

April 25, 2024

Daina McFadden
Permit Communications Specialist
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

2,000-Gallon Test Bed Initiative Demonstration RD&D permit Public Comment

Dear Ms. McFadden,

Enclosed herein are comments on the 2,000-Gallon Test Bed Initiative Demonstration RD&D permit submitted by Hanford Communities.

BACKGROUND

Founded in 1994, Hanford Communities represents the cities of Kennewick, Pasco, Richland, and West Richland, along with Benton County, Franklin County, and the Port of Benton on Hanford cleanup-related matters. Together, these local governments represent the over 315,000 people in the Tri-City area, which is immediately adjacent and downstream of the Hanford Site, and as such we have a uniquely vested interest in the safe, timely, and successful cleanup effort.

TREATING WASTE

Currently, tank waste treatment is the primary long-term cost driver at Hanford, with projected lifecycle expenses ranging from \$199 billion to \$496 billion. Despite plans to begin vitrification of Low Activity Waste (LAW) in the near future, a strategy has not been developed for stabilization of the remaining 15-20 million gallons of Supplemental LAW (SLAW) not currently planned to be vitrified.

One of Hanford Communities' top priorities is the development of innovative strategies that will safely expedite cleanup while reducing long-term risks and cleanup costs. We are encouraged by the potential benefits of grouting Hanford's SLAW, and note that this concept has strong support from the Government Accountability Office (GAO), the National Academies of Science, Engineering, and Mathematics (NSAEM), and Energy Communities Alliance (ECA). These analyses have indicated that grouting Hanford's SLAW could lead to significant risk reduction by retrieving waste from aging tanks much sooner than vitrification, while also reducing long-term Hanford cleanup costs. It is also notable that this approach has been successfully implemented at DOE's Savannah River Site.

Therefore, Hanford Communities is excited and optimistic about the potential for grouting Hanford's SLAW, and we strongly support the 2,000 Gallon Test Bed Initiative Demonstration as a mechanism to further determine whether it is a viable approach moving forward.

REQUESTED CLARIFICATIONS

To effectively address questions we have heard from the public, Hanford Communities urges clarity and expansion on the matters listed below. If any of these questions are outside the scope of this permit, at a minimum we suggest stating what the process will be for making those determinations, and sharing where additional information can be found.

1. Comprehensive description of the "totes" that are planned for transporting the SLAW, including physical size and weight, along with any relevant testing/certifications of the containers.
2. Consider using a term other than "tote" to describe the container that the SLAW would be shipped in. While it may be technically accurate, the term is often associated with grocery bags, etc., which diminishes the credibility of the container.
3. Description of how the totes will be packaged, including how many would be loaded on a truck, how many shipments are planned, and what the transportation routes will be.
4. Analysis of any potential increased or decreased risks to worker safety and public health associated with grouting compared to vitrification.
5. Comparison of how Hanford's SLAW compares to other materials that are transported on public roadways, particularly as it relates to risk and worst-case scenario impacts to public health and the environment.
6. Analysis of the potential for higher radioactivity levels "settling" to the bottom of totes during transport, thus leading to dose rate measurements on the lower portion of the package exceeding 49 CFR 173 dose limits.
7. Description of the actions that would be taken if a package does not meet the Waste Acceptance Criteria of a receiving facility.

CONCLUSION

The success of this demonstration relies heavily on public perception and education; therefore, Hanford Communities suggests non-technical responses to questions and comments associated with this permit whenever possible. Easily understandable and relatable information is critically important when seeking public acceptance of efforts such as this. Hanford Communities also looks forward to supporting any additional public education and outreach campaigns on this topic in the future.

Thank you for considering our comments, and we look forward to working with the Tri-Party Agencies, tribes, and other key stakeholders to support successful cleanup of the Hanford Site in the years to come.

Sincerely,

A handwritten signature in cursive script that reads "Charles E. Torelli".

Chuck Torelli
Chair, Hanford Communities
Mayor Pro Tem, City of Kennewick