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US Environmental
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Dept of Ecology

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February 4, 2016

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Re: Central Plateau Milestone Series Change Package

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

Background

The Hanford Advisory Board (Board) provides the Tri-Party Agreement (TPA) agencies with policy advice that reflects the Board's core values¹ related to Hanford cleanup. Core values² pertinent to the Proposed Changes to Hanford Central Plateau Cleanup Work and Schedule (Change Package) include:

- protect the Columbia River,
- protect and restore groundwater,

¹ http://www.hanford.gov/files.cfm/HAB_2013O-01_ValuesWhitePaper_Attach.pdf

² As presented, the values listed are of equal importance.

Envirolssues

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- protect the broader environment,
- involve the public,
- secure sufficient funding,
- maintain the integrity of the Tri-Party Agreement (TPA),
- incorporate long-term stewardship needs in current and future cleanup decisions.

The changes proposed by the TPA agencies in the milestone series, M-015-00 (Investigation Work on the Central Plateau), M-016-00 (Cleanup Work on the Central Plateau), M-085-00 (Canyon Cleanup), M-037-00 (Closure Requirements for Treatment, Storage, and Disposal units), and M-094-00 (Completion of 300-Area Facilities), are unprecedented. This is the first time³ in which the Board is tasked to consider an extensive, negotiated change package to TPA Milestones that provides only losses in the form of delays and no benefits in the form of accelerated cleanup projects.

The Board expects the TPA agencies to negotiate achievable, legally binding milestones with the intent of balancing challenges to achieve cleanup goals on schedule with the need to conduct and regulate a timely cleanup that reduces risk through remediation. The Board is concerned that the delays negotiated in this milestone series were too easily pushed out using insufficient funding as an excuse, rather than proposing more stringent cleanup deadlines to make the case for more funding. Hanford cleanup is not discretionary. It is a federal obligation to address the legacy of Cold War environmental contamination and honor regulatory commitments to return the site to compliance with environmental laws. The Board urges the TPA agencies to negotiate more stringent deadlines as part of this obligation, to demonstrate the importance of this work, as Congress considers Hanford funding.

The Board believes there is nothing impossible, nor impractical, about accomplishing remediation under the original TPA milestones, utilizing technology that is currently available. Hanford cleanup decisions will have impacts on people and the environment for hundreds of years to come. The Change Package, as written, assumes that contaminants contained in unlined trenches, in plumes of vadose zone soil and groundwater, both near-surface and deep, are going to stay put during the proposed delays. This false assumption

³ The Board previously provided consensus advice on at least 13 proposed TPA Change Packages (Advice #53, 72, 73, 82, 125, 128, 154, 163, 216, 224, 231, 264 and 285).

eliminates the urgency to fund this remediation work by presuming there is infinite time available to mitigate this waste moving through the environment. For over a decade, many interests at Hanford, including the TPA agencies, have engaged in discussions in a variety of forums including the Hanford Lifecycle, Scope, Schedule, and Cost Reports⁴; centered on how previous funding shortfalls have created and will continue to create, a large “bow wave” of unfunded projects. Until this "bow wave" is eliminated, the result will be exponential increases in the cost of total cleanup and increased risks from aging facilities and infrastructure. Adequate funding levels are required to avoid this budgetary, and in our opinion, environmental crisis.

The public should have meaningful opportunities to influence cleanup decisions through open and transparent processes. Change Packages are particularly complex. The proposed changes are difficult for the public to understand, and without clarity, make it challenging for individuals to provide meaningful comments.

The Board believes that information provided about the changes should be more comprehensive. The TPA agencies provided a coded list of the proposed changes and some explanation of the process, however, the agencies failed to fully describe how Hanford cleanup will move forward with these significant delays. The rationale for the proposed changes or assumptions that were used to both necessitate the delay and support the new proposed dates was not fully explained. An explanation was not provided for how the agencies assessed the potential for increased risks to the environment, workers, the public, or Tribes. A high-level overview of where the proposed changes fit within completion of Hanford cleanup and how delays may impact overall costs of the cleanup would have increased the HAB’s and the public’s understanding. In the future, the TPA agencies are encouraged to provide this information and map an in-depth vision for the Board and the public detailing the activities that are being recommended for elimination, deferment, or reassignment from one milestone to another.

