

DRAFT, Rev 2

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Hanford Advisory Board Draft Advice on M-091 Milestones Changes:

M-91 Milestones (Tentative agreement on Negotiations for the Realignment of Select M-091 Waste Management Milestones, June 2015)

Background:

The Hanford Advisory Board (HAB) has, at its core, the tenets of “Protect the Columbia River” and “Do no further harm.” Over many years the HAB has been unequivocal in its quest for the Tri-Parties to stay the course for a systematic, logical and TPA Milestone driven pathway for cleanup. Additionally, the HAB has always supported cleanup pathways that are transparent to the public and defensible by the Tri-Parties as achievable.

In the past we have been loath to prioritize cleanup projects, because any cleanup that is achievable supports protection of the Columbia River and thus the health of the environment needed for people and animals who depend on the river and the ecosystems it feeds. We carry a commitment to protection of future generations.

As funding for cleanup at Hanford has become more elusive over the more recent years, the Tri-Parties have further pressed the HAB to consider, with more scrutiny, prioritization of cleanup efforts. As we look at the proposed changes to this M-091 Milestone package, we are left in the quandary of being placed in an arena where we do not have all of the necessary information specific to the funding of these milestones that assures us we can tell the public these milestones are achievable. Further, the HAB has been told that there are other change packages being negotiated between the TPA agencies, specifically the M-15, M-16 and M-85 series. These additional, yet to be defined, but interconnected changes leave us without a comprehensive picture from which we can prioritize the M-091 and future cleanup efforts.

The tentative agreement for the M-91 milestone change package was released on July 6th, of 2015. On July 31st, it was announced that the Waste Isolation Pilot Plant would not be able to meet the goal of resumption of activities in 2016. Given further delay of reopening the WIPP facility, it would seem that the newly proposed changes to M-91 are no longer calibrated against what is currently known about further schedule delays at WIPP.

Further, it appears that current thought by the Tri-Parties is that their ability to enter into new negotiations for further Remove, Treat, Dispose (RTD) of Hanford TRU wastes are contingent on first shipping to WIPP what is currently in storage on site in order to “make room” for the staging of future, yet to be negotiated, TRU waste bound for WIPP.

Given the uncertainties as to the volume and treatment needs required to quantify future remediation of TRU and TRUM constituents (both remote and contact handled), coupled with WIPP operational permits that identify the site closing for acceptance of material in 2030, the HAB sees a disconnect between the time necessary to negotiate further RTD and the ability to achieve that remediation by 2030. Start of new negotiations for TRU cleanup should not be held hostage by a false presumption that DOE must first send already packaged waste bound for WIPP, before looking at other TRU retrieval. This is especially true if you do not understand the full extent of the funding and remediation necessary to achieve successful cleanup of TRU material. It is imperative that we understand the cost, potential technical issues and any other issues that might derail meeting the 2020 milestone. We are uneasy with a lack of Milestones for the rest of the TRU waste. A ten year window is no guarantee of enough time to meet yet to be negotiated cleanup obligations.

Advice:

The Advice below reflects the above identified limitations of the “window” through which the HAB is currently looking:

1. The Hanford Advisory Board advises agreement to cleanup Milestones that are achievable and reflect a “global continuity” with other unresolved TPA Milestones which the HAB and the public can understand.
2. The HAB advises Milestone development that truly reflects the limitations of time and the necessary work needed to be accomplished by 2030 in order to successfully meet the limitation of access for disposal of Hanford TRU into the WIPP facility.
3. The HAB advises that the Tri-Parties should be in agreement that, in tandem with removal from the site of already repackaged TRU, DOE should be engaged, now, in aggressive work to characterize, determine remediation methods needed, quantify volumes and packaging needs of CH and RH TRU not yet exhumed at Hanford.
4. The HAB advises that it is impossible to prioritize, as asked for by the TPA parties, with a commitment to full funding of this work, when there may very well be other priorities that the HAB feels are more important to effectively protect the Columbia River and future generations.