-5, **Table 5-1** In the FY 2013 report, Add Milestone M-015-21A to Table of HFFACO milestones complete, changed or deleted or			

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	add footnote to indicate date change from 12/31/2012 to 06/30/2015. Add Milestones M-015-38 B, M-015-91B, M-015-92B, and M-016-120 with similar information.			
14	P. 5-7, **Figure 5-2. NM Stabilization and Disposition – PFP (PBS RL-0011) Remaining Cleanup Schedule** end dates show end of FFY 2017 (9/30/2017), which does not match text in the box above bar graph schedule that indicates facilities will be demolished to slab-on-grade by 09/30/2016. Please correct the schedule bar to reflect 09/30/2016 completion date or change date in text box.			
15	P. 5-9, **Figure 5-3. NM Stabilization and Disposition – PFP (PBS RL-0011)** shows the funding for completion of PFP through FFY 2017, which does not match the text in the box over Figure 5-2 or HFFACO Milestone M-038-00A that requires facility transition and selected activities to be complete by 09/30/2016. Please add information that describes the use for funds in FFY 2017.			
16	P. 5-10 **Figure 5-4 NM Stabilization and Disposition PFP (PBS-RL-0011) Remaining Estimated Cleanup Costs by Work Element** extends Disposition PFP Facility through Fiscal Year 2017. Please explain why the schedule extension is necessary given receipt of funds in FFY 2012, which the 2011 report assumed would be absent.			
17	P. Ecology noted that Figure 5-5 Major Hanford Site Groundwater Plumes in 2009 in the FY 2011 is not in the 2012 report. Ecology does not object to the deletion of the figure, which was not a current representation of the extent of contamination.			
18	EDITORIAL: P. 5-22. Figure 5-8 Soil and Water Remediation – Groundwater/Vadose Zone Remaining Estimated Cleanup Costs by Work Element, please correct 200-UP-1 to show remediation	u		

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	through 2039 or change Table 5-4. Please remove 200-ZP-2 Operable Unit.			
19	Page 5-32 Figure 5-15 shows Liquid Effluent Facilities will operate through 2017 then stop operations. They will resume operations in 2050 and continue through 2060. Table 5-9 describes the Liquid Effluent scope but does not indicate a suspension of operation. Please provide a brief statement to explain the lengthy suspension of operations in Table 5-9. P. D-14: Please provide similar information in the Level 3 Scope Summary for Liquid Effluent Facilities in Table D.7.			
20	P. 5-32 Figure 5-15 shows Sludge Disposition in PBS-0013C beginning in 2012 and ending in ~ FY 2027. PBS RL-0012 funds the Sludge Treatment Project through 2015 for Phase 1 retrieval then continues to fund Cost & Schedule Uncertainty and Management Reserve through 2018 (see Appendix D P. D-11 Table D-6). It would appear that the Sludge Treatment Project in PBS-0012 and Sludge Disposition in PBS-0013C both fund the same effort from 2016 through 2018. RL should consider reducing/eliminating Cost & Schedule Uncertainly and Management Reserve in the Sludge Treatment Project in FY 2016 and 2018. Those funds would then be available for use in other high priority cleanup activities.			
21	P. 5-37 ¶ 4 bullet 5 states that removal excavations will be 15 feet below grade. In comments on the FY 2011 report (No. 47), Ecology requested that RL and the MSA add a statement that the depth of excavation will be determined when the Tri-Parties plan a specific remediation measure. The statement is not in the text of the FY			

