



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

BUD:PJZ/18-BUD-0022

**JUN 25 2018**

MEMORANDUM FOR ANNE M. WHITE  
ASSISTANT SECRETARY  
FOR ENVIRONMENTAL MANAGEMENT  
EM-1, HQ

FROM: DOUG S. SHOOP  
MANAGER

A handwritten signature in blue ink, appearing to read "D. S. Shoop".

SUBJECT: FISCAL YEAR (FY) 2020 ENVIRONMENTAL MANAGEMENT  
(EM) COMPLIANCE BUDGET SUBMITTAL FOR THE U.S.  
DEPARTMENT OF ENERGY (DOE) RICHLAND OPERATIONS  
OFFICE (RL)

Consistent with EM's FY 2020 budget formulation guidance and the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA), paragraphs 148 and 149, RL is requesting \$1.398B for FY 2020. This request is responsive to Executive Order 12088 and recognizes the TPA objectives of DOE, the U.S. Environmental Protection Agency, and the Washington State Department of Ecology.

RL's FY 2020 budget request represents planned efforts for continued achievement of important cleanup progress. In summary, the RL FY 2020 budget request is designed to:

- Maintain safe, secure, and compliant activities, facilities, and operations, including groundwater pump and treat operations;
- continue to upgrade site infrastructure and services to support Central Plateau cleanup, including Waste Treatment Plant operations;
- initiate characterization and removal of contaminated equipment and water from K West Basin;
- continue progress on 300-296 waste site beneath the 324 building;
- continue remediation of waste sites in the 100K Area;
- continue preparation for moving cesium and strontium capsules into dry storage;

**JUN 25 2018**

- support repackaging of transuranic waste currently in storage; and
- continue River Corridor and Central Plateau waste site, canyon, facility remediation and risk reduction.

A public meeting was held to gather input during the development of Hanford's FY 2020 budget. The Oregon Department of Energy, the Yakima Indian Nation, the Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribes were all also invited to attend the public meeting. Attached is a summary of the public meeting results as well as written comments we received from the Yakima Indian Nation, Heart of America Northwest, and the general public.

RL and its Contractors will continue to evaluate and advance cleanup strategies and initiatives that optimize taxpayers' dollars, while working collaboratively with state and federal regulators.

If you have any questions, please contact me, or your staff may contact Gregory A. Jones, Assistant Manager for Business and Financial Operations/Chief Financial Officer, on (509) 372-8977.

Attachments:

1. Budget Priority Discussion Summary
2. Budget Priorities Public Comments

cc w/attachs:

Celinda Crawford, EM-3  
Shari Davenport, EM-5  
Dave Einan, EPA  
Mark Gilbertson, EM-4  
Ken Niles, DOE-Oregon  
Kenneth Picha, EM-3  
Robert Seifert, EM-4.31  
Alexandra Smith, Ecology  
Steve Trischman, EM-5.1

Hanford Public Meeting  
FY 2020 Budget Priority Discussion  
April 23, 2018

Background: A public meeting to gather input to be used as part of the process of submitting a Fiscal Year 2020 budget request for the Hanford Site was held at the Richland Public Library on April 23, 2018, from 6:30 p.m. until 8:00 p.m. In addition to those attending the meeting in person, a tele-video broadcast was also conducted (called a webinar) where individuals using computers in other locations could see and hear the meeting, and ask questions of presenters.

The format of the meeting allowed for officials from DOE-RL and DOE-ORP to provide presentations on cleanup projects at the Hanford Site that could be funded with FY 2020 dollars. Officials representing the local Washington State Department of Ecology and Environmental Protection Agency offices also spoke. In addition to video presentations, a number of poster boards were on display throughout the meeting room where cleanup projects for RL and ORP were shown. Meeting attendees were asked to “vote” on the projects they felt were of the highest priority to accomplish for both RL and ORP. The voting was done by attendees physically writing a number on a post-it note, and affixing that post-it note to the poster itself. The number on the post-it note represented the voter’s priority for that cleanup project (in this case, a #1 vote represented the voter’s top priority...a #2 vote was the voter’s second highest priority...etc.)

