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Waste Encapsulation and Storage Facility permit modification

Publication text, page 3. "Why capsule transfer matters"

"... will provide increased safety and resiliency."

- The current configuration is safe and resilient.

"... the concrete pool cell walls show signs of deterioration..."

- The thick, reinforced concrete walls can suffer deterioration, are holding water, and the integrity is not compromised due to deterioration.

"... active cooling and water circulation are necessary to dissipate the heat..."

- The capsules are now cooled by water and are being moved to a dry storage, so this statement is not logical.

"A spill or release would create a significant volume of contaminated water."

- The water is not currently contaminated, the capsules are double encapsulated stainless steel, the capsules are not deteriorating after decades under water; so, what significant future event would cause capsules to fail, to cause the water to become contaminated?

o A power loss or equipment failure? No, it would not. If the facility would be left without power and unattended, evaporation of the pool water would manifest over years.

o In the extremely unlikely event that the 13 feet of pool water totally evaporated, the capsules would be dry, in a concrete containment, 13' below grade.

o If there would be a flood, again there would be no release.

o There is no imaginable earthquake scenario that would displace the capsules from the 13' deep concrete structure.

o If the capsules were uncovered by evaporated water, the capsules would not breach, but would be unshielded to the sky.

"There are no viable alternatives to continued storage of the cesium and strontium capsules at the Hanford Site."

- So this statement begs the questions:

o What is the benefit of this major project?

o Why was the No-Action alternative not selected?

o What is the total cost and schedule of this action?

o Why design and build non-standard casks for a one-of-a-kind use?

o Why subject workers to gamma ray exposure when today there is none?

o Why subject the environment to a possible radioactive spill accident?

The radioactive half-life of Cesium 137 is 30 years, so more than half of the original radioactivity is already gone. The present pool configuration is sound and has performed perfectly.

The double encapsulated SS capsules have high value as a future gamma irradiation source and should be left in-situ.

Focus on and accomplish more important Hanford clean-up matters.

Respectively submitted: