

United States Government

Department of Energy
Richland Operations Office

memorandum

DATE: AUG 3 2009

REPLY TO
ATTN OF: FMD:KSM/09-FMD-0161

SUBJECT: FISCAL YEAR (FY) 2011 ENVIRONMENTAL MANAGEMENT BUDGET SUBMITTAL
FOR THE U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE (RL)

TO: I. R. Triay, Assistant Secretary
for Environmental Management, EM-1, HQ

Consistent with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), we are requesting \$1,095M for FY 2011 which is required to continue to meet our commitment to clean up the legacy of the Hanford Site. This budget request fulfills a requirement of the Tri-Party Agreement between DOE, the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology), premised upon the expectation that the changes tentatively agreed as part of the January 2009 Negotiations Conclusion Agreement is formally made. This request also supports work scope to be accomplished consistent with federal environmental statutes, regulations, and permits that are not captured by the Tri-Party Agreement.

Our planning represents our efforts to align the challenges, both technical and fiscal, with our commitment to make significant cleanup progress at the Hanford Site and reduce the active cleanup footprint. In summary, with this budget request and incremental funding received through the American Recovery and Reinvestment Act, RL will:

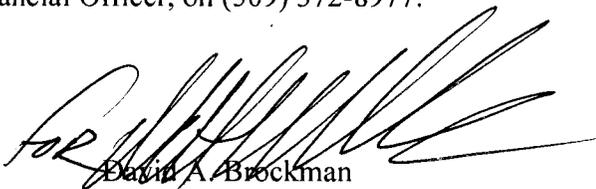
- Maintain safe and compliant facilities and essential services;
- clean up most of the River Corridor Area of the Hanford Site by 2015 (this includes a focus on the River Corridor Project, K Basins Closure Project and River Corridor Groundwater Remediation);
- complete the demolition and decontamination of the Plutonium Finishing Plant by 2016;
- continue transuranic waste retrieval from burial grounds;
- continue transuranic waste repackaging and continue shipments to Idaho National Laboratory and the Waste Isolation Pilot Project;
- continue Central Plateau groundwater and waste site characterization, including Remedial Investigation/Feasibility Studies;
- continue mixed low-level waste treatment;
- support the remote-handled transuranic waste capability project;
- remediate waste sites in the Central Plateau 200 Areas;
- support U Plant Canyon remediation pilot project; and
- support the Natural Resource Trustee Council Operations and Natural Resource Damage Assessment activities.

AUG 3 2009

As part of Tri-Party Agreement Paragraph 148 and DOE's commitment to seek, collect and consider input in the development of Hanford's budget, we provided budget briefings and information to Ecology, EPA, Tribal Nations, the Hanford Advisory Board (HAB) and the public during RL's budget development process. We are providing, as attachments to this memo, the HAB advice #213, "Priorities for Fiscal Year 2010, Out-Year and Economic Stimulus Budgets," dated February 6, 2009, Ecology letter, "United States Department of Energy (USDOE) Federal Fiscal Year 2011 Budget Impacts at Hanford," dated July 14, 2009, to RL, ORP, and HQ EM, and all comments that were submitted to RL and ORP online via the Hanford Site web page as of July 30, 2009. In our briefings and public meetings with the regulators, the HAB, Tribal Nations, and the public, we asked that comments be provided by July 30, 2009. The written comments are also available electronically on the Hanford website at www.hanford.gov.

Efforts are ongoing to look at cleanup strategies that emphasize reduction of the active cleanup footprint thereby creating opportunity for increased investment in other areas such as the transuranic waste treatment and retrieval and Central Plateau groundwater remediation and characterization. We will continue to seek input on cleanup priorities from our regulators, Tribal Nations, stakeholders, and members of the public. That input will also be provided to DOE Headquarters for consideration in the development of the FY 2011 budget request for Hanford cleanup.

If you have any questions, please contact me, or your staff may contact Gregory A. Jones, Assistant Manager for Administration/Chief Financial Officer, on (509) 372-8977.