The information below summarizes the results for the DOE-RL office. The methodology for determining priorities was to take the numbers on the post-it notes; add them together; and then divide by the number of votes cast. The highest priority projects are those with the lowest average score, as depicted in the summaries below:

- The project that was voted as the top priority for RL was the work to move capsules of cesium and strontium out of wet storage in the Waste Encapsulation Storage Facility and into a dry storage area. This project received an **average of 2.75** (votes submitted were 2, 2, 3, and 4...which equal 11...divided by 4 votes cast...equals 2.75).
- The next highest priority for RL was to complete demolition of the Plutonium Finishing Plant. It received an **average of 3.75** (1, 3, 4, and 7).
- Also receiving an **average of 3.75** (1, 3, 4, and 7) was the project of demolishing the 324 Building, and remediating the 300-296 Burial Ground located underneath the building’s foundation.
- Coming in as the fourth highest priority for RL cleanup was remediating the facilities and structures in Hanford’s Central Plateau. The work associated with this received an **average of 5.50** (2, 5, 6, and 9).

- The work to remove the sludge from the 100-K Basins ranked as the fifth highest priority. That project received **an average of 5.75** (1, 5, 8, and 9).
- Continuing to clean up groundwater at Hanford, decommissioning wells, and implementing Records of Decision came in as the sixth highest priority at RL. That work received **an average of 6.25** (2, 3, 10, and 10).
- The seventh priority at Hanford was the removal of the transuranic (TRU) waste at Hanford. This work received **an average of 6.75** (5, 6, 7, and 9).
- Maintaining the Site's infrastructure which will be needed to continue the cleanup operations at Hanford was the next highest priority. It scored **an average of 7.25** (1, 6, 11, and 11).
- Placing the K East and K West Reactors into interim safe storage following the removal of the K Basin sludge was the next highest priority with **an average of 8.33** (4, 10, and 11).
- Mitigating the aging facility risks at Hanford ranked as the tenth priority. That project earned **an average of 9.00** (8, 8, and 11).
- Maintaining minimum safe operations at Hanford (protection of special nuclear materials/long-term stewardship/safeguards and security/environmental monitoring) was the next priority, scoring **an average of 9.67** (5, 12, and 12).
- The project which received the lowest average priority score was the work to reduce the risks associated with the Plutonium Uranium Extraction Plant (PUREX) Tunnel #2. This work earned **an average of 10.00** (6, 12, and 12).

A similar exercise was conducted for the DOE-ORP projects. The results for ORP were:

- Retrieving the waste currently stored in single-shell tanks was the top priority project for ORP (**average score of 1.75**; 1, 1, 2, and 3).
- Continuing to work on the Direct Feed Low-Activity Waste (DFLAW) project (**average score of 2.00**; 1, 2, 2, and 3).
- Maintaining safe operations in Hanford's tank farms was the third highest priority for the ORP group (**average score of 2.25**; 1, 2, 3, and 3).
- Working on the Waste Treatment Plant's Pretreatment and High-Level Waste facilities came in next (**average score of 4.00**; 4, 4, 4, and 4).
- The single shell tank closure project was the lowest priority for ORP (**average score of 5.00**; 5, 5, and 5).

May 7, 2018

U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, H5-20  
Richland, WA 99352

I am writing in response to the notification<sup>1</sup> of the public comment period from April 23, 2018 to May 25, 2018 on Hanford Cleanup and Budget Priorities.

With respect to the Hanford Waste Treatment and Immobilization Plant (WTP), the Office of River Protection's budget briefing presentation and poster indicate a "vision" to be a high performing organization that is safety conscious. Goals are to progress Direct Feed Low Activity Waste Vitrification (DFLAW), and to implement Pretreatment rework projects such as the Low Activity Waste Pretreatment System (LAWPS), Tanks Side Cesium Removal Project (TSCR), and Effluent Management Facility (EMF). FY2019 planned spending is up to approximately \$746 million plus \$15 million more for partial WTP commissioning.

ORP's "Priorities" poster (attached) identifies that cesium separated from tank waste by the LAWPS and TSCR projects **will be stored for future disposition** instead of immediately vitrified as was promised in the original WTP contract and commitment to the public. The life cycle costs of the new, orphan, cesium waste permitting, storage, and unknown disposal are omitted, and they are hidden, future obligations to the taxpayer.

