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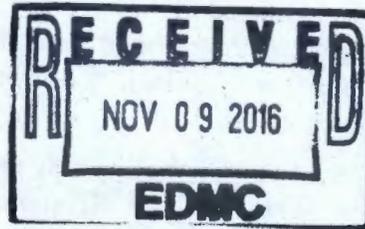
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 7, 2016

16-NWP-192

Mr. Ray J. Corey
United States Department of Energy
Richland Operations Office
PO Box 550, MSIN: A5-11
Richland, Washington 99352



Re: *M-091 Engineering Alternatives Study*, CHPRC-02916, Revision 0

Dear Mr. Corey:

The Department of Ecology (Ecology) received the *M-091 Engineering Alternatives Study*, CHPRC-02916, Revision 0, on October 3, 2016. The submittal of this document as a secondary document is required to meet *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Milestone M-091-51. Thus, the milestone has been met through the submittal.

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Ecology, as the Milestone M-091 lead regulatory agency, can comment on this report per Section 9.2.3 and Figure 9-3 in the *Tri-Party Agreement Action Plan*. Ecology has chosen to make the following comments to be considered for the milestone change request to meet Milestone M-091-52:

- United States Department of Energy – Richland Operations Office (USDOE-RL) previously looked at *Next Generation Waste Retrieval & Disposal* (CHPRC-00182) as a Value Engineering exercise. Neither that exercise nor this M-091-51 report resolve the regulatory issues for retrieval (e.g., “processing of a container within the burial grounds ... triggers RCRA and dangerous waste requirements within the burial ground” (p. 3-2)). USDOE-RL should develop more detailed proposals for direct loading retrieval, repackaging, storage, and Waste Isolation Pilot Plant (WIPP) shipment.
- Ecology recognizes the advantages of integrating waste management capabilities for both M-091 and CERCLA-generated waste. The CERCLA-generated waste (including K Basins sludge and the D-10 tank) has a September 30, 2024 due date, but this study anticipates that “Acquisition and readiness of necessary capital assets may not be fully realized until 2024” (p. 8-1). USDOE-RL should coordinate schedules and cost estimates for treatment and packaging of CERCLA waste with negotiation of the M-091-52 milestone change request.



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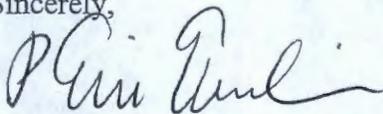
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- Ecology would like a discussion included in the report about how to potentially ship waste to INEL and WIPP by rail. Although this is not an available option currently, Ecology proposes that the transportation concepts should be expanded as follows:
 - The use of the Idaho Advanced Mixed Waste Treatment Project (AMWTP) facility would require DOT-compliant transport from Hanford to Idaho. For TRU/TRUM waste, the study should evaluate the availability of containers (e.g., TRUPACTs) to transport the waste.
 - Waste destined for the AMWTP facility may need to be repackaged at Hanford to meet transportation requirements. USDOE-RL should do a comparative analysis of the costs of processing waste at Hanford vs. the costs of pre-processing at Hanford, transporting to Idaho, then processing at Idaho.
 - The report proposes a very large number of Remote Handled (RH) shipments, and Ecology believes rail should be evaluated as an alternative for shipment to WIPP. The ATMX-600 series railcars provided the equivalent of a Type-B package, but Ecology understands they have been retired. Options for transporting Hanford TRUM waste should be coordinated with USDOE's ongoing national studies of transportation options for SNF and HLW.
- Ecology appreciates the information and discussion in the report associated with all aspects of managing and disposing of RH waste. Ecology was not totally aware of the entire scope of this waste and was thus surprised by the discussion regarding the use of Monitored Natural Attenuation. Ecology and USDOE-RL clearly need to discuss this further so a pathway can be agreed to how this waste will be managed and disposed.

Ecology appreciates the efforts of USDOE-RL in producing this report. Ecology looks forward to the milestone change request to meet Milestone M-091-52.

If you have any questions, please contact me at elis.eberlein@ecy.wa.gov or (509) 372-7906.

Sincerely,



P Elis Eberlein
Waste Management Acting Project Manager
Nuclear Waste Program

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cc: See page 3

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NWP Central File