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Washington State Dept of Ecology

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February 6, 2009

Shirley Olinger, Manager U.S. Department of Energy, Office of River Protection P.O. Box 450 (H6-60) Richland, WA 99352

Ines Triay

Acting Assistant Secretary

Office of Environmental Management

EM-1/Forrestal Building U.S. Department of Energy 1000 Independence Avenue Washington D.C. 20585

Re: Surface Storage Capacity for Vitrified High-Level Waste is Needed to Facilitate Completion of Hanford Cleanup

Dear Ms. Olinger and Ms. Triay,

Background

The United States Department of Energy's (DOE) High-Level Waste (HLW) disposal strategy has long assumed that a licensed deep geologic repository will be available for disposal of vitrified waste from Hanford and other DOE sites. The Hanford Advisory Board (Board) supports the safe, timely, and permanent disposal of all processed HLW in a properly licensed deep geologic disposal facility.

The Board notes, however, that the national program to site and properly license a deep geologic HLW disposal facility has been, and continues to be, delayed. Should these delays continue, final disposition of treated and packaged HLW from Hanford will likely be significantly delayed, potentially resulting in cost increases from the construction and operation of secure storage and handling facilities for the canisters of vitrified HLW that will be produced by the Waste Treatment Plant.

In light of the above, the Board provides the following advice:

Advice

DOE should use a systems approach for contingency planning at Hanford on the basis of a deep geologic repository not opening on schedule. This approach would require that DOE

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Envirolssues Hanford Project Office 713 Jadwin, Suite 3 Richland, WA 99352 Phone: (509) 942-1906 Fax: (509) 942-1926 perform extensive systems life-cycle analyses of viable scenarios for surface storage of vitrified HLWs on the Hanford Site. This storage capability must be sufficiently robust to store waste for decades, but not permanently. The Washington State Department of Ecology should permit the facility for a time period which obliges DOE to move forward with deep geologic disposal before storage risks increase. These analyses should include what impacts, if any, there would be on the Hanford cleanup schedule.

Further, vitrified HLW storage activities should not adversely impact the initiation, operation or completion of tank waste treatment. Therefore, storage capability should be sufficiently robust and flexible to accommodate the storage needs of the potential waste canister quantities throughout the treatment mission.

The Nuclear Waste Policy Act requires that Hanford's immobilized HLW be disposed in a deep geologic repository. DOE should make it a priority at the national level to properly site, evaluate, license, and commission a deep geologic repository for final disposition of HLW.

Sincerely,

Susan Leckband, Chair

Susan Leekhand

Hanford Advisory Board

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: David Brockman, Manager, U.S. Department of Energy Richland Operations
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The Oregon and Washington Congressional Delegations