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	2012 report. Please add the statement to the FY 2013 report.			
22	P 6-3 Figure 6-1. Simplified Process Diagram for Tank Waste Retrieval and Treatment shows a revision from FY 2011. Supplemental TRU Treatment Systems treat contact-handled TRU waste only. That change reflects the baseline case in the System Plan Rev. 6; however, Ecology does not support supplemental treatment including managing tank waste as TRU. Please add a note so stating.			
23	P. 6-8, last sentence references DOE/EIS-0391 estimated costs for tank closure based on the preferred alternative of the draft. with links to the documents. The statement as it appears could be misleading to a reader. There is no single preferred alternative. In Vol. 1 of the draft DOE/EIS-0391, Sec. 2.12 describes the USDOE's preferred alternatives; however, no single alternative is preferable for tank waste retrieval/treatment/closure/storage. Instead, the USDOE provides its criteria for the preferred alternative (99% retrieval, treatment allowing separation and segregation of waste as low level waste and high level fractions, landfill closure, storage with shipment of immobilized HLW for disposal offsite) and the alternatives that meet them. Table 2-52 in the Draft *TC&WM EIS* provides the combined costs for all of the alternatives, but the reader must review Sec. 2.12 **Tank Closure** text on p. 2-307 where the USDOE specifies its preference for tank closure alternatives 2A, 2B, 3A, 3B, 3C, 4, and 5. When a reader wants to select only the alternatives that the USDOE prefers for preferred retrieval, treatment, and closure, the USDOE narrows the Alternatives to 2B, 3A, 3B, and 3C. Only by reading the sentence			

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	following can the reader find the same four alternatives among the seven that the USDOE preferred for storage. Draft *TC&WM EIS* Table 2-50 provides summary cost estimates for the primary components of each activity (storage retrieval, treatment construction, operations and deactivation) by Alternative for each Tank Closure Alternative. For the each of the four alternatives that the USDOE identified as its preferred alternatives, Table 2-50 shows the details of the primary components which then can be selected. In the FY 2013 report, please consider inserting a small table that lists only the USDOE's preferred alternatives and their total costs (a subset of the information that appears in Table 2-52). It should be abstracted from the Final *TC&WM EIS* (estimated to be released in summer 2012).			
24	Pp. 6-6 & 6-7, Table 6-1. Tank Waste Cleanup Key TPA and Consent Decree Milestones			
25	P. 7-11: Ecology is pleased that the USDOE added a statement that informed the reader of the USDOE's recognition that it will remain on the Site to ensure cleanup remedies remain protective of the environment. Please continue to incorporate that sentence in future releases of the Lifecycle Scope, Schedule and Cost Report.			
26	Sec. 7.3 does not show Real Estate and Site Planning, which reflects the deletion forecast in the FY 2011 Lifecycle Report. Reviews of the FY 2012 Level 2 scope of PBS-0041 River Corridor Closure Summary in Table 4-3 (Mission/General Support) and PBS-0040 Table 5-7 do not show real estate and site planning activities. From the information available in the FY 2012 report, the only PBS that includes real estate and site planning continues to be PBS RL-LTS			

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	Post-Closure Surveillance and Maintenance (see Table 7-4 in the FY 2011 and FY 2012). As the PBS does not begin until FY 2061, that would imply that all real estate and site planning is postponed until then. The Tri-City Development Council is slated to receive ~ 1,600 acres of land for development of an energy park well before then, so some PBS must provide funds for the transfer. Please identify the PBS(s) that funds real estate and site planning before 2061 within RL and ORP with details of funds available in the FY 2013 report .			
27	P. A-34, Table A-6: Central Plateau -- Remediate Remaining 200 West Area Inner Contaminated Soil Sites (200-WA-1) Operable Unit: The Rationale/Bases for Analyzing Alternatives This Reporting Year cites an incorrect reference (TPA MS M-085-30A). TPA Milestone M-085-30A requires the USDOE to submit an RI/FS Work Plan for the 200-CR-1 OU (REDOX Canyon/associated waste sites) by 12/31/2017.			
28	P. A-34, Table A-6: Central Plateau -- Disposition Cesium/Strontium Capsules: Insert the following text before the existing text under Rationale/Bases for Analyzing Alternatives This Reporting Year: "Milestone M-092-05 requires the USDOE to determine a disposition path and establish interim milestones for the Hanford Cs/Sr capsules by 06/30/2017." Insert the following text after the existing text: "Prior to the development of the 2027 Lifecycle Report, decide whether development of alternatives could benefit future planning and budget requests."			
29	P. A-34, Table A-6: Central Plateau (Outer Area) -- Disposition Remaining Outer Area Buildings and Facilities (200-OA-1 Operable Unit): Rationale/Bases for Analyzing Alternatives This Reporting			