At the same time, the Government Accountability Office has noted (for years) that DOE has erred in pursuing fast track design-build (design and construction at the same time for WTP), with the most recent report being GAO-18-241, *Hanford Waste Treatment Plant –DOE Needs to Take Further Actions to Address Weaknesses in Its Quality Assurance Program*<sup>2</sup>.

The current status of the ORP mission, contract management, and flow sheet suggest that:

- No new orphan cesium or other isotopic waste should be created from the tank waste without including the immediate disposal path and life cycle flow sheet. Changing the waste from one form to another (in a perpetual jobs program) without disposal only serves to expose the work force to unnecessary risk and radiation in a manner that is contrary to the ALARA principle. Any waste should be processed one time – to dispose of it.

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<sup>1</sup> Comment period from April 23, 2018 to May 25, 2018 per <https://www.hanford.gov/pageAction.cfm/calendar?&IndEventID=8860>

<sup>2</sup> <https://www.gao.gov/products/GAO-18-241>

- DOE should immediately stop work on all parts of the WTP until a complete extent of condition, for all design and quality errors and omissions, for all facilities is known. An extent of condition that covers “100%” *of only some of the systems* is not a genuine extent of condition. The parsing of definitions should stop. To do otherwise is to continue to throw vast quantities of good money after bad. If Pretreatment and High Level Waste will not pass muster, the plant should be stopped. Running LAW-Only (DFLAW) does not reduce risk, creates new cesium expenses, and has caused large expenses for the LAWPS and TSCR Facilities, with no end in sight for the spending on the unreliable rest of WTP.
- The Tank Side Cesium Removal Facility should be accurately identified as a line item project, implementing the requisite DOE Order 413.3B, nuclear safety, quality assurance, and permitting requirements. This project is not a demonstration. It will continue to process up to 5 million gallons of waste.

A line item includes a *“full-scale test asset or other pilot/prototype asset primarily constructed for experimental or demonstration purposes, but planned to become DOE property and continue to operate beyond the experimental or demonstration phase.”* In addition, the TSCR line item should not be parsed to avoid including disposal design for the high activity cesium waste. Costs should be charged to WTP contingency, due to the failure of Pretreatment. The same is true for LAWPS. NEPA documentation, including a supplemental EIS is needed for both of these unplanned activities, which were not envisioned in the Tank Closure and Waste Management EIS.

- Effluent Management Facility (EMF) construction should stop until there is a final, verified design. The EMF effort began AFTER the prohibition on fast track design-build was published in DOE Order 413.3B. Multiple problems continue. Delivered valves in the LAW facility are of indeterminate quality, according to condition report 24590-WTP-GCA-MGT-18-00299. Further, EMF process vessels require vendor weld repairs and have material quality issues (per CCN-305061, attachment section 2.1 on page 20). As an example, Condition Report 24590-WTP-GCA-MGT-18-44093 further shows that a third party (QA) witness point was not conducted on EMF equipment, and the attribute is now inaccessible due to the welding that followed. These are repeat issues for which GAO has recommended stop work due to failure of previous corrective actions programs. Yet, construction is continuing at a rapid pace, while the design is not more than 82% completed (per CCN-305218).
- DOE should finish the in-progress Earned Value Management System (EVMS) audit of Bechtel that was postponed indefinitely last fall (on October 27, 2017) by the Acting Assistant Secretary for Environmental Management. Attempts to reset the project baseline variances to “zero” (CCN-303579), effectively hiding mismanagement, should be rejected.

