

Draft Waste Incidental to Reprocessing Evaluation for the Test Bed Initiative

U.S. Department of Energy Comment Period

COMMENT DEADLINE: Wednesday, February 2, 2022

Submit Comments by February 2, 2022 to: TBIWIR@rl.gov

Sample Public Comments Prepared by Hanford Challenge

To Whom it May Concern,

Thank you for providing an opportunity to comment on the *Draft Waste Incidental to Reprocessing Evaluation for the Test Bed Initiative*. A transparent, accountable, and safe cleanup is important to me.

1. **NRC Determination Not WIR Determination:** Vitrifying Hanford's tank waste liquids is important, however USDOE should use an NRC determination process not the WIR process to decide if Hanford's tank waste liquids have been treated to remove sufficient concentrations of radionuclides.
2. **Don't Send Waste to Perma-Fix Northwest:** Perma-Fix NW has a recent history of serious worker over-exposures, two unreported fires, and a lack of coordinated agency oversight. The facility has demonstrated that it is incapable of safely treating tank waste. Do not send 2,000 gallons of tank waste to Perma-Fix NW. Doing so may put nearby communities, workers, and the environment at risk.
3. **Focus Should Remain on Vitrifying Tank Waste:** Before locking ourselves in to the Test Bed Initiative, let's see how well the Waste Treatment Plant (WTP) performs in vitrifying the tank waste. There is a lot we still don't know and maybe the WTP will be able to treat more than the predicted 40-50% of the low-activity waste. Maybe there won't be any Supplemental Low-Activity Waste to speak of because it can all be vitrified. Instead of hastily grouting the waste now and regretting it later, let's wait and see how vitrification goes.
4. **Conclusions Don't Scale Up:** Phase 2 sets a precedent for the treatment and final disposal of Hanford's tank waste. The 2,000 gallons in Phase 2 could scale up to 500,000 gallons in Phase 3, and afterwards USDOE may decide to use the TBI WIR process to grout the remaining tank waste. The analysis in the Phase 2 TBI WIR is not sufficient to support a larger scale project.

Sincerely,

[Your Name]