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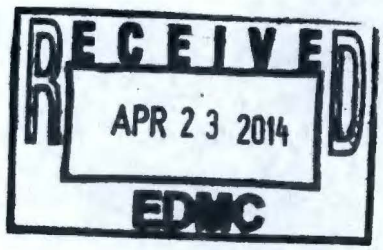
April 18, 2014 14-NWP-072



Ms. Karen Flynn, Assistant Manager
Mission Support Alliance
United States Department of Energy
PO Box 550, MSIN: A4-19
Richland, Washington 99352

Dear Ms. Flynn:

Re: Completion of Fiscal Year (FY) 2014 Hanford Lifecycle Scope, Schedule and Cost Report – *Hanford Facility Agreement and Consent Order* (Tri-Party Agreement) Milestone M-036-01D

The Department of Ecology (Ecology) appreciates the timely receipt of the "2014 Hanford Lifecycle Scope, Schedule and Cost Report" (DOE/RL-2013-02, Rev. 1). The 2014 report meets the requirements of M-036-01D.

Ecology noted that the 2014 report differed slightly in format and content from the previous year's reports:

- The addition of a graphic representation of duration of additional costs, such as usage-based services, general & administrative costs, and site-wide services was very helpful to us in understanding the full costs of every activity.
- Conversely, the omission of lists of Tri-Party Agreement milestones from the text impeded a reader's understanding of why activities received funds.

As a result of our review, we request that you:

- Continue to show the adders in the graphs and tables in the FY 2015 report.
- Return the lists of TPA milestones to the text.
- Continue to provide the tables of information with scope summaries, funding in the near-term at level 3, and funding for the life of the project at level 2.

Each item requested helps us understand what the Hanford Site offices must receive to meet its compliance obligations. Detailed comments are enclosed.

If you have any questions, please contact Melinda J. Brown, Nuclear Waste Program Specialist, at Melinda.Brown@ecy.wa.gov or (509) 372-7886.

Sincerely,

John B. Price
TPA Program Manager
Nuclear Waste Program

mjb/tkb
Enclosure

cc electronic w/enc:
Dennis Faulk, EPA
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Stephen Korenkiewicz, USDOE
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Ken Niles, ODOE
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.3.Document Title(s)/Number(s) DOE/4L-2013-02, Rev. 1

2014 Hanford Lifecycle Scope, Schedule and Cost Report

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	U.S. DOE Response	Ecology Response	Open/ Close	Reviewer Initials
1	ES-1/Background/ 3/1	Ecology supports RL's decision to use information current as of 12/01/2013 and encourages use of timely information.						
2	ES-2/Summary of Lifecycle Scope/ 2/2	Ecology noted that the FY 2014 Cleanup Schedule extends from FFY 2014 through 2060, 10 years less than the schedule in the FFY 2013 report (see Rev. 0, p. ES-2). The text does not explain the reduction of 10 years or make reference to the section of the report with an explanation.	In the FY 2015 report, if the end date for cleanup varies from the 2014 report, please add a statement about the causes for the change or a reference to the appropriate section for an explanation.					
3	ES-2/Summary of Lifecycle Scope/5/2	The cause of the decrease in the total cost estimate appears but an explanation of the 10-year reduction in the cleanup schedule is absent.	Please add that explanation.					
4	ES-4/Table ES-1/Infrastructure and Services (PBS RL-0040)	Increase from $ 2.6 – 2.7 B in FY 2013 report to $6.8 - $6.9 in FFY 2014 report. No explanation provided.	In FY 2015, add explanations for significant increases.					
5	Sections 4.0, 5.0, 6.0	That information helps the reader to understand updates that appear as a result of changes to the HFFACO. M-036 sentence 2 stipulates: The report shall reflect all of those actions necessary for the USDOE to fully meet all applicable environmental obligations, including those under the HFFACO, the consent decree in the State of Washington vs. Chu, Case No. 08-5085- FVS, and the Hanford RCRA/HWMA Permit, including the Hanford Waste Treatment and Immobilization Plant.	Ecology requests that USDOE contractor (MSA) return to the FY 2013 format that includes tables of key TPA milestones for River Corridor, Central Plateau and Tank Waste Cleanup.					
6	3-9/3.3/2/2	Ecology is concerned that the FY 2014 report information does not reflect the actions necessary to comply with existing environmental obligations. Ecology requests that the FY 2015 report address compliance obligations and omit USDOE proposals for changes. For example, the text in the FY 2014 report Sec. 3.3, ¶ 2, sentence 3 says KE Reactor will be in ISS by FY 2019 and KW Reactor will be in ISS by 2022. The dates for KE and KW ISS are clearly at variance with TPA milestone M-93-27 (as it appeared in the Table 4-1 of the FY 2013 report and remains in HFFACO Action Plan Appendix D as of 3/10/2014). In the FY 2013 report, MS M-93-22 required the USDOE to complete KE ISS by 7/31/2014. MS M-93-27 required the USDOE to complete KW ISS by 12/31/2019. In the HFFACO 4/10/2014 Appendix D, MS M-093-27 now requires the USDOE to complete KE and KW ISS by 12/31/2019. Nothing in the TPA milestones as of 4/10/2014 allows RL to move the date to complete	Please correct the text as necessary in the FY 2015 report.					