The Board has long argued for early access to information and for increased public participation. It appears to the Board that more consideration should be given to the timing of public meetings during TPA Change Package public comment periods to ensure adequate time is provided to build understanding of these complex topics. There were several conversations through the Board’s Public Involvement and Communications

⁴ http://www.hanford.gov/files.cfm/2014_Lifecycle_Report_DOE-RL-2013-02_Rev.1_FINAL.pdf

Committee, and the River and Plateau Committee, in which Board members recommended that meetings be held later in the comment period, as opposed to holding the meetings in November 2015.

We believe that a more comprehensive suite of information and planned public meetings are needed to achieve meaningful public involvement. The success of the Board as a group representing and advocating for varied interests depends on having the latest information pertaining to the priorities, timelines and funding decisions that impact the completion of cleanup.

The Board supports the addition of the new milestone M-016-250 which aims to “develop a three year rolling prioritized schedule consistent with site-wide cleanup priorities to implement waste site removal actions.” Aggressive pursuit of this milestone by the proposed March 31, 2016 deadline will help facilitate a much needed, collective understanding of Fiscal Year 2017 federal budget requirements. It is the Board’s understanding that initial inputs to budget planning are needed starting in February 2016.

Considerable cleanup is being delayed in contaminated areas that the Board has previously identified as a high priority. For example, moving forward with the investigation and remediation of non-tank farm/non-canyon waste sites in the 200 Areas, milestones M-015-00 and M-016-00, is consistent with Board values. The Board believes this work to have higher priority than other projects such as the demolition of U Plant or closure of B Pond, S Pond or the Non-Radioactive Waste Disposal Landfill (NRDWL), included in milestone M-085-00.

The Board believes the TPA agencies should expeditiously remediate the plume beneath the 324 Building and move the Waste Encapsulation Storage Facility (WESF) cesium and strontium capsules into dry storage, both of which pose very high risks. Proposed milestone changes should be adjusted accordingly to better reflect these higher priorities.

The Board also believes the TPA agencies should expeditiously investigate potential risks posed by the PUREX tunnels.

In addition, setting milestones for work described as “To Be Determined” (TBD) is not acceptable. TBD is neither a guide for the Board or stakeholders, nor a vehicle for agencies seeking funding for future cleanup. The Board repeatedly heard this message at public

meetings.

The Board supports continuing the practice of setting some, limited target milestones, based on observations of cleanup work to date. We have seen successful remediation and a reduction of risk to humans and the environment because of this practice.

Advice

The delays in this change package are difficult to accept; in response the Board provides the following specific advice:

- The Board advises the TPA agencies to meet legal obligations by negotiating more stringent deadlines in an effort to demonstrate the priority of this work to Congress and drive adequate funding for Hanford cleanup.
- The Board advises DOE to seek adequate resources for all proposed cleanup activities.
- The Board advises DOE to expedite the new M-016-250 milestones⁵ (3/31/2016) in order to support efforts to influence the FY 2017 Federal budget planning process, show progress, keep trained crews together for remove-treat-dispose work, and to take advantage of “shovel ready work”.
- The Board advises the TPA agencies to set a specific, achievable date for the M-016-00 milestone⁶ and to cease the practice of publishing “To Be Determined” as a place mark for a completion date. The goal should be to establish specific, achievable milestones within a process that allows for changing milestones when necessary.
- The Board advises the TPA agencies to adjust proposed milestones to reflect an

⁵ **M-016-250**: “Develop a three year rolling prioritized schedule consistent with site-wide clean-up priorities to implement waste site removal actions per Action Memoranda (DOE/RL-2009-37, DOE/RL-2009-48, and DOE/RL-2009-86). This milestone series will continue on a yearly basis to reaffirm selected sites and recommend any changes to the list, to maintain a three year rolling prioritized schedule, until such time that removal actions are completed.” (3/31/2016 And Annually Thereafter)