- DOE's Office of Inspector General should promptly publish the audit of commercial grade dedication (QA) that has been on the books for three years without being completed.
- DOE's Office of Inspector General should promptly finish the in-progress audit of the cancelled procurements at WTP, including not just storage costs, but the wasted costs of equipment designed and ordered that will not be used.
- DOE should make available to the public the WTP Project Peer Review (PPR) and Optimization Studies from October-November of 2017, so that the public can compare these reports to the Quality Assurance recommendations made by GAO, and to the "schedule over safety and quality observations" in GAO's report. The PPR appears to have been aimed at circumventing requirements under schedule pressure. What organizations were represented in the PPR and Optimization Study? Did QA or Safety approve these reports?
- DOE should go back and re-evaluate the justification of mission need for ORP, and look at the overall site mission alternatives and risks, as this has gone way too far off track. WTP is a failed project. DOE Order 413.3B requires submittal of an over target baseline request, when indicated by poor performance. A top level estimate of completion (EAC) is required for all of WTP for the life cycle, and this has not been produced month after month, while the \$690 million spending continues to waste about \$2 million/day. Costs for PT and HLW are still "TBD." A truthful estimate at completion is needed and a new analysis of alternatives is needed. WTP should be kicked back to CD-0 and this should have been done long ago.
- Disposal of tank waste should be re-evaluated in the context of the contamination that already exists in the 200 areas in the soil and in the deactivated buildings. As a minimum, low-temperature processes should be considered. Easy to verify processes and fraud-resistant less-complex processes should be considered. ORP's plans to grout and ship offsite 2,000 gallons of low activity tank waste, at a cost of more than \$1M (18-WSC-0025) should be re-evaluated in light of the overall risk reduction. Cesium is left behind, and ORP is willing to spend more than \$500/gallon to ship low activity sodium nitrate/sodium hydroxide waste out of state. If applied to retrieved liquids from the tank farms, the potential cost, with no risk reduction due to no HLW disposal or even isolation, would range from \$28 billion to \$56 billion.
- DOE should end its policy of forgiving fines. Bechtel was recently cited in a preliminary notice of violation (PNOV) for worker safety, with no fine levied because ORP had previously reduced fee (17-CPM-0061 and 2016 PEMP Award Fee Scorecard). If you look, the reduced fee was based on a "*trend of reportable events over the last year.*" But the PNOV was for specific violations and harm, and the failure to impose a fine is a failure to provide a deterrent for future problems of the same type. There are

continued problems with electrical safety, for example, so the environment has not improved. DOE should impose fines where they are warranted, as in this case. Bechtel spends around \$1 million/year just on related lobbying efforts, \$250,000 recently on WTP alone (per [opensecrets.org](http://opensecrets.org)). Is DOE management getting the complete story when making decisions on behalf of the taxpayer and on behalf of the workforce that is placed at risk? Condition report 24590-WT-GCA-MGT-18-00284 identified numerous electrical code violations (safety hazards) in the WTP Laboratory. Condition Report 24590-WTP-GCA-MGT-18-00112 indicates there is a stop work on subcontractor electrical work due to recent events. These are indications of no improvement in the “trend.”

- In an April 29, 2018 article in the Tri-City Herald, Alex Smith of the Department of Ecology was quoted as saying: *"It sort of feels in some ways like we are at a tipping point at Hanford where the costs are just starting to eclipse anybody's palatability of paying for that treatment and that cleanup."* Actually we are long past the “tipping point” of palatability.

In the same article, Ken Niles of the State of Oregon was quoted as saying to the National Academy of Sciences, "We hope your assessment will spur new interest *and funding* toward finding new technologies to help the cleanup at Hanford and elsewhere in the DOE complex."

It is long past time to stop crying “wolf” to get more funding for political projects, and look at practical means of disposal, which have already been profitably “studied” for more than 60 years. Indeed, there is a growing appearance that the “wolf” is being deliberately created, due to the intentional failure to address known issues (such as the void space/water intrusion in the aging single shell tanks, and the void space in the PUREX tunnels).

- WTP commissioning (if performed), must include both of the LAW melters (operating individually and together). Cold commissioning of one melter followed by commissioning of the second melter on actual tank waste (hot start without cold commissioning) should not be allowed. ORP personnel in attendance at the meeting where this was proposed (CCN-303510) voiced no objections in the meeting minutes. Commissioning one melter does not guarantee the safe startup of the second melter and its off-gas system. In addition the LAW melter-specific off-gas systems are eventually joined in one stream, where the combined off-gas proceeds through filtration, selective catalytic reduction (for NO<sub>x</sub> removal), caustic scrubbing, and treatment in the EMF.

