



April 5, 2022

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 FY24 Budget Request through your annual Cleanup Priorities comment period.

Hanford Challenge is a non-profit, public interest, environmental and worker advocacy organization located in Seattle, WA.¹ 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.

Hanford Challenge believes in the principle of offsetting future cleanup spending by spending more now; spend more now, to spend less later. This adage is even more pressing when paired with the multi-generational timeline of Hanford cleanup and long-term monitoring. Why increase the burden of nuclear waste management that future generations must bear and risks from delaying cleanup work, when we could lighten that burden, foster intergenerational equity, and celebrate a more successful cleanup by increasing well-managed spending to accomplish more cleanup now?

The US Department of Energy's (USDOE) 2022 Lifecycle, Scope, Schedule and Cost Report estimates a need for dramatic increased spending in the coming decades to keep pace with Hanford cleanup. These estimates are at odds with USDOE rhetoric about expectations of flat funding and fiscally constrained environments. Hanford Challenge believes that there is work to be done within USDOE to reckon with the contradiction between USDOE's own written projections and verbal budget expectations so that they align in a common vision that can be leveraged for increased funding for Hanford cleanup.

During the USDOE Hanford Cleanup Priorities public meeting on March 15, the WA State Department of Ecology's John Price provided a presentation and noted that according to his estimates, the USDOE Richland field office falls half a year behind schedule every year that the appropriation amount falls short

¹ Hanford Challenge mailing address: P.O. Box 28989 Seattle, WA 98118.

of the compliance level funding request. Furthermore, Mr. Price added that if the Hanford Site funding increased up to the compliance level funding request, that would allow for twice as much work to be completed than what occurs under the appropriated level. Hanford's Sitewide Services are necessary, but taken alone, funding that only covers site wide services essentially stalls cleanup, as it is not enough to support actual cleanup work. Increased funding is necessary to move the cleanup forward, however, USDOE seems intent on undermining any effort to advocate for more funding. By setting such low expectations that the budget will ever increase, USDOE is essentially discouraging external parties from advocating for increased funding. This is a mistake.

It is imperative that the U.S. Department of Energy make a strong case to the Office of Management and Budget and to Congress for compliant funding. By advocating for funding that reaches the compliance level funding request, Hanford cleanup can stay on track and protect human health and the environment.

Please take the following comments into consideration as you plan for Fiscal Year 2024 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 USDOE headquarters, the funding and work scope for the level below that (regardless of whether USDOE 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 and future generations
 - 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 USDOE 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. Request funding levels based on projections in the 2022 Lifecycle Scope, Schedule and Cost Report and use the report as leverage to advocate for the funding needed to stay on track.
 - **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 activities. USDOE should look at funding and legislative efforts to increase contractor oversight. USDOE 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 USDOE 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, starting with 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. Ensure that all facilities that handle tank waste and secondary waste from tank waste treatment include robust protections for workers from chemical vapors.
- **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.
- **Build New Tanks Now:** Start the process for building new tanks and increase readiness and quick-to-implement infrastructure for emergency pumping of leaking tanks.
- **Fund and Formulate a Leak Response Plan:** Fund the development of a comprehensive long-term plan to address Single-Shell Tank leak detection, characterization, mitigation, cleanup, and communication.
- **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 black ink that reads "Nikolas F. Peterson". The signature is written in a cursive style with a large, stylized initial "N".

Nikolas F. Peterson, Executive Director