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	Year Rationale/Bases for Analyzing Alternatives This Reporting Year states that analysis of alternative before 2018 are not likely to contribute more useful information for out-year budget planning. TPA MS M-15-38b requires the USDOE to submit a revised FS Report and revised Proposed Plan for 200-OA-1 to EPA by 10/30/2014. It would seem plausible that the information about alternatives and associated estimates of costs and schedule would be at least in preparation when the Plan goes out for public comment. On that basis, the alternatives analysis might be useful to prepare in FY 2016.			
30	P. A-34, Table A-6: Central Plateau (Outer Area) – Disposition PUREX Storage Tunnels (200-CP-1 Operable Unit: Rationale/Bases for Analyzing Alternatives This Reporting Year Rationale/Bases for Analyzing Alternatives This Reporting Year states that the knowledge base is extremely limited and that cleanup actions are expected to be 15+ years in the future so earlier planning and development would be premature. TPA MS M-085-20A requires the USDOE to submit a RI/FS Work Plan for 200-CP-1 OU by 09/30/2015. The Parties have not agreed to change the MS date as of this date; therefore, if the CERCLA process occurs, there would be an RI, an FS report and a proposed plan ready for public comment in perhaps 5 years thereafter. Consider revising the Bases to report any formal requests for changes in the MS or any revisions in the RL baseline that show the delay in canyon disposition, if they are under consideration by the parties.			
31	Table A-6, Tank Waste – Double Shell Tank Closure Rationale/Basis: The text states that closure for the DSTs is not expected any sooner than 2034 and for the WTP no sooner than			

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	2050. The report asserts that earlier planning and budget development would be unnecessary. System Plan Rev. 6 Figure 9-2 RPP Mission Summary Schedule has a note that the Closure of all of the DSTs will be 9/30/52. Please revise the note to reflect changes in the baseline schedule when the USDOE completes changes to its approved baseline (cited in the "Department of Energy FY 2013 Congressional Budget Request Environmental Management," Volume 5, **Explanation of Changes**, Page 206).			
32	EDITORIAL: FY 2012 Table C-1 format is much more readable than the previous Table D-1 in the FY 2011 Lifecycle Report. Please continue its use in future reports.			
33	Tables D-33, Major Construction Plant Wide costs by year from 2012 through 2020 are less than the costs that appear in the FY 2011 Report Table E-33. Please explain the why the estimates for plant wide activities decreased in the 2012 Lifecycle Report. Please add the explanation of the decreases in the Plant Wide activity in Sec. 6.3 assumptions.			

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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April 13, 2012 12-NWP-049

Stephen L. Korenkiewicz, Lifecycle Report Project Manager
Richland Operations Office
United States Department of Energy
825 Jadwin, MISN: A5-16
Richland, Washington 99352

Re: Letter, Matt McCormick, Manager, Richland Operations Office [RL] and Scott L. Samuelson, Manager, Office of River Protection [ORP] to Mr. D. A. Faulk, Program Manager, Office of Environmental Cleanup and Ms. J. A. Hedges, Program Manager, Nuclear Waste Program, "Completion of Contract Deliverable CD 0187a Hanford Lifestyle Scope, Schedule and Cost Report - Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-036-01B Milestone," 12-PIC-0004, dated January 17, 2012

The Department of Ecology's Nuclear Waste Program (Ecology) reviewed the FY 2012 Lifecycle Scope, Schedule and Cost Report (see Reference 1). We recognize that the Fiscal Year (FY) 2012 Lifecycle Report could not incorporate all of the comments we provided (Reference 2) on the FY 2011 report (Reference 3) because the FY 2012 report was due on January 31, 2012. We are pleased that we are already addressing our comments with your Mission Alliance Contractor (MSC) staff, so we did not repeat them here. Instead, we concentrated most of our reviews on the alternatives analyses. In addition to our comments below, we are enclosing other comments.

The FY 2012 Lifecycle Report analysis of alternatives for cleanup relied on the River Protection Project System Plan (ORP-11242 Revision 6). Prepared by the US Department of Energy (USDOE), Office of River Protection (ORP), Revision 6 was the first system plan that complied with the provisions of Hanford Federal Facility Agreement and Consent Order (HFFACO) milestone M-062-40. Per the requirements in that milestone, the report documented the results of analyses that USDOE-ORP performed for 10 scenarios (termed cases) that Ecology and USDOE-ORP had selected. Each of nine different scenarios changes certain assumptions underlying the Baseline Case then reports the impact upon the success criteria for approximately 23 metrics. The FY 2012 Lifecycle Report used Revision 6 but summarized the conclusions in that Plan.

