

Laura Feldman

Dear To Whom It May Concern,

Thank you for providing an opportunity to comment on the Holistic Settlement Agreement. Please update the Consent Decree Changes and New/Changed TPA Milestones to reflect the following comments:

1. **WAIT FOR GROUT TEST RESULTS BEFORE ANY GROUT DECISION, DELAY NEW INTERIM MILESTONE M-062-64:** Change the date for this milestone from Dec 2024 to *Within 12 months of receiving all relevant information from the 2,000 gallon Test Bed Initiative, including; the time it takes to find a grout recipe that works and hardens tailored to this specific tank waste, grout-to-waste ratios, grout setting time, performance of in-tank pretreatment system, transportation reports, cost reports, and vendor quality of work from both commercial treatment and disposal sites in Texas and Utah. (P.S.- Please require a public comment period on your proposed grout decision prior to finalizing.)

2. **PROVIDE ENVIRONMENTAL IMPACT ANALYSES FOR PUBLIC REVIEW PRIOR TO FINALIZING HOLISTIC SETTLEMENT AGREEMENT CHANGES:** The agencies need to provide all analyses of environmental impact through NEPA and SEPA documentation and provide this information to the public for review, PRIOR to finalizing changes to the Holistic Settlement Agreement.

3. **ASSESS GROUT SHIPMENT TRANSPORTATION IMPACTS:** Create and share a transparent plan to assess the transportation impacts and options for potentially shipping millions of gallons of tank waste through communities as part of your proposed grout plan. Consult with communities along potential routes and get public input before making your decision.

4. **BUILD NEW TANK SPACE FASTER AND BUILD MORE THAN 1M GALLONS:** Move up the date in Milestone M-045-139 to have new tank storage and staging space sooner than 2040. Sixteen years is too long to wait for new tank space, build it faster and increase the volume beyond the one million gallons in the proposed agreement.

5. **SHARE COST IMPLICATIONS:** Be transparent about the budget implications of your proposed changes to Hanford tank waste work scope and deadlines. Please provide this information as a part of the public comment period.

Grouting the waste is of great concern to me. When waste is removed from tanks to be grouted, the tank itself still has waste residue (maybe to be grouted) and will be left where it is rather than removed. Also I worry about tanks being grouted off-site, given the Perma-fix accidents, for example, in Richland some years ago. All wastes should be vitrified as originally planned.

Waste movement through Central Oregon, along the Deschutes River, a "Wild and Scenic River," as well as other western states to deposit these wastes in Clive, Utah and Andrews Texas is too risky. I have spoken with and learned from other activists presenting online from New Mexico and Texas that they do not want these wastes. As we work to protect the Columbia River, these

communities have their own water sources such as the Ogallala Aquifer that provides Andrews, Texas with its drinking water.

From the Nuclear Guardianship Ethic: We need to take responsibility for the wastes we are bequeathing to the future by immobilizing, safely containing and stewarding these wastes until future generations figure out how to transmute this contamination in some way. We need to focus our resources on this work rather than creating more waste. (Energy Northwest signed a joint development agreement with X-energy to build up to 12 such small modular reactors on the Hanford reservation by 2030.)

Thank you for considering my comment.

Sincerely,
Laura Feldman