

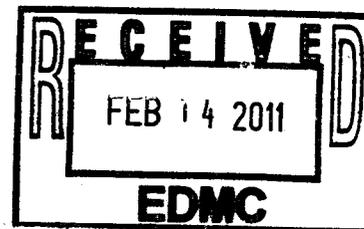


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

February 10, 2011

Mr. Matthew McCormick, Manager
United States Department of Energy, Richland Operations Office
P.O. Box 550, MSIN: A5-10
Richland, WA 99352



Re: Disapproval and Path Forward on the Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone, *M-91 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan of June 2010*

Dear Mr. McCormick:

The Department of Ecology (Ecology) received the 2010 revision of the M-91 Project Management Plan (PMP) on June 29th of 2010. Ecology appreciates the efforts of the United States Department of Energy (USDOE) and the author(s) of this report. However, as submitted, the PMP did not adequately address many critical issues and failed to meet the requirements set forth under Section 11.5 of the Action Plan for the Implementation of the Hanford Consent Order and Compliance Agreement. Ecology is particularly concerned by the following issues:

1. The document, as currently written, lacks forward-looking statements that relate to actions and expectations for the future. Therefore, it fails to "describe in detail the work to be done and the performance standards to be met." [Pg. 11-2, Section 11.5, Attachment 2, Action Plan for Implementation of the HFFACO]
2. This document lacks adequate funding information, funding projections, and fiscal impact analysis. Funding or lack thereof is a key "project constraint" that is explicitly required by section 11.5 of the TPA. [ibid.]
3. Readability issues that include ambiguous statements, illegible font sizes, and unclear jargon. Please find detailed comments on the PMP submitted on June 29th, 2010 attached.

Ecology met with USDOE and contractor representatives on Wednesday December 1st, 2010 to discuss our concerns and comments. In response to our concerns, USDOE submitted a revised PMP that included proposed resolutions to our comments on Tuesday, January 18th, 2011. While we appreciate that many of our comments were satisfactorily resolved in the latest revision, Ecology finds that a number of significant outstanding issues remain unresolved. Ecology finds that the PMP we received on Tuesday, January 18th, 2011, does not fully meet the requirements set forth under Section 11.5 of the Action Plan for the Implementation of the Hanford Consent Order and Compliance Agreement and is not a satisfactory final primary document.

Ecology understands that it may be more pragmatic for all parties involved to shift our attention forward to the upcoming 2011 PMP. We look forward to working with USDOE to resolve our concerns in that document. Therefore, to assure that Ecology will receive a 2011 PMP that meets all regulatory requirements to Ecology's satisfaction, Ecology will schedule bi-weekly meetings with USDOE and Contractor representatives to address our comments until our concerns are resolved to our satisfaction.

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A Draft 2011 PMP Revision that resolves Ecology's concerns will be submitted to Ecology by May 30, 2011. Please also note that as required by M-091-03, the M-91 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan of June 2011 will be due on June 30th 2011. Ecology looks forward to working collaboratively with USDOE.

If you have any questions, please contact me at 509-372-7923 or Albert Chang at 509-372-7929.

Sincerely,



Deborah Singleton
Project Manager
Nuclear Waste Program

jvs

cc w/enc:

Michael Collins, USDOE
Joanne Norton, USDOE
Dennis Faulk, EPA
Robert Piippo, MSA

cc: w/o enc:

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USDOE-RL Correspondence Control

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Document Number(s)/Title(s)	Program/Project/Building Number	Reviewer Albert Chang Elis Eberlein	Organization/Group	Location/Phone 372-7906
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Comment Submittal Approval: Agreement with indicated comment disposition(s)

Status:

Organization Manager (Optional) _____

Date _____

Reviewer/Point of Contact _____

Date _____

Reviewer/Point of Contact _____

Author/Originator _____

Author/Originator _____

Item	Page #, Line #, or Section and Paragraph	Comment (s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/problem indicated.)	Hold Point	Disposition (Provide justification if NOT accepted.)	Status
1.	Globally	This document lacks active language and forward looking statements that are expected from a project management plan. The current content in the document seem more appropriate for a background document or status update. It fails to inform the public as to "why and when will who do what and how" in the current and future years. Please revise to include clear description of the anticipated course of action and appropriate justification.			
2.	Globally	This document is reticent on the potential impacts that budgetary expectations and constraints may have on the DOE's ability to meet the M-91 milestone deadlines. In accordance with TPA requirements regarding primary documents, please provide necessary and appropriate fiscal projections, analysis, and scenarios. Please also consider including sensitivity analysis to illustrate which parts of the anticipated course of action is most exposed to budgetary constraints and/or changes.			
3.	Globally	This document under-uses transitions that are necessary to serve as bridges from one idea to the next, one sentence to the next, or one paragraph to the next. Please enhance use of transitions for readability.			

