

# National Academies of Sciences (NAS) Review of FFRDC Report on Supplemental Treatment Options for Low-Activity Waste at Hanford

## COMMENT DEADLINE: October 31, 2019

**Send Comments by *October 31, 2019*:**

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Nuclear and Radiation Studies Board  
Division on Earth and Life Sciences  
The National Academies of Sciences, Engineering, and Medicine  
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### Sample Comments Prepared by Hanford Challenge

Dear Mr. Ferguson,

Thank you for the opportunity to provide public comment on the NAS review of the FFRDC report on the Supplemental Treatment of Hanford's Low-Activity Waste. I am writing because I care about future generations exposure to Hanford's radioactive legacy. Please consider the following points while you finalize your review:

- Prioritize protecting future generations and the environment, not cost-savings.
- Please be clear that more research and development is necessary to ensure that the analysis of different waste forms has the scientific rigor that a decision of this magnitude requires.
- Do not create a pathway for long-lived radionuclides such as Technetium-99 and Iodine-129 to remain in shallow land burial onsite at Hanford.
- Consider the following context in your review of the analysis of cost-comparisons between the different waste forms: Hanford's long history of projects being delayed, mismanaged, over-budget and rife with technical problems that may or may not be recoverable.
- Make explicitly clear where there is uncertainty in the FFRDC report and urge decision makers to be cautious of the findings.
- Supplemental LAW is one of many decisions yet to be made at Hanford and must be examined in the context of how much total waste DOE plans to leave on the Hanford Site. As each piece of the cleanup puzzle comes together, cumulative impacts must be considered to ensure cleanup plans are protective of future generations. Please consider cumulative impacts in your review.
- The grout form proposed by the FFRDC is itself toxic and a potential threat to the environment.

In conclusion, I oppose the use of grout at Hanford for purposes of immobilizing long-lived nuclear wastes, and urge the National Academies of Sciences to resist the allure of short-term cost-savings as a trade-off for long-term protection of the environment and human health.