

# Richard Honour

Richard C. Honour, PhD  
19211 64th Place NE, Kenmore, WA 98028  
425.772.1473 rhono@precautionarygroup.org  
August 30, 2024

Re: Proposed amendments to Tri-Party Agreement and Consent Decree.

"The U.S. Department of Energy, Washington State Department of Ecology and the U.S. Environmental Protection Agency recently announced a landmark agreement that lays out a realistic and achievable course for cleaning up millions of gallons of radioactive and chemical waste from large, underground tanks at the Hanford Site. Following mediated negotiations that began in 2020, also known as Holistic Negotiations, the agencies have signed a settlement agreement with proposed new and revised cleanup deadlines in the Tri-Party Agreement and Washington v. Energy consent decree. The proposed changes uphold a commitment to the safe and effective cleanup of tank waste."

For the record, and as my submission of comments hereto:

1. I support removing waste from Hanford for disposal offsite where there is no risk to contaminate surface or groundwaters.
2. I expect my Washington State agencies and Governor to use all powers they have to ensure that liquid radioactive wastes are not shipped through any densely inhabited regions when there is a far safer alternative to treat and solidify Hanford's tank wastes before they are shipped for disposal.
3. I want an EIS, specific for the proposed Hanford waste materials to be transported before the agencies adopt this or any other similar program.
4. I am deeply concerned that Hanford's High Level Nuclear Waste tanks continue to leak without any action to stop the leaks.
5. The Agreement must be changed to include enforceable requirements to remove leakable liquids from leaking tanks starting in 2025 and to prioritize full retrieval of wastes from the tank farms that have leaking tanks.
6. I strongly support accelerating removal of waste from tanks in the 200 West Area, noting well that the waste must be treated and solidified before it is shipped anywhere for disposal.
7. The Washington State Department of Ecology must adopt requirements that ensure the wastes will be treated and solidified before shipment through Spokane or Oregon.
8. Leaking tanks must be prioritized for removal of all leakable liquids or full retrieval. Leaking tanks cannot be allowed to keep leaking until 2040 or later.
9. An EIS is required to review the impacts of decisions, such as not retrieving waste from leaking tanks, and to present reasonable alternatives to stop the leaks and speed up retrieval before more tanks leak.
10. The leak from tank T-101, which is now the third tank admitted to be actively leaking, must be addressed with urgency.
11. Liquid radioactive wastes from Hanford's tanks must not be transported through Spokane or Oregon when an option to solidify and treat the waste before shipping it is available.
12. Priority Concerns:
  - a. Where is Washington State's concern about USDOE trucking millions of gallons of liquid waste?
  - b. Why isn't Washington joining Oregon in urging that the wastes are treated and solidified before

being shipped 1,575 to nearly 1,900 miles to be disposed in Texas?

c. Why isn't Washington State department of Ecology insisting that an environmental impact statement (EIS) be prepared to consider the risks and alternatives before the agreement adopts this program?

d. I'm deeply concerned that Hanford's High Level Nuclear Waste tanks continue to leak without any action to stop the leaks.

e. I want the Agreement changed to include enforceable requirements to remove leakable liquids from leaking tanks starting next year and to prioritize full retrieval of wastes from the tank farms that have leaking tanks.

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