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	Globally	The formatting of charts and figures presents readability problem, please reformat or print on pull out pages.	
	Globally	This document lacks descriptions and/or identification of the burial grounds. Please include maps to assist the reader in identifying and deciphering nomenclature such as "218-W-4B LLBG" on Pg. 2-4.	
	Globally	Documentation and data to support the body of the report is lacking. Please enhance the appendixes to better lay the foundation for claims presented in the body of the document. Please also enhance cross-referencing between the body of the report and the appendixes for better readability.	
	Globally	The labeling and discussion of charts and figures are unsatisfactory. They are often insufficient, incongruous, and sometimes even misleading.	
4.	Exec. Sum. Pg. i	The first sentence on the fourth paragraph of the executive summary claims that "this PMP considers both the existing and proposed milestones." The rest of the document does not support this claim. Please revise the document to support the new milestones and meet this claim by discussing how the change in milestones will be reflected in the plan.	
5.	Exec. Sum. Pg. ii	The first sentence on the second to last paragraph claims that the document presents a "plan for the acquisition of capabilities necessary for the retrieval, storage, and treatment/processing of MLLW and TRUM waste." The rest of this PMP indeed reiterates that such a plan exists. However, the document does not appear to ever elucidate the specifics of what that plan entails. Please revise.	
6.	Pg. 1-2	In the second line of the second paragraph under Section 1.1, there is an extra "and" between the terms "retrieved" and "RSW." Please revise.	
7.	Pg. 1-5	The first sentence under section 1.4 describes Figure 1-2 as an "inventory." However, the chart does not present "a detailed, itemized list, report, or record of materials in stock" and reports merely the historic and projected total volumes of waste. Please provide a detailed account of the various waste streams and re-title as appropriate.	
8.	Pg. 1-5	All the bullet points under Section 1.4 refer to projections about future events, and therefore appear extraneous to and/or incongruous within a section that is titled "Current Status"	
9.	Pg. 1-5	While Section 1.4 of the 2010 PMP is labeled "Current Status," this section contains absolutely no information about the year 2010. Please revise for	

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		coherence between title and content.			
10.	Pg. 1-6	It is unclear as to how Figure 1-2 was derived. What are the underlying assumptions, analytical basis, and data sources? Please provide more information.			
11.	Pg. 1-6	On Figure 1-2, it is unclear as to whether horizontal axis refers to data from the beginning or end of the respective fiscal years.			
12.	Pg. 2-2	It is unclear as to how Figure 2-1 was derived. What are the underlying assumptions, analytical basis, and data sources? Please provide more information.			
13.	Pg. 2-2	Figure 2-1 leaves a lot of blank space towards the right side of the chart while shrinking the axis to barely legible proportions. Please reformat for readability.			
14.	Pg. 2-3	In the first paragraph under section 2.2, please elaborate as to what constitutes "commercial facilities" and provide evidence to support the claim that these facilities have "been shown to be effective."			
15.	Pg. 2-3	In the second paragraph under section 2.2, please identify or elaborate on the perceived "regulatory issues."			
16.	Pg. 2-3	In the second paragraph under section 2.2, please identify or elaborate on which "details of" waste transportation "must be resolved."			
17.	Pg. 2-3	In the first paragraph of Section 2.3, please elaborate on what specifically "enhanced methods and equipment" might entail and elaborate on how you anticipate obtaining those specific methods and/or equipment. Please also include a more extensive and thorough description and discussion of NGR as an appendix to the document.			
18.	Pg. 2-3	In the first paragraph of Section 2.3, please elaborate on how new methods and equipment will help achieve the goal of performing "all required processing steps as near to the retrieval process area as possible." Ecology strongly encourage the inclusion of diagrams in either the body of the report or in the appendices.			
19.	Pg. 2-3	In the second paragraph under section 2.3, please elaborate on how the NGR approach is expected to "minimize staging, storage, and transfer of individual containers between multiple facilities." Ecology strongly encourage the inclusion of diagrams in either the body of the report or in the appendices.			
20.	Pg. 2-3	In the second paragraph under section 2.3, please elaborate on what the "required WPP characterization and documentation" entails. For example, does NGR			