David A. Brockman
Manager

Attachments

cc w/attachs:

D. A. Faulk, EPA
C. M. Flohr, EM-31
J. A. Hedges, Ecology
J. H. Luczak, EM-31
S. S. Patel, EM 3.2
M. L. Sykes, EM-30
C. D. West, EM 3.2

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

February 6, 2009

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Ines Triay
Acting Assistant Secretary
Office of Environmental Management
EM-1/Forrestal Building
U.S. Department of Energy
1000 Independence Avenue
Washington D.C. 20585

Re: Priorities for Fiscal Year 2010, Out-Year and Economic Stimulus Budgets

Dear Ms. Olinger, Mr. Brockman, and Ms. Triay,

Background

The Hanford Advisory Board (Board) has consistently emphasized its commitment to the timely and effective cleanup of the Hanford Site in compliance with the Department of Energy's (DOE) commitments under the Tri-Party Agreement (TPA). The Board has also on a number of previous occasions expressed its concerns regarding the inability of DOE's field offices – the Richland Operations Office (DOE-RL) and the Office of River Protection (DOE-ORP) - to meet binding programmatic requirements for the Hanford Site cleanup program due in part to the continuing inadequacy of funding provided to the DOE's Environmental Management (EM) program. The TPA is a legally binding commitment by DOE for the cleanup of the Hanford Site.

In the development of their Fiscal Year (FY) 2010 Budget and out-year requests, and in any stimulus package, the Board urges DOE to request adequate funding to

achieve compliance with existing TPA milestone commitments and to make adequate progress towards existing out-year milestone commitments.

The Board has already identified \$220 million in specific additional priority funding needed for FY 2009, which would provide concrete cleanup advances to protect the Columbia River, groundwater and improve safety (Advice #205). That additional \$220 million, if appropriated, would be less than half the amount of funding which DOE reports would be needed to meet existing TPA schedules and its own baseline. Our advice on the FY 2009 budget provides a basis to guide prioritizing additional funding by DOE's field offices and Congress for FY 2010 through 2012.

Our goal of accelerating reduction of the contamination footprint and reducing safety risks is not new. DOE committed to Congress, tribes, the states and the public to request that the funding which had been going to the smaller DOE sites cleaned up under the "2006 Closure Account" would be dedicated to cleaning up the remaining large sites, including Hanford. Instead, following Office of Management and Budget direction, DOE's congressional budget requests were for those funds to be spent on other programs starting in FY2006. Hanford delayed work, and milestones were relaxed while funds were concentrated on closing the smaller sites. DOE's commitment to increase funding was not honored. Now is the time to accelerate the cleanup of the most contaminated areas of the nation, including Hanford.

Remedial investigation and feasibility studies are required by law, and the TPA must receive funding for proposals to "shrink the footprint," and to proceed to be "shovel-ready." Thus, additional funds for projects should be authorized and appropriated to be obligated over several years. The Board recommends that DOE request such supplemental funding as may be available from part of the national economic stimulus program. In addition to accelerating the cleanup of the Hanford Site, such supplemental funding would meet the national goals of expediting shovel-ready, job-creating programs. Both field offices have a number of programs and projects for which the planning and initial regulatory requirements have been met to allow their early initiation. The undertaking of additional site cleanup programs and the expediting of currently funding limited programs would, in addition to meeting economic stimulus goals, help resolve many of the concerns regarding the relatively slow rate of progress on Hanford Site cleanup.

The recommendations we make would, if followed, accelerate protection of the environment from spreading contamination and reduce serious risk and have the important benefit of actually lowering the total cost and liability of the federal

government for cleanup of Hanford. A very large proportion of funding for Hanford cleanup goes to simply maintaining safety envelopes, dangerous facilities and waste sites.

For example, the site spends over \$50 million a year simply to maintain “minimum safe and secure services” for the Plutonium Finishing Plant (PFP), with numerous serious risks. Accelerating clean out and demolition is an investment which will actually save taxpayers hundreds of millions of dollars in long-term liability, while improving safety.

The bullets included within the following Board advice are not listed in priority order.

Advice

Both field offices are advised to consider using the following general principles in developing their supplemental funding requests and budget planning for FY 2009, 2010 and out-years, and to develop a multi-year Integrated Priority List (IPL) for utilization in funding allocations, which must be done in collaboration with the regulators, the Board and based on public input.

- Allocate funding by general program priorities rather than specific tasks.
- Identify early start programs and the resulting benefits, starting with shrinking the contamination footprint and making the Columbia River Corridor available for safe public and tribal use pursuant to treaty rights and plans for the Hanford Reach National Monument by 2012.
- Ensure worker health and safety.