From our analysis of the information in the FY 2012 Lifecycle Report, we offer the following comments:

- As Ecology has stated elsewhere, the State does not support treatment of tank waste as transuranic waste (TRU). While USDOE-ORP has assumed that some tank waste will be treated as TRU then packaged and stored for transport to the Waste Isolation Pilot Plant (WIPP) (see System Plan Revisions 4, 5, and 6), we do not agree. Ecology has stated that we will not start on a permit for the TRU mixed waste facility until the appropriate documentation is place verifying that the waste is accepted at WIPP. This would likely include: a Waste Incidental to Processing

(WIR) determination that supports ORP's contention, approvals from the US Environmental Protection Agency (EPA), and a class 3 permit modification for WIPP from the State of Mexico. While the System Plan Revision 6 and its predecessors assumed that some quantity of waste will be treated and disposed as TRU, Ecology regards that assumption as unacceptable.

- Ecology also views treatment of tank waste using a fluidized bed steam reformer (FBSR) as reliance upon unproven technology. We continue our support a second LAW vitrification facility.
- In addition, as Table 6-6 states, the volume of the FBSR product will be 2.4 times the volume of the LAW waste, which is not acceptable for disposal on the Hanford Site. The Draft *Tank Closure and Waste Management Environmental Impact Statement* indicated that the other waste forms were not suitable for LAW immobilization. Ecology is firm its assertion that there is and has been a long-standing commitment by the USDOE to vitrification for immobilized LAW.
- Subsequent to the completion of Revision 6, ORP has begun to revise it to examine other alternatives. While we must receive another update to the document within three years, we appreciate continued involvement in the development of the next report. We found that Revision 6 met the conditions in HFFACO milestone M-062-40. The FY 2012 Lifecycle Report provides information that also appears in the System Plan Revision 6, but we will not base our decisions for cleanup on that dated information. Instead, we expect subsequent additions of the System Plan and the Lifecycle Report to provide us more timely information.
- The FY 2013 Environmental Management congressional budget request notified lawmakers that the USDOE is reducing its funding request for Waste Treatment Plant Major Construction to allow the River Protection Project to resolve issues in pretreatment. The budget request states that the USDOE will maintain progress in Low Activity Waste (LAW), High Level Waste (HLW), and the Analytical Laboratory construction. If the re-baselining effort results in fundamental changes in the treatment of tank waste and disposal of treated waste, Ecology expects that a future revision of the Lifecycle Report will again revisit tank waste treatment alternatives.

We reviewed the information in the remainder of the report and have some comments.

- We expect to see the reorganization of the Central Plateau operable units reflected in the schedule and costs of the FY 2013 report.
- We expect to see revisions of the milestones, costs and schedules that the Parties agreed could change in FY 2012 in the FY 2013 report.
- We appreciate that the FY 2012 Report lists the significant changes from the previous report in Section 1.8. The enumeration provides a very useful reference for those who have read the FY 2011 report.
- The addition of subsection 1.8.2 Future Report Changes is equally useful. The enumeration of regulatory and other changes that occurred after August 31, 2011 also keys the reader to the content of future reports.
- Stating that some of the planning case assumptions and costs do not align with *the Central Plateau Cleanup Completion Strategy* is appropriate. Ecology would expect future editions of the Lifecycle Report to address the misalignment.
- We agree with the USDOE's decision to delete the FY 2011 Chapter 9.0 Opportunities for Improvement in the FY 2012 Report. Sufficient time was not available for the USDOE to compile the recommendations or for the Parties to evaluate them before the milestone M-036-01B report was due on January 31.

Bcc electronic:
Suzanne Dahl, Ecology
Jeff Lyon, Ecology
Dan McDonald, Ecology
John Price, Ecology
Ron Skinnarland, Ecology
Cheryl Whalen, Ecology

Bcc w/o enc:
NWP Reader Files

Bcc w/enc:
NWP Central Files

- We are pleased to see changes in the report format that put report changes and future changes in the beginning of the report. The summary is very useful to the reader there.
- We find that the summary of cleanup decisions that appears in Table C-1 is now in a format that aids the reader by placing the initial decisions and subsequent revisions in a compact table.

