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December 18, 2024

Sent via email: <u>LTWDP@wipp.doe.gov</u>

RE: Oregon Feedback and Comment on Proposed Definition of Legacy Transuranic Waste by the Carlsbad Field Office

To whom it may concern,

Oregon appreciates the opportunity to provide input on the proposed definition of Legacy Transuranic Waste for placement prioritization in the Waste Isolation Pilot Project Panel 12 to the extent practicable. The definition as presented is reasonable and appropriate, and successfully captures retrievably-stored and remediation/risk reduction wastes. Given the time periods and complex missions ahead, we welcome the DOE-Carlsbad Field Office's forward thinking in including waste sites - including some at the Hanford site - which are not yet included in a Record of Decision.

We do question the inclusion of the down-blended NNSA "dilute and dispose" waste as Legacy TRU. While safe and permanent disposal of this material is important, we consider it to be outside of the activities associated with remediating the legacy of the weapons complex. We are concerned that the significant volume increase associated with the down-blending process will prevent Panel-12 placement of remediation wastes which must be removed from the accessible environment, for example, contaminated soil or other wastes from the Hanford site.

With the expected resumption of TRU shipments to Carlsbad from Hanford through Oregon, we also wanted to take this opportunity to commend DOE-Carlsbad Field office on their transportation safety program. The extensive outreach, training, and willingness to host tours of the WIPP facility remain exemplary examples of effective stakeholder engagement. Oregon looks forward to increased engagement and specific training for our first responder community along the Hanford-WIPP transportation route in the coming years ahead of the Hanford TRU shipments. We hope that as non-transuranic waste shipment campaigns are planned, Carlsbad Field Office will be willing to share lessons learned with the other field offices around the complex to ensure awareness and preparedness programs are successful. If you have any questions or would like to discuss these comments, please contact me or my Assistant Director, Max Woods.

Thank you.

Tom Sicilia, RG Hanford Hydrogeologist

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Jeff Wyatt Chair, Oregon Hanford Cleanup Board Cc: Dave Einan, U.S. Environmental Protection Agency
Stephanie Schleif, Washington Department of Ecology
Jennifer Colborn, U.S. Department of Energy, Hanford Field Office
Mason Murphy, Confederated Tribes of the Umatilla Indian Reservation
Laurene Contreras, Yakama Indian Nation
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Susan Coleman, Hanford Advisory Board
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