The approach proposed demonstrates *a cavalier disregard for safety*, particularly so in a nuclear environment that includes lethal concentrations of toxic gasses. GAO, in report GAO-18-241, recommended that management’s downgrading of quality assurance findings should stop. Similarly, ORP’s downgrading of safety, quality assurance, and

operational readiness measures associated with commissioning should also stop. NQA-1 requires design verification in all cases before equipment is used to perform its safety function.

- DOE should consider scrapping the TPA in favor of life cycle risk-based decisions, implemented according to the appropriate laws, regulations and requirements, and nothing more.

GAO noted in GAO-18-241 that cost and schedule targets place immense pressure on ORP upper management. Part of that pressure arises from ill-conceived Tri-Party Agreement Milestones, and Consent Decree Dates, which result in hasty, ill-considered decisions and reductions in safety, including risk increases associated with single shell tank water additions and retrieval. Of note is the gridlock that is built into decisions that are made, but not scheduled for implementation.

The need to stabilize the PUREX railroad tunnels, for example, was identified as early as 1980, but *nothing was done* until there was a collapse (management by what was predicted to become a crisis). Ecology values clean closure of everything, but sometimes that means just moving the waste from one hole in the ground to another hole in the ground, without regard for employee or environmental risk. Sometimes it appears DOE managers approve decisions as political trades, perhaps because there is no time limit or because costs will occur long after the current executives retire. The gridlock should stop, and inappropriate negotiations (based on personal preferences outside of the law) should stop. Contractor input to decisions should be limited, because DOE contractors profit and value *interim solutions*, which pay well today, and are guaranteed to pay well in the future too.

- The original fast-track design-build decision (CD-3A) for WTP was motivated by a perceived political need to show progress by moving dirt, even though it was well known that the design work was of poor quality. The same perceived political need to show progress has driven the reactive DFLAW approach and panic driven LAWPS, EMF, and TSCR spending. The root causes are the same. And the results reveal the same failures in cost, schedule, and safety.

DOE's requirements for methodical work, which have been rejected or exempted, were put in place for a reason. (See other examples of ineffective DOE Management and more corrective actions processes that are "too early to assess" at MOX and SPRU, per DOE Inspector General Reports OAI-M-17-07 and DOE-OIG-18-27).

This suggests that any exceptions for WTP regarding non-implementation or lessons learned, and any acceptance of new "corrective actions" managed improvements processes will not produce anything of value.



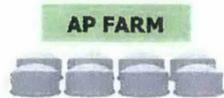
# Direct Feed Low-Activity Waste

\$5B

Over the next 10 years, continues after that

HAS NoEIS

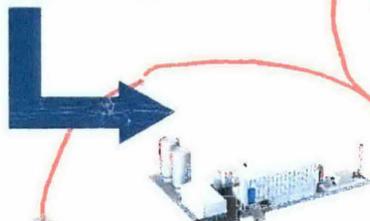
HAS No EIS  
No Disposal Path  
No Permit  
No Risk Reduction



AP FARM

LOW-ACTIVITY WASTE PRETREATMENT SYSTEM

Storage of Separated Cesium For Future Disposition



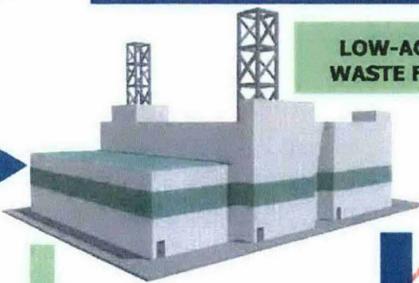
TANK-SIDE CESIUM REMOVAL CONCEPTUAL LAYOUT

WASTE TREATMENT PLANT

LOW-ACTIVITY WASTE FACILITY

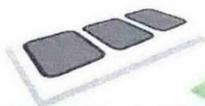
WHERE IS THE SECONDARY WASTE FROM EMI BOTTOMS?

HAS No EIS  
No Permit  
No Risk Reduction



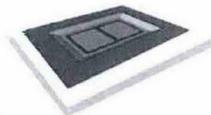
Waste Treatment Byproducts

LIQUID EFFLUENT RETENTION FACILITY



Treated Waste

INTEGRATED DISPOSAL FACILITY



Funding amounts are approximate

## **Comments of Heart of America Northwest On USDOE's Hanford Cleanup FY 2019 Budget Request and Development of the FY'20 Budget**

Heart of America Northwest is the region's largest citizens' group working to involve the public in Hanford Cleanup decisions, with over 15,000 members across the Northwest from Spokane to Seattle, from Bellingham to Vancouver, Portland, Hood River and Eugene.