We look forward to the FY 2013 Lifecycle Report and the document that will address comments we made on the FY 2011 and FY 2012 reports.

If you have any questions, please call me at 509-372-7886.

Melinda J. Brown,
M-36-01 Milestone Manager
Nuclear Waste Program

dbm
Enclosure

Reference 1: DOE/RL-2011-93, Rev. 0, 2012 Hanford Lifecycle Scope, Schedule and Cost Report, [Lifecycle Report], dated December 2011

Reference 2: Letter, Melinda J. Brown, M-036-01 Milestone Manager to Stephen L. Korenkiewicz, Lifecycle Report Project Manager, 11-NWP-135, dated November 10, 2011

Reference 3: DOE/RL-2010-25, Rev. 0, 2011 Hanford Lifecycle Scope, Schedule and Cost Report, dated December 2011

cc: David Einan, EPA
Dennis Faulk, EPA
Stacy Charboneau, USDOE
Dru Butler, MSA
Linda Delannoy, MSA
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record:
Environmental Portal
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control

Document: NA
Document Date: 02/16/2012
Author: FREDENBURG E
Addressee: KORENKIEWICZ S

Actionee: Stephen Korenkiewicz
Due Date: ACTION

Title: Concern Regarding Tank Waste Treatment, the Lifecycle Report (DOE/RL-2011-93, Rev. 0) does not Provide Information in Sufficient Detail "to Help Inform Decision Makers about Schedule and Work Prioritization"

DIR	DIV	NAME
MGR		
DEP		
AMA		
AMA	FMD	
AMA	HRM	
AMA	PRO	
AMCP		

DIR	DIV	NAME
AMMS		
AMMS	ISI	
AMMS	PIC	Korenkiewicz, Stephen (Actionee)
		Jones, Rosie
		Pak, Paul
AMMS	SES	
AMMS	SSD	
AMRC		
AMSE		
AMSE	EMD	Weil, Steve
AMSE	OOD	
AMSE	SED	
OCC		
OCE		
ORP		
PNSO		
RLCI		

Comments:

Records Schedule Information:
ADM-16.1.5b

Scan?: Yes Sensitive?: No

Sensitive Attachments?:

IDMS Folder: RL General Corr

Date RL CC Rec'd: 02/22/2012

February 16, 2012

Stephen Korenkiewics, Lifecycle Report Manager
U.S. Department of Energy – Richland Operations Office
P.O. Box 550, Mailstop A5-16
Richland, WA 99352

Dear Mr. Korenkiewics:

With respect to tank waste treatment, the Lifecycle Report (DOE/RL-2011-93, Rev. 0) does not provide information in sufficient detail "to help inform decision makers about schedule and work prioritization."

Efficient operation of WTP supporting completion of waste processing by 2047 requires timely completion and startup of a 2nd LAW treatment facility and several infrastructure projects.[1] Those projects are identified in the Lifecycle Report and key cited reference (River Protection Project System Plan, ORP-11242, Rev. 6). However the level of detail regarding schedules in Chapter 6 and Appendix D.2 of the Lifecycle Report and in Chapter 9.0 of the RPP System Plan is extremely inadequate for the intended purpose "to help inform decision makers." Regulators and key interest groups wishing to provide meaningful input to USDOE decision makers must have access to more detailed information.

As a minimum, the Lifecycle Report should be expanded to identify critical USDOE decisions and timing for those decisions. Without even that minimal level of detail, regulators and key interest groups have no basis to help inform USDOE decision makers about schedule and work prioritization. If USDOE is serious about meeting the intent of TPA Milestone M-036-01, it must provide the necessary level of detail.

Sincerely,

Ed Fredenburg

Ed Fredenburg

9875 NE Meadow Loop
Newberg, OR 97132

RECEIVED
FEB 22 2012
DOE-RLCC

[1] Kosson, D.S., Gallay, D.R., Pegg, I.L., Wymer, R.G., and Krahn, S. External Technical Review of System Planning for Low Activity Waste Treatment at Hanford. U.S. DOE, Office of Environmental Management, 2008.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

May 8, 2012

Stephen L. Korenkiewicz
Lifecycle Report Project Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, Mail Stop A5-16
Richland, Washington 99352

Re: *2012 Hanford Lifecycle Scope, Schedule and Cost Repo*rt, DOE/RL-2011-93

Dear Mr. Korenkiewicz:

The U.S. Environmental Protection Agency has completed its review of the subject document. If you have any questions regarding our enclosed comments, please contact me.

