
Overarching Budget Advice Commentary *(lettered for ease of reference, not indicative of priority)*

Compliance Budget

- A. DOE field and Headquarters future budget planning and budget requests should be based on full compliance with regulatory and Consent Order requirements.
- B. All funding required to meet the TPA and regulatory requirements should be within the target budget, and requested by both field offices and by DOE-HQ to Congress.
- C. Where DOE reasonably believes that a relaxed milestone may replace current requirements, it can identify that in a footnote, rather than reducing the funding request and failing to identify the existing compliance requirements.
- D. Full funding from Congress to meet all TPA milestones and regulatory requirements. It is not enough for field offices to simply “identify” costs to comply. The field offices are obligated to request full funding pursuant to the TPA requirements.
- E. Ensure cleanup of the Outer Area of the Central Plateau complies with the TPA milestones associated with this work.
- F. Lack of budget does not justify changing milestones.
- G. Meet “target milestones” and remain on pace for final milestones.

Integrated Priority Lists

- H. Prior to submitting proposed budgets to Headquarters, DOE-RL and DOE-ORP should present to the Board, stakeholders, and the public the alternate budget scenarios, including integrated priority lists, consistent with the DOE Headquarters’ budget guidance to the sites. The Board believes it is essential that DOE consider the budget levels as called for in the Lifecycle Report as the foundation for the out year budgets.
- I. Overall, the Board, the public, and the regulators should review the proposed “integrated priority list” for DOE-RL and DOE-ORP to establish how the offices would spend funding consistent with target budgets – which are hundreds of millions of dollars lower than the regulatory compliance budget scenario presented to the Board and public. Prior to field office submission, further Board and public comment should occur on how priorities will be set within, and the adequacy of, the target budget scenarios.
- J. Develop Priority Lists based upon risk, plus other factors, for the future work since, overall, there never appears to be enough money to do everything required.
- K. Budget using assumptions that significant portions of pre-1970 buried or disposed TRU wastes will be retrieved. This requires adequate funding for characterization of scores

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of waste sites. Therefore, the IPL should include identification of funding necessary for characterization of these sites – even if it places the total DOE-RL budget above the target budget.

- L. Fund all the work identified in Activity Building Blocks (ABBs)

Buy Back Lists

- M. Buy-backs lists should emphasize meeting applicable requirements, and opportunities to reduce the mortgage cost for future cleanup.

Definitions

- N. Define the following terms and identify how these items justify or drive budget requests (making progress, minimum safe, essential, ready to serve, compliant, compliance, enforceable milestones, target milestones, good project management, TPA, and Consent Decree).

Characterization vs. Retrieval

- O. The Tri-Party agencies should try to achieve a balanced approach with additional characterization as needed to move forward with actual cleanup of the waste sites. As demonstrated in the River Corridor, extensive characterization costs may be avoided by simply adopting a retrieval or partial retrieval remedy.

Safeguards and Security Funding

- P. Safeguards and security funding should not come from the DOE-Environmental Management budget, which could reduce funds for cleanup.

Min-Safe and Site Services

- Q. Scrutinize the minimum safe and site services ABB to find efficiencies. Some service upgrades may need deferral. DOE-ORP and DOE-RL should disclose the portion of its funding which goes to site services. Reductions in funding of site services should not compromise worker and public health and safety or risk failure of mission.

Priority Areas in Past HAB Budget Advice *(numbered for ease of reference, not indicative of priority)*

1. Research and development funding.
2. Funds for identified regulatory and community support activities, including public involvement programs.
3. Nuclear Materials Stabilization and Disposition

