



Columbia Riverkeeper
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January 31, 2018

Daina McFadden
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354

Sent via email & e-comment

RE: Class 3 Permit Modifications Relating to the Waste Encapsulation and Storage Facility (WESF) and Proposed Capsule Storage Area (CSA)

Dear Ms. McFadden,

Columbia Riverkeeper is a 501(c)(3) nonprofit organization with a mission to protect and restore the Columbia River, from its headwaters to the Pacific Ocean. Since 1989, Riverkeeper and its predecessor organizations have played an active role in educating the public about Hanford, increasing public participation in cleanup decisions, and monitoring and improving cleanup activities at Hanford. On behalf of our 13,000 members in Oregon and Washington, Columbia Riverkeeper offers the following comments on the proposed Class 3 permit modifications relating to the Waste Encapsulation Storage Facility (WESF) and the Capsule Storage Area (CSA).

The Washington Department of Ecology (Ecology) and U.S. Department of Energy (Energy) should remove cesium and strontium capsules from WESF in a manner that protects worker and public safety, as well as the Columbia River. In pursuing removal of capsules from aging basins and into dry storage, Riverkeeper supports Ecology and Energy's proposal to construct and operate the Capsule Storage Area (CSA). This proposed facility will provide interim dry storage of the capsules that are currently in wet storage. Further, Ecology and Energy should study the degradation of concrete in WESF, potentially providing important data for assessing risks at other basins storing radioactive material.

Ecology and Energy have been aware for years that WESF presents one of the most significant risks at the Hanford site. Storing 1936 highly radioactive cesium and strontium capsules in aging concrete basins poses an unnecessary and unacceptable threat to human health and the environment, particularly in the event of a loss of cooling water. As Ecology is aware,

over long time periods, concrete structures may degrade as a result of sufficient exposure to ionizing radiation.¹ Any failure of cooling water containment for capsules stored in WESF could have dramatic impacts, potentially releasing large quantities of radiation into the environment in a manner that would threaten human health, worker safety, and the environment. Accordingly, addressing WESF and proceeding with the CSA is an urgent matter.

The timeline for accomplishing capsule removal and dry storage gives us serious concerns. In its Waste Encapsulation and Storage Facility (WESF) and Capsule Storage Area (CSA) Permitting Plan, Energy proposes to begin construction of the facilities in July 2019.² Further, in its new Agreement in Principle regarding changes to the TPA for this process, Energy proposes, “Milestone M-092-21 requires DOE to complete the transfer of the Cs/Sr capsules from the Waste Encapsulation and Storage Facility (WESF) to a new interim safe storage facility by August 31, 2025.”³ Based on this information, we are concerned that Ecology and Energy may be moving too slowly in the process of removing capsules from wet storage. We urge Ecology and Energy to move quickly and to expedite removal of capsules to dry storage prior to 2025.

Ecology’s public notice states, “WESF is an aging facility. Dry storage would significantly reduce the possibility of a release of radioactive material, should an unlikely event cause the loss of pool storage water, which may result in the overheating and breach of one or more capsules.” Riverkeeper concurs with Ecology’s assessment that dry storage would reduce the risks associated with the capsules in WESF and urges the agencies to proceed as quickly as possible to remove capsules to a new Capsule Storage Area.

Thank you for accepting these comments on behalf of Columbia Riverkeeper, and please accept the enclosed 243 comments of Columbia Riverkeeper members.

Sincerely,



Dan Serres
Conservation Director
Columbia Riverkeeper

¹ Addendum H. Waste Encapsulation and Storage Facility Hot Cell A Through F. Dangerous Waste Management Unit Closure Plan. July 2017. P. H.49.

https://fortress.wa.gov/ecy/nwp/permitting/hdwp/rev/8c/WESF/WESF_Closure.pdf

² Shoop, Doug. U.S. DOE. Letter transmitting Waste Encapsulation and Storage Facility (WESF) and Capsule Storage Area (CSA) Permitting Plan. December 2017. P. 7. <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0066768H>

³ U.S. Department of Energy. Agreement in Principle for the Negotiation of Hanford Federal Facility Agreement Consent Order For Milestone M-092-00, Change Form M-92-17-XX. December 2017. Page 2 of 2. <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0066804H>