December 26, 2008

Ms. Susan Leckband, Chair
Hanford Advisory Board
713 Jadwin, Suite 4
Richland, Washington 99352

Re: Hanford Advisory Board (HAB) Consensus Advice #209 – Updated Tank Waste System Plan

Dear Ms. Leckband:

Thank you for your letter regarding tank waste retrieval, treatment, and immobilization at Hanford and advice on the “Updated System Plan to Retrieve, Treat, and Dispose of Tank Waste and Close Tank Farms” (Updated Tank Waste System Plan). Director Manning asked me to reply to you on his behalf.

The Department of Ecology agrees that an Updated Tank Waste System Plan should be issued annually and made available to the public. A System Plan is vitally important to support key decisions on tank waste retrieval, treatment, disposal, tank farm closure, and for gaining regional and national support.

We too expect the Tank Waste System Plan to establish a baseline, and also to evaluate all aspects of planning, alternative cases, programmatic risks (including regulatory compliance), and lifecycle costs of the various alternatives. Our goal is to aggressively plan and continue making progress on Hanford cleanup. The only way we can meet our goal is by having a Tank Waste System Plan that is clear and credible and that provides an integrated path for tank waste retrieval, treatment, and immobilization.

We have told the U.S. Department of Energy (USDOE) that we are interested in participating in all aspects of developing the System Plan. We have recommended to USDOE that the Waste Treatment and Immobilization Plant (WTP) Contractor and the Tank Farm Operations Contractor integrate their respective models for the Tank Waste System Plan. To date we have only provided general guidance on scope and strategic objectives.

We do not expect the Tank Waste System Plan to detail reducing worker exposure to chemical vapors. We do expect USDOE to be able to provide their plans on how to achieve a safe working environment. In addition, the final fate of all waste streams is under analysis and final requirements for the waste streams will be governed by the WTP Dangerous Waste Permit and USDOE and federal policy.
As Ecology said in our response to HAB Advice #192 (dated October 5, 2006), developing and implementing a credible plan for Hanford tank waste is of great importance. The plan must address all the interconnected issues involved in retrievals and waste processing.

We appreciate the HAB’s interest in the Tank Waste System Plan. We will continue to share with you our involvement in the development of this document. USDOE plans to have key assumptions and the approach for the River Protection Project (RPP) System Plan, Rev. 4 established by the end of December 2008. Ecology supports USDOE’s intent to update this plan annually to reflect new information and to incorporate model refinements. We believe that, over time, the System Plan will become an increasingly valuable tool for planning, decision-making, and communications.

Sincerely,

Jane A. Hedges
Program Manager
Nuclear Waste Program

nu/lkd

cc: Elin D. Miller, EPA Region 10
    Dennis Faulk, EPA
    Doug Frost, USDOE-HQ
    Doug Shoop, USDOE-RL
    David Brockman, USDOE-RL
    Shirley Olinger, USDOE-ORP
    Steve Pfaff, USDOE-ORP
    Stuart Harris, CTUIR
    Gabriel Bohnee, NPT
    Russell Jim, YN
    Ken Niles, ODOE