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From: James F. Brown III [SMTP:jfb160@psu.edu]
Sent: Monday, November 16, 1998 1:45 PM
To: george_h_sanders@rl.gov
Subject: Comment on K-Basin Clean-Up Milestones

Dear Sir,

I must take issue with the proposed "Revised Strategy" for clean-up of the K-Basins.

The plan presented (<http://www.hanford.gov/tpa/docs/m-34-98-01/focus.html>) states that "Target dates are not legally enforceable, but are schedule dates that if missed, indicate that future milestone dates are in jeopardy."

My issue are these:

1) There is a clear pattern by FDH and DESH over the last several years of not meeting deadlines.

Q: How does DOE intend to expedite the clean-up of the K-Basins if it cannot legally punish its contractors for poor performance to schedule? What is to prevent the contractors from continually falling behind on the clean-up schedule?

2) My understanding is that contractors who are not meeting milestones do not make fee and will not have their contracts renewed.

Q: What specific actions will be taken by DOE if its "best-in-class" contractors start missing deadlines?

3) I have seen the K-basin pools from the inside. It is not pretty. The spent fuel pools are unlined concrete structures. All it would take is a minor seismic disturbance to cause a rupture in the pool.

Q: What specific actions have actually been taken in the last two years by FDH or DESH to reduce the environmental risks associated with the K-Basins.

What I mean by "specific actions" is: Not paperwork. No SARs or equipment designs. What physical changes have been made to the facilities or equipment which will lower the risks??? What physical work has been actually done inside the K-Basin buildings themselves to reduce risks?

Example: There are holes big enough to see through in the ceiling of the K-East Basin.

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