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21.	Pg. 2-3	have different WIPP certification needs than the current process? In the first sentence of the third paragraph under section 2.3, please insert a comma between the words "retrieval" and "non-destructive."		
22.	Pg. 2-3	The third paragraph under section 2.3 is unclear. Please use transitions to make clear the relationship between the NDA, the NGR approach, and the CCP.		
23.		Reserved		
24.	Pg. 2-4	In Section 2.4, the term "218-W-4B LLBG" is undefined jargon and difficult to decipher. Please consider including maps in the appendix to assist the reader in identifying and deciphering nomenclature as mentioned previously in the global comments.		
25.	Pg. 2-5	In Section 2.5, please elaborate on how you plan to "acquire" canister and cask loading capability: via design-build contract, off-the shelf purchase, or other?		
26.	Pg. 2-6	In Section 2.6, please elaborate quantitatively on the subject of storage capacities, so that this section isn't completely qualitative. Ecology strongly recommends a table format.		
27.	Pg. 3-1	Please identify and elaborate upon the "unique characteristics that are impediments to the identification of a disposal path" and		
28.	Pg. 3-1	Please identify and elaborate upon the specific actions that will be taken to meet the proposed M-091-03D-02 Milestone that "requires the June 30 th , 2011, revision of this plan to contain a disposition path for all of the no-path forward wastes."		
29.	Pg. 4-1	In the second paragraph on Pg. 4-1, the term "218-W-4C" is undefined jargon and difficult to decipher. Please consider including maps in the appendix to assist with the reader in identifying and deciphering nomenclature as mentioned previously in the global comments.		
30.	Pg. 4-1	In the second paragraph under section 4.1, the term "NGR-TFRCS" is unclear jargon and difficult to decipher. Please consider spelling it out in the body of the report before using the acronym alone.		
31.	Pg. 4-1	It is unclear as to how Figure 4-1 was derived. What are the underlying assumptions, analytical basis, and data sources? Please provide more information.		
32.	Pg. 4-2	It is unclear as to the meaning of the row of "F" along the horizontal axis in Figure 4-2.		
33.	Pg. 4-3	In the second to last paragraph on Pg. 4-3, the term "smeared" is undefined		

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		jargon and difficult to decipher. Please explain and clarify the term.			
34.	Pg. 5-1	It is unclear as to how Figure 5-1 was derived. What are the underlying assumptions, analytical basis, and data sources? Please provide more information.			
35.	Pg. 5-1	Please explain the large spike in treated waste between fiscal years 12-14 illustrated in Figure 5-1			
36.	Pg. 6-1	Please clarify as to the status of K-Basin sludge waste volumes – are they considered part of the treated volumes addressed in M-91-42?			
37.	Pg.6-1	The last bullet point on this page uses the term “Idaho” in an unclear manner. Please specify that this refers to the “Advanced Mixed Waste Treatment Project in Idaho” and not the state in general.			
38.	Pg.6-1	Last year’s M-91 Project Management Plan states that Idaho National Laboratory’s Waste Acceptance Criteria was too limited to be practical (pg. 12 of that report); is that still the case?			
39.	Pg. 6-2	Under the first bullet point under section 6.2, the term “TRUPACT II” is undefined jargon and difficult to decipher. Please elaborate and explain.			
40.	Pg. 6-2	Under the third bullet point under section 6.2, the term “offsite commercial facility” is vague. Please consider more descriptive terms such as “offsite commercial waste treatment (storage and/or disposal) facility”			
	Pg. 6-2	The first paragraph under section 6.2 is unclear; please revise.			
41.	Pg. 6-3	It is unclear as to how Figure 6-1 was derived and unclear as to how the bullet points under Section 6.2 are germane to the figure. What are the underlying assumptions, analytical basis, and data sources for this figure? Please provide more information.			
42.	Pg. 6-4	It is unclear as to how Figure 6-2 was derived. What are the underlying assumptions, analytical basis, and data sources? Please provide more information.			
43.	Pg. 6-5	It is unclear as to how Figure 6-3 was derived. What are the underlying assumptions, analytical basis, and data sources? Please provide more information.			
44.	Pg. 6-6	Please elaborate on what the “substantial opportunities” alluded to on this page may entail.			
45.	Pg. 6-7	Please identify and discuss fiscal constraints under section 6.3, the section that is currently intitled “Constraints.”			

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46.	Pg. 7-1 In the first sentence on this page, the term "Work Breakdown Structure" is unclear jargon. Please consider defining or elaborating.			
47.	Pg. 7-1 The first sentence on this page is written in passive language that leaves the actor unclear. Please revise to specify the intended actor.			
48.	Pg. 7-1 In future publication, please consider publishing in electronic formats that hyperlink to external documents referenced in this report. This would have been very helpful at the term "DOE413.3A."			
49.	Pg. 7-1 Please include analysis of fiscal constraints and their impacts to "Schedule and Critical Path Analysis" in section 7.1.			
50.	Pg. 7-1 The second bullet point under section 7.2 correctly identified a key deliverable that was not included in this report. Please revise the report so that each and every "June PMP revision," including this present revision, incorporates "the President's budget."			
51.	Pg. 7-2 Please elaborate on performance measures in the section titled "Performance Measurement."			
52.	Pg. 7-2 Figure 7-1 does not appear to add value to the report. Please elaborate to explain how elements of the figure support retrieval, treatment and disposal of MLLW & TRUM waste as identified in the M-91 milestones.			
53.	Pg. 7-3 Please identify or elaborate upon the "reporting system" referred to in the second paragraph of Section 7.6.			
54.	Pg. 7-4 Please address how the PMP has changed or will need to change to reflect the renegotiated milestones.			