

# 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

## CHAIR:

Steve Hudson

## VICE CHAIR:

Susan Leckband

## BOARD MEMBERS:

### **Local Business**

Don Bouchey

### **Labor/Work Force**

Derek Donley  
Thomas Carpenter  
Melanie Meyers  
Lynn Davison  
Rebecca Holland

### **Local Environment**

Gene Van Liew

### **Local Government**

Maynard Plahuta  
Pam Larsen  
Art Tackett  
Rob Davis  
Jerry Peltier  
Gary Garnant  
Bob Parks

### **Tribal Government**

Russell Jim  
Gabe Bohnee  
Armand Minthorn

### **Public Health**

Tony Brooks  
John Howieson

### **University**

Gregory Korshin  
Richard Stout

### **Public-at-Large**

Jan Catrell  
Rudy Mendoza  
Sam Dechter  
Bob Suyama

### **Regional Environ- ment/Citizen**

Shelley Cimon  
Steve Hudson  
Floyd Hodges  
Susan Leckband  
Gerald Pollet

### **State of Oregon**

Ken Niles  
Mecal Seppalainen

### **Liaison**

**Representatives**  
Washington State  
Department of Health

## EnviroIssues

### **Hanford Project Office**

713 Jadwin, Suite 3  
Richland, WA 99352  
Phone: (509) 942-1906  
Fax: (509) 942-1926

June 11, 2015

Stacy Charboneau, Manager  
U.S. Department of Energy, Richland Operations Office  
P.O. Box 550 (A7-75)  
Richland, WA 99352

Kevin Smith, Manager  
U.S. Department of Energy, Office of River Protection  
P.O. Box 450 (H6-60)  
Richland, WA 99352

Dennis Faulk, Manager  
U.S. Environmental Protection Agency, Region 10  
825 Jadwin Ave., Suite 210 (A1-43)  
Richland, WA 99352

Jane Hedges, Manager  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA 99354

Re: FY2016 and FY2017 Budget Priorities

Dear Ms. Charboneau, Messrs. Smith and Faulk and Ms. Hedges,

## **BACKGROUND**

The Hanford Advisory Board (Board) would like to thank the U.S. Department of Energy (DOE) - Richland Operations Office (RL), DOE-Office of River Protection (ORP), the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology), known as the Tri-Party Agreement (TPA) agencies, for presenting at the recent April 28th annual public meeting for input to upcoming out-year Hanford cleanup budgets. Although most information provided was useful, overall the materials fell short of the Board's expectations. The report presented by DOE-ORP for example, was at too high of a level and lacked sufficient detail for the Board to determine how specific areas of interest would be addressed. It was clear from the materials presented that DOE intends to continue to significantly underfund Hanford for another year. The Board was pleased with DOE-RL's budget format of showing the funding requests by Analytical Building Blocks (ABB) in descending priority order. Although the Board may disagree with individual ABB funding levels, we do find it easier to understand and agree with DOE-RL's relative priority list. DOE-ORP provided no details on the Fiscal Year (FY) 2017 budget (neither budget numbers nor

**HAB Consensus Advice # 284**

Subject: FY2016 & FY2017 Budget Priorities

Adopted: June 11, 2015

Page 1

priorities). The Board recognizes that it is almost impossible to develop a compliant budget after working for so many years with non-compliant funding levels.

The Tri-Party agencies continue to attempt to settle some differences on the TPA milestones, priorities and schedules in the courts through a Settlement Agreement and a judicial Consent Decree. These processes exclude public input or review, and may result in funding decisions that vary widely from Board and public priorities. Unfortunately, the Settlement Agreement and Consent Decree discussions are casting a shadow of doubt over the reliability of this year's budgeting process, thus making it difficult for DOE to develop realistic TPA compliant budgets for the Board to review and provide meaningful comments and advice. It seems reasonable to expect that Hanford budgets will most likely change significantly once a settlement is reached and a court order is issued.

We urge that the Tri-Parties utilize the Board and public's input on budget priorities in the negotiations and court process over which path will be funded for tank waste, including providing these comments to the Court.

Prior to the April 28th DOE budget presentations, DOE requested the Board's Budgets and Contracts Committee (BCC) to develop a white paper describing its expectations for the meeting. This paper was provided two months before the actual budget presentation. The emphasis of the paper addressed budget reductions and extended schedules and the Board did have an expectation that the presentation would provide a higher level of detail of the past funding impacts on the current schedules and milestones. To our disappointment, the presentation was a repeat of previous years and the level of detail expected was not there. Additionally, the Ecology representative stated that based on past underfunding, the schedule had slipped at least 25 years.

