



Comments submitted by email to: [Tier2EECA@rl.gov](mailto:Tier2EECA@rl.gov)

April 30, 2021

U.S. Department of Energy  
Attn: Jennifer Colborn  
P.O. Box 450, H6-60  
Richland, WA 99352

Dear Ms. Colborn,

Thank you for the opportunity to submit comments on the *Engineering Evaluation/Cost Analysis on Proposed Alternatives for 200 West Area Tier 2 Buildings/Structures Non-Time Critical Removal Action (DOE/RL-2020-39, Rev 0)*. Thank you, also, for your responsiveness to our request to hold a public meeting and extend the comment period. We appreciated the public meeting you held on April 20, 2021 and the opportunity to ask questions and the extension of the comment period to April 30, 2021.

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.

Hanford Challenge appreciates actions that remove contamination and reduce hazards on the Hanford site and reduce the long-term cost of cleanup. We support work to safely characterize and remove contamination, determine waste disposal based on waste form and safely demolish buildings that currently pose a danger to workers. We also strongly support the policy of "spend more now to spend less later." Increased well-managed cleanup funding can accelerate cleanup work to lower the total cost of cleanup, especially straightforward projects like building decontamination and demolition, that are incurring avoidable "babysitting costs" and increased risks from aging infrastructure while waiting for cleanup funding to be available to complete the work.

The buildings and structures included in the Tier 2 Non-Time Critical Removal Action contain a slew of known and hard to manage hazards such as beryllium, asbestos, and plutonium that need to be very carefully managed to avoid airborne release and worker exposure. We are keenly aware of the damage airborne release can have on the site and worker health and safety as evidenced by the poorly managed demolition of the Plutonium Finishing Plant that resulted in worker exposure to plutonium and americium, plutonium contamination leaving the site on vehicles and with contamination detected miles away at the Columbia River, and increased cost and delays to completion of the project as a result of the airborne releases.

Careful planning, extensive characterization, well-prepared worker protections and safety training in anticipation of contact with plutonium, beryllium, asbestos, lead, and other hazards is necessary to avoid worker exposures and airborne release of contamination in these buildings and structures.

We are also keen to ensure that waste is adequately characterized.

Thank you for considering our comments.

**Specific Comments include:**

- **Prevent Airborne Releases:** Please incorporate lessons learned from the Plutonium Finishing Plant airborne releases to ensure that all steps are taken to keep contamination contained during the characterization, removal, and demolition of the buildings and structures associated with this comment period. For instance, do not conduct open-air demolitions.
- **Prevent Worker Exposures:** Please take all necessary steps to prevent worker exposures by presumptively protecting workers from all possible hazards they may encounter during characterization work. Make sure that all workers who set foot near or in these buildings/structures have the training and protective equipment needed to protect them from exposure to asbestos, beryllium, plutonium, and other suspected or known contamination in the buildings and structures that are the subject of this comment period.
- **Ensure Robust Characterization:** Characterization is critically important to define the extent and type of contamination that will be a part of the removal action for these buildings and structures. It is important to Hanford Challenge that waste is characterized and disposed of appropriately, including any high-level waste, transuranic waste, greater than class c, and low-level waste that may be discovered as part of the characterization efforts.

- **Spend More Now to Spend Less Later:** Increase funding requests from the local DOE RL/ORP office to the Office of Management and Budget to ensure the message is loud and clear that money can be saved long-term by spending more on cleanup now instead of babysitting waste sites that are just waiting for funding to be freed up to get those waste sites safely and effectively cleaned up and off the books.
- **Increased Detail in Public Involvement Materials:** In the future please include more details about the cleanup sites and their known and suspected hazards in the public materials prepared for the comment period. We found that the presentation and fact sheet were lacking clarity and specificity about the hazards and buildings/structures that would have made the materials more accessible and better explained the “why” of the proposed non-time critical removal action.
- **Ditto on Oregon DOE Comments Re: High-Level Waste:** Hanford Challenge has [read the comments submitted by Oregon Department of Energy](#) and share their concerns related to high-level waste characterization<sup>1</sup>.

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

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<sup>1</sup> See, Oregon Department of Energy Comments on the *Engineering Evaluation/Cost Analysis on Proposed Alternatives for 200 West Area Tier 2 Buildings/Structures Non-Time Critical Removal Action (DOE/RL-2020-39, Rev 0)* <https://www.oregon.gov/energy/safety-resiliency/Documents/2021-4-28-Oregon-Comments-on-200W-Tier-2-EECA.pdf>