

## **Statement for Environmental Management Advisory Board**

**August 23, 2006**

**Several years ago, the Department of Energy (DOE) promoted an initiative for risk-based decision making. The initiative died quietly, and decision-making continued on the established basis of politics, intuition and hysteria.**

**Your role as advisors to DOE policy makers might make it possible to resurrect the sanity that was reflected in the initiative, and it might therefore be possible to save the \$12B that is going to be wasted in the construction and operation of an unnecessary vitrification plant for Hanford tank waste.**

**The most recent risk assessment for a tank waste Environmental Impact Statement (EIS) indicated that the maximum annual dose that tank waste could impose on an individual near an arbitrary boundary was a few hundred millirems, and more than 99% of that dose was from transport of waste that had already leaked from the tanks and would eventually reach groundwater. The contribution to dose from moisture ingress into the tanks and diffusional release of residual waste was minuscule. Any barrier capability of the tank shell was ignored.**

**The analysis was based on an assumption that the Tri-Party Agreement (TPA) goal of 99% removal of waste from the tanks had been achieved. The risk assessment model used for the EIS analysis was undoubtedly imperfect, and every model that has been used in the past, or will be used in the future, is, or will be, imperfect. This absolutely does not mean that the results are not credible.**

**It was apparent to me at the presentation I attended that the analysts were not free to speculate on the effects of a less ambitious TPA goal, but it is obvious that 99% waste removal goes far beyond the actual need. With appropriate material additions, it is likely that total in-situ immobilization would provide a zero-risk closure configuration, particularly if the ridiculous Linear, No-Threshold (LNT) hypothesis is recognized as invalid (though that's another issue worthy of separate discussion).**

**Thank you for allowing me this opportunity to express my views. I hope you will consider the possibility of incorporating risk assessment into the decision-making process at an appropriate level of importance. The expertise at Hanford could make an enormous contribution to nuclear technology in areas like the emerging Global Nuclear Energy Program, and it should not be wasted on unnecessary solutions to non-problems.**

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