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Comments pertaining to the 2000 Gallon Test Bed Initiative Demonstration Draft Research, Development and Demonstration Permit

Well, if the adage “The solution to pollution is dilution” is still embraced, this project is a perfect example of the continued shell game of dispersing radioactive material without a clearly articulated transport plan, processing plan and a permanent disposition not only defined, but guaranteed. Hanford is responsible for this material, cradle to grave.

We all want to see the radionuclide burden at Hanford reduced, but it is morally bankrupt to send any material on the road to another site that has no proven technology to stabilize it.

Comments:

a) Do not sign off on this permit unless it includes proven technology that can successfully address stabilization of the contaminants coming to the Utah and Texas sites and additionally, guarantees permanent disposition there. There should be no ambiguity in the permit as it needs to address the disposition.

b) The permit should address, in writing, that there will be no ability for this waste to come back to Hanford.

c) The permit should address, in writing, that once material is bound for another site there is no avenue for denying acceptance of it at the receiving site. We don't want to create an orphan waste.

c) The cesium loads are heavier than anticipated at the DFLAW Facility. This resulted in the necessity of multiple runs to further reduce the waste stream load. (More time, more money, more product). Lessons learned from DFLAW should be carried into the TBI initiative that address cost, time and potentially larger volumes of material.

d) A bounding articulation of accident risk, in transport, should be addressed in the permit.

e) The permit should address the potential of processed waste, (grouted), failing to meet the acceptance criteria at Clive or Waste Control Specialists, where will it go?

f) We have always had, at Hanford, the collective commitment to “as good as glass” – meaning that any other technology and disposition must meet the rigors of material disposition in glass. Keep this mantra on the table.

g) Analytics of the totes should be completed on site at Hanford. Each receptor site should have a defensible treatment and disposition plan specific to the contents of each tote, prior to their leaving Hanford.

Thank you,
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