

DOE Hanford Site 2011 Budget Formulation – Comments

Niles, Ken

Author:

Date: 07/30/2009

Comment:

Thank you for the opportunity to comment on the fiscal year 2011 budget formulation for the Hanford Site. I am submitting these comments on behalf of the State of Oregon.

For the first time in many years, the short-term funding situation for Hanford looks promising. Funds provided through the American Recovery and Reinvestment Act have allowed a tremendous amount of deferred work to move forward. We believe that the managers and staff of both the Richland Office and the Office of River Protection deserve considerable credit for demonstrating that Hanford workers were able to move forward quickly with important job retention/creation projects that will make a substantial difference in the overall cleanup.

We are concerned that we not lose this renewed momentum when the stimulus money has been spent. We expect to see a compliant budget in fiscal year 2012 and beyond.

We support the 2015 vision for the DOE Richland Office. We do believe that cleanup along the Columbia River is a high priority and is mostly achievable by 2015. We are pleased that groundwater has finally moved up as a priority in the Hanford cleanup and look forward to operation of the ZP-1 groundwater treatment facility and an expansion of other groundwater treatment program. For the first time, it appears that the focus on groundwater contamination has truly moved from containment to remediation.

We are pleased that the DOE Richland Office continues to support funding of the Natural Resource Damage Assessment work and has substantially increased the proposed base funding for 2011. However, the funds identified are less than the amount recommended to DOE by the Senior Trustees. We encourage DOE to further increase funding for this important task.

We do have some concerns that are not fully addressed in the fiscal year 2011 budget request.

One project that we anticipate DOE will not successfully complete by 2015 is complete clean-up of the 618-11 burial ground, and possibly the 618-10 burial ground as well. We are pleased that there are funds in the stimulus funding to begin work at the 618-10 burial ground, to include remediation of the trenches and characterization of waste within the caissons. However, no funding has yet been identified for remediation of the caissons or work at the 618-11 burial ground.

More than this, DOE lacks sufficient capabilities or facilities to handle the quantities of remote-handled waste that are expected to come from one or both of these burial grounds. This lack of capability was identified many years ago, yet DOE has yet to take steps to resolve this deficiency. We would like to see DOE put a greater priority on obtaining sufficient remote-handled waste capabilities so that work can move forward on remediating both of these high-risk burial grounds.

We are concerned that the K-Basin sludge continues to take large amounts of funding away from other cleanup projects. This project has gone through numerous delays over the

years. We would like to see an increased focus towards resolving this problem once and for all, and free up those funds for other cleanup projects.

We would like to see DOE resume shipment of transuranic waste off of the Hanford Site to permanent disposal at the Waste Isolation Pilot Plant. As shipments do resume however, we strongly encourage DOE to be more cognizant of hazardous winter road and weather conditions along the transport route through northeast Oregon. We recommend that shipments not be planned during the winter months, but do resume when weather is less likely to cause shipment delays or an increased risk.

Finally, we do not support DOE's plan to use one Record of Decision for the entire Central Plateau and we recommend that DOE reconsider this plan. The waste sites are simply too diverse and complex for such an approach to succeed.

For the Office of River Protection, we are encouraged by a new emphasis on technology development, as the Waste Treatment Plant operations and tank waste retrieval projects could both benefit from the development of new technologies. We are pleased that DOE is planning to explore Wiped Film Evaporator technology and also explore new ways to optimize use of the Waste Treatment Plant and of tank waste retrieval. We also encourage DOE to further explore whether fractional crystallization may be effective in removing non-radioactive salts from the waste and greatly reduce the quantity of wastes to be immobilized.

We do not support DOE's plan to delay a decision on Supplemental waste treatment until 2015. We strongly encourage DOE to provide sufficient funding to support a decision by no later than 2012, so that work can begin to ensure that sufficient treatment capability is available as quickly as possible.

Author: Cimon, Shelley

Date: 07/28/2009

Comment:

Not in order of priority:

1) With the current ability/agility of the EM budget office to "rack and stack" the Analytical Building Blocks, it now makes sense to start the final lift - finishing the characterization of non-TPA negotiated wastes buried across the Hanford site and in the vadose zone, in order to start building a picture for public discussions of what "done" might look like.

Coupled with this, will come the ability to bound some of the costs of cleanup, look for the opportunities to get more work done through strategic planning, and identify where greater risk reduction might be met (this demands adequate characterization).

- 2) I want to see all pre-70 Suspect TRU negotiated into the TPA with the understanding/agreement that adequate characterization is essential across the Hanford Site. I am especially thinking about the 42 plus miles of trenches in the Central Plateau (SW-1 and SW-2 - some of which are located over old waste ponds. The over-target Budget must include funding for this work.
- 3) Budget requests need to be based on the current TPA negotiated agreements as they exist today.
- 4) I am impressed with the ability of the Hanford site to step up to the opportunity with funding from the ARRA and initiate real cleanup.
- 5) I am concerned that we will lose momentum after 2011. DOE-EM must plan for the loss of the ARRA funds and build budgets that will continue all of the work necessary to reach closure.
- 6) The budget must include planning for the design of a waste blending facility to support a verified waste stream needed to feed the vitrification plant. The test should be done with "hot" feed. Adequate tanks for this facility will help build contingency into the system.
- 7) Thanks you for responding to HAB advice on the spending plans for the ARRA funding by changing plans.
- 8) If the wiped film evaporator technology is determined feasible, additional funding should be requested to deploy multiple units. Inclusion of funding to support this will enable ORP to make additional space available.
- 9) It is time to define the path forward for supplemental treatment to complete the mission. This should be funded such that a decision can be made by 2012.
- 10) There must be funding in this budget to implement all TPA negotiated milestones, including contact handled TRU retrieval, beginning removal of remote handled TRU, addressing the need for a facility to treat remote-handled TRU and lastly address the needs of mixed waste treatment.

Thanks you,

Shelley Cimon