## **SPECIFIC BUDGETARY CONCERNS**

Funding should be provided for the removal and treatment of thousands of stored containers of hazardous and radioactive waste at Hanford's Central Waste Complex. This is necessary to meet EPA and Ecology orders to remove waste and close facilities on a schedule as fast as available treatment capacity will allow.

It is imperative that funding be prioritized for the fastest possible removal of stored cesium and strontium capsules to dry cask storage from the 1970's era Waste Encapsulation and Storage Facility (WESF). In the event of a major earthquake, which is now recognized as possible, these wastes could be exposed to air causing a massive radiation release. A major earthquake could also potentially cause catastrophic damage to Hanford's aging tank system.

Funding levels for the 324 Building cleanup needs a higher priority in FY 2016. The building is very close to the Columbia River. Contamination levels in soil under the building, which are so high as to cause fatal doses in minutes, have been reported as increasing in recent weeks. Water lines supporting the fire suppression system for the 324 Building have a history of failing due to aging and could cause contamination under the building to migrate toward the river if another failure were to occur undetected.

DOE has proven that Deep Vadose Zone (DVZ) contamination can be successfully treated using a variety of technologies, including state-of-the-art pump and treat systems at Hanford. Of the 43 sites

in the DVZ Operable Unit (aka 200-DV-1) that have been identified, only one location has perched water contamination and is using the pump and treat system.

For years, the Board has followed the development of plans to remediate the Vertical Pipe Units (VPUs) in the 618-10 Burial Ground. The Board is encouraged that casings have been put in place and trained crews are now waiting for direction to begin retrieving the waste. We understand that if the crews are not given the direction to proceed, they will be disbanded. All of the money spent to plan the work and train the workers will be wasted. More importantly, a high-risk waste site that holds containers of liquid radioactive waste will remain in place. Implementation of the years of planning should not be passed off to another contractor in the future.

Overall, the Board understands the effort that both local DOE offices are making to meet required milestones and Consent Decree requirements, but budget cuts at the DOE-Headquarters (HQ) level have created a legal dilemma for local offices. The Board applauds local offices' efforts to deliver a meaningful budget and path forward. Although DOE-HQ made legal commitments to the State of Washington to cleanup Hanford in a timely manner, current budgets fall far short of meeting those agreements and place both the environment and public safety at ever increasing risk.

On a more specific but important level of concern, the Board has identified a number of budget driven cleanup issues. For example, the Board is concerned with DOE-ORP's requests for funding to empty leaking tanks. Tank retrievals such as AY-102 and T-111 do not appear to be funded in the most recently proposed FY 2017 budget. Additionally, there is no budget request to support increasing the on-site tank capacity. The overall tank liquid waste removal has slipped to the point that current TPA requirements will not be met.

As the two latest Government Accountability Office (GAO) reports on DOE's tank waste and treatment programs found,

DOE's current schedule for managing the tank waste does not consider the worsening conditions of the tanks or the delays in the construction of the Waste Treatment and Immobilization Plant (WTP), a facility being constructed to treat the waste and prepare it for final, long-term disposal....DOE has not estimated the impact of the WTP delays on its schedule to remove the waste from the tanks. As a result, DOE cannot estimate how long the waste will remain in the aging tanks. (GAO Report 15-40)

The GAO report issued last month (GAO 15-354) found that further delays and cost increases should be expected in providing treatment for tank wastes. Alternatives which the GAO found that DOE had not considered include providing new tank capacity.

These findings make it imperative for DOE to address the leaking tanks issue and provide for new on-site tank capacity.

There are a range of high priority safety and environmental risks which need adequate funding.

The Board supports DOE-RL's plan to break out site-wide services into its own clearly identified budget line in the future. This breakout will greatly add to transparency and understanding of which

essential site-wide services are funded while properly identifying the actual funding going to individual cleanup budget tasks.

The Board is very concerned about the continued reductions to the DOE-RL-100 account that funds the Board and other public involvement activities. Until recently, the Board has held rotating meetings in Spokane, Portland, Seattle, and Hood River; today we meet only in the Tri-Cities. With the current DOE-RL-100 budget, the Board holds five local meetings, and with the proposed FY 2016 budget could be limited to holding as few as four meetings. Decreasing the Board's budget works against DOE's stated goal to increase transparency, receive public opinion and stimulate active involvement of the public in the setting of budget priorities.

