



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 10, 2014

14-NWP-133

Mr. Steve Hudson, Chair
Hanford Advisory Board
713 Jadwin, Suite 3
Richland, Washington 99352

Re: Hanford Advisory Board Consensus Advice # 276 "2014 Lifecycle Scope, Schedule and Cost Report"

Dear Mr. Hudson:

Thank you for the Hanford Advisory Board's advice regarding the "2014 Hanford Lifecycle Scope, Schedule and Cost Report" (Lifecycle Report). The Department of Ecology (Ecology) has considered your comments and would like to share our perspectives.

- The Board advised the United States Department of Energy (USDOE) to include a variety of Hanford funding scenarios that show the negative impact of reduced budgets on out-year cleanup schedules and the added costs that will be incurred if additional funding is not provided.

Ecology shares your concerns that the USDOE requests to Congress and Congressional appropriations are significantly lower than the estimates provided in the Lifecycle Report. But we view your request as outside the scope of the Lifecycle Report.

Tri-Party Agreement (TPA) Milestone M-036-01 requires USDOE to prepare a report that reflects actions necessary to meet applicable environmental obligations. Therefore, we encourage you to work with the USDOE to evaluate the impacts of reduced budgets in a venue other than the Lifecycle Report.

- The Board advised that the Lifecycle Report be revised to reflect that a permanent geologic repository is unlikely in the near term.

Ecology agrees, and has contacted USDOE to request that the cost of the immobilized high-level waste (IHLW) interim storage be added to the next Lifecycle Scope, Schedule and Cost Report.

The text on page 5-10 of the 2014 Lifecycle Report includes two contradictory statements:

"A planned offsite geologic repository will be ready to accept IHLW canisters from the Hanford Site starting in April 2023." (Bullet 2)

"ORP recognizes delays in the availability of a national geologic repository by April 2023 as a key uncertainty." (Footnote 6)

Ecology thinks adding the cost of the IHLW interim storage to the next Lifecycle Report will reconcile this contradiction.



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- The Board advised the Tri-Party agencies to provide preliminary cost estimates for remaining cleanup actions.

In the Lifecycle Report, those cleanup actions appear in Appendix B, Table B-1. The range of plausible alternatives appears in Tables B-2, B-3, and B-4. An anticipated schedule for detailed analyses of future cleanup action alternatives appears in Table B-6.

Ecology supports evaluation of the alternatives on the schedule in Table B-6, as it will be modified by the M-036-01 Project Managers. We view preparation of preliminary estimates now as expending scarce resources.

Further, we think it likely that changes in the TPA, possible amendments to the Consent Decree, and changes in environmental laws and rules will make revision of the estimates necessary.

- The Board advised the Tri-Party agencies to assess the value of issuing annual reports when baseline schedules have not changed.

Ecology agrees. It is possible there will be substantial changes to milestones during the next year, which would be reflected in the Federal Fiscal Year 2016 Lifecycle Report. Therefore, Ecology will encourage the Tri-Party agencies to revisit your request in April 2016.

If you have any questions regarding our responses, please contact John Price at John.Price@ecy.wa.gov or (509) 372-7921.

Sincerely,



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