Identify the impact the proposed expenditure would have on the following objectives.

- Protect the Columbia River.
- Reduce the footprint of the Hanford Site.
- Stop or reduce the spread of groundwater contamination.
- Complete decontamination and removal of contaminated unused facilities.
- Reduce risk and future costs.
- Accelerate cleanup of specific sites to reduce long term maintenance and surveillance costs.
- Advance scientific understanding of and develop engineering and scientific solutions for identified cleanup problems.

OFFICE OF RIVER PROTECTION

The Board's overarching values and funding priorities for DOE-ORP are summarized as follows:

- Provide adequate funding to continue construction of the Waste Treatment Plant (WTP) to meet the 2019 start-up date.
- Upgrade the tank farm infrastructure. Upgrades are needed to protect the environment and to prepare to transfer waste to WTP.
- Remove waste as soon as possible from corroding and leaking single shell tanks (SSTs).
- Begin design and engineering of a second Low Activity Waste (LAW) facility and/or supplemental treatment immediately. WTP is not designed to treat all of Hanford's tank waste.
- Address technical issues such as reducing the sulfur and aluminum content in tank waste and treatment of secondary waste. These types of issues must be addressed soon so WTP can function appropriately.

SUGGESTED AREAS FOR SUPPLEMENTAL DOE-ORP FUNDING

- Upgrade site infrastructure to facilitate site compliance with hazardous waste law standards and to prepare for transferring waste to WTP.
- Accelerate waste retrieval from SSTs. With 140 SSTs remaining to be emptied, DOE must accelerate retrieval beyond one or two tanks per year.
- Upgrade and/or create additional waste evaporator capacity to make space available for retrieval.
- Reinitiate planning for the early start-up of the LAW portion of the WTP evaluation of options for a second LAW vitrification facility.
 - These studies should include the evaluation of alternative LAW treatment and processing options including sodium wastes treatment, LAW waste melter life and capacity and supplemental waste stream processing options.
 - Decisions regarding the treatment of the LAW wastes should be made by 2012 with a goal of achieving processing operations by 2022 for the second LAW facility.
- Accelerate characterization of the contaminated soils (vadose zone) beneath the tank farms to support cleanup decisions.
- Conduct SST structural assurance studies and characterization of wastes.

- Accelerate cleanup of the Columbia River Corridor soil and groundwater – reversing the delays towards meeting the goals of completion by 2012.
 - Install or expand groundwater pump and treat and other remediation projects for areas along the river including 100 K Area and 100 BC Area.
 - Continue removal of K-Basin sludge and removal of pools.
- Resume and fully fund TRU retrieval and treatment to meet TPA milestones.
- Treat the backlog of mixed wastes stored on site.
- Provide remote-handling capability to address 618-10 and 11 burial grounds; including, packing, treatment and size reduction of remote-handled TRU.
- Complete cleanup of 618-10 and 618-11 burial grounds and K Basin sludge by 2015.
- Provide for maintenance and upgrade of site infrastructure to support cleanup mission.
- Characterize and issue plans for waste sites surrounding PFP and canyons to support an integrated cleanup approach for PFP and nearby areas beginning in 2010; including full funding of the 200-ZP-1 operable unit pump and treat system for cleanup of groundwater.
- Completely fund National Resource Damage Assessment program requirements.
- Continue and expand vadose zone and groundwater characterization program to meet schedules for issuing cleanup decisions.

The Board strongly supports the provision of adequate funding to achieve the above programmatic goals and objectives. Providing the additional funding to fully support the above objectives will materially support the goals of reduction of the Hanford Site footprint, and reduce the risk that Hanford poses to the regional environment. The provision of economic restoration or stimulus funds above the normal Hanford DOE-EM budget allocations will also support the national economic stimulus objectives of employment enhancement and economic recovery in the near term.

- Upgrade Effluent Treatment Facility to treat secondary waste from WTP.
- Design and construct the high-level glass storage facility.
- Continue the Pretreatment Engineering Platform Phase 2 testing to assist the development of a sodium management strategy.