As the "public's voice for Hanford Clean-Up", we have to **express our deepest disappointment that USDOE, Ecology and EPA have not provided a meaningful opportunity of the public to understand, discuss and provide input on the cleanup budget and priorities.** It has been many years since the agencies have provided the public around the region with such meaningful opportunities to discuss budget priorities, constraints and opportunities with agency managers at public meetings round the region. This lack of public discussion has a direct impact on public support and interest in funding cleanup of the most contaminated area in North America – and the most dangerous industrial facility or Superfund site in the US.

Public meetings also used to drive news coverage and contact by the public with Members of Congress to urge support for cleanup funding.

**Budgets are an expression of agency values and priorities.** The budget is where the real decisions on Hanford Cleanup priorities and actions are made. Thus, the public has lost the opportunities to interact and impact those priorities and values, which it used to have every year when the agencies held budget priority input meetings around the region every spring which drew hundreds of participants. *We urge the agencies to return to such meaningful public interaction and involvement.*

Once again, USDOE chose to hold a single daytime meeting in Richland to present and discuss the FY'19 Budget Request and FY'20 budget preparation. Few members of the public were present. Web participation is extremely limited and does not offer meaningful interaction, including the ability to follow-up questions or discuss issues with others in the audience.

Compounding the lack of opportunity to have meaningful face to face discussion is the **USDOE's decision not to provide the regulators or the public with any disclosures of proposed FY 2020 budgets for projects** (PBS, or Project Baseline Summaries, which are the basic building blocks for the Richland and Office of River Protection Field Offices' budgets).

The Tri-Party Agreement requires disclosure of proposed budgets along with input and discussion before USDOE's field offices forward proposed budgets to USDOE headquarters. This is a serious violation, and the regulators should not sit back with blinders on for their ability to review the out-year budget plans or for the public to review proposed budgets.

USDOE's unilateral budget decisions threaten the health, environment and safety of the Northwest today and for many generations to come.

The FY'19 funding levels requested from Congress and which appears to be the basis for submission of the Field Offices to USDOE Headquarters for 2020 and out-years for cleanup in

the River Corridor are inadequate to meet legal schedules and fundamental health and environmental standards. The inadequate request levels prejudice and predetermine pending cleanup decisions for proposed Records of Decision in a manner that will directly harm the health of the public and tribes to utilize resources and shorelines as guaranteed under numerous laws and Treaty rights.

The Hanford Federal Facility Cleanup Agreement and Consent Order (“Hanford Cleanup Agreement”) requires the Energy Department to submit a request to Congress which provides for full compliance with the schedules of the Agreement and requirements of applicable federal and state cleanup laws, including CERCLA.

**The FY 2019 Request submitted by the Department to Congress appears to fall \$1.318 billion short of meeting compliance needs as identified by the state of Washington.**

A compliant budget for the Hanford Site would require \$3.4 billion for Fiscal Year 2019; however the President’s budget falls short at \$2.2 billion.

USDOE will miss many of its legal requirements because of its budget priorities and decisions. These budget shortfalls will clearly result in major cleanup delays, increasing risks to the Columbia River, endangering Hanford workers, and risking major failures of aging confinement systems that pose serious risk to human and environmental safety.

**Budgets are an expression of values.**

**USDOE’s budget proposal for FY’19 and ’20 do not place appropriate value on protecting the Columbia River, the health of people who will use the River Corridor, or the health and safety of the workforce – particularly in regard to tank emissions and preventing additional contamination following the tragic exposures from the spread of Plutonium in 2017.**

USDOE’s Field Offices have not shared proposed project level budgets for FY 2020 for review and comment by regulators, the HAB or public even though this is required by the Hanford Cleanup Agreement. This lack of disclosure is very disturbing. It undermines public support for cleanup funding and informed comment on priorities. Heart of America Northwest, the Hanford Advisory Board and the public are left with no option other than to assume that FY’20 proposals will be based on level funding for projects, even where the Board and regulators have expressed grave concern over adequacy of funding for projects and priorities.

