

Brian Vance, Manager  
Office of River Protection  
Department of Energy  
Richland, Washington 99352

July 12, 2018

Dear Mr. Vance,

The Department of Energy (Energy) recently released for public comment its “Draft Waste Incidental to Reprocessing Evaluation for Closure of Waste Management Area C at the Hanford Site” (Draft WIR Evaluation). The proposed reclassification of high-level nuclear waste in Hanford’s C Tank Farm is one of the most significant changes to Energy’s cleanup approach in recent years and demands meaningful deliberation.

We ask that you consider withdrawing the Draft WIR Evaluation and working with the State of Washington and the undersigned on a new path forward for the following reasons:

- A history of case law strongly suggests that Energy’s WIR approach contradicts the Nuclear Waste Policy Act as it applies to Washington.
- Energy is likely spending considerable resources on a WIR evaluation that could generate litigation and distract from other more important cleanup work.
- Information supporting the Draft WIR Evaluation is incomplete and inadequate. Energy’s Performance Assessment and review of potential soil and groundwater impacts do not present information necessary to support the Draft WIR Evaluation.
- Energy has been unable to provide information regarding the potential presence of transuranic waste (TRU) in C Farm tanks. The presence of TRU waste in the C Farm should render at least some of the tank waste facially unsuitable for shallow disposal in grouted tanks at Hanford.
- Pouring cement onto approximately 70,000 gallons of tank waste containing 1.2 million curies of long-lived radioactive products forecloses future remediation possibilities, both for the in-tank waste and for wastes that have leaked out of the tanks and into the soil, and thereby consigns an extraordinary amount of radioactivity next to the Columbia River in perpetuity.

If you decide to proceed with the public process for the Draft WIR Evaluation, we have the following requests:

- Energy should schedule a set of public meetings around the region, specifically including Seattle, Portland, the Tri-Cities, and Spokane. The meetings should occur in the evenings, be widely publicized, and accept public comments. Good facilitation is a necessary requirement for successful meetings, as well as the use of plain language and plenty of opportunity for questions and answers. Please consider working with the Hanford Advisory Board’s Public Involvement Committee as a resource for the logistics related to these regional meetings.

- Energy should make public all comments received by agencies and members of the public as they are received to better facilitate increased public knowledge of the Draft WIR Evaluation.
- Energy should extend the deadline for comments to incorporate the anticipated review by the Nuclear Regulatory Commission, in order for the public to have the best information available on which to base their comments.

Some members of our groups participated in the single, all-day meeting in Richland, Washington for the Draft WIR Evaluation. The meeting reinforced our deep-seated concern that Energy is rushing towards making a decision that will fundamentally alter the framework for Hanford cleanup. Hanford's tanks hold some of the nation's most toxic, radioactive waste. Pollution from Hanford's tanks has already entered Hanford's soils, groundwater, and some has reached the Columbia River. Energy must give the public every opportunity to understand the gravity and ramifications of reclassifying high-level waste.

Foreclosing future remediation efforts to remove more waste from the C Farm tanks by grouting these tanks, and future efforts to remove high-level waste that has contaminated the soils below the C Farm tanks, is unwise and unnecessary.

We look forward to your reply.

Respectfully,

Dan Serres, Columbia Riverkeeper

Tom Carpenter, Hanford Challenge

Geoff Fettus, Natural Resources Defense Council

Laura Skelton, Washington Physicians for Social Responsibility

Gerry Pollet, Heart of America Northwest

cc: Washington State Congressional Delegation  
Oregon State Congressional Delegation  
Governor Jay Inslee  
Governor Kate Brown