

# Hanford Advisory Board Draft Advice

**Topic:** Establishing FY2014-2015 Cleanup Priorities

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**Originating Committee:** Joint Budgets and Contracts

**Version #1:**      **Color:**   pink   yellow   green   Salmon   X   purple   blue

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## Background

The Board understands that there may be reduced site budgets in the coming years. It is important to the Board that cleanup (defined by the Board as projects that achieve regulatory compliance, risk<sup>1</sup> reduction, removal of contamination from the environment, mitigation of hazards, and consideration of tribal treaty rights), is prioritized over non-cleanup work in times of reduced funding. The Board believes that DOE, Ecology and EPA should develop and implement an evaluation methodology process for prioritizing cleanup projects that examines each cleanup project against a variety of criteria that reflect Board values and public concerns. This prioritization framework would be reflected in the Lifecycle Scope, Schedule, and Cost Report (Lifecycle Report), and be applicable to out-year budgets.

The Hanford Advisory Board (Board) is very disappointed with the processes of establishing the annual Hanford budget. The late release of budget information, coupled with sequestration impacts, present a major concern to the Board about cleanup work prioritization and transparency. Recent discussions with the U.S. Department of Energy-Richland Operations Office (DOE-RL) and the U.S. Department of Energy-Office of River Protection (DOE-ORP) raised many questions regarding the adequacy of the out year budgets to meet Tri-Party Agreement (TPA) Milestones. TPA Milestones and other compliance requirements were put in place to ensure that the federal government did not further delay cleanup efforts or allow dangerous conditions to continue longer than necessary. Funding to meet these obligations must be requested by USDOE at every level and further delays should not be negotiated. Indeed, new developments have led to an increased level of risk from delay.

The Board believes a system should be developed to prioritize projects that have funding profiles and schedules in the Hanford Site Cleanup baseline, and are evaluated in the cost analyses contained in the Lifecycle Report. To that end, the Board has developed suggested criteria for the TPA agencies to consider when prioritizing cleanup work.

## Advice

The Board believes that all cleanup actions at Hanford are important and should be funded. Acknowledging that budgets vary year to year, the Board believes that prioritizing cleanup projects using values-based criteria will produce a prioritized list of projects that will help determine how to best use available funds.

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<sup>1</sup> The potential to harm human health and the environment in the short and long term.

- The Board advises DOE to present to the Board DOE's current methodology for prioritizing projects, and to consider, as reflected in the HAB Values White Paper, the following criteria identified as key to this decision-making process:
  - Does the cleanup project reduce risk to workers, the environment, and/or the public (priority for immediate risk, followed by generally short-term, and long-term risks)?
  - Does the cleanup action maintain/meet/move towards attainment of TPA milestones, consent decree, and/or RCRA permit requirements?
  - Will delaying the cleanup project result in increased lifecycle costs and result in a predicted increase in total cleanup cost?
- In addition, the Board advises DOE to request full funding to meet all compliance obligations and to address new emergent threats, such as leaks from Single Shell and Double Shell High-Level Nuclear Waste Tanks (HAB #263).
- The Board advises that funds need to be set aside in FY 2014 and 2015 for responding to leaks in both single and double shell tanks (e.g., retrieval and treatment, if appropriate, for single shell tank wastes); and, provide for planning and construction of additional tank storage capacity.
- The Board is very concerned that DOE-ORP did not provide any proposed FY 2015 budget for the Board or public to review, and advises that DOE provide ample time for regulator, Board and public review of a proposed FY 2015 Priority List for Tank Farms prior to submission of proposals to HQ.