



February 18, 2019

Theresa Kliczewski
U.S. Department of Energy, Office of Environmental Management
Office of Waste and Materials Management (EM-4.2)
1000 Independence Avenue SW
Washington, DC 20585

RE: DOE Proposed Change to Radioactive Waste Definition

Dear Ms. Kliczewski:

The Tri-Cities Local Business Association, which represents many local businesses engaged in Hanford Site cleanup, strongly supports the U.S. Department of Energy (DOE) proposed change to the definition of high-level radioactive waste (HLW). Because the change is so sensible and long overdue, we presumed it would be approved without our need to comment. Apparently, we were mistaken. Our local voices may be being drowned out by outsiders with far less stake in the matter who erroneously claim the changes represent a lessening of cleanup standards. Thus, we feel it is imperative to weigh-in.

The current definition of HLW is a carry-over from approximately 70 years ago when spent fuel was being reprocessed. It was reasonable at the time, given the circumstances. However, much has changed since then that prompts a need for change. Thus, DOE is proposing to classify the waste as either HLW or non-HLW based on the radiological characteristics of the waste and the ability of the wastes to meet appropriate disposal facility requirements. The proposed classification is technically defensible and offers the significant benefits of achieving site cleanup safer, sooner, more efficiently, and at far less cost to taxpayers.

DOE's proposal is particularly appropriate for Hanford where, for far too long, a significant quantity of waste has been stored in HLW tanks with plans to treat and dispose of it as HLW, regardless of its actual composition or level of hazard. This is a costly, overkill approach. Much of these wastes could be treated using timely, safe methodologies other than processing at the Waste Treatment Plant (WTP).

DOE should have the freedom and flexibility to decide which wastes in the tanks need to be treated at the WTP and which can and could be treated and disposed by alternate means. The decision should be based on the characteristics and hazards of the waste, NOT on the basis of its origin. It would cost much less than treatment at the WTP, which will be very expensive to operate.

Maintaining the status quo, i.e., retaining the long-held definition of HLW, places an unfair and unjust burden on the taxpayer by unnecessarily prolonging Hanford cleanup by tens of years and adding tens of billions of dollars, if not hundreds of billions, to the cost. Furthermore, it adds risks to a workforce that must manage the waste stored in deteriorating tanks and infrastructure until the WTP is operational. The risks to workers will increase over time as workers experienced in Hanford waste management retire.

Letter to Theresa Kliczewski, DOE-EM
January 18, 2019
Page 2

TCLBA is in full agreement with technical experts who support DOE's proposed change to the definition of radioactive waste based on waste characteristics and hazards. The proposal offers a common-sense approach to treating and disposing of these wastes in a safe and compliant manner. It makes sense from a technical and practical perspective, and it will help us achieve Hanford cleanup goals faster and with much greater safety, efficiency and cost savings. We are available to answer any questions.

Sincerely,



Steven Anderson, President TCLBA / Dave McCormack, Vice President TCLBA
/ Keith Klein, TCLBA Executive Director
cc: TCLBA Members