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		KW ISS out to FY 2022, as it appears in Table 3-1 of the FY 2014 report.						
7	4-4/4.1/1/2 & 3/	The USDOE stated that it plans to disposition PFP by FY 2016, but that cost and schedule uncertainty extend the schedule through 2020 (Figure 4-2). In the FY 2013 report, Figure 5-2 on p. 5-7 extended the schedule for disposition through FY 2018.	In the FY 2015 report, please provide an explanation of why the schedule for disposition now extends 4 years beyond the milestone completion date.					
8	C-3/C.1.1/Table C-2	In the FY 2014 report, costs for PFP exceeded $225 M, in contrast to the FY 2013 report where costs were ~ $145 M (Table D-2).	Please provide an explanation for the significant increase in PFPF disposition costs in FY 2016 that appears in the FY 2014 report.					
9	C-3/Table C-2	PBS RL-0011 PFP costs for site-wide services were $562 K for 2016 in the FY 2013 report (see Table D-2). In the FY 2014 report, costs for site-wide services increased to 22.3 M and the effort extended through 2020 (see Table C-2).	Please provide a detailed explanation of the added tasks that resulted in the increase in the costs for site-wide services in the FY 2014 report.					
10	3-8/3.2/Figure 3-6+ GENERAL COMMENT	In Figure 3-6, the sludge treatment project ends at the end of FY 2017. In the FY 2013 report, the project ends at the end of FY 2016.	. In the FY 2015 report, please explain the reasons for extensions to this schedule and/or other schedule that lengthens from the duration in the FY 2013 report.					
11	4-27/4.6/2, bullet 1	For work funded by PBS RL-0040, the report states that an industrial worker scenario will be used to define the exposure scenarios and threshold cleanup levels in the 200 Areas. The Inner Area will use an industrial exposure scenario but the Outer Area sites will use a residential exposure scenario.	In the FY 2015 report, please modify the statement to state that the Outer Area sites will be subject to a residential exposure scenario					
12	4-7/4.2/5/2	Text states there are 10 groundwater operable units, six in the River Corridor and four on the Central Plateau. In the FY 2015 Report, please add the operable unit numbers for the six in the River Corridor and four in the Central Plateau. Detail about them appears in the FY 2013 report, Section 5.2.						
13	4-8/4.2/Figure 4-5	The FY 2014 shows that drilling activity ending in FY 2064, an increase of three years from the schedule in the FY 2013 report. In addition, the FY 2014 schedule shows two intervals in the drilling activity. FY 2014 Table 4-2 does not address the incorporation of the intervals.	In the FY 2015 report, please address the reason for the intervals in drilling activities.					
14	C-22/Table C-12	In the FY 2014 Report, 100-BC-5 Operable Unit Level 3 elements include four work elements that also appear in the FY 2013 Table D-12 table. The FY 2014 level 3 elements lack two elements that appeared in the FY 2013 report: 100-BC-5 Well Support and 100-BC-5 Field Studies and Deployment.	In the FY 2015 report, please return the two missing work elements or explain why they were deleted.					

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15	4-9/4.2/Table 4	FY 2014 report does not include a work element for management, oversight, and performance of borehole and geophysical logging to support characterization and remedial decisions. That scope appeared in the FY 2013 report.	In the FY 2015 report, please identify the PBS that funds the work element.					
16	4-18/4.4/Figure 4-11	FY 2014 schedule for FFTF cleanup assumes completion by FY 2035. The FY 2013 report assumes the cleanup will end in 2036. What actions led to the shortened schedule?	Explain what factors allowed RL to reduce the schedule by 1 year in the 2014 report.					
17	4-19/4.4/Figure 4-12	Total cost for FFTF cleanup in the FY 2014 report is reduced from $1.1 Billion in FY 2013 to $0.8 B. In addition, the FY 2014 schedule ends the effort in 2035, one year before the date in the FY 2013 report.	In the FY 2015 report, the bases for the significant reductions in the cost for the FFTF cleanup should appear in the text of Sec. 4.4. Please address the marked reductions in the costs for FFTF Cleanup from 2019 through 2033. Please identify any changes in scope that allow the reductions.					
18	4-27/4.6	Ecology noted that the FFTF assumptions contain a statement that beginning in FY 2019 FFTF budget levels are to reflect an optimal ramp up to complete sodium residuals cleaning, etc. The represent a delay of four years from the 2013 report (2015). Figure 4-12 shows the beginning of a budget increase in FY 2019, with the peak funding in FY 2029.	Ecology suggests that where no HFFACO milestones or other requirements are in place but if schedules change within a Lifecycle Report, the US DOE and its contractor add some explanation of the reasons for a delay (e.g., cleanup part of future action [canyon], facility in safe standby, awaiting soil and groundwater cleanup].					
19	5-6/5.1/Figure 5-4	Facility Closures now shows a gap in the effort in FY 2019 but the text does not address the gap.	In the FY 2015 revision, add an explanation for the gap.					
20	GENERAL	Separation of the information in Appendix A (Hanford Site Cleanup Decisions both final and interim) from the Future Cleanup Actions and Alternative Analyses (in Appendix B) was very helpful in categorizing which cleanup decisions remain.	Please continue to separate those actions underway/complete from those awaiting action.					
21	APPENDIX C	Please continue to provide the estimated schedule and cost status tables. When the ORP baseline changes from Rev. 4 of the system plan, please incorporate the changes into the tables.						