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The Honorable Ron Wyden
221 Dirksen Senate Office Bldg.
Washington, D.C., 20510

Dear Senator Wyden,

The Oregon Department of Energy has deep concerns about the potential impacts of President Trump's proposed FY 2021 budget on the Hanford nuclear site cleanup. We recognize that this is a proposed budget and that historically Congress – led by the Northwest delegation – has typically restored much or all of any proposed cuts. However, the U.S. Department of Energy already appears to be moving forward with planning for a much more limited Hanford cleanup during the coming decade.

The President's proposed budget would cut overall spending at Hanford by more than \$700 million – a 27 percent reduction over FY 2020 funding. Both of Hanford's offices – the Richland Field Office and the Office of River Protection, would each suffer significant cuts – more than \$346 million (a 34 percent cut) for the Richland Office, and more than \$358 million (a 22 percent cut) for the Office of River Protection.

Even with level funding, Hanford will face challenges in meeting its regulatory requirements. In September of last year, the Hanford Site Manager submitted a "compliant" FY 2021 budget request to DOE Headquarters. For the Richland Office, that anticipated budget was \$1.335 billion and for the Office of River Protection the request was \$2.050 billion. That combined budget request totaled \$3.385 billion – a \$771 million increase over the FY 2020 funding level and nearly \$1.5 billion more than the President's FY 2021 request.

The impacts of the President's FY 2021 budget request would be significant. DOE proposes to simply stop progress on several vitally important projects, including efforts to move 1,936 highly radioactive cesium and strontium capsules to safer storage, and work to remove highly concentrated radioactive soil from beneath a building in Hanford's 300 Area. The groundwater treatment program would take a 59 percent cut in funding. Few, if any, new remediation projects would begin. It appears retrieval of waste from Hanford's older single-shell tanks would also be greatly reduced or halted altogether.

The proposed cuts appear to be part of a broader strategy for reduced funding. Last week, DOE unveiled its vision for the Environmental Management program through 2030, touting it as a "A Time of Transition and Transformation." Its goals for Hanford during the next decade show a greatly reduced cleanup – focusing almost entirely on the start-up of tank waste treatment at the expense of most everything else.

DOE has been working for the past several years towards meeting a 2023 Consent Decree milestone to begin vitrification of some liquid lower-hazard waste through a process called Direct-Feed Low Activity

Waste (DF-LAW). While we do support this effort, it should not come at the expense of other important work at Hanford.

The unilateral decision to stop work on the cesium-strontium capsules is particularly concerning. The capsules are stored under water in concrete basins adjacent to Hanford's B Plant. These capsules contain an estimated one-third of the total radioactivity at the Hanford Site.

In 2013, the Oregon Department of Energy raised concerns about potential degradation of the concrete walls due to the high radioactivity they were subjected to over several decades. Risks at this facility derive from potential loss of cooling water. The likelihood of such an event is most directly related to a significant seismic event.

If the concrete is appreciably weakened – and we don't know that to be the case – stresses from an earthquake could lead to direct failure of the walls or the basin bottom, causing the drain down of the pools. Due to the loss of water, the ultimate release from such an event may include a significant fraction of the inventory of cesium 137 and strontium 90 stored in the facility, because of overheating and thermal failure of the capsules. Hanford contractors have analyzed potential impacts from such an event and in some cases found them to be devastating.

DOE has taken some short-term actions to attempt to mitigate those risks but has also acknowledged the severe risk these capsules pose. Although DOE did not act with the urgency we suggested, DOE did begin the process of designing storage casks and upgrading the facility to allow for the transfer of the capsules from pool storage to much safer dry storage. DOE negotiated a milestone with its regulators to complete movement of the capsules to dry storage by August 31, 2025.

In its budget document, DOE explains the change this way: "Decrease reflects re-planning and re-evaluation of former seismic integrity study performed." As yet, DOE has not performed a re-evaluation of the seismic study, nor do they have any new data related to the integrity of the basins. The risk remains and DOE's decision to stop funding this project puts site workers and the region at risk.

Lack of sufficient funding through the years has repeatedly led to missed milestones, increased risks, greatly increased costs, and DOE's own estimates that show cleanup will not be complete for many decades. DOE points out that Hanford receives more money than any other DOE EM site. The pertinent question is not which site is getting the most money. The question that DOE should be asking is: "What does it take to move the cleanup successfully forward and reduce the risks in a reasonable time frame?" This proposed budget does neither.

Please let me know if you have any questions.

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: Brian Vance, Hanford Site Manager
Alex Smith, Washington Department of Ecology
Dave Einan, U.S. Environmental Protection Agency
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