

HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

Advising:

US Dept of Energy
US Environmental
Protection Agency
Washington State
Dept of Ecology

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June 7, 2013

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Re: 2014-2015 Budget Priorities

Dear Messrs. Smith, McCormick, Faulk and Ms. Hedges

Background

The Hanford Advisory Board (Board) understands that there may be reduced site budgets in the coming years. It is important to the Board that Hanford Federal Facility Agreement and Consent Order (HFFACO also known as Tri-Party Agreement [TPA]) cleanup, as defined by the Board as projects that achieve regulatory compliance, risk¹ 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 would benefit from learning about U.S. Department of Energy-Richland Operations Office (DOE-RL) and the U.S. Department of Energy-Office of River Protection (DOE-ORP) Washington State Department of Ecology (Ecology), and U.S. Environmental Protection

¹ The potential to harm human health and the environment in the short and long term.

EnviroIssues

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HAB Consensus Advice # 266

Subject: 2014-2015 Budget Priorities

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Agency (EPA) evaluation methodology process for prioritizing TPA cleanup projects. It is the Board's hope that their process examines each TPA cleanup project against a variety of criteria including Board values and public concerns. This prioritization framework could be reflected in the Lifecycle Scope, Schedule, and Cost Report (Lifecycle Report) and be applicable to out-year budgets.

The 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 TPA cleanup work prioritization and transparency. Recent discussions with DOE-RL and DOE-ORP raised many questions regarding the adequacy of the out-year budgets to meet 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 DOE at every level and further delays should not be negotiated. New developments have led to an increased level of risk from delay.

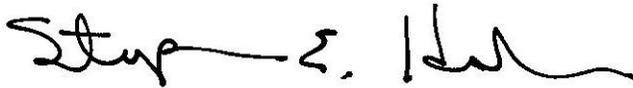
The Board believes that all cleanup actions at Hanford are important and should be fully funded. Acknowledging that congressional appropriations may vary year-to-year, the Board believes that prioritizing cleanup projects using Board and public values-based criteria will produce a prioritized list of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

Advice

- 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 be requested 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 advises that DOE provide ample time for regulator, Board, and public review of a proposed FY 2015 Priority List for DOE-ORP prior to submission of proposals to DOE-HQ. The Board is very concerned that DOE-ORP did not provide any proposed FY 2015 budget for the Board or public to review.

- The Board advises DOE to present its 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 planned cleanup protect the Columbia River and 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?

Sincerely,



Steve Hudson, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Jeff Frey, Deputy Designated Official, U.S. Department of Energy, Richland Operations Office
Catherine Alexander, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations