

# ***Draft Waste Incidental to Reprocessing (WIR) Evaluation for Closure of Waste Management Area C (WMA C)***

*Comment Period: June 04, 2018- Nov 07, 2018*

## **Say What?**

A step by-step-guide to creating a comment you can stand by.

### **1. What are you commenting on?**

The U.S. Department of Energy (DOE) is seeking public comment on its *Draft Waste Incidental to Reprocessing (WIR) Evaluation for Closure of Waste Management Area C (WMA C)* at the Hanford Site. The Draft WIR Evaluation is a tool DOE is using to relabel Hanford's high-level radioactive waste as low-level waste so that it can leave the remaining 62,900 gallons of waste in the 16 C-Farm tanks and cover the waste with concrete. This would allow DOE to "close" this cleanup project, leaving this waste in the tanks under concrete permanently.

There are disposal rules for high-level nuclear waste that require removal, treatment and disposal in a deep geologic repository. By reclassifying this waste as low-level waste DOE would bypass this requirement to treat and dispose of this waste in a legally-compliant and protective manner.

This application of the WIR process is precedent-setting and has the potential to establish the criteria for the closure of all of Hanford's tank farms. This could result in the abandonment of 700,000 gallons of high-level nuclear waste at Hanford, and the reclassification of millions of gallons of high-level waste leaked or deliberately dumped to the soil.

As part of this comment period, DOE is also welcoming comments on the C-Farm Performance Assessment, which assesses the remaining risk in the C-Farm tanks and equipment connecting the tanks.

A Performance Assessment uses a mathematical model of a natural system to predict the migration of a source term (such as a specific volume of radionuclides) to a future receptor at a specified point in space, commonly over a period of 1,000 to 10,000 years but sometimes longer. An example of a receptor scenario is a future residential user who builds a house, grows crops, and extracts water from a well in the vicinity of the site in question, usually after a period of 100 years when institutional controls preventing their access to the area are assumed to have failed. The purpose of the performance assessment is to give reasonable assurance, using the best available science, that a future receptor will not receive a radiation dose or chemical exposure in excess of safety standards and performance objectives established in law. Because perfect knowledge of

the future is impossible, a good performance assessment will account for uncertainties in natural, engineered, and human social systems to ensure that potential risks associated with these uncertainties are responsibly managed. In the case of the WMA C WIR, the Performance Assessment is conceived as a living document that must be reevaluated periodically to ensure that as new information becomes available, the assumptions underpinning the modeling are still valid.

Hanford Challenge and other groups, including the Hanford Advisory Board and Oregon Department of Energy are reviewing these documents to prepare comments to submit by November 7<sup>th</sup>. We have provided some sample comments, see attached, that we will be updating during our review of the Draft WIR Evaluation and C-Farm Performance Assessment.

**2. How will you submit your comments to DOE-RL? What are the options?**

**By mail:** Mr. Jan Bovier,  
U.S. Department of Energy,  
Office of River Protection,  
P.O. Box 450, MSIN H6-60,  
Richland, WA 99354

**By Email:** [WMACDRAFTWIR@rl.gov](mailto:WMACDRAFTWIR@rl.gov)

**3. Is there a deadline?**

Yes, November 07, 2018.

**4. Will there be public hearings?**

No, there are no public hearings planned to discuss this issue and accept public comments. DOE held a public workshop in June in Richland, WA.

We are asking people to continue asking for regional public hearings.

**5. What information is available to learn about the issue?**

- Hanford Challenge [Fact Sheet](#)
- Department of Energy [Fact Sheet](#)
- Columbia Riverkeeper [Fact Sheet](#)
- [DOE Timeline of WIR Evaluation](#)
- [WIR Presentation provided by DOE at June 2018 Presentation in Richland, WA](#)
- [Draft WIR Evaluation Document](#)
- [Waste Management Area C Performance Assessment](#)
- Congressional [letter](#) requesting additional public meetings from Sen. Murray, Sen. Cantwell and Rep. Smith

**6. Given what you know at this point, are you ready to say something?**

- [If yes, say it!](#) If no, look to examples for help (see attached sample comments), or ask an expert! Contact Liz Mattson at [lizm@hanfordchallenge.org](mailto:lizm@hanfordchallenge.org) for resources.
- You can comment more than once on different issues.

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