

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,

Thank you for this opportunity to provide Hanford Communities' comments regarding proposed amendments to the Hanford Tri-Party Agreement and Consent Decree. As background, 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 320,000 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.

First and foremost, we applaud the Tri-Party Agencies for actively working to achieve consensus on the path forward for managing and treating Hanford's tank waste. We have observed over the years that cleanup efforts across are most successful when there is alignment between the Department of Energy (DOE), its regulators, and key stakeholders. We hope that this approach will continue in the years to come, as it is critical to the long-term success of the Hanford cleanup mission.

Please find our comments below regarding several specific proposed changes.

FORBEARANCE PROVISION

Based on the Department's report to Congress as directed by Section 3139 of the National Defense Authorization Act of Fiscal Year 2018, Public Law 115-91, we have been very optimistic about opportunities to employ DOE's high-level waste interpretation at Hanford. Amongst other benefits, the report noted that applying the interpretation could reduce costs at Hanford by \$73 billion to \$210 billion, and that "it is possible that the mission could finish a decade or more earlier than the reference case...". Those cost savings can then be reinvested to expedite other Hanford cleanup activities.

Although we understand that the Washington State Department of Ecology (Ecology) has concerns about applying the high-level waste interpretation at Hanford, we believe the potential benefits are so great that this approach should not be excluded from consideration. Instead, we strongly encourage the agencies to work in a good-faith effort to identify opportunities to test the interpretation at Hanford to better understand the potential benefits, while also working to address any concerns. If successful, the interpretation can then be employed for 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 understand the merits of adding tank waste storage capacity, we believe the costs associated with designing, permitting, and constructing those tanks will be very significant. We also do not understand the rationale for exactly one million gallons of additional storage capacity.

Ultimately, successful retrieval and treatment of Hanford's tank waste is the permanent solution to this issue. Therefore, if resources that could be invested in those efforts are instead diverted to new storage capacity, it will further prolong mission completion. Rather than committing to a somewhat arbitrary number of additional tank waste capacity, we encourage the agencies to instead agree to add additional storage capacity on an as-needed basis if circumstances dictate.

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 would establish a milestone for completion of negotiations for "completion of closure of all Single-Shell Tank (SST) Farms" within 18 months of the date for achieving HLW Facility hot commissioning. Given that hot commissioning isn't scheduled for over a decade, we are concerned about the prolonged timeline for tank closures. There is a distinct possibility that intrusions from rainwater and snowmelt could introduce additional liquids into already retrieved tanks, potentially necessitating additional retrieval campaigns.

Retrieving tanks twice (or more) would significantly increase the timeline and cost for completion of Hanford cleanup. Therefore, we encourage the Tri-Party Agencies to work proactively now to move forward with closure of 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 has the potential to significantly reduce the timeline for completion of tank waste treatment, while saving billions of dollars in long-term costs. Tank waste treatment is the permanent solution for Hanford's single-largest environmental risk and cost driver, so every effort should be made to retrieve the waste and treat it as expeditiously as possible (either by grouting or vitrification). Therefore, we strongly support these new milestones, and encourage the Tri-Party Agencies to explore opportunities to employ grouting technologies at other tank farms as well.

Thank you for considering our comments, and again we commend the Tri-Party Agencies for their ongoing efforts to reach alignment on the path forward for Hanford cleanup.

Sincerely,



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