RICHLAND OPERATIONS OFFICE

The Board's overarching values and funding priorities for DOE-RL Operations Office are summarized as follows:

- Remediate groundwater and vadose zone contamination to protect the Columbia River, starting with groundwater along the Columbia River.
- Fund retrieval and treatment of wastes from soil sites, and treatment of the backlog of mixed wastes.
- Complete groundwater and soil remediation.
- Remove and treat all transuranic waste (TRU), including waste with TRU characteristics in the soil buried or discharged before 1970.
- Complete cleanup of the Columbia River Corridor, including 618-10 and 11 burial grounds and K Basin sludge.
- Maintain adequate site infrastructure to support all site functions.
- Characterize waste sites and issue investigation and cleanup proposals to meet the 2011 deadline in the TPA for these plans.
- Accelerate decontamination and decommissioning of PFP and the surrounding area.

SUGGESTED AREAS FOR SUPPLEMENTAL DOE-RL FUNDING

DOE's IPL for FY 2010 identifies \$685 million in specific cleanup work required by the TPA or in DOE's baseline which would not be funded at the request/target level for 2010. We commend DOE-RL for providing an IPL with transparency for the cost of each 'activity building block' to allow the regulators, the Board and the public to review and advise on funding priorities, as well as assist in making difficult choices.

Our advice prioritizes funding choices within the context of DOE having inadequate 'target' funding to meet all requirements:

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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

cc: Elin D. Miller, U.S. Environmental Protection Agency, Region 10
Jay Manning, Washington State Department of Ecology
Doug Shoop, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office
Steve Pfaff, Co-Deputy Designated Federal Official, U.S. Department of Energy, Office of River Protection
Richard Campbell, Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Catherine Brennan, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations



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July 14, 2009

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Ms. Shirley J. Olinger, Manager
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Mr. David A. Brockman, Manager
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Re: United States Department of Energy (USDOE) Federal Fiscal Year 2011 Budget Impacts at Hanford

Dear Dr. Triay, Ms. Olinger, and Mr. Brockman:

The Washington State Department of Ecology (Ecology) has reviewed your plans to use Federal Fiscal Year (FFY) 2009 supplemental funds (American Recovery and Reinvestment Act or ARRA), FFY 2010 funds, and FFY 2011 funds to achieve progress in Hanford Site cleanup.

We appreciate your briefing fellow Tri-Party Agreement agencies, the tribes, and the Hanford Advisory Board on the budget proposals for 2009 through 2011 and the ARRA stimulus funding as your plans developed during the past several months. We appreciate both USDOE offices' efforts to comply with the budget briefing and coordination requirements of the Tri-Party Agreement (TPA) as the new federal administration worked out the budget process and schedule for FFY 2010 and 2011.

The ARRA stimulus funds create a major opportunity for Hanford to make additional cleanup progress beyond what would have been accomplished with the planned budget funding levels. Ecology is pleased that you are using the combination of base budget funding and ARRA funding to restore priority funding to work that you stopped in late 2008 because of the funding constraints in the 2009 continuing resolution. We support the effort to use both fund sources to achieve tangible progress during the 2009, 2010, and 2011 for the following cleanup activities:

- Accelerate the containment and treatment of contaminated groundwater along the Columbia River and on the Central Plateau.
- Continue construction of the Waste Treatment Plant (WTP) to treat tank waste.
- Continue retrieval of the tank waste from the single-shell tanks.
- Fund critical upgrades to the tank farms to ensure that tank waste can be transferred to the WTP and that the plant can operate at full capacity.
- Complete soil and building cleanup on the River Corridor by 2015 – shrinking the area of active cleanup at Hanford to 75 square miles in the Central Plateau.
- Start active soil and building cleanup in the Central Plateau.

Overall, Ecology's priorities for the Hanford cleanup budget for the next several years continue to be:

Richland Operations Office (RL)

1. Accelerate groundwater containment and remediation along the Columbia River and on the Central Plateau.
2. Finish the river corridor cleanup (including K Basins) of contaminated buildings, soil, and groundwater to reduce the risk to the river and to the users of the Hanford Reach National Monument.
3. Finish the Plutonium Finishing Plant remediation to reduce environmental and worker risk and to minimize safeguards and security costs.
4. Start full-scale remediation of soil and decommissioning & demolition of buildings in the Central Plateau. Complete regulatory documents on the near-term TPA schedule to enable work to proceed as rapidly as funding allows.
5. Finish transuranic (TRU) and mixed waste backlog retrieval, packaging, certification, and off-site shipment as soon as funding allows.

