



Oregon

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Delivered via email to:

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RE: 2024 Hanford Site Budget and Cleanup Priorities

Ms. Colborn,

Oregon has been an active participant in Hanford budget conversations since the late 1980s. While there has been a challenge to reviewing the actual budget numbers of late due to federal government budget embargo limitations, the general position of Oregon remains:

- Protect the Columbia. This has been and remains Oregon's top priority.
- Do not let the perfect be the enemy of the good, but do not let the expedient be the enemy of the acceptable.
- Provide clear and transparent information to the public. Not just because it is required, but because it builds trust in a cleanup process that the public can support.
- "Get on with cleanup" (Tank Waste Task Force Final Report, 1993)

We expect DOE to request funding as outlined in 2022 Lifecycle report (https://www.hanford.gov/files.cfm/2022_LCR_DOE-RL-2021-47_12-27.pdf), or at a minimum, a budget compliant with the Tri-Party Agreement as recently assessed by Washington Department of Ecology (<https://apps.ecology.wa.gov/publications/documents/2205006.pdf>). However, as Congress has yet to provide funding at a compliant level let alone the levels projected in a lifecycle report, it is understandable that the 5-year plan assumes flat funding. Future iterations of the Lifecycle report should also include a flat funding assumption to evaluate what impacts the current funding climate may have on the costs and schedule to complete the mission.

The USDOE Richland Office (RL) has had some major accomplishments in recent years and is well positioned to continue to "change the skyline" at the site. The Plutonium Finishing Plant removal action was completed. The K Basin filter media has been removed from the river corridor and basin decommissioning is planned. The infrastructure needed to transfer the highly-radioactive cesium and strontium capsules to dry storage is progressing. Work to set up remediation of the 324 building soils has resumed. The completion of these high risk, high visibility projects poses a question for cleanup:

What is next? However, the “5-year plan” (<https://www.hanford.gov/page.cfm/5-YearPlan>) document covering budget years 2022-2026 does not include central plateau investigation or remediation projects.

RL is devoting time and energy to change the skyline at the site. To be sure, removing crumbling contaminated buildings is important, makes the site a safer place to work, and reduces maintenance costs. However, there are practical implications of putting all your cleanup eggs in the skyline basket. The building debris needs contaminated soil for compaction if the ERDF landfill is going to be managed efficiently. As waste site remediations along the river corridor are completed, DOE should ensure that there are remove-treat-dispose (RTD) actions on the central plateau that are shovel ready and funded to provide the needed soils to ERDF. The course of action proposed by the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) team may be one such project.

The commitment of resumption of transuranic and transuranic mixed (TRU and TRUM) waste shipments to the Waste Isolation Pilot Project (WIPP) in New Mexico in 2028 was a major accomplishment in the last M-091 negotiation. That leaves 22 years for the TRU and TRUM waste from Hanford to get to WIPP before it closes in 2050. That includes the retrievably stored waste covered by M-091 as well as any wastes generated during remediation. DOE should accelerate investigation of waste sites in the central plateau to ensure that the WIPP shipment schedule and accompanying soil and waste retrieval actions accounts for all of the TRU that has to be disposed.

EM has committed to conducting assessments to determine whether PFAS have been released to the environment at the site. DOE should include a budget request to include sampling for PFAS in soil and groundwater samples across the site.

It is our understanding that the Natural Resource Damage Assessment at Hanford Site does not have a line item in DOE’s budget, although the Trustee Council estimates costs in the Project Execution Plan and annual 3-year rolling projections. These costs, while perhaps considered minimal by Hanford Site budget standards, reflect important work in assessing injury to natural resources and identifying necessary restoration to compensate the public for losses in those natural resources. Ongoing and adequate funding for the NRDA process is a priority for Oregon, tribal nations, and other stakeholders.

US DOE- Office of River Protection (ORP) has similarly made steady progress of late, in spite of the limitations imposed by the pandemic. Tank farm retrievals continue, TSCR is online, DFLAW is preparing for heat-up, off-site disposal options for tank waste are being evaluated, and the Holistic Negotiations are reported to be drawing to a close. Oregon views tank retrieval and waste treatment as a much higher priority to tank farm closure at this time, and hopes that the requested budget will reflect the commitment to waste treatment.

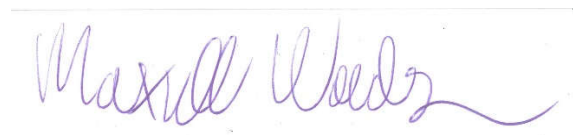
A continued commitment to research is critical to cleanup success across both field offices, and can have national and even global impact. The complex and varied nature of the contamination, along with the co-location of Pacific Northwest National Lab (PNNL) provides a unique opportunity to develop new cleanup processes and technologies. DOE should fund additional research for, among other projects: dry-mining of tank waste in failed tanks; rapid mobile key radionuclide removal systems to facilitate retrieval of SSTs interstitial liquids or future failed Double Shell Tanks; vadose and deep vadose in-situ remediation; and ways to balance Environmental Justice and climate impacts associated with traditional fossil fuel-intensive waste-site remediation and tank waste treatment. This research has the potential to remove more waste from leaking tanks, stop contaminants in the vadose zone from entering

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groundwater, and reduce the climate impact of cleanup projects at the site and potentially around the world. Such developments could have longstanding national and global benefits that will extend long after the successful completion of the EM mission at Hanford.

US DOE has a legal and moral obligation to complete cleanup at the Hanford site, and Oregon respectfully submits these priorities for the cleanup mission in the coming years. The mission is a marathon, and DOE has reached a steady pace. Oregon and the rest of the country are rooting for DOE to cross the finish line and encourages DOE to openly ask for the resources it needs. If you have any questions, please contact Tom Sicilia of my staff at tom.sicilia@energy.oregon.gov.

Sincerely,



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