DOE is legally obligated to meet milestones as defined in the Tri-Party Agreement (TPA) and in the Consent Decree. It is incumbent on DOE-Headquarters to request the level of funding necessary to meet all applicable legal requirements, including TPA schedules.

We offer our comments to assist the public in commenting as well as the U.S. Congressional delegations from WA and OR to support funding levels identified by a budget which reflects public priorities and compliance.

**For cleanup of the Columbia River Corridor, USDOE's Congressional Budget Request for FY 2019, and the presumed "level funded" Richland Field Office proposal for 2020, would cut funding from the 2018 Congressional appropriation of \$183.692 million down to \$89.577 million (reflected in PBS RL-0040 and 0041). This is a cut in cleanup work proposed for the Columbia River Corridor of \$94 million.**

PBS RL-30 for soil and groundwater remediation for the entire Hanford site (including both the Central Plateau and River Corridor) is proposed to be slightly reduced from \$132.363 million to \$131 million.

This flat funding for sitewide soil and groundwater cleanup and \$94 million reduction for other cleanup work along the River Corridor are clearly inadequate to:

- perform K-Area cleanup, including soil;
- implement soil removal remedies for the 300 Area as USDOE has committed to consider based on review of performance of the injection remedy;
- implement contaminated soil removal remedies for the B-C, D-H and N Areas urged by us and advised by the Hanford Advisory Board to be part of the final Records of Decision; and,
- Utilize pump and treat remedies for the B-C Areas as the Board is also advising.

Thus, the funding levels proposed would impact health, public and tribal access to the River Corridor, and the River environment for hundreds of years.

For many years, we have urged **removal of Strontium and Cesium capsules from water storage to dry cask storage as an urgent safety matter at WESF in B Plant on the Central Plateau**. Funding levels proposed for design, if held level, will not be adequate to proceed with removal. Funding does not appear to be sought to remove the extremely high hazards at B-Plant (e.g., in the event of an earthquake) and remove the Cesium and Strontium capsules to dry cask storage.

**Nor will the proposed level funding of PBS or Control Points enable USDOE to properly respond to the serious contamination spread during the demolition of the Plutonium Finishing Plant** and the realities that this project will not conclude in FY 2018, and that much more extensive controls are needed for future demolitions.

**Heart of America Northwest is extremely concerned over the need to implement engineered controls for vapor emissions from tanks to protect worker health; and, that High Level Nuclear Waste Single Shell Tanks continue to leak. USDOE's budget proposals are inadequate to fund such health and safety work.**

USDOE's Budget Request for FY 2019 for the Office of River Protection (ORP) cuts \$41.5 million from the PBS. Control Point ORP-14 for removal of waste from tanks ("stabilization") compared to FY 2018 and a cut of \$55.5 million from the 2017 Appropriation. This is the PBS / Control Point which would fund the worker health investments and removal of waste from leaking tanks.

Budgets are an expression of values. The ORP Budget Request for FY'19 and presumptive request at flat funding for PBS ORP-14 for FY'20, appear to reflect that USDOE does not value the health and safety of its work force as a priority. Otherwise, ORP and USDOE would be requesting funds now to begin the long overdue modeling and design of engineered chemical vapor emission control (pollution controls) and monitoring systems.

**The USDOE and ORP budgets also fail to show that USDOE places a high value on preventing more High Level Nuclear Waste Tanks from leaking** their wastes into the soil and contaminating the environment and groundwater. This continues decades of USDOE ignoring or downplaying the risks and harm from additional tank leakage.

The Office of River Protection's proposed budget for 2019 and presumed budget for 2020 emphasizes adoption of Direct Feed Low Activity Waste (DFLAW) and unproven implementation of "tank side" Cesium removal. This is a very expensive investment in untested technology with construction beginning in 2019. Before spending billions more on this untested effort which may place more workers' health at risk, Heart of America Northwest urges that USDOE fund a complete analysis of the safety and potential health and environmental impacts of this program in compliance with NEPA and SEPA, and scale testing of technology on tank wastes, before proceeding with a massive expenditure which will divert funding from other cleanup work.

