



August 10, 2021

U.S. Department of Energy
Attn: Jennifer Colborn, HMIS
P.O. Box 450, H6-60
Richland, WA 99352
Comments submitted via email: CleanupPriorities@rl.gov

RE: Public Comment Period for Hanford Cleanup Priorities

U.S. Department of Energy:

Thank you for the opportunity to submit comments on the Hanford Site field-office FY23 Budget Request.

Hanford Challenge is a non-profit, public interest, environmental and worker advocacy organization located at 2719 East Madison Street, Suite 304, Seattle, WA 98112. Hanford Challenge is an independent 501(c)(3) membership organization incorporated in the State of Washington with a mission to create a future for the Hanford Nuclear Site that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy. Hanford Challenge has members who work at the Hanford Site. Other members of Hanford Challenge work and/or recreate near Hanford, where they may also be affected by hazardous materials emitted into the environment by Hanford. All members have a strong interest in ensuring the safe and effective cleanup of the nation's most toxic nuclear site for themselves and for current and future generations, and who are therefore affected by conditions that endanger human health and the environment.

The process by which the Hanford Site prepares, submits, and receives funding for cleanup has always been a challenge. The increased uncertainty posed by Covid-19 budgetary impacts increase the stress and challenges to achieving compliant cleanup funding levels. Nonetheless, it is paramount that the U.S. Department of Energy make a strong case for compliant funding.

Please take the following comments into consideration as you plan for Fiscal Year 2023 and beyond.

- **Increase Transparency:** Increase the level of detail provided in budgetary briefings and public involvement materials. Information provided should include the proposed Project Baseline Summary level funding, guidance from DOE headquarters, the funding and work scope for the level below that (regardless of whether DOE has changed the name of how it breaks out this level from the terminology in the Tri-Party Agreement), and Integrated Priority Lists. The comment period is not meaningful without this information. Ensure that future detailed budgetary information differentiates between the costs of "min-safe" and "mortgage costs" and the level of funding that accomplishes actual cleanup work.
- **Build Collaborative Space for Hanford's Budget Process:** Create space for collaboration with the public and regulators while developing future budget proposals for Hanford cleanup. Work with the regulators to prepare Tri-Party Agreement Agency budget briefings that involve collaborative

advanced planning between all parties. Give the public the tools and detailed budgetary information necessary to make a compelling case for full funding of Hanford cleanup to achieve regulatory compliance, risk reduction, removal of contamination from the environment, mitigation of hazards, and consideration of tribal treaty rights.

- **Prioritize Funding Cleanup Projects:** It is important to Hanford Challenge that cleanup - defined as projects that achieve regulatory compliance, risk reduction, removal of contamination from the environment, mitigation of hazards, and consideration of tribal treaty rights - is prioritized. Request funding of cleanup projects that:
 - Reduce risk to workers, the environment, and/or the public
 - Maintain/meet/move towards attainment of TPA milestones, consent decree, and/or RCRA permit and other requirements
 - Use engineering controls versus administrative controls where feasible
 - Prevent the short-term spread of contamination
 - Reduce long-lived radioactive contamination and risk
 - Protect the Columbia River
 - Protect/remediate the deep vadose zone
 - Use existing and proven technologies
 - Prevent future releases
 - Mitigate past releases
 - Reasonably address public concerns in a timely manner
 - Safely treat, store, and dispose of waste
 - Listen to, encourage, and protect workers who raise concerns and work to resolve those concerns
 - Mitigate mobile high-risk contaminants before less mobile high-risk contaminants (ex: 324 Building, drainable tank liquids)
 - Contains infrastructure budget/support systems necessary to complete the work and maintain a safe working environment for the Hanford workforce

- **Request a Compliant Budget:** Hanford Challenge would like DOE to request full funding to meet ALL compliance obligations and to address emergent threats, such as leaks from single-shell and double-shell high-level nuclear waste tanks. Ask for the money you need and make a strong case for why it is imperative that cleanup be fully funded.

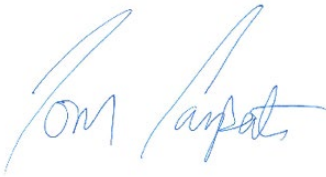
- **Address Systemic Problems:** There are many systemic problems at Hanford that money alone cannot fix. Instead, more checks and balances are needed to safeguard cleanup funds. DOE should look at funding and legislative efforts to increase contractor oversight and address contracting inefficiencies that lead to high overhead costs. DOE should also take efforts to renew commitment to improving the safety culture at Hanford.

