

April 10, 2003

The Honorable Spencer Abraham
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Abraham:

Revision 2 of the Department of Energy's (DOE) Implementation Plan for the Defense Nuclear Facilities Safety Board's (Board) Recommendations 94-1, *Improved Schedule for Remediation in the Defense Nuclear Facilities Complex*, and 2000-1, *Prioritization for Stabilizing Nuclear Materials*, dated July 2002, commits to completing sludge removal from the Hanford K-Basins by August 2004. In a letter of December 27, 2002, the Assistant Secretary for Environmental Management informed the Board that DOE's commitment to begin sludge removal from the K-Basins by December 2002 would not be met, but that sludge removal from the K-East Basin was expected to begin by May 30, 2003. This letter did not suggest that these startup delays would imperil the commitment date for completing sludge removal from the basins.

Recent discussions between the Board's staff and representatives of the Spent Nuclear Fuel Project at Hanford revealed that Hanford's plans for the completion of sludge removal are no longer consistent with the Implementation Plan. The site's present strategy calls for completion of sludge removal from the K-East Basin by June 30, 2005, and from the K-West Basin by April 29, 2005. The delays appear to be the result of the late start in the K-East Basin and the failure to apply sufficient resources to preparing for sludge removal activities for the K-West Basin. For example, the fiscal year (FY) 2003 budget for sludge removal from the K-West Basin allows only for conceptual design work. The contractor plans to perform all other design, procurement, and construction activities in FY 2004 and to carry out system testing and operations in FY 2005, despite the August 2004 commitment date for completion of sludge removal.

The Board is not aware of any technical considerations that would justify delaying completion of sludge removal from the K-Basins. Therefore, pursuant to 42 U.S.C. § 2286b(d), the Board requests that DOE provide a report within 60 days of receipt of this letter that provides either a path forward for completing sludge removal from the Hanford K-Basins by August 2004, or a revised Implementation Plan with justification for delaying completion of sludge removal beyond this date.

Sincerely,

John T. Conway
Chairman

c: The Honorable Jessie Hill Roberson
The Honorable Robert G. Card
Mr. Keith A. Klein
Mr. Mark B. Whitaker, Jr.