



## Idaho National Laboratory Environmental Management Budget Concerns for Fiscal Year 2008 and 2009

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The Idaho National Laboratory's (INL) Environmental Management (EM) Program "Progress to Cleanup" has enjoyed widespread support from this Citizens Advisory Board (CAB) and the Idaho public at large. This program has greatly enhanced public confidence in the DOE commitment to a viable and timely cleanup of the INL site. A key component of this program is the decontamination and decommissioning (D&D) of obsolete facilities that may be both hazardous and contaminated. The D&D program is the centerpiece of the effort to "Reduce the Footprint" at INL. We believe the continual progress of D&D at the site will be severely curtailed in Fiscal Year (FY) 2008 and 2009, unless additional funding is forthcoming. This action would severely affect the confidence that the Department of Energy (DOE) has strived so hard to achieve.

Although the total EM budget for FY 2008 is close to that of FY 2007, the Sodium Bearing Waste Treatment Project will require some \$80 million more money for FY 2008 vs. 2007. This project is critical to meeting compliance and regulatory agreements, and cannot be delayed. Although the SBWT funding required in FY 2009 is less than 2008 by some \$45 million, the total target EM 2009 budget has been reduced by an even greater amount. Because of other compliance commitments required by the tri-party agreement between DOE, EPA, and the State of Idaho, the D&D program will bear most of the shortfall. The D&D program will suffer an approximate loss of funding of some \$50 million (-75%) in 2008 and some \$30 million (-45%) vs. the levels of 2007. We understand that there is a reasonable chance that D&D funding, post FY 2009, may be restored to 2007 levels, so this funding pattern will create a temporary "hole" in this important activity. The CAB feels this is unwise for the following reasons:

Public Acceptance – This reduction in a most visible activity may be interpreted by the citizens of Idaho as a loss of commitment to the entire program. Confidence in DOE's commitment is crucial to the success of the entire cleanup project.

Labor Continuity – The current D&D program workforce is working well and has developed the specific professional skills that only time and teamwork can produce. This lower funding will require a significant reduction in force. It will be most difficult to recall these uniquely qualified people, if and when funding is restored, so potential productivity and safety impacts could occur. The quality of the cleanup work could also suffer. We recommend that this is both fiscally and professionally unwise. In order to return to the productivity and skill level to that which is now present, it will require a whole new set of employment activities that would include, but not be limited to, recruiting new, qualified personnel with proper education and experience dealing with issues of nuclear waste with radiation hazards or exposure risks, and then provide training that is crucial and specific to this activity.

CERCLA Issues – The Idaho CERCLA Disposal facility (ICDF) landfill, the INL state-of-the-art landfill of CERCLA wastes, receives the majority of D&D debris. Delaying the D&D program also delays the closure of the ICDF, perhaps for years, and the installation of the final precipitation inhibiting cover, thus allowing more leachate to be generated, and thus increasing the possibility of collection system failure and release to the environment. With substantially reduced funding the balance of efficiently filling the ICDF, while reducing the available "footprint" for precipitation collection would be impacted.

Hazards of Old Facilities – These facilities continue to deteriorate. The longer the wait, the more difficult it will be to dismantle them. An even bigger problem is that D&D started in 2007 will have to be curtailed; leaving facilities in a far more unsatisfactory state than before D&D had begun.

Surveillance and Maintenance – Although not a big expense, any additional money spent on facilities waiting for D&D is just money wasted.

In summary, the CAB recommends that the INL ceiling level funding for FY 2009 be increased by some \$30 million and this be specifically placed in PBS-40 (Nuclear D&D). This will allow important work to resume in FY 2009, even though there may be a more significant impact in FY 2008, based on the President's request to Congress.

Thank you for the opportunity to comment on the FY 2009 budget development. This issue is critical to the credibility of the cleanup program in Idaho and to the trust and confidence that has been established over the years due to the significant accomplishments on site.