



Oregon

Kate Brown, Governor



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U.S. Department of Energy
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WA Department of Ecology
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Richland, WA 99354

Dave Einan
U.S. Environmental Protection
Agency
825 Jadwin Avenue, Suite 210
Richland, WA 99352

Dear Ms. Smith and Mr. Vance and Mr. Einan,

For the last 30 years, the Oregon Department of Energy has provided formal and informal input on Hanford cleanup priorities to the U.S. Department of Energy and its regulators. Throughout this time, we have emphasized as among our very top priorities beginning vitrification of Hanford's tank waste and taking measures to contain and clean up the contaminated groundwater. We've seen significant progress on groundwater remediation in recent years and it does appear likely that limited tank waste vitrification may finally be near.

As other specific issues or projects have been identified through the years, many have become Oregon priorities and many of these have been successfully resolved.

There has been a consistency in Oregon's priorities through the years, focusing first and foremost on protecting the Columbia River. We have also prioritized work that will reduce serious risks; reduce mortgage costs; and support progress. As a Trustee of Hanford's Natural Resources, we have consistently supported sufficient funding for Natural Resource Damage Assessment and Restoration work, to help move that process toward resolution.

The most recent detailed budget priority letter we submitted was in July 2017. Those priorities for DOE's Richland Office, in turn, were consistent with detailed budget priorities we provided in December 2015. We had hoped many of these priorities we identified three years ago would be done or farther along by this time.

Oregon's current priorities are still reflected in the priorities we shared in 2017, with the exception of those projects that have been completed:

Oregon's priorities – 2017 through December 2019 for DOE-RL

- Complete demolition of the Plutonium Finishing Plant to slab-on-grade **[COMPLETE]**
- Begin moving the cesium/strontium capsules from pool storage at WESF to dry storage – *Oregon objected to 2025 TPA Milestone as not aggressive enough. DOE may have difficulty meeting even that conservative milestone without consistently prioritizing funding for this project.*
- Complete installation of the extended apatite barrier at N Area – *not yet complete.*
- Begin and complete sludge movement from K West Basin **[COMPLETE]**

- Begin remediation of the high-dose soil contamination beneath 324 Building – 2021 TPA milestone officially “at risk.”
- Interim stabilize the PUREX tunnels **[COMPLETE]**
- Expand groundwater treatment into the 200 East Area – *more needs to be done.*
- Complete the River Corridor Records of Decision – *not yet done.*

Oregon’s priorities 2020 through 2022 for DOE-RL

- Complete transfer of cesium/strontium capsules to dry storage – 2025 TPA Milestone may be in jeopardy unless consistent priority of available funding is assured.
- Complete remediation of soil beneath the 324 Building and demolish the building – 2021 TPA milestone officially “at risk.”
- Resume retrieval/treatment of retrievably stored waste from the solid waste burial grounds and resume shipments of transuranic waste to the Waste Isolation Pilot Plant – *does not show up on list of “DOE – Hanford Top Priorities” provided at June 17, 2020 DOE budget meeting.*
- Demolish the K-West basin – *does not show up specifically on list of “DOE – Hanford Top Priorities” provided at June 17, 2020 DOE budget meeting.*
- Develop a more robust program to characterize and remediate contamination in the deep vadose zone – *does not show up on list of “DOE – Hanford Top Priorities” provided at June 17, 2020 DOE budget meeting.*
- Begin Interim Safe Storage of K East and K West reactors – *does not show up specifically on list of “DOE – Hanford Top Priorities” provided at June 17, 2020 DOE budget meeting.*
- Begin characterization of the Central Plateau solid waste burial grounds – *does not show up on list of “DOE – Hanford Top Priorities” provided at June 17, 2020 DOE budget meeting.*

DOE-RL work that Oregon believes can be delayed until after 2026 (unless substantial additional funding is received)

- | | |
|----------------------------|--|
| • PUREX tunnel remediation | • Non-Radioactive Dangerous Waste Landfill (NRDWL) barrier |
| • U Plant closure | • Outer Area soil cleanup |
| • S Pond barrier | |
| • B Pond barrier | |

For DOE-ORP, Oregon continues to support continued progress towards Direct-Feed Low-Activity Waste treatment; a continuation of tank waste retrievals; and full resolution of technical issues so that work can resume on the entire Waste Treatment Plant complex. We do not believe funds should be dedicated toward tank closure until tank waste treatment is well underway.

If you have any questions or wish to discuss any of our comments, please contact me at 503-378-4906.

Sincerely,



Ken Niles
Assistant Director for Nuclear Safety

CC: Matt Johnson, Confederated Tribes of the Umatilla Indian Reservation
Laurene Contreras, Yakama Nation
Jack Bell, Nez Perce Tribes
Oregon Hanford Cleanup Board
Hanford Advisory Board