

Anonymous

1. AY-102 is unfit for use and it is unrealistic that clean closure standards can be met. Ecology is going to have to Hanford specific rule making in order to address closure of the tank. There is no mention of that in the draft AY-102 permit or the fact sheet. Ecology needs to lay out a schedule for the actions that Ecology need to take with regards to a change to WAC 173-303, in order to close AY-102. Ecology also needs to justify why delaying the closure of AY-102 makes sense when the tank structure needs to be filled with grout. In some ways the delay of AY-102 feels like the Ecology response to the Purex Tunnels, where decisions were delayed until the the purex tunnels collapsed and immediate action needed to be taken.
2. Ecology has not completed their commitment with respect to WTP. In the original WTP fact sheet Ecology committed to removing the design information after construction was complete. Ecology re-iterated that commitment in the WTP Direct Feed LAW Operating permit fact sheet; that after construction certification was completed on the facilities needed to support DFLAW the design information for those facilities would be removed. It has been at least 5 years since construction certification has been completed and the facilities are operating. The permittees requested the design information be removed but Ecology has not done that yet. Ecology has not fulfilled the commitment they made, twice. Ecology needs to follow through on their commitment to the WTP permit.
3. DOE and the contractors continued insistence to grout 200 East waste and not focus on 200 West grouting, where there are legal commitments to do so, is another way DOE and its contractors continue to distract focus on what the legal commitments are. Once again Ecology needs to keep DOE and its contractors focused on agreements that have already been made, rather than letting DOE and the contractors make a quick buck by taking waste from the vitrification plant under the guise that TSCR needs to keep operating.