



Oregon

Kate Brown, Governor



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July 21, 2016

Ms. Stephanie Schleif
Washington Department of Ecology
3100 Port of Benton Blvd
Richland, WA, 99354

Dear Ms. Schleif:

We appreciate the opportunity to review the Proposed Closure Plan for the 324 Building in Hanford's 300 Area. Since highly concentrated waste was discovered beneath the building in 2010, the State of Oregon has encouraged the U.S. Department of Energy to make retrieval of that waste a priority.

On December 21, 2015, Oregon provided comments on proposed Tri-Party Agreement (TPA) milestone changes, primarily for work on Hanford's Central Plateau. In that letter, we listed the 324 Building as a "near-term" priority, with the expectation that the waste site would be remediated and the building demolished no later than 2021. That timeline is consistent with TPA milestone M-016-85, which requires the building to be demolished by September 30, 2021.

Oregon was not the only entity to provide comments to the U.S. Department of Energy and its regulators on concerns about moving forward with the 324 Building.

In the Comment Response document to the TPA Change Package, the Tri-Parties noted that the 324 Building was one of three major topics highlighted among the 1,500 comments received. In response,

"the TPA agencies have established a new milestone for completing remote excavation of the highly radioactive portion of the waste site underneath the 324 Building by September 30, 2019 (milestone M-016-85A). Since the public identified this work as one of their major priorities, the agencies wanted to provide the public with a specific milestone to highlight the progress and projected completion date for this work."

In reviewing the *324 Building Dangerous Waste Management Units Closure Plan* (DOE/RL-96-73, Rev 4), it appears as though the proposed closure will not meet either milestone. Excavation of the contaminated soil beneath the building is forecast to take 22 months, once planning activities are completed. Yet there is nothing within this document that indicates when planning activities will be completed and the work can begin.

If the 22 month estimate is accurate, work would need to begin no later than November of 2017 to meet the September 30, 2019 milestone.

The September 30, 2021 milestone would not be achievable under the proposed seven year schedule in this *Closure Plan*. Even if work were to begin immediately, the estimated completion time would be September of 2023.

Given the importance that the Tri-Parties acknowledged for this work, and the fact that new milestones were just recently set, it is disturbing to see a Closure Plan that seemingly makes no attempt to meet these milestones.

We strongly suggest that this work be made a higher priority; that work begin no later than November of next year to begin excavation of the contaminated soil; and that a schedule be developed and implemented that would allow both milestones to be met.

If you have any questions, I can be reached directly at 503-378-4906 or via e-mail at ken.niles@oregon.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Niles". The signature is fluid and cursive, with the first name "Ken" being more prominent than the last name "Niles".

Ken Niles
Assistant Director for Nuclear Safety

Cc: Dennis Faulk, U.S. Environmental Protection Agency
Doug Shoop, U.S. Department of Energy, Richland Office
Oregon Hanford Cleanup Board
Steve Hudson, Chair, Hanford Advisory Board
Rod Skeen, Confederated Tribes of the Umatilla Indian Reservation
Russell Jim, Yakama Indian Nation
Gabriel Bohnee, Nez Perce Tribe