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April 5, 2024

Jennifer Colborn
U.S. Department of Energy
Delivered via Email
CleanupPriorities@rl.gov

Re: Hanford Fiscal Year 2026 cleanup priorities comment letter

Dear Ms. Colborn,

Oregon appreciates this annual opportunity to provide comment on the Hanford cleanup and budget priorities for the near future, focusing on fiscal year 2026. The coming years are expected to see major accomplishments, including the finalization of the last Records of Decision (RoDs) along the River Corridor and the vitrification of the first tank waste in the waste treatment plant. The supply chain and work disruptions associated with the COVID pandemic have largely worked through the system, and cleanup is progressing. The critical work that DOE and its contractors completes safely every day is admirable.

However, in a fiscally constrained environment, Oregon is concerned that there may be a pending "characterization deficit," particularly on the central plateau. The reality of a large and complex environmental cleanup is that decades can elapse between investigation and closure. Without additional characterization, the estimates of how long the mission will take and how much it will cost are limited. Oregon encourages DOE to invest in characterization in the upcoming years, not decades later, in order to refine the scope, schedule, and budget of cleanup work required to achieve site closure.

Along the River Corridor, we anticipate that DOE will fund projects to continue the cleanup progress, including implementation of the remedies prescribed by the RoDs for all of the 100 areas as well as the revised/amended RoD for the soil contamination under the 324 Building. Oregon supports these efforts to remove contamination that poses a risk to the Columbia River.

Contamination from waste sites on the central plateau can take 50 years to reach groundwater. Since groundwater contamination will lag behind cleanup activities by decades, characterization now and subsequent remediation may be able to reduce the operational period of the highly effective groundwater pump and treat mission. The pump and treat mission is effective at reducing contamination and preventing groundwater plumes from leaving the central plateau,

but Oregon suggests that DOE's should accelerate identification and removal of contamination and remove the pathways to groundwater.

We are encouraged by the recent grant to Pacific Northwest National Laboratory to study methods of removing waste from tanks without adding water ("dry mining" waste removal techniques). Similarly, we appreciate the progress on the Transuranic Waste processing facility in support of the resumption of waste shipments to the Waste Isolation Pilot Project (WIPP), and the overdue initiation of transfer of cesium and strontium capsules from the Waste Encapsulation Storage Facility (WESF) to dry storage. Following safe and successful transfer of these capsules and draining of the WESF pool, core samples of the storage pool walls and floors should be collected to allow the study of long-term exposure of concrete to high levels of radiation.

The Office of River Protection is scheduled to sunset in October of 2024 – Once there is only one budgetary office at Hanford, it will be important to make progress on waste in tanks but also continue to characterize and cleanup waste in soil creeping unchecked towards the river.

Based on The Washington Department of Ecology's analysis of lifecycle scope data, a compliant budget for Fiscal Year 2026 is approximately \$4.56 billion, and in subsequent years, a compliant budget would further increase. This year, a contract for tank farm operation, recovery, and treatment was awarded for up to \$45 billion dollars over 10 years. The enacted fiscal year 2024 budget was a record setting ~\$3 billion dollars for the two Hanford offices. To state another way, the projected high-end cost of one contractor is 150% of the current record-high budget. Tank waste management and recovery, operation of the Direct-Feed Low Activity Waste facility, and design/construction of the high-level treatment facility are critical and necessary. However, this contract does not include cleanup activities, sitewide infrastructure, or other non-tank waste projects included in the compliant budget — all vitally important activities.

It is important to note that without the results of the still ongoing "Holistic negotiations," full information on specifics for cleanup projects and milestones is limited, which restricts interested parties' ability to comment on the full scope of upcoming fiscal year priorities. Oregon is hopeful that future foundational negotiations between DOE and its regulators will be transparent and include stakeholders and tribal nations early, which has not been the case with the Holistic negotiations; which, after four years, still no information has been released to the public.

In addition to characterization, cleanup, and immobilization activities on-site, Oregon also expects DOE to continue funding restoration assessments through the Hanford Natural Resource Trustee Council, and to expand funding for training for first responders and emergency managers along transportation corridors in anticipation of the resumption of waste shipments off-site. These programs may have relatively smaller price tags, but they are of high value to the region.

Oregon believes that continued progress towards cleanup and risk mitigation at Hanford has shown significant value for the funds appropriated by Congress. The coming years will provide tangible high-profile results - with the resumption of waste shipments to WIPP and the first

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waste glass being poured from the Waste Treatment Plant. In Oregon's opinion, it is critical that the cleanup of less high-profile projects also continue on the path to site closure.

Characterization, cleanup, facility disposition, waste retrieval, waste treatment, and onsite and offsite waste disposal are Oregon's priorities. The best way to protect the Columbia River and the northwest region is to finish the cleanup. The decisions made and actions taken in 2026 will play their part in determining how long it takes to complete that mission. If you have any questions please contact me or Tom Sicilia (tom.sicilia@energy.oregon.gov) of my staff.

Regards,

Maxwell Woods

Oregon Department of Energy

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Cc:

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