⁶ **M-016-00**: “Complete remedial actions for all non-tank farm and non-canyon operable units in accordance with schedules established in approved RD/RA work plans.” (changed from 9/30/24 to TBD).

acceleration of the M-015-00 and M-016-00 milestones series which cover the investigation and remediation of non-tank farm/non-canyon waste sites located in the 200 Areas, ahead of M-085 work related to demolishing plans to demolish U Canyon and close B Pond, S Pond, and NRDWL. In addition, with regards to M-015-00 and M-016-00 milestone sites with below ground contamination, the TPA agencies should consider temporarily delaying capping to allow for future deep vadose zone remediation.

- The Board advises the TPA agencies to negotiate earlier milestone dates for the cleanup of the 324 Building and initiate remediation of the plume beneath the Building⁷. Extremely high radiation levels and proximity to the Columbia River and to the people living within the boundary of the City of Richland morally obligates near-term action.
- The Board supports the newly proposed milestone M-016-086 (9/30/21) for cleanup of the 618-11 burial ground⁸.
- The Board advises the TPA agencies to expeditiously investigate whether the PUREX tunnels pose a high risk, and if so, to then negotiate milestones to begin planning for their remediation.
- The Board advises DOE to move the WESF cesium and strontium capsules⁹ into dry storage. These capsules pose a very high risk. Proposed milestone changes should be adjusted accordingly to better reflect this higher priority.
- The Board advises the TPA agencies to schedule meetings to educate the Board and the public on expectations for cleanup based on year-by-year goals and

⁷ **M-016-85:** "Complete remedial actions for 300-296 Waste Site in accordance with RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1) and final disposition for the 324 Building and Ancillary Buildings in accordance with the Removal Action Work Plan (DOE/RL-2004-77)." (9/30/2021)

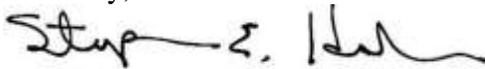
⁸ **M-016-86:** "Complete remedial actions for 618-11 Burial Ground in accordance with RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1)." (9/30/2021)

⁹ **M-092-05:** "Determine disposition path and establish interim Agreement Milestones for Hanford Site Cs/Sr capsules. DOE will assess the viability of direct disposal of the Hanford Cs/Sr capsules at the national high-level waste repository and provide a schedule leading to its disposition. If DOE concludes that direct disposal is a viable and preferred alternative to vitrification, DOE will submit to Ecology specific documentation justifying its conclusion, with a proposed milestone change request establishing enforceable Agreement Milestones for dispositioning Hanford Cs/Sr capsules." (06/30/2017) *NOTE: This milestone is not included in this Change Package.*

activities for the next decade and beyond. The intent is for the Board and the public to better understand the overall impact of the delays proposed in the change package and to address how DOE intends to mitigate the “bow wave” of unfunded work that has accumulated.

- The Board advises the TPA agencies to improve the public review and comment process on proposed changes to the TPA or other important cleanup actions, working closely with the HAB's Public Involvement and Communication Committee on the development of materials and presentations describing change packages.
- During future TPA Change Package comment periods, the Board advises the TPA agencies to include supplemental plain language explanations of terminology used throughout the change package in their materials, especially references to buildings, facilities, and waste sites.
- The Board advises the agencies to create materials during future TPA Change Package comment periods that make information about the following clear and accessible:
 - Rationale for the proposed changes and assumptions that were used to both necessitate the delay and support the new proposed dates;
 - Explanation of how the potential for increased risks to the environment, workers, the public, and Tribes were assessed;
 - High-level overview of all pending cleanup work at Hanford and where the proposed changes fit within completion of Hanford cleanup;
 - Impacts of the delays on estimated long-term cost increases for cleanup.

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.

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