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4. Soil and Water Remediation Programs
5. TRU Waste/Pre-1970 TRU
 - Characterization and initiation of actions to remove, treat (as necessary), and dispose of chemical and pre-1970 disposed TRU radioactive wastes, including radioactive waste burial grounds, and non-radioactive dangerous waste and solid waste landfills.
 - Examination of alternative means of treating small, discrete low activity or TRU waste streams.
 - Contact-handled TRU retrieval
 - Retrieval of remote-handled TRU, including having a facility capable for treating remote-handled TRU.
6. Stored mixed waste
 - Characterizing and treating dangerous wastes in storage – which have been the source of recent leaks -- as well as for retrieval and treatment of transuranic waste (TRU) and Mixed Wastes.
 - Accelerate the schedule to bring stored mixed wastes into compliance before there are additional leaks or a more serious accident.
7. Burial Grounds
 - 618-10/11
 - Radioactive, and non-radioactive burial ground waste
 - Retrieve and treat buried mixed wastes.
 - Solid waste burial ground work.
 - Solid waste landfills.
8. Deep vadose zone characterization, technology development, and remediation.
9. Groundwater
 - Funding should be identified within the target budget for groundwater action to meet TPA and regulatory schedules, including at 200 UP-1, K Area, and the 300 Area.
 - Accelerate 300 Area groundwater remediation to match the public expectation that the River Corridor will be cleaned up by 2015.

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- Remediation of the carbon tetrachloride, chloroform, uranium, and technetium contamination in various locations on the site to permit greater progress in the remediation of these specific groundwater contaminants.
 - Sufficient funding should be provided for the groundwater program without a reduction in facilities decontamination and decommissioning and soil remediation programs.
10. PFP decontamination, deactivation, and decommissioning activities to complete the demolition to slab on grade.
11. U Canyon Demolition and remediation
12. River Corridor
- Additional remediation work along the Columbia River.
 - 100K area Deactivation, Decontamination, Decommissioning, and Demolition and waste site remediation.
 - Remaining cleanup work in the River Corridor including ground water, facility decontamination and decommissioning, and remediation of waste disposal sites
 - Characterization and necessary remediation of waste sites adjacent to the Columbia River and in the 300 Area.
13. K Area
- Characterize the remaining sludge material so that it can be removed from K West Basin.
 - Processing and disposition of K Basin sludge consistent with the DOE-RL 2015 vision.
 - Funding for the completion of the K Reactor fuel storage basins and groundwater cleanup
14. Tank Waste
- Safe storage and monitoring of the 53 million gallons of high level tank wastes
 - Develop technologies viewed as having significant potential to make additional space available in double shell tanks.
 - Accelerate tank waste retrieval, including through the use of technologies beyond those presently employed.

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- Deploy multiple units (e.g. wiped film evaporators) to enable DOE-ORP to make additional space available for SST waste retrieval.
- Increase the current SST retrieval rate to minimize the risk posed by the wastes in the aging tanks (four to five tanks per year).
- Comprehensive system planning studies for the retrieval, treatment and disposal of tank waste.
- Evaluate the integrity of existing single shell tanks (SSTs) and a consideration of options for obtaining additional double shell tank (DST) space.

15. WTP - Pretreatment Facility

- Projects that will remove wastes from tanks while serious safety and engineering design problems for Vitrification Plant's Pretreatment Facility are resolved.
- Pretreatment Facility construction following resolution of safety and engineering concerns.
- Specific waste streams from Single Shell Tanks treated in order to make progress towards the required removal and treatment of wastes prior to the Pretreatment Facility becoming operational in the coming decade.
- Long term/interim storage of waste produced by the WTP pending identification of a national high level waste repository.

16. WTP – Waste Blending Tanks

Determine needs for waste blending tanks as part of the WTP complex and determine how to integrate blending tanks into its SST retrievals. Identify funds to move forward with designing and constructing these new blending tanks.

- Funds for a waste blending facility for WTP.

17. WTP - Supplemental Treatment/LAW

- Funding start up of the LAW facility.
- Funding for technology development in support of low activity waste (LAW) supplemental treatment processes that create a safe and stable waste form to meet requirements.
- Addition of a third melter to the LAW facility.

18. Characterization of soils contaminated by leaks to stem the spread of contamination from past leaks (or from leaks during retrieval) and begin active cleanup.