

Hanford PERMIT MODIFICATION COMMENT PERIOD **Waste Encapsulation Storage Facility** **WESF “wessif”**

COMMENT DEADLINE: Wednesday, September 30, 2020

Submit Comments to Ecology Portal: <http://nw.ecology.commentinput.com/?id=DJWB3>

Hanford Challenge’s Suggested Comments:

Thank you for the opportunity to provide public comment on the plan to add WESF to the active portion of the RCRA Permit, Section III as Operating Unit Group 14 to allow the capsules at WESF to be moved into dry storage.

I am very concerned about getting the WESF capsules into dry storage sooner rather than later. If a major earthquake or other event causes the water to drain from the WESF capsule storage pools, it could trigger a catastrophic release of radioactivity that could make the Hanford Site inaccessible for hundreds of years. We can't let that happen.

Thank you for considering my comments:

Include Catastrophic Release Emergency Response Plans: Ensure that robust, specific and detailed emergency response plans for a catastrophic release of radioactivity at WESF are included in the permit.

Ensure Conditions Are Safe Now and in the Future: Require that data sets showing the effect of gamma dose on dry concrete are applied to assessments of risk at WESF and other DOE facilities where concrete structures are exposed to high-dose radiation fields. This data has been excluded and has direct relevance to WESF, the casks DOE has designed for dry storage and the pads the casks will sit upon. Making conditions safer at WESF and other DOE sites is important to me.

Require Concrete Testing: Due to the scarcity of data on the effects of gamma radiation on dry concrete, it is incumbent that Ecology require collection of concrete testing data at WESF for use in assessments under Ecology's permits to make conditions safer now and in the future.

Accelerate Transfer to Dry Storage: Use your regulatory muscle to push up the deadline to get the capsules into dry storage sooner than 2025.

Make Information Accessible: Ensure that plain language materials are provided that explain permitting history, provide a guide to the documents that are part of the comment period in question, and the context of the action.