

## Draft HAB Advice for Establishing FY2014-2015 Cleanup Priorities

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### Background

The Board understands that there may be reduced site budgets in the coming years. It is important to the Board that cleanup (defined by the Board as projects that achieve regulatory compliance, risk<sup>1</sup> reduction, removal of contamination from the environment, mitigation of hazards, and consideration of tribal treaty rights), is prioritized over non-cleanup work in times of reduced funding. The Board believes that DOE, Ecology and EPA should develop and implement a selection process for prioritizing cleanup projects that examines each cleanup project against a variety of criteria that reflect Board values and public concerns. This prioritization framework would be reflected in the Lifecycle Scope, Schedule, and Cost Report (Lifecycle Report), and be applicable to out-year budgets.

The Hanford Advisory Board (Board) is very disappointed with the processes of establishing the annual Hanford budget. The late release of budget information, coupled with sequestration impacts, present a major concern to the Board about cleanup work prioritization and transparency. Recent discussions with the U.S. Department of Energy-Richland Operations Office (DOE-RL) and the U.S. Department of Energy-Office of River Protection (DOE-ORP) raised many questions regarding the adequacy of the out year budgets to meet Tri-Party Agreement (TPA) Milestones.

The Board believes a system should be developed to prioritize projects that have funding profiles and schedules in the Hanford Site Cleanup baseline, and are evaluated in the cost analyses contained in the Lifecycle Report. To that end, the Board has developed suggested criteria for the TPA agencies to consider when prioritizing cleanup work.

### Advice

The Board believes that all cleanup actions at Hanford are important and should be funded. Acknowledging that budgets vary year to year, the Board believes that prioritizing cleanup projects using values-based criteria will produce a prioritized list of projects that can be cut in times of reduced budget, and expanded in times of abundance. The Board advises DOE to develop a rational framework for prioritizing cleanup projects in FY 2014 and 2015 using the following criteria identified as key to this decision-making process, and that reflect HAB values:

**A. If the answer to the following filtering criteria questions is a “yes”, the project would be considered priority for 2014-2015**

- F1. Will delaying the cleanup project cause or create a clear and present danger to human health and the environment?

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<sup>1</sup> The potential to harm human health and the environment in the short and long term.

- F2. Is the project already underway?
- F3. Is the project actually performing cleanup as opposed to non-cleanup related work (ex: technical review, R&D of low-risk buildings...)?
- F4. Will delaying the cleanup project result in increased lifecycle costs and result in a predicted increase in total cleanup cost?

**B. If the answer to the following discriminating criteria questions is a “yes,” then the cleanup project would be evaluated based on the following table. Each of the following questions would be scored from 0-25 points.**

- D1. Does the cleanup action prevent the short-term spread of contamination?
- D2. Does the cleanup action reduce long-lived radiation contamination and risk?
- D3. Does the cleanup action protect the Columbia River?
- D4. Does the cleanup action protect/remediate the deep vadose zone
- D5. Is the cleanup action on a critical path?
- D6. Does the cleanup action use existing and proven technologies (rather than developing unknown technologies, e.g. bulk vitrification plant, steam reforming)?
- D7. Does the cleanup action prevent future releases (build tanks)?
- D8. Does the cleanup action mitigate past releases (vadose zone)?
- D9. Does the project demonstrate cleanup success to the public?
- D10. Does the cleanup action reasonably address public concerns?
- D11. Is the cleanup action achievable?
- D12. Does the cleanup action safely treat, store, or dispose of waste?
- D13. Does the cleanup action reduce near-term risk to the public?
- D14. Does cleanup action reduce near-term risk to the environment?
- D15. Does the cleanup action prevent unnecessarily exposing workers to risk?
- D16. Does the cleanup action mitigate mobile high-risk contaminants before less mobile high-risk contaminants (e.g. 324 Building, drainable liquids in the tank waste)
- D17. Does the cleanup action contain infrastructure budget/support systems necessary to complete the work?
- D18. Does the cleanup action reduce future long-term risk?
- D19. Does the cleanup action maintain/meet/move towards attainment of TPA milestones, consent decree, RCRA permit requirements?

These factors could be arranged in a matrix for purposes of evaluating the relative importance of each factor as it applies to a given project, and the total ranking of each project relative to each of the other projects. The Board advises DOE to develop a system of the type outlined below for prioritizing the many baseline projects to achieve the most essential cleanup activities and maintain the minimum-required safety functions for the Site, within the available budget.

Discriminating Criteria Matrix for Cleanup Project Prioritization

	Criteria 1	2	3	4	5	6
Project A						
Project B						
Project C						
Project D						