



7130 W. Grandridge Blvd., Ste. A
Kennewick, WA 99336-7725

(509) 735-1000
TryTri-Cities.org

August 30, 2024

Washington State Department of Ecology
Attn: Daina McFadden
3100 Port of Benton Blvd.
Richland, WA 99354

RE: Hanford Communities Comments on Proposed Amendments to the Hanford Tri-Party Agreement and Consent Decree

Dear Ms. McFadden,

Founded in 1963 as the Tri-City Nuclear Industrial Council and now known as the Tri-City Development Council (TRIDEC), we work to enhance economic growth and prosperity in Benton and Franklin counties. TRIDEC is managed by a 39-member Board of Directors, including elected officials, business, and community leaders from across the Tri-City area. Our organization also advocates for the policies and funding needed to advance the Hanford cleanup mission, and we serve as the Department of Energy (DOE) – designated Community Reuse Organization (CRO) for the Hanford Site.

We would like to begin by acknowledging the Tri-Party Agencies for their efforts to achieve consensus on the management and treatment of Hanford's tank waste. Over the years, we have observed that defense nuclear cleanup efforts are most effective when the Department of Energy, its regulators, and key stakeholders work in close alignment. We trust that this cooperative strategy will continue, as it is critical to ensuring the long-term success of the Hanford cleanup mission.

Below are our comments on several specific proposed changes.

FORBEARANCE PROVISION

Referencing the Department's report to Congress, as mandated by Section 3139 of the National Defense Authorization Act for Fiscal Year 2018, Public Law 115-91, there is optimism about the possibility of applying DOE's high-level waste interpretation at Hanford. The report noted that this interpretation could lead to cost reductions of \$73 billion to \$210 billion, and potentially allow the mission to be completed a decade or more earlier than otherwise planned. The savings could then be redirected to speed up other Hanford cleanup efforts.

While we recognize the concerns raised by the Washington State Department of Ecology regarding the application of the high-level waste interpretation at Hanford, we believe the potential advantages are too substantial to overlook. We urge the agencies to collaborate in good faith to explore possibilities for testing this interpretation at Hanford and addressing any issues as they arise. If proven successful, this approach could be extended to other waste streams at the site.



ATTACHMENT C: ESTABLISH MILESTONES TO BUILD ONE MILLION GALLONS OF MULTI-PURPOSE TANK WASTE STORAGE CAPACITY IN 200 WEST AREA (Change Number M-45-24-08)

Although we recognize the potential advantages of increasing tank waste storage capacity, the expenses involved in designing, permitting, and constructing these tanks are expected to be significant. Furthermore, the justification for a specific increase of one million gallons in storage capacity is unclear.

Ultimately, the permanent solution lies in the successful retrieval and treatment of Hanford's tank waste. Allocating resources to build new storage capacity might delay the completion of that effort. Instead of committing to a fixed amount of additional storage, we suggest that the agencies agree to expand storage capacity as needed based on evolving conditions.

ATTACHMENT L: UPDATE TPA MILESTONE M-062-45, REQUIRING SYSTEM PLAN NEGOTIATIONS AND ESTABLISH TWO NEW MILESTONES (Change Number M-62-24-03)

Paragraph 7 of this section suggests setting a milestone to complete negotiations for closing all Single-Shell Tank (SST) Farms within 18 months of the HLW Facility's hot commissioning. Since hot commissioning is not expected to occur for more than a decade from now, we are worried about the long timeline for tank closures. There is a genuine risk that rainwater and snowmelt might add more liquids to tanks that have already been retrieved, possibly requiring further retrieval efforts in the future.

Repeatedly retrieving tanks would substantially expand both the timeline and cost of the Hanford cleanup. We strongly encourage the Tri-Party Agencies to take proactive measures now to advance the permanent closure of the retrieved tank farms.

ATTACHMENT M: ESTABLISH NEW TPA MILESTONES TO CREATE ALTERNATIVE TREATMENT CAPACITY FOR LAW FOR 200 WEST AREA SSTs (Change Number M-62-24-04)

Grouting and off-site disposal of low-activity waste could greatly shorten the timeline for finishing tank waste treatment and save billions in long-term costs. Given that tank waste treatment addresses Hanford's biggest environmental risk and cost driver, every effort should be made to speed up waste retrieval and treatment, whether through grouting or vitrification. We strongly endorse these new milestones and encourage the Tri-Party Agencies to consider applying grouting technologies at other tank farms as well.

Thank you for your consideration of TRIDEC's comments. Like the Tri-Party Agencies, we are deeply committed to successful Hanford cleanup, and we again express our appreciation for the Tri-Party Agencies' efforts to achieve alignment moving forward.

Sincerely,



Karl Dye
President & CEO
TRIDEC