



Oregon

Kate Brown, Governor



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June 23, 2021

William F. Hamel,
Assistant Manager for the River and Plateau
US Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352
Delivered VIA email to M-091@rl.gov

Dear Mr. Hamel,

Oregon has long supported efforts to protect the Columbia River by removing waste from the region. Transuranic (TRU) waste at Hanford should be safely shipped to the Waste Isolation Pilot Plant (WIPP) as soon as the opportunity exists. We are heartened to see successful Tri-Party agency negotiation, with a firm start date to TRU shipment resumption, and a realistic extension to reflect the anticipated closure date of WIPP included in the revised M-091 milestone. We would additionally ask the Richland office of the US Department of Energy (DOE-RL) to do everything in its power to ensure that waste is retrieved, characterized, and ready for WIPP certification should the opportunity to resume shipments before 2028 present itself. While we have no objections to the proposed changes in the M-091 milestone, we offer the following considerations which we hope will minimize the risk of additional foreseeable delays.

The initial 10-20 waste shipments per year, beginning in 2028, are anticipated to ramp up during the mid-2030s. Oregon encourages DOE to work with the Western Interstate Energy Board (WIEB) to discuss the anticipated shipment frequency, schedule, and potential seasonal hazards. Given the nature of the shipments, the amount of waste, and the distance to be traveled, it is important for states along the transportation route to have as much information as possible, as soon as possible to ensure a coordinated approach to transportation safety that avoids delays. Additionally, the proactive planning surrounding future offsite TRU shipments should include the current best estimated volume of non-M-091 TRU waste which will also need to be shipped to WIPP before 2050. While we understand that the actual shipment schedule for this waste is largely out of DOE-RL's control and out of scope in the M-091 comment period, the DOE-Carlsbad office as well as the states along the transportation routes should be aware of the total shipment density required to meet the goal of getting all of the TRU waste at Hanford to WIPP.

We appreciate the early (2024) milestone for an engineering study for Remote Handled TRU wastes, but we note that building the technology and facilities needed to safely process remote-handled TRU waste has been a challenge in the past. DOE-RL will have less than 16 years to implement any program elements which may be required to successfully retrieve, characterize, and ship remote-handled

containers. Those strategies and schedules evaluated in the study should be discussed with states along the transit route as well as the Carlsbad field office.

Based on the fact sheet and milestone documentation, DOE-RL assumes that waste packages that do not assay as TRU or mixed TRU will be classified as mixed low-level waste (MLLW). As we have communicated to DOE-RL on several recent occasions, we are concerned about the apparent lack of a process and documentation to affirm that these wastes, which resulted from the reprocessing of spent nuclear fuel, have been demonstrated to not qualify as High Level Waste (HLW) prior to their on-site disposal in a shallow environment. We request that the rationale for classification as MLLW instead of HLW be documented in a publicly accessible format prior to disposal at the Environmental Restoration Disposal Facility (ERDF).

Oregon supports the safe transportation and offsite disposal of Hanford TRU waste in a permanent repository which will result from the successful execution of the work described in these milestones. To facilitate scheduling and minimize surprises for this critical mission, we reiterate our request that DOE engage with states early and often specifically regarding transportation safety.

If you have any questions or wish to discuss any of our comments, please contact Tom Sicilia of my staff at tom.sicilia@oregon.gov or 503-508-8333.

Sincerely,



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Oregon Hanford Cleanup Board
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