



U.S. ENVIRONMENTAL PROTECTION AGENCY
HANFORD PROJECT OFFICE
825 Jadwin Ave., Suite #210
Richland, WA 99352

April 4, 2019

Shannon Ortiz
Management Analyst
Richland Operations Office
U.S Department of Energy
P.O. Box 550, M/S H5-20
Richland, Washington 99352

Subject: Comments on 2019 Hanford Lifecycle Scope, Schedule and Cost Report

Dear Ms. Ortiz:

The U.S. Environmental Protection Agency is providing comments on the 2019 Hanford Lifecycle Scope, Schedule and Cost Report through this letter. Thank you for the opportunity to comment and to help shape future baseline analyses and reporting. The baseline report is an important tool in helping to scope, plan and account for the various activities that need to be completed to keep Hanford cleanup on track and headed toward eventual completion.

Our comments are provided below:

1. Is there a more widely accepted rate of realization of problems that would increase costs besides picking the high end as everything that could go wrong? It seems like this number could be misused to influence the scope and quality of Hanford cleanup in a negative way. Suggest that the next lifecycle include a case that is more based on real life experience at Hanford and other major cleanups across the country to come up with an actuarial type formula for when problems that affect cost and schedule are encountered.
2. The alternatives regarding how much Remove-Treat-Dispose (RTD) work will take place in the 200 Area are not realistic. The assumption of RTD only to 15' is not always a good one in many places including the Central Plateau Inner Area. The report is vague about cleanup in the Outer Area but seems to imply that it won't have as prolonged a long-term stewardship period as the Inner Area where some waste management will continue in perpetuity.
3. Not all deep vadose zone issues are in 200-DV-1 Operable Unit (OU) so there will have to be more remedial alternative choices than just RTD and capping to help ensure protective remedies for waste sites that stretch from the surface down to the present water table.

4. The 200-PW-1/3/6 and 200-CW-5 OUs don't appear to be factored into the scope, cost, and schedule. The remedial action implementation for these OUs is also not discussed in the tables and appendices. A Record of Decision (ROD) and Remedial Design/Remedial Action work plan with enforceable schedules and related milestones should be included as this is a significant environmental cleanup effort to remove these long-lived hazards from the Hanford 200 Area National Priorities List site.
5. It appears that the 200-BC-1 OU (BC Cribs and Trenches) is missing from the cost and schedule. Or is this OU included with 200-WA-1? It shouldn't be generically included in the East Area because the waste sites are not within the 200-EA-1 OU. The only place the OU is mentioned is in the restatement of the milestones. Please explain or include this scope if it was forgotten.
6. Does DOE's Inner Area catch all for the rest of the buildings include 224-B and 224-T. These are mini-canyon buildings that concentrated plutonium and will require significant funding and effort to decontaminate and demolish (D&D) them. However, they are not likely to be anywhere near as difficult to D&D as the 233-S Pu Concentration Facility or the Plutonium Finishing Plant which were far more contaminated inside.
7. The report is vague on what projects are going to be done and when regarding the 300 Area work scope. It is difficult to decipher when the 618-11 waste site is to be remediated. In addition, there will be some retained facilities and waste sites under the final ROD that are pushed out to the 2045 timeframe. The costs don't appear to be included to address those facilities and waste sites.

The EPA looks forward to continuing to improve the lifecycle baseline. Please don't hesitate to contact me if you have questions.

Sincerely,



Craig Cameron
Project Manager

cc: Greg Jones, DOE-RL
Joe Franco, DOE-RL
Joni Grindstaff, DOE-ORP
Alex Smith, Ecology
Susan Leckband, HAB
Ken Niles, ODOE
Rod Skeen, CTUIR
Jack Bell, Nez Perce Tribe
Laurene Contreras, Yakama Nation
Administrative Record files for M-036