- **Make the Case for Decreasing the Total Lifecycle Cost of Hanford Cleanup:** Often at Hanford, delaying cleanup projects for any reason results in increased lifecycle costs for the entire Hanford Cleanup mission. Hanford Challenge requests that DOE make a plan for and request increased funding levels that **decrease the total lifecycle costs** of Hanford cleanup and make a strong case for this in its budget proposals and budget related documents by requesting the funding necessary to achieve this goal. Spend more now to spend less overall.

- **Delay Tank Closure:** Delay tank closure at Hanford, especially at the C Farm tanks, until the safe and effective treatment capacity to immobilize Hanford’s tank waste in glass has been achieved. Delaying tank closure also offers time for the development of technologies that may allow for the retrieval of more tank waste.
- **Focus on Safe and Effective Tank Waste Vitrification:** Make glass safely. Prioritize work on Direct Feed Low Activity Waste. Continue solving problems to be ready for high-level waste vitrification.
- **Accelerate Work to Remove Cesium and Strontium Capsules to Dry Storage:** Request funding that speeds up the work to safely remove the Waste Encapsulation and Storage Facility’s cesium and strontium capsules to dry-cask storage. We would like to see this work completed prior to the 2025 TPA milestone.
- **Safely Complete Removal of Contaminated Soil Beneath the 324 Building:** Request funding that allows for the 324 Building B-cell contamination to be removed safely and on schedule, and maximizes worker protections. Ensure that funding levels allow for characterization of waste as it is removed to ensure that no long-lived contaminants end up in the Environmental Restoration Disposal Facility.
- **Fund Vapor Engineered Exposure Controls:** Complete the testing, selection, and implementation of the most effective measures to safely address worker exposure to toxic chemical vapors in Hanford’s tank farms as outlined in the Sept 2018 settlement agreement regarding tank vapors. Ensure that workers are provided effective respiratory protection using supplied air respiratory protection while working in the tank farms to protect workers from both immediate and chronic health effects and illnesses.
- **Plan for Expanded High-Level Tank Waste Storage:** Request funding to plan for and implement safe additional storage of Hanford’s high-level tank waste so that this space is available before more Hanford underground storage tanks fail.
- **Increase Infrastructure and Readiness to Respond to Tank Leaks:** Request funding to increase readiness to quickly move in infrastructure necessary to pump a leaking tank.
- **Restore Onsite Treatment Capacity for Waste Treated at Perma-Fix Northwest:** Request funding to restore onsite treatment capacity to return treatment of Hanford’s waste to the Hanford site. See [our 2020 report](#) outlining concerns with Perma-Fix NW.
- **Request Funding for Deep Vadose Zone Contamination:** Restore funding to plan remediation of the deep vadose zone, especially below Hanford’s tank farms where an estimated one million gallons or more of high-level nuclear waste has leaked. The vadose zone contaminants will continue to migrate through the soil re-contaminating areas that were previously cleaned up. Remediating the deep vadose zone won’t happen without a plan, funding, and an ongoing commitment to accomplish the work. This work must be funded in order to protect future generations.
- **Request Additional Funding for Groundwater Remediation:** Protect the Columbia River, future generations and the environment by requesting additional funding for groundwater remediation.

- **Increase Funding for Public Involvement:** Public awareness, input, and involvement in decisions about Hanford cleanup is essential to achieve a successful cleanup. Therefore, additional funding should be provided in RL-100 for the vital public involvement work of the Hanford Advisory Board, the WA State Department of Ecology's oversight, and WA State Department of Health. Emergency preparedness is also an essential activity at the Hanford Site and should not be cut short.
- **Request Contingency Funding for Emergencies:** Recent history has shown us the need for RL and ORP to request and set aside funding to quickly respond to emergencies and unplanned cleanup crises. As we have seen in the past several years with the identification of leaked contamination beneath the 324-Building, the PUREX Tunnel 1 collapse, the [RL Matrix](#) identifying 27 potential sites needing stabilization to avoid contamination release, and the B-109 tank leak; contingency funding would provide a welcome buffer to respond quickly to these issues. Request funding to plan for a future that will contain emergencies and unplanned crises to ensure a nimble response that does not redirect money away from other important cleanup work.
- **Request Funding for an Independent External Review of the Waste Treatment Plant:** Successful and safe treatment by immobilizing Hanford's tank waste in glass is non-negotiable. It is critical to determine what can and cannot be salvaged at the Waste Treatment Plant. Request funding for an independent external review.

Thank you for considering our comments.

A handwritten signature in blue ink that reads "Tom Carpenter". The signature is fluid and cursive, with the first name "Tom" being larger and more prominent than the last name "Carpenter".

Tom Carpenter, Executive Director