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To: Tri-Party Agencies for the Public Comment period concerning the Proposed Holistic Settlement Agreement

Thank you for this opportunity to weigh-in on the Proposed Holistic Settlement Agreement. Many of us have been waiting a long time for this chance to share our perspectives on potential changes in Hanford clean-up through these newly agreed paths. Hopefully and successfully, this Agreement will lead this site to further risk reduction through identification of wastes and their volumes and put forward sustainable treatment options and permanent disposition pathways we can all support.

My mind is focused on the issue of grout. As I cut through the zealotry that we ALL have for reducing the radiological and chemical burden at the Hanford site, I have to say that I don't believe that it is morally responsible to burden another community with untreated waste for which there is no technically successful solution in place (built and tested), at the receiving site for processing.

There should be no need for DOE to block waste that is bound for other sites from coming back to Hanford. DOE can prevent the need for it to come back if DOE has done due diligence. By this I mean take cradle to grave responsibility, site-by-site. This, to me, means that DOE should not agree to the transport of any waste if there is a potential for waste to become orphaned. We need only to look at the 2,100 metric tonnes of plutonium that was shipped to Savannah from Hanford for processing that never occurred, or, to continue on, part of that plutonium that was then shipped on, in the dead of night and now resides in Nevada. All of this material awaits permanent disposition. Scattering of any radionuclide forms around out country is not the answer.

This negotiation was done behind completely closed doors. It is a shame. I was a participant in the Tank Waste Task Force, which helped the chief negotiators for USEPA, USDOE and WDOE bring the Single-Shelled Tanks into Tri-Party Agreement Milestones. The diversity and wealth of perspectives, lay and technical folks, drove the negotiators, when they were at loggerheads, to search successfully for solutions.

So, now we find ourselves as observers to this negotiation peeling back the layers and seeing disconnects between data deliver timelines and timelines outlined for cleanup decisions that would greatly benefit from needed data. The data gaps, data we are all dependent on to understand the scope and scale and timeline of the grout campaign, for example, do not exist. We don't see anticipated volumes, or the risks identified and the technical analysis needed to determine viable solutions for shipment of solid vs liquid forms of waste. The public should laud the analysis of the National Academy of Sciences which states that a solid waste form is more resilient than liquid. There are Milestone dates that make me question the achievability of not just this project, but the critical start-up of the Waste Treatment Plant and all of it's needed facilities.

There are Milestone dates that are questionable. Specifically I have been thinking about the miles of cross-site transfer lines which are imperative (a single point failure) to the success of managing and moving, for processing, literally millions of gallons of tank waste. I believe that use/reuse of these lines

is an assumption right now. It's incumbent to "get on with it" right now and assess and characterize the extent of conditions of both the 3160 line (sludge) and the 3150 line for liquids. The assessment, alone will take considerable time. The public and Ecology need to know the extent of conditions and the projected scope of a project to get them into working condition and permitted. This seems, to me, to be critical path. Additionally, since covid, materials are potentially more difficult to procure.

We have another leaking tank at Hanford. I think I can safely say that a proposed 1,000,000 gallon new tank will not be enough contingency. Ask for what you need.

It is time for DOE to layout a "Roadmap" for the public, literally a map with the Milestone dates and all permitting and new building facilities and retrofitting of infrastructure needed in order to bring the WTP on line. This needs to happen now, in order to clearly identify the integration of all new facilities and infrastructure and permitting needed to bring the WTP on line.

I was pleased to see agreement on the ability for Ecology to further access all data and documents. This will support agreements furthering more informed, sustainable and implementable decisions for clean-up of the Hanford site. I would like to understand how that will occur for them.

Recommendations specific to the grout issue:

Environmental Impact Statement:
Conduct a full supplemental EIS or, in lieu of that, meet all NEPA requirements.
a)It should describe/define the grouting campaign, cradle to grave. (scale, volume of campaign, transport, off-site permanent disposition).
b)Everyone should understand the legal benchmarks that define when a tank can be declared successfully retrieved.

Treatment:
1) Begin with a commitment to fully process all ear-marked liquid waste at the Hanford site into a grouted form prior to off-site disposition. The MASF facility being used for Mock-ups of remediation projects is a brilliant success and one sign that the site knows how to successfully and safely address risk reduction in projects managing liquid waste. Keep the work and jobs at Hanford.

2) Define the technical course needed to stabilize liquid waste in grout, (volumes and ratios of contaminant to grout), including, especially, the total anticipated campaign volumes. The public can accept and even champion a campaign of this sort when seeking budgets if it is well defined, associated transport risk is clearly analyzed and DOE seeks to educate the public and initiate a dialogue. The more comprehensive, the better.

3) Wait for the needed data: Defer decisions determining treatment on or off-site, (M-062-24-04), until delivery and analysis of the Test Bed Initiative results. The budget was spent to have a data platform that supports a decision based in logic. Wait.

Transport:
The State of Oregon held well attended informationals in cities all along the transportation routes for TRU material leaving Hanford and bound for permanent disposition in the WIPP site in New Mexico. Including safe havens when dealing with inclement weather. I believe that grouted material transport will be more readily accepted by the public and assuredly IS a lower risk than the transport of liquid waste. I live in Eastern Oregon, in a mountain valley. Our winters are fierce and mountain passes and

canyons the most talked about, by truckers, in the nation. We have had a radioactive shipment crash on I-84, just as it was leaving my valley. Don't ship liquids. Hold informational meetings and include the public in discussions.

Quantify the duration of the campaign and volumes to be transported. Is is by truck, or train?

Other questions:
1)I can't speak to the technical components of the negotiations with any authority but I concur with what Oregon Department of Energy has submitted and hope that you will heed their observations and concerns.
2) What happens ""if?" - There is no Plan B.
3) Thank you for the forbearance on the interpretation of HLW.
4) I'm not thrilled with the holding place of 2043. We need an operational plant. It would seem that negotiations should be ongoing from now on. Every three years look at sequencing seems too long as does the six year date for talking about all topics.
5) With A-104 and A-105 needing additional treatment technologies, it's important for this type of project to be included in a Roadmap for everyone. Add this to the proposed Roadmap. Get on with bench-scale studies. I wonder how DOE can successfully integrate these kind of tank anomalies/intricacies into treatment at the WTP?
6) How do you three agencies decide what the scale (boundary and type) of information is needed to inform a change in project? Are you using a FEPS model? Where does public input play a role?

Thank you,

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