Anonymous

The 200 Area (West) sodium storage facilities should be permitted as dangerous waste management units, and should have an enforceable closure schedule. USDOE is practicing "speculative accumulation" of the sodium stored there because it's not feasible for USDOE to recycle it. USDOE has had a concept of reusing the sodium in the WTP; however the WTP is not designed to take in that radioactive sodium when converted to NaOH.

A material is considered accumulated speculatively if it's stored for recycling without a feasible means of recycling or if less than 75% of the material is recycled within a calendar year. Generators must be able to demonstrate that the material is potentially recyclable and has a feasible means of recycling, including identifying potential recyclers and recycling technologies. They must also track the amount of material recycled to ensure it meets the 75% threshold. USDOE can't meet the 75% test. Although the material is potentially recyclable, the uses USDOE cited in HNF-3321 "Hanford Site Sodium Disposition Evaluation Report" are no longer feasible. Those cited uses are "the pretreatment of radioactive waste prior to processing in the Waste Treatment Plant or possibly for chemistry control in the high level radioactive waste storage tanks". Pre-treatment doesn't apply because USDOE is using TSCR for pre-treatment. USDOE statement that it's "possible" doesn't meet the standard for a "demonstration" that it's feasible to handle and load radioactive sodium into the HLW tanks for chemistry control.

TPA milestone M-092-09 due 12/31/2026 requires Conceptual Design Report Package (30% design) for the sodium reaction facility/capability to convert Hanford bulk sodium to aqueous sodium hydroxide to be used in the Hanford Waste Treatment and Immobilization Plant (WTP). USDOE should not be allowed a schedule extension for M-092-09. The milestone should be re-worded to required conversion and disposal of the sodium waste as one of the closure activies (WAC 173-303-610(3)vi & vii) for the 200 West sodium storage.