

Hanford Communities

Richland · Kennewick · Pasco · Franklin County · Port of Benton · Benton County

September 24, 2015

The Honorable Mike Simpson
Chairman, Subcommittee on
Energy and Water Development
Committee on Appropriations
United States House of Representatives
2362B Rayburn House Office Building
Washington, D.C. 20515

The Honorable Mary Kaptur
Ranking Member, Subcommittee on
Energy and Water Development
Committee on Appropriations
United States House of Representatives
2362B Rayburn House Office Building
Washington, D.C. 20515

The Honorable Lamar Alexander
Chairman, Subcommittee on
Energy and Water Development
Committee on Appropriations
United States Senate
S-218, United States Capitol
Washington, D.C. 20510

The Honorable Diane Feinstein
Ranking Member, Subcommittee on
Energy and Water Development
Committee on Appropriations
United States Senate
S-146A, United States Capitol
Washington, D.C. 20510

Subject: Report of the Omnibus Risk Review Committee, A Review of the Use of Risk-Informed Management in the Cleanup Program for Former Defense Nuclear Sites

Dear Chairmen Simpson and Alexander & Ranking Members Feinstein and Kaptur:

We have read with interest an August 27, 2015, letter signed by Washington Governor Jay Inslee and Oregon Governor Kate Brown. They expressed their concerns to Representatives Simpson and Kaptur and Senators Alexander and Feinstein regarding the subject report. The states undertook a detailed evaluation of the Report of the Omnibus Risk Review Committee and a follow up letter from the State of Washington Department of Ecology and the Oregon Department of Energy also clearly details the flaws with the Committee's analysis and conclusions.

Local Perspective

The CRESP Risk Review Committee, an organization with "stakeholder participation" in their name did not talk to community representatives as they gathered information. The history of what the federal government has done to contaminate our natural resources and our vision for

the future of our region should be the basis of this analysis. We have heard the Environmental Protection Agency (EPA) state that Hanford is the most contaminated place in the Western Hemisphere. Cleaning up the chemical and radioactive waste the federal government left behind is complex and expensive. It is their absolute obligation to do the job well.

We believe there are opportunities for policy changes and efficiencies that could save millions of dollars. We will identify those ideas in the report that have merit. However we are offended by a wholesale effort to homogenize the cleanup approach at very different EM sites across the country.

Unique to Hanford is the majestic Columbia River that is the source of drinking and irrigation water to many communities in two states. We commend the Department of Energy's (DOE) cleanup of the River Corridor. In their letters, the states have explained the cost effectiveness of removing the source term of contamination plumes. This process was also effectively advanced by the adoption of interim Records of Decision so that cleanup could get under way sooner rather than later.

Another concern to our communities is the need for continuity of cleanup actions. Environmental remediation work at Hanford is very hazardous. It requires a workforce with unique scientific and technical training and a focus on the safety culture. Significant training is required before workers set foot on site. If funding is not consistent and stable the workforce fluctuates. If a trained worker is laid off, all of their training departs with them. The next hire could be in training for months before even getting into the field.

State Involvement

We believe that the letters submitted by the Governors and State Agencies clearly articulate the importance of state regulations and enforcement. We do not support any change in the authority of the states.

Tank Waste

The technical knowledge of the authors of the Committee Report comes into serious question when you read what they have written about tank waste at the various sites. The material is significantly different. Environmental Impact Statements and studies clearly document that grout and steam reforming will not work for Hanford tank waste. The waste forms do not capture the waste for the long term and it will leach out. Hanford tank waste came from different chemical processes and salt was added to acidic waste to neutralize it to protect the viability of the tanks. The contents of each tank are different and very complex.

In addition to the waste now contained in the tanks more than a million gallons of waste have leaked to the environment and more could leak. We need tank waste treatment soon to capture the material in a stable waste form. If the waste is not remediated it will continue to move towards groundwater and the river.

The Good Ideas

The Committee notes that tank closure and tank waste disposal at Hanford does not fall under the provisions of Section 3116 of the Ronald Reagan Defense Authorization Act, as is the case at Savannah River and Idaho. There was a fair amount of uncertainty about the implications of the provisions when they were passed. We have followed the process of tank closure in Idaho and South Carolina and believe that the provisions of 3116 should now be applied to Hanford. This is necessary because a large portion of Hanford's tank waste will be disposed on site and there will need to be a process by which waste is reclassified as other than high-level waste.

The Hanford Communities support a change in the definition of high-level waste. It does not make sense for the definition to be based on where the material came from, it should be based on the hazard posed by the material. This could open up more immediate options for waste disposal for material that does not need to be placed in a deep geologic repository. This opportunity could save the Department of Energy millions of dollars.

The CRESP report notes that DOE site managers have limited and insufficient flexibility to adjust to emerging issues at the sites. We agree and encourage more delegation of authority.

The report states that infrastructure systems are operating past their design lives and are being "run to failure." This is of particular concern at Hanford because cleanup activities will be continuing for more than 50 years. We do not agree that a new engineering study is needed. What is needed is for these issues to be given priority in funding decisions.

We concur that the Waste Encapsulation and Storage Facility (WESF) at Hanford which contains over one-third of the radioactivity at the site is beyond its design life. The facility is at risk if it is impacted by a significant earthquake. It is important for DOE to proceed expeditiously to remove the cesium and strontium capsules in the facility and put them into dry cask storage.

Conclusions

It is very troubling that a report with so many factual errors was submitted to Congress without the opportunity of review and input from stakeholders and the Department of Energy. We hope that DOE will respond with the corrections that are needed.

It is also hoped that Congress will recognize that recommendations to reduce funding for vitally needed cleanup necessary for the health, safety and economic vitality of our region and the Columbia River Basin are ill advised. The laws of the United States and the State of Washington are applicable to the Department of Energy. We concur with comments in the letter submitted by the Department of Ecology and the Oregon Department of Energy, "There are no shortcuts and no cheap solutions to a quality cleanup, no matter how many reports are commissioned that might wish otherwise. The difficulty and expense of achieving a quality cleanup at Hanford does not eliminate the federal government's obligations".

Thanks you for considering our comments.

Sincerely,



Robert J. Thompson, Chairman
Hanford Communities Governing Board
Councilmember, Richland, WA

Cc: Honorable Ernest Moniz, Secretary of Energy, Department of Energy
Honorable David Klaus, Deputy Under Secretary for Management and Performance,
Department of Energy
Honorable Monica C. Regalbuto, Assistant Secretary of Energy for Environmental
Management
Honorable Senator Patty Murray
Honorable Senator Maria Conwell
Honorable Congressman Newhouse
Kevin Smith, Manager, U.S. DOE Office of River Protection
Stacy Charboneau, Manager, U.S.DOE Richland Operations Office
Jane Hedges, Nuclear Waste Program Manager, Washington Dept. of Ecology