



15-HAB-0013

NOV 12 2015

Mr. S. E. Hudson, Chair  
Hanford Advisory Board  
Enviroissues Hanford Project Office  
713 Jadwin, Suite 4  
Richland, Washington 99352

Dear Mr. Hudson:

HANFORD ADVISORY BOARD (Board) ADVICE #285, “TRI-PARTY AGREEMENT MILESTONE M-091 CHANGES”

Thank you for the Board’s advice on the proposed changes to the Tri-Party Agreement (TPA) M-091 milestone series. The U.S. Department of Energy (DOE) and Washington State Department of Ecology (Ecology) (agencies) have provided point-by-point responses to the Board’s advice bullets below.

**Advice Point #1:** The Board advises that the TPA agencies agree to TPA milestone M-091 (TRU) cleanup milestones that are achievable and reflect a “global continuity” with other unresolved TPA milestones, (specifically M-15, M-16, and M-85). With a transparent, comprehensive understanding of the interconnected relationships between the various change packages, the Board and the public can understand the cleanup milestones. The Board cannot prioritize any specific milestone without a DOE commitment to full funding and a logical rationale that prescribes the importance of one milestone over another.

**Response:** The agencies agree that the proposed M-091 milestone changes should reflect a “global continuity” with other TPA milestones and have sequenced work in proposed changes to the M-091 milestones with the other TPA milestones, including proposed changes to M-015, M-016, and M-085 milestones. The proposed M-091 milestones are based on repackaging smaller volumes of waste in early years (2015-2020) while several high-profile projects are being completed (i.e., Plutonium Finishing Plant, 324 Building, 618-10 and 618-11 burial grounds, and K Basins’ sludge). The proposed M-091 milestones would then schedule retrieval and repackaging of larger volumes and more difficult wastes. The post-2020 work is consistent with changes to the M-15/16/85 milestones that agencies have proposed for public comment.

**Advice Point #2:** The Board advises the TPA agencies to actively negotiate and support milestone schedules that actually reflect the limitations of time and the extent of the work necessary to accomplish shipment of Hanford TRU off-site by 2030, after which when access to the Waste Isolation Pilot Plant facility may be severely curtailed or terminated.

**Response:** The agencies agree with the need to ensure that all TRU waste is shipped offsite by 2030. The proposed milestones were structured to reflect the extent of the work necessary to accomplish the 2030 date.

**Advice Point #3:** The Board advises the TPA agencies to agree that, in tandem with off-site removal of already repackaged TRU, DOE should be actively engaged in characterizing, determining remediation methods, and quantifying volumes and packaging needs of contact handled- and remote handled-TRU wastes which have not yet been exhumed at Hanford.

**Response:** The agencies have been working on “Next Generation” remediation approaches for the past several years. A Project Management Plan required by the M-091-03 milestone requires DOE to quantify volumes and packaging needs of all wastes that have not been exhumed.

**Advice Point #4:** The Board advises the TPA agencies to remove the TRU and Transuranic mixed waste that is currently stored at the Central Waste Complex (CWC) in violation of the safety standards of Resource Conservation and Recovery Act and Washington State Hazardous Waste Management Act, in a quick and safe manner and to close those storage units. To accomplish this, waste should be treated or processed as fast as treatment capacity allows.

**Response:** The agencies share the goal of removing waste and closing the outdoor storage areas at CWC as soon as possible. We are prioritizing the work to first address and process any stored waste that may pose health and safety risks in its current condition.

**Advice Point #5:** The Board advises the TPA agencies to hold regional public meetings from which a common understanding of the interrelationships among TPA milestones M-091, M-15, M-16 and M-85 (Central Plateau change packages) can be built and shared.

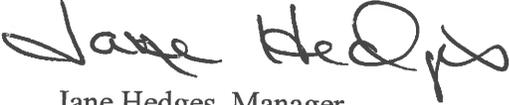
**Response:** The agencies are holding regional public meetings for the proposed milestone changes and have developed outreach materials that describe the interrelationship of M-091 to the other milestones.

**Advice Point #6:** The Board requests an extension of the TPA milestone M-091 change package public comment period to allow time to promote better public understanding and facilitate more informed public comment on the change packages. Additionally, those milestones in the M-091 package that do not require funding before fiscal year 2019 should be included for discussion in the upcoming Central Plateau change package public comment period.

**Response:** The agencies previously agreed to an extension of the public comment period for the M-091 milestone changes. If public participation for the other milestone changes (M-15/16/85) leads to additional comments on the M-091 milestones, we will consider making further revisions to this milestone series.

Thank you again for your advice on the proposed TPA milestone changes. We look forward to the Board's continued involvement as Hanford cleanup progresses. If you have any questions, please contact Kristen Holmes at (509) 376-5803 or [Kristen.Holmes@rl.doe.gov](mailto:Kristen.Holmes@rl.doe.gov).

  
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