Sincerely,

David R. Einan
Lifecycle Report Project Manager]

Enclosure

cc: Gabe Bohnee, NPT
Stuart Harris, CTUIR
Russell Jim, YN
Melinda Brown, Ecology
Dru Butler, MSA
Susan Leckband, HAB
Ken Niles, ODOE
Admin Record: M-36

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EPA Comments on "2012 Hanford Lifecycle Scope, Schedule and Cost Report" DOE/RL-2011-93

General Comments

1. The EPA would like to discuss the utility of updating this document annually. After the 2013 submittal if may be more appropriate to update the document only when a major program shift occurs.

2. Several of the schedule figures (e.g., Fig 5-5) summarize at such a high level that they won't satisfy many readers. Suggest a note referring to the appendices where the detailed information can be found.

3. Appendix D appears to have a number of mistakes. As an example, on table D-13 both the 100-BC-5 and 300-FF-5 operable units will have decisions made in the near term, yet funding to implement these near-term decisions is not until 2022-2024.

4. Appendix D has a lot of cost detail, but little in the way of specifics on schedules of cleanup elements.

Specific Comments

1. Page ES-2, 5th paragraph, last sentence
Revise the sentence to indicate that although the time period evaluated in this report ends at 2090, LTS extends longer because waste sites and disposal facilities will have caps that require maintenance beyond that date. Also, change "DOE will have" to "DOE plans on having" a presence ....

2. Page 1-14, Table 1-4
Two entries are not correct. A decision on disposition of 100 Area reactors was made in a 1993 NEPA ROD, and a CERCLA ROD was issued in 2008 for the 200-ZP-1 Operable Unit.

3. Page 4-2, Table 4-1
There are two entries to complete all interim Remedial Action s in the 300 Area by a given date. The dates do not match. Which is correct?

4. Page 4-3, 5th bullet and photos below
Need to consider whether final actions for the 100 Area reactors must be completed before deletion.

5. Page 4-15, penultimate bullet
Insert the word 'interim' so that the sentence reads: "T Plant is acceptable for interim sludge storage...."

6. Page 5-1, 5th paragraph, 1st sentence
Change "Hanford Site" to "Central Plateau" because the definition is overly broad otherwise.

EPA Comments on "2012 Hanford Lifecycle Scope, Schedule and Cost Report" DOE/RL-2011-93

7. Page 5-1, 6th paragraph
Replace the last sentence with the following edited sentence: It is DOE's intent to clean up the Outer Area to a level comparable to the River Corridor, i.e., suitable for unrestricted surface use (under continued Federal ownership and control and consistent with DOE's anticipated future land use of conservation/mining).

8. Page 5-11, 3rd paragraph, 4th sentence
There is no such term as "target TPA milestone"; they should be referred to as target dates.

9. Page 5-11, 4th paragraph, 1st sentence
Insert "hexavalent" before chromium.

10. Page 5-12, 1st paragraph
This paragraph should also include CERCLA, as all groundwater units are classified as CERCLA units.

11. Page 5-16, Table 5-3
Explain what is meant by the text in the third bullet: "comparison of regional risk versus Hanford Site risk."

12. Page 5-25, 1st paragraph
Add some text to explain the "bumps" in the outyear funding, also.

13. Page 5-32, Figure 5-15, last line
Sludge Disposition is to be completed by 9/30/2024.

14. Page 5-37, 1st paragraph
End the paragraph after the second sentence and delete the rest.

15. Page 5-37, penultimate bullet
Explain what is meant by "aggregate barriers" and where they will be utilized.

16. Page D-7, Table D-4
The Scope Summary for the Level 3 Work Element "KW Deactivation and Dewater" describes decontamination of the KW Basin walls and floor. That activity is not identified in any decision document or work plan. Explain or delete.

17. Page D-59, Table D-23
The costs for Fiscal Years 2014-2017 are much too low to support the work on 618-10 and 618-11 waste sites.