Office of River Protection (ORP)

1. Construct the WTP on the most rapid achievable schedule and identify, communicate, and address technical and scheduling problems early.
2. Maintain safe tank farm storage and drive down the cost of base operations at the tank farms, making more funds available for cleanup.
3. Retrieve waste from the single-shell tanks and make full use of the 242-A evaporator (and other potential technologies) to make maximum progress prior to start of tank waste treatment at the WTP.
4. Complete upgrades to tank systems and facilities required to support timely retrieval and WTP operations.
5. Construct new facilities necessary to support or maintain WTP operations (for example, second low activity waste treatment facility and immobilized high-level waste canister shipping/storage facility).
6. Complete studies having potential to improve WTP operating efficiency (for example, sodium management, increased waste loading in glass, Phase 2 testing at the Pretreatment Engineering Platform).

At both the USDOE Headquarters and Hanford Site levels, Ecology reiterates its position that the USDOE is legally obligated to meet all TPA milestones and is responsible for submitting a budget sufficient to attain these milestones. Ecology offers the above list of priorities without waiving this position, and without excusing the USDOE from any non-compliance. For those matters addressed by current TPA milestones that are now unachievable due to the USDOE's delays (namely, tank waste retrieval and treatment), the USDOE should develop project baselines that allow for such work to move forward as quickly as possible. In this way, the USDOE's delays beyond the milestone dates will be minimized to the maximum extent possible.

Looking ahead for the next few months, Ecology is very interested in working closely with the United States Environmental Protection Agency, RL, and ORP to complete the following key cleanup planning activities:

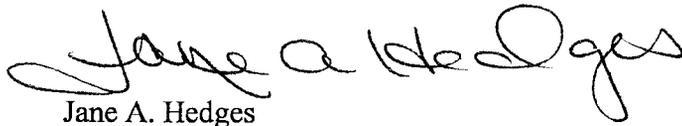
- Review the contractor baselines for the cleanup work for the single-shell tanks and the Central Plateau.
- Review the detailed plans for spending the ARRA stimulus funds in combination with the base budget funds.
- Develop the draft TPA change packages for the schedule to:
 - Complete the cleanup decisions for the soil and buildings on the Central Plateau.
 - Complete the retrieval and shipment to the Waste Isolation Pilot Plant of the retrievably stored TRU waste.
 - Treat the backlog of mixed waste in storage at the Central Waste Complex.

Ms. Triay, Ms. Olinger, Mr. Brockman
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The above list does not include any matters within the scope of the *Washington v. Chu* case, or under discussion in relation to that case.

We look forward to continuing discussions with you about your plans. If you have any questions about our comments, please contact John Price at 509-372-7921 or Ron Skinnarland at 509-327-7924.

Sincerely,

A handwritten signature in black ink that reads "Jane A. Hedges". The signature is written in a cursive, flowing style.

Jane A. Hedges
Program Manager
Nuclear Waste Program

cc: Jay Manning, Ecology
Dennis Faulk, EPA
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record
Environmental Portal
ORP Correspondence Control

From: Webmaster@RL.gov [mailto:Webmaster@RL.gov]
Sent: Tuesday, July 28, 2009 12:16 PM
To: ^Webmaster
Subject: DOE Hanford Site 2011 Budget Formulation

The following comment has been submitted in response to DOE Hanford Site 2011 Budget Formulation:

Name: Cimon , Shelley
Address: 1208 First Street
La Grande Or 97850
E-mail: scimon@oregontrail.net

Comments: *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

Author's permission granted to publish this comment: Yes

From: Webmaster@RL.gov [mailto:Webmaster@RL.gov]
Sent: Thursday, July 30, 2009 4:17 PM
To: ^Webmaster
Subject: DOE Hanford Site 2011 Budget Formulation

The following comment has been submitted in response to DOE Hanford Site 2011 Budget Formulation:

Name: Niles , Ken

Address: Oregon Department of Energy/625 Marion Street NE
Salem OR 97301

E-mail: ken.niles@state.or.us

Comments: *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's permission granted to publish this comment: Yes