

April 3, 2023

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## **RE: 2025 Hanford Site Budget and Cleanup Priorities**

Ms. Colborn,

Oregon appreciates the annual opportunity to restate our priorities with respect to the Department of Energy's (DOE) cleanup of the Hanford Site. While progress is being made, the slow and steady nature of the work results in minimal change to Oregon's high priority tasks. Oregon's priorities are viewed through the following framework.

- Protect the Columbia. This has been and remains Oregon's top priority.
- Provide clear and transparent information to the public. Not just because it is required, but because it builds trust in a cleanup process that the public can support.
- "Get on with cleanup" (Tank Waste Task Force Final Report, 1993)

Previous Oregon priority letters have voiced a preference for cleanup over demolition, and that preference continues. 2025 activities should continue cleanup on the River Corridor and effectively manage groundwater plumes. Characterization, classification, and cleanup of the contamination associated with the 300-296 waste site under the 324 building is a top priority, and we have confidence that DOE can continue progress in the 100 areas while safely finishing this cleanup.

On the Central Plateau, we similarly support risk reduction actions such as completing transfer of the cesium and strontium capsules to dry storage. We continue to view timely cleanup of both relatively simple waste sites such as those in the 200-IA operable unit and those with challenging scopes such as 200-PW-1,3,6 as critical to protecting the Columbia River. These remedial actions should be started, if not finished, this decade. Additionally, continued progress on characterization and remediation of Central Plateau waste sites this decade maximizes the chance that all transuranic (TRU) wastes currently at Hanford will make it to the Waste Isolation Pilot Plant (WIPP) for disposal by 2050. We are encouraged to hear that preparing for TRU shipments is a DOE priority in 2025, and Oregon is excited to support the shipping campaign as waste leaves the northwest.

To that point, Oregon encourages DOE to expand the ongoing consent-based siting process for spent nuclear fuel to identify a potential successor to WIPP. After 2050, down-blended decommissioned weapons and any Hanford TRU shipments that miss the "WIPP window" will still need a disposition pathway. WIPP took at least 20 years to permit and construct, so it is reasonable to assume that the successor to WIPP will follow a similar lifecycle.

The Office of River Protection has made significant progress in the past decade, and we hope to see work build on that success. We support continued operation of direct feed low activity waste, deliberate design and construction of the High-Level Vitrification facility and a cross-site transfer line, adding capacity to effluent treatment, and safe disposal of low-level vitrified waste in the integrated

disposal facility. Retrieval of waste from single shell tanks (SST) remains a priority to "closing" tanks that had previously been retrieved. While retrieval is critical, the tanks holding waste yet to be retrieved should continue to be inspected, and tank leak response plans should be in place to mitigate releases of additional waste to the environment.

Oregon participated in and provided comment on the recent Federally-Funded Research and Development Center (FFRDC)-National Academies of Science study regarding treatment options for Supplemental Low Activity Waste (SLAW). We encourage DOE to begin a formal evaluation of requirements associated with option 6a from the recently published FFRDC report. "Right-sizing" the treatment strategy to the disposal facility presents an opportunity to contain mission costs and complete cleanup on schedule. While Oregon continues to believe that vitrification of tank waste is the preferred option for waste disposed at Hanford, other options such as grout may be viable for other disposal environments such as those presented in the SLAW report. As noted in Oregon's comments during the study, we encourage DOE to include a comprehensive transportation safety and security plan, and include the transit states in that plan at the beginning, including Oregon. The evaluation and transportation plan should also include commitments from the proposed receiving facility and its regulators along with an assessment of where and when the liquid waste will be solidified.

As we stated in our 2024 priorities letter, DOE has a legal obligation to request at least estimated TPA-compliant funding levels, and we are encouraged to see that the 2024 President's Request Budget is moving in the right direction with a request of approximately \$3 billion for the Hanford site. Research at PNNL associated with the Hanford cleanup such as tank retrievals, "green" remediation, and waste stabilization continues to have the potential to provide benefit well-outside the bounds of Hanford. Perand polyfluoroalkyl substances (PFAS) assessment and National Resource Damage Assessment (NRDA) funding are similarly critical, first to ensure that all impacts are being accounted for, and then to ensure accountability for all impacts.

As always, Oregon stands ready to help DOE successfully complete its cleanup mission safely and on schedule. We encourage DOE to identify steps that can be taken in the short term which will reduce uncertainty in the long-term strategy. Waste characterization and the identification of alternate treatments and disposal pathways that will maintain schedules within budget constraints should be the top priorities once critical risks are mitigated. It took decades of production to contaminate the Hanford environment. Efforts to properly prioritize remediation and recovery may allow the cleanup mission to be completed on the TPA-agreed upon schedule if not sooner.

If you have any questions, please contact Tom Sicilia of my staff at tom.sicilia@energy.oregon.gov.

Sincerely,

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**Oregon Department of Energy** 

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