



# HANFORD ADVISORY BOARD

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

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

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September 19, 2019

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Brian Vance, Acting Manager  
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Re: Public Involvement in Budget Development (HAB Consensus Advice #302)

Dear Mr. Vance,

**Background**

The Hanford Advisory Board has consistently advised the Tri-Party Agreement (TPA) agencies to provide detailed budgetary information during the TPA annual budget public comment period so that the Board and public are able to make meaningful public comments. Consistent with TPA requirements, the Board has requested that the field offices share their proposed out-year budget numbers, cleanup work funded by that budget proposal, and ensure that a compliant budget is requested that meets TPA and other regulatory or consent decree schedules.

The field offices have historically provided the following budget information to the Board, Tribes, public and regulators:

- The overall funding guidance from headquarters for each field office's proposed budget and how the field office would break that out by Appropriation control point or account, now referred to as Project Baseline Summary (PBS) level.
- Work scope and funding for each major activity within each control point or PBS, e.g., how much funding will be allocated on emptying High Level Waste Tanks out of the \$677 million proposed for PBS ORP-14 for Radioactive Liquid Tank Waste Stabilization and Disposal and how many tanks would be emptied. This is referred to as the "Activity Data Sheet (ADS)" level in the TPA.
- An "Integrated Priority List (IPL)" showing each field office's proposed funding request in a building block format showing what would be the guidance level for the field office's request and what work would be funded if Congress appropriated more funding than the guidance requested.

The Board appreciated the past practice of more robust public involvement activities on the budget including holding a half-day (or longer) public workshop to present the detailed budget information and regional public budget meetings in addition to holding an evening public meeting in Richland to present the proposed out-year budget, answer questions and take comment. The Board would like to see a return to this level of public involvement on the budget, especially in light of escalating cleanup costs as detailed in the 2019 Lifecycle Scope Schedule and Cost Report. It should be noted that the additional public involvement helped build public and Congressional support for funding cleanup work. The Board is looking forward to the Committee of the Whole planned for Oct 2019 on what is currently called the 2024 Vision and Annual Work Priorities and will benefit from learning about current funding priorities, opportunities and constraints. However, the Board does not want this to replace the need for an annual spring budget workshop and public meetings to enable meaningful Board and public comment on the regional DOE Hanford site offices funding proposal.

The Board is frustrated that USDOE has not shared with the public or regulators any proposed funding levels or detailed work scope for fiscal year 2021. USDOE also did not share proposed overall funding by major appropriation account (PBS) for each field office.

If the Hanford field offices were to return to sharing meaningful planning proposals for budget and work scope in a workshop and regional public meetings, public understanding and support for cleanup funding and priorities would be enhanced across the region.

Sharing that information would reduce confusion over how proposed funding levels and work compare to longer term cost and schedule impacts from various funding scenarios discussed in the 2019 Lifecycle Scope, Schedule and Cost Report. It will also allow the public to provide meaningful input to USDOE.

The TPA Article XLVIII Section on Cost, Schedule, Implementation, Planning and Scope begins on Page 65 of the “Legal Agreement” viewable at [https://www.hanford.gov/files.cfm/Legal\\_Agreement.pdf](https://www.hanford.gov/files.cfm/Legal_Agreement.pdf). Paragraphs 148 and 149 require USDOE to provide the regulators and public with the level of budget and work scope detail necessary to enable the regulators and public to review whether the proposed budget will fund the work required in the fiscal year for which the field offices are planning. The TPA agencies are discussing updating the terminology used to describe budget documents and practices in this section of the TPA.

The TPA requires a comment period to be held each spring on the proposed budget being developed by the Hanford site field offices (e.g., in the Spring of 2019, the Hanford site was planning for the 2021 fiscal year). The workshop which USDOE previously held each spring, and which the Board advises USDOE to resume, would enable the Board and public to understand what work is being proposed for funding and have questions posed and answered at the outset of the comment period. This workshop and regional public meetings aid in the development of the Board’s advice.

### **Advice**

The Board advises USDOE to return to sharing detailed budgetary information at the outset of the comment period each spring, including the proposed PBS level funding, guidance from HQ, the funding and work scope for the level below that (regardless of whether USDOE has changed the name of how it breaks out this level from the terminology in the

TPA), and Integrated Priority Lists. The comment period is not meaningful without providing this information. The Board also advises that the information be shared with adequate time for the Board to prepare timely advice, coordinated with the annual Board work plan.

The Board advises the TPA agencies to start the annual budget comment period with a workshop for Board and interested public, Tribes and regulators in which:  
Detailed budgetary information is shared for the proposed funding request for each field office including project baseline summary numbers, a breakout for each project baseline summary to show major spending categories, budget control points, analytical building blocks, and integrated priorities lists;  
The cleanup work scope and priorities for the next five years is provided, including work scope at risk if cleanup funding levels drop;  
Opportunities exist for questions, answers and discussion.

The Board advises the TPA agencies to resume holding regional public meetings on cleanup budget priorities during the comment period and prior to submission of field office budgets to HQ. The Board advises the TPA agencies to make sure these meetings:

- Are planned with input from the HAB and the HAB's Public Involvement and Communications committee;
- Include information about how the proposed budget reflects escalating cleanup costs as detailed in the Lifecycle Scope, Schedule and Cost Report in order to build support for long-term investments and priorities;
- Provide the public with an overview of the work required by TPA and other compliance documents along with the funding which would be required to stay on schedule (the Compliant Budget).

The Board advises that the level of detail provided on budget priorities enable the Board and public to differentiate the costs of "min-safe" and "mortgage costs" from the funding for actual cleanup work.

Sincerely,



Susan Leckband, Chair  
Hanford Advisory Board

Enclosure

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cc: Dawn Wellman, Executive Director, Benton-Franklin Council of Governments, David Borak, Designated Federal Officer, U.S. Department of Energy, Headquarters  
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