**At least one, and likely six, Single Shell Tanks are leaking or have recently been leaking.**

Not one of these tanks is prioritized in USDOE's proposals for funding to have all waste removed in order to prevent additional leakage – even though both federal and state hazardous waste laws require any tank which is leaking to have all waste removed immediately or as soon as practicable.

USDOE is legally obligated to meet milestones of the Tri-Party Agreement (TPA) and in the Consent Decree between DOE /Ecology. It is incumbent on DOE-HQ to submit a request with funding levels as identified by a compliance budget submitted by DOE-RL and DOE-ORP.

We urge USDOE to meet its legal obligation to submit to Congress a budget which identifies and is adequate to meet its Hanford Cleanup Agreement schedules and other standards – as required by both the Agreement and CERCLA.

We urge a return to meaningful public involvement with full disclosure, including an "integrated priority list" of out-year proposed budgets and regional meetings to discuss and take input. An integrated priority list is necessary for both the public and regulators to examine and comment on USDOE's priorities for funding – as the list shows in building block order which projects and activities will be funded and which will not be funded depending on final funding levels. In providing these comments, *we recognize that Congress has traditionally had to increase USDOE's requested funding levels.* **Disclosure of an integrated priority list and meaningful public involvement are vital to help identify where those increases should go.**

The submission to USDOE Headquarters and review should not occur until after the public and regulators have had at least 30 days to review and comment on proposed project level and activity level funding proposed for FY'20, including public meetings.

Respond to, or comments to:

Gerry Pollet, J.D., Executive Director

Heart of America Northwest

*"The Public's Voice for Hanford Clean-Up"*

[office@hoanw.org](mailto:office@hoanw.org) and [Gerry@hoanw.org](mailto:Gerry@hoanw.org)

submitted to:

[HanfordPriorities2020@rl.gov](mailto:HanfordPriorities2020@rl.gov)

Shared: EPA, Washington Ecology; WA and OR Congressional Delegation



**Confederated Tribes and Bands  
of the Yakama Nation**

Established by the  
Treaty of June 9, 1855

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May 25, 2018

Doug Shoop, DOE-RL Manager  
Brian Vance, DOE-ORP Manager  
US Department of Energy  
Richland Operations Office  
P.O. Box 550, H5-20  
Richland, WA 99352

RE: Public Comment on Hanford Cleanup Budget Priorities

Dear Managers Shoop and Vance,

The Yakama Nation Environmental Restoration Waste Management Program (ERWM) is greatly concerned with the US Department of Energy's (USDOE) Proposed Budgets for Hanford Cleanup Priorities. The Hanford Federal Facility Cleanup Agreement and Consent Order requires the USDOE to submit a request to Congress which provides for full compliance with the schedules of the Agreement and the requirements of applicable federal and state cleanup laws. The budget request submitted by the USDOE to Congress is inadequate to meet legal schedules and appears to fall \$1.318 billion short of meeting compliance needs as identified by the state of Washington.

Of particular concern, are the proposed funding levels for cleanup in the River Corridor. The requested funding for this area is inadequate to perform the required cleanup actions necessary to protect Yakama Nation Treaty resources. The Treaty of 1855 guarantees the Yakama Nation's rights to live along and fish the Columbia River as it flows through Hanford for 50 miles, past nine reactor areas and the Hanford 300 Area. It is our expectation that the USDOE will uphold its trust obligations to the Yakama Nation as well as provide Treaty resource protection by establishing priorities that result in cleanups and restoration of the Hanford Site to ensure that resources are clean, healthy and safe for the Yakamas and are not diminished by Hanford contamination.

ERWM stresses the importance of government-to-government consultation prior to the submittal of USDOE's proposed budgets and cleanup priorities now and into the future for the Hanford Site. In order to adequately prepare for consultation, ERWM urges disclosure of proposed funding levels for each Hanford Cleanup project and requests managerial level meeting on the development of the budget proposals.

If you have any questions regarding ERWM Program comments or concerns please contact me at 509-452-2502.

Sincerely,



Marlene George  
YN ERWM Projects Coordinator

CC: Alex Smith Ecology NW Program Manager  
Dave Einan US EPA Hanford Manager