

Richard Honour

Dear WA State Department of Ecology Hanford Nuclear Site,

Thank you for the opportunity to provide comments on the Class 2 Permit Modification for the Waste Encapsulation Storage Facility. I am very concerned about getting the WESF capsules into dry storage sooner rather than later. If a major earthquake or other event causes the water to drain from the WESF capsule storage pools, it could trigger a catastrophic release of radioactivity that could make the Hanford Site inaccessible for hundreds of years. We can't let that happen. Thank you for considering my comments:

-Require Concrete Testing: Due to the scarcity of data on the effects of gamma radiation on dry concrete, it is incumbent that Ecology require collection of concrete testing data at WESF for use in assessments under Ecology's permits to make conditions safer now and in the future.

-Don't Delay Transfer to Dry Storage: Work hard to stay on schedule to complete work by August 2025, while ensuring a safe work environment.

-Fully Fund WESF: Deliver a unified message on fully funding Hanford cleanup to ensure crucial cleanup work, such as transferring the capsules to dry storage, is completed.

-Include Catastrophic Release Emergency Response Plans: Ensure that robust, specific and detailed emergency response plans for a catastrophic release of radioactivity at WESF are included in the permit. The emergency response plan is even more important in light of the delays to the 2025 milestone.

In the first case, "Preventing" added delays for getting the capsules into safer storage for near-term safety is the cardinal challenge at hand, not more politically-driven excuses. The on-going funding and work at WESF must include a formal final action plan, as shall be reviewed and approved by the directly-affected communities, for the perpetual, safe and long-term sequestration of the materials in question, far beyond the impact of any imagined catastrophic event.

These materials cannot be stored under any conditions by the methods of the historic and current plans and proposals, and therefore a Number One Priority for the project going forward must be to identify the safest long-term storage of these materials, based on the latest technology and engineering inputs, without inherent delays brought to us by yet another round of conversational planning and false starts.

The timebomb is ticking on a major seismic event near or directly under Hanford, and therefore such anticipated event poses a direct death threat to the local and adjacent populations, stat, or in the not-too-distant future, while Nero fiddles. No one will be able to say after the fact that, "No one knew," for you do know.

The greatest danger from these wastes is not necessarily the said wastes of and by themselves, but it is the inept planning and failure to enact a firm action plan that poses the killer threat. The future is upon us, and you must be a key part of it, or go home.

Sincerely, Richard C. Honour, PhD
The Precautionary Group

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