



# Oregon

Kate Brown, Governor



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August 16, 2022

Delivered via E-Mail to:

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Ms. Colborn,

Oregon appreciates the opportunity offered by the Tri-Party Agreement Agencies to comment on the adaptive milestone approach piloted in this proposal. Given the budgetary constraints and new “Indefinite Delivery Indefinite Quantity” (IDIQ) contracting vehicle, some way to establish and achieve short to mid-term cleanup successes is necessary.

The adaptive milestone approach is intended to optimize work in the Central Plateau, with a pilot program focusing on 14 milestones that were placed in abeyance by the TPA agencies. However, the information package associated with this comment period does not include even a list of those 14 milestones, and requires chasing a paper trail from the linked tentative agreement to another document (<https://www.pdw.hanford.gov/document/AR-16097>) on the Administrative Record. Given that new milestones associated with these 14 in abeyance are the impetus of the comment period, they should be clearly presented and explained in the distributed materials. The fact sheet is clear that changes are being proposed, but fails to adequately describe why the milestones listed for this three year window were selected, who had input in the selection process of those milestones, how the public was engaged, when and how the adaptive milestone approach piloted here will be assessed, where the milestones in abeyance can be found, or exactly what operable units are included in the adaptive milestone package.

Oregon appreciates and acknowledges that the public meeting held on August 9 ([https://youtu.be/WuPi\\_frOWvc](https://youtu.be/WuPi_frOWvc)) successfully answered some of these questions, but with only ten days left in the comment period. The meeting established that the comment period is actually related to the milestones themselves, rather than the adaptive approach, as presented in the fact sheet and announcements. We recommend that, in the future, clear and concise messaging should identify the target of the solicited comments, and that public meetings should kick off the comment window, not close it, to allow informed and fully developed comments.

We also note that it is also unclear how the projects identified in the informational materials fit into the Hanford 5-Year Plan ([https://www.hanford.gov/files.cfm/HMIS-5YearPlan-Placemat-3-0\\_1011.pdf](https://www.hanford.gov/files.cfm/HMIS-5YearPlan-Placemat-3-0_1011.pdf)), which was last revised in late 2021. The work proposed here was not included in the distributed material or in public cleanup priorities discussions held in the spring of 2022. There should be a balance between fulfillment of tasks given a funding level and continuing to request compliant funding levels moving forward. As such, we recommend that the adaptive milestones for Year 3 should be assessed annually, coincident with the budget request to Headquarters. These annual updates should be published prior to the cleanup priorities public meeting and budget review cycle to support informed public comment opportunities.

Based on the fact sheet, we understand that a model which “uses existing project planning tools” is being used to establish the interim milestones in a three-year rolling window; however, there is no description of whether or how the model has been used for developing the interim milestones listed in this comment period, or on when the public will be engaged on the inputs and results of the model. The public meeting presentation indicated that the model is not yet operational, and further that its parameters will not be available for public input or discussion. Public comment periods will, however, be held on the milestones negotiated by the TPA agencies as a result of the model data. Oregon recommends that the input parameters and preliminary results of the model should be clearly presented and published on the administrative record once the toolset has been completed. There are far-reaching inputs that must be considered to ensure that the big picture is not blurred by model-generated short term “micro-goals.” For example, the Waste Isolation Pilot Plan (WIPP) is expected to close by 2050, which means all of the potential trans-uranic waste sites on the central plateau need to be characterized and remediated in the near-term (e.g., within one professional lifetime) in order to safely ship such waste to WIPP. Another example: any model which is used in project scheduling should include the soil-to-debris balance as an input. As such, it should include all potential soil removal/remove treat dispose waste sites as well as all buildings expected to be demolished. Inclusion of the 200-IA waste sites is a good first step to meet this goal, although other waste sites and buildings with approved removal/remedial plans should also be assessed in this model package.

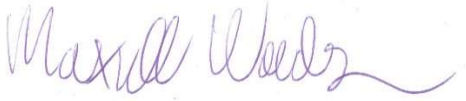
It appears that the pilot model excludes cleanup work not associated with the 14 milestones in abeyance, including tank farm remediation/potential transuranic tank wastes and remediation of Operable Units 200-PW-1,3,6 in accordance with the 2011 Record of Decision (<https://www.hanford.gov/news.cfm/DOE/CW-PWRODSignedFINALRev010-5-11.pdf>). When optimizing cleanup across the Central Plateau, Oregon recommends that the process should lean into the “One Hanford” mentality and fully assess and consider all remediation requirements and goals in the area, with the understanding that Consent Decree milestones are not necessarily adaptive.

Oregon supports the efficient use of resources and investment in and usage of emerging technology, and the Plateau Risk Evaluation Program management model is potentially a good step in that direction. We recommend that stakeholders, the public, and tribal nations should be engaged when developing the inputs to the model, and when assessing which milestones to include in subsequent three-year periods. US DOE should reconcile the three-year planning window described here with the 5-year vision and public cleanup priority discussions, which typically request input for the third year in the future. This cleanup priority discussion and adaptive milestone strategy may provide a real chance for input and engagement if the TPA agencies are able to disclose which projects “fit the model” and are therefore in consideration for the third year. In the near term, US DOE should focus on characterization and investigation work (M-015-93C, M-015-98, and M-015-99) rather than setting a deadline to set a milestone to set a schedule (M-015-118, M-015-119). Understanding how much and what type of waste remains is critical to setting removal schedules and ensuring that disposal is possible within space and time constraints, be it on-site or off-site. If this pilot program is successful, Oregon recommends it should be expanded to all waste sites and operable units on the Central Plateau. Doing so will allow the “waste budget” to be assessed comprehensively, and more readily identify contaminated soil resources to offset demolition debris compaction needs in ERDF.

Oregon Department of Energy

We look forward to continued engagement on this pilot project, and the public evaluation of whether or not it is an appropriate tool to balance the significant remaining cleanup tasks to complete at the site with the limited resources US DOE has available. If you have any questions, please contact Tom Sicilia of my staff ([tom.sicilia@energy.oregon.gov](mailto:tom.sicilia@energy.oregon.gov)).

Sincerely,

A handwritten signature in purple ink that reads "Maxwell Woods". The signature is written in a cursive style and is positioned above a horizontal line.

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