



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

June 7, 2018

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Susan Leckband

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Dear Mr. Shoop, Mr. Vance, Ms. Smith, and Mr. Einan:

Background

The Hanford Advisory Board (HAB, Board) has significant concerns about the future of Hanford's cleanup funding. A compliant budget for the Hanford Site would require \$3.4 billion for Fiscal Year (FY) 2019, however the President's budget falls short at \$2.2 billion. Every budgetary shortfall away from a compliant budget adds years to the cleanup mission; increases risks to the environment, public, and workforce; and significantly increases the total cost of Hanford cleanup. The Board has consistently advised the local U.S. Department of Energy (DOE) offices to request compliant funding levels to prevent these delays, additional risks, and increased costs. A compliant budget provides the level of funding that meets all Tri Party agreements and obligations.

Budgets are an expression of values. DOE's budget proposals need to place appropriate value on protecting the Columbia River, the health of people who rely on the Columbia River, and the health and safety of the workforce – particularly in regard to tank emissions and preventing additional contamination following the exposures from the spread of plutonium in 2017.

DOE Hanford field offices have not shared proposed project level budgets for FY2020 for review and comment by regulators, the HAB or public even though this is required by the Tri-Party Agreement (TPA). This lack of disclosure undermines public support for cleanup funding and informed comment on priorities.

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DOE is legally obligated to meet milestones as defined in the TPA and in the Consent Decree. The Board believes it is incumbent on DOE Headquarters (DOE-HQ) not only to request but to defend the level of funding necessary to meet all applicable legal requirements, including TPA schedules.

The President's Budget request for DOE Richland Operations Office (DOE-RL) FY2019 is \$747 million. The legally compliant budget for FY2019 is \$1.385 billion. DOE-RL has indicated in the past that the amount of funding required to maintain Hanford's aging facilities, site infrastructure, and surveillance is approximately \$600 million per year. The President's proposed budget would therefore provide only about \$147 million for actual cleanup – more than \$600 million less than is legally required.

Compliance budgets are crucial to the residents and stakeholders affected across the Northwest region. These budget shortfalls will clearly result in major cleanup delays, increasing risks to the Columbia River, endangering Hanford workers, and risking major failures of aging confinement systems that pose serious risk to human and environmental safety. Annual budget shortfalls also significantly increase the total cost of Hanford cleanup. Thus, the funding levels proposed would impact health, public and tribal access to the River Corridor, and the river environment for hundreds of years.

The Board is concerned that two high priority projects would not move forward with the President's FY2019 budget proposal. These projects include removal of cesium and strontium (Cs/Sr) capsules from water storage to dry cask storage, and removal of highly contaminated soil underneath the 324 Building.

The HAB is also concerned as to whether DOE-RL will have the funding to properly respond to the serious contamination spread during the demolition of the Plutonium Finishing Plant (PFP).

In addition to the severe FY2019 proposed DOE-RL budget cuts, the Board is also concerned about inadequate funding proposed for the DOE Office of River Protection (DOE-ORP). The compliance budget for DOE-ORP in FY2019 is \$2.1 billion. The President's budget cuts that by \$660 million. The President's budget cuts to DOE-ORP in FY2019 could impact funding for engineered vapor controls, worker health investments and removal of waste from aging tanks, and efforts to immobilize Hanford's tank waste in glass.

The HAB has identified FY2020 budget priorities to most expeditiously advance Hanford cleanup activities and to minimize further risks to the environment and to the safety of Hanford workers and the public. In doing so, the HAB is in no way diminishing the imperative for DOE-RL and DOE-ORP to accomplish all identified tasks leading to the cleanup commitments for Hanford.

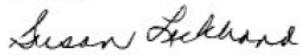
Advice

- The HAB advises DOE-RL and DOE-ORP to provide more detailed budget information including project baseline summary numbers, budget control points, analytical building blocks, and integrated priority lists for both Hanford field offices to the HAB and its regulators as it develops its annual budget submittal to Office of Management and Budget (OMB). This detailed information allows the Board, the public, and regulators to more effectively weigh in on budget priorities. The submission to DOE-HQ and review should not occur until after the public and regulators have had at least 30 days to review and comment on proposed project level and activity level funding proposed for FY2020.

- The HAB advises the following priorities be fully funded to maintain compliance with the Tri-Party Agreement in FY2020 and beyond. The following items are not listed in any specific order.
 - **River Corridor cleanup activity**, including the funds necessary to implement remedies in FY2020 which, as urged by the Board in other advice, should include removal of significant soil contamination and groundwater cleanup actions to protect the Columbia River and health of people using the shorelines.
 - **Construction of the DFLAW related facilities**, supporting hot commissioning by December 31, 2023.
 - **Expanded Public Involvement**, including activities that provide information and gather public input. These activities include full funding of the HAB, and regional meetings that effectively inform and solicit input from the public in Hanford cleanup decision making.
 - **Expanded Groundwater Pump & Treat Program**, including continued funding for operation of existing facilities.
 - **Worker Health and Safety Programs**, including engineered vapor control programs.
 - **Single Shell Tank (SST) Retrievals**.
 - **324 Building Disposition**, to eliminate the extremely high radioactive soil contamination beneath that structure, and initiate demolition of the building and surrounding facilities.
 - **Cs/Sr Capsule Relocation and Storage**, involving preparation of equipment and facilities necessary to move the Waste Encapsulation and Storage Facility's Cs/Sr capsules to long-term dry cask storage. Increased funding is necessary to remove this hazard sooner than the current draft milestone of 2025.
 - **Completion of the 100 N Chemical Reaction Barrier (Apatite Barrier)**, to prevent strontium from migrating to the Columbia River.
 - **100 B/C Cleanup**, including preparation and implementation of groundwater pump-and-treat and soil remove-treat-dispose (RTD) activities.
 - **Design and Construction of the Waste Treatment Plant (WTP)**, supporting Hot Start of the Waste Treatment Plant by December 31, 2033.
 - **Upgrade Hanford Site infrastructure to support the cleanup effort**, including those facilities and services supporting security, fire, utilities, communication, transportation, emergency preparedness, cross-site tank waste transfer capability, etc.
 - **Sludge off the River**, focusing on movement and storage of K Basin sludge to the T-Plant canyon, and addressing disposition of contaminated K Basin facilities/equipment.

- **Plutonium Finishing Plant (PFP) Actions**, including post-demolition stabilization to prevent further spread of contamination. PFP characterization to support transfer to 200-WA-1 Operable Unit of remaining subsurface structures and soil remediation.
- **Safe storage of Hanford tank waste**, including planning for new tank waste storage capacity to assure environmental protection until robust plans for tank waste treatment can be implemented.

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: Anne White, Assistant Secretary of Environmental Management, U.S. Department of Energy, Headquarters
Dave Borak, Designated Federal Officer, U.S. Department of Energy Office of Environmental Management
James Lynch, Deputy Designated Federal Officer, U.S. Department of Energy, Office of River Protection and Richland Operations Office
The Oregon and Washington Delegations