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December 7, 2017

Daina McFadden Washington Department of Ecology 3100 Port of Benton Boulevard Richland, WA 99354

Dear Ms. McFadden:

Thank you for the opportunity to provide comments on proposed modifications to the Hanford Dangerous Waste permit regarding Hanford's cesium and strontium capsules. We acknowledge that there are two separate comment opportunities – one related to preparation of the Waste Encapsulation and Storage Facility (WESF) for the transfer of the capsules, and the other related to construction and operation of the capsule storage area.

We have no specific concerns or comments related to the specifics of either proposed permit modification.

We are concerned with how long this entire process has been taking and that we are still years away from getting the cesium and strontium capsules into dry storage. It has been more than five years since the potential hazard of a WESF storage basin failure due to concrete degradation was first recognized. Oregon then expressed its concerns in writing in a letter to the U.S. Department of Energy on July 22, 2013. Soon after, there appeared to be general acknowledgement that moving the capsules into dry storage should be a top Hanford priority.

It is our understanding that the Washington Department of Ecology has generally been very accommodating as far as accelerating permit processes for key cleanup projects when asked by the U.S. Department of Energy (DOE). Nevertheless, we urge Ecology to look for further opportunities to streamline permitting processes related to this project. We also urge DOE to look for opportunities to accelerate this project and eliminate this potentially significant threat to the region.

Should you want to discuss our comments, please contact me at 503-378-4906.

Sincerely,

Ken Niles

Assistant Director for Nuclear Safety

c.c. Doug Shoop, U.S. Department of Energy Richland Office
Alex Smith, Washington Department of Ecology
Laura Buelow, U.S. Environmental Protection Agency
Matt Johnson, Confederated Tribes of the Umatilla Indian Reservation
Rose Longoria, Yakama Indian Nation
Jack Bell, Nez Perce Tribe
Oregon Hanford Cleanup Board
Hanford Advisory Board