Public meetings were traditionally held across the region every year on Hanford cleanup budget priorities for out-years, which built regional support and public understanding and provided for a true breadth of public input on all-important priorities of what gets funded for cleanup. Likewise, there were also annual "State of the Site" meetings that allowed for public interaction with senior managers of the Tri-Party agencies, and provided input on overall priorities and major issues of public concern. Neither have been held in over one year – citing budget restrictions.

The Board's comments and advice provided this year are very similar to that provided last year due to the slow pace of progress made on the items listed last year.

#### **ADVICE**

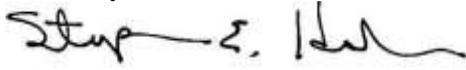
The Board believes it is critical that both DOE-RL and DOE-ORP be adequately funded for FY 2016 and FY 2017 to fulfill their cleanup mission. The following advice points are of equal value and not listed in priority order.

- The Board advises DOE-RL to fully fund and support hazardous and radioactive waste cleanup, including treatment and removal of the thousands of stored containers on-site with removal and treatment of deteriorating or improperly stored containers in the Central Waste Complex on a pace as fast as the commercially available treatment capacity allows for the waste to be removed.
- Due to high safety risks, the Board advises DOE-RL to fund removal of cesium and strontium capsules at WESF into long-term dry cask storage.
- The Board advises DOE-RL to restore funds for continued installation and activation of the strontium barrier along the Columbia River and other groundwater protective activities.
- The Board advises DOE-RL to fund characterization and remediation of all DVZ sites to the limits of technology. The Board supports a vision of future protection of the Columbia River ecosystem, all fauna and the future health of human populations to come.
- The Board advises DOE to prioritize retrieval of the waste under the 324 Building in FY 2016. The Board concurs with members of Congress who have expressed concern to DOE officials regarding this waste and the risk it poses to the Columbia River. The Board also

supports Congress adding funding to the DOE-RL budget under development for FY 2017 to continue remediation of that waste.

- The Board advises DOE-RL to proceed as soon as possible to remediate the VPUs in the 618-10 and 11 Burial Grounds. Funding to begin the process for 618-11 should follow the increased priority to complete 618-10 to ensure the continuity of a trained workforce.
- The Board advises DOE-ORP to focus on resolving technical issues still outstanding on pre-treatment, tank farm vapors, and the High Level Waste Facility when prioritizing funding requests. The Board appreciates and expects DOE-ORP to support the commitment that the Board and public will have at least 30 days to review and comment on the proposed DOE-ORP FY 2017 budget priorities with sufficient ABB detail, prior to submission to DOE-HQ.
- The Board advises DOE-ORP to provide its FY 2016 and FY 2017 budget materials in the ABB format in descending priority order in a timely manner to allow for an adequate review and well-informed comments from the Board and the public.
- The Board advises that DOE-ORP proceed to fund new tank storage capacity (see HAB Advice #275) and removal of waste from aging single shell tanks on an expedited schedule.
- The Board advises DOE-ORP to fund early startup of the Low Activity Waste Facility and for completion of the WTP.
- The Board advises that DOE-ORP provide a five-year budget projection for its programs so the Board can have a high level of confidence that there will be adequate funding to keep WTP construction on track.
- The Board advises DOE to request full funding from Congress to meet all legal requirements of the ongoing cleanup work at Hanford for FY 2016 and FY 2017. This will provide stable, multi-year funding sufficient to maintain the continuity of trained work force and procurements over the duration of Hanford cleanup.
- The Board advises DOE to request adequate funding for FY 2017 in the project baseline summary DOE-RL-100 to support a minimum of six full Board meetings per year and the necessary subcommittee meetings required to meet DOE-HQ expectations and work plan needs. Funding in FY 2016 and FY 2017 should be sufficient to provide for at least one Board meeting outside of the Tri-City region to meet expectations of the Tri-Party agencies and regional public stakeholders. By doing so, DOE ensures increased transparency and opportunities for broader public attendance.

Sincerely,



Steve Hudson, Chair  
Hanford Advisory Board

---

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

cc: Mark Whitney, Principle Deputy Assistant Secretary for Environmental Management, U.S. Department of Energy, Headquarters  
Jeff Frey, Deputy Designated Official, U.S. Department of Energy Richland Operations Office  
Joni Grindstaff, Deputy Designated Official, U.S. Department of Energy Office of River Protection  
Maia Bellon, Director, Washington State Department of Ecology  
David Borak, U.S. Department of Energy, Headquarters  
The Oregon and Washington Delegations