



Oregon

Tina Kotek, Governor



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RE: Oregon Feedback and Comment on the FY2025-FY2029 Hanford 5-year Plan

Dear Ms. Colborn,

Oregon appreciates the ongoing opportunity to provide input on the annual revisions of the Hanford 5-Year Vision communication placemat. Since its introduction in 2019, we have observed significant improvements in both design and digital presentation. This letter outlines areas where perhaps further improvements could be made and highlights key information from the latest version.

The updated 5-year plan clearly establishes the top priority of the newly created Hanford Field Office: the treatment of tank waste at the Direct Feed Low-Activity Waste (DFLAW) facility and the construction of supporting infrastructure. Many aspects of the tank waste retrieval mission are accelerated in this version, including the installation of temporary barriers at both the T and B Farms, scheduled for completion years earlier than previously anticipated. These barriers are crucial for slowing the migration of leaking waste, such as from tank T-101, helping protect groundwater until the tank can be emptied – Oregon supports this accelerated schedule. The plan also reflects progress from recent holistic negotiations outcomes, particularly in the advancement of the West Area Risk Management (WARM) system to support future tank retrievals and off-site disposal of tank waste – which, as noted in our recent comments regarding the holistic negotiation agreement, Oregon strongly prefers grouting of tank waste at Hanford, and request that future iterations of the 5-year plan reflect design and construction of a grout facility at Hanford, accordingly.

To be clear, Oregon acknowledges the importance of tank waste treatment. However, we note that there are multiple other critical activities, such as waste site investigation, environmental cleanup, and records of decision for 100-K and 100-N that would support river protection, that might seemingly be deprioritized. We encourage DOE to consider how it can advance the cleanup mission and other important tasks and projects, while also maintaining and advancing the tank waste treatment mission. More specifically, key projects, including the records of decision for both the 100-N and 100-K Areas, have been delayed by at least an additional year. Demolition activities at the K-West Basin are delayed by at least 4 years and preparatory work for Central Plateau buildings have also been postponed with no published schedule. The B and T Plant projects, once scheduled for fiscal year 2026, are absent from the plan, suggesting delays until after 2029. Similarly, planned characterization activities for the PUREX and REDOX facilities, previously set for FY 2027, have been removed entirely. This list is not exhaustive, but it illustrates the delays or deferral of important risk management and cleanup activities. While site infrastructure projects also face delays, they are less severe compared to those affecting risk reduction.

These changes suggest that Hanford is fiscally constrained and is making a choice to prioritize tank waste treatment at the expense of delays on other projects. Based on the Washington Department of Ecology's analysis of lifecycle scope data, a compliant budget for Fiscal Year 2026 is approximately \$4.56 billion, with subsequent years requiring further increases. This estimate of compliant budget does not take into consideration actions related to the Holistic Negotiations, so can be considered to be on the low end. The disclaimer on the front page of the 5-year plan, which states that "Funding aligns to holistic negotiations," signals that DOE is assuming it will be allocated additional funding from Congress to address the priorities of the Holistic Negotiation agreement, but not enough to meet cleanup milestones.

Simply because of the time-value of money, the most cost-effective way to clean up Hanford is to act swiftly, but this will only happen with adequate funding. Delays increase both the time and expense required to complete the mission. This year sees the initiation of a contract for tank farm operation, recovery, and treatment with a cost of up to \$45 billion over 10 years. The enacted fiscal year 2024 budget was a record-setting ~\$3 billion for the two Hanford offices. To put this in perspective, the projected high-end cost of one contractor is 150% of the current record-high budget. While tank waste management and recovery, operation of the Direct-Feed Low Activity Waste facility, and design and construction of the High-Level Waste treatment facility are critical and necessary, this contract does not include cleanup activities, sitewide infrastructure, or other non-tank waste projects included in the compliant budget – all vitally important activities.

Additionally, Oregon continues to be concerned about a potential "characterization deficit," especially on the Central Plateau. Comprehensive characterization is crucial, as decades may pass between initial investigation and final closure. Without thorough assessment of the Central Plateau soils and completion of the necessary CERCLA documentation, the overall scope, timeline, and cost of the cleanup remain unclear. Given the complexity of the contamination, this work will be neither quick nor inexpensive. Oregon urges the Department of Energy to prioritize characterization efforts in the near term to refine the scope and cost of the remaining work, ensuring progress toward eventual site closure.

We urge DOE to continue to include cleanup activities on the 5-year placemat, even when funding is not guaranteed. The mission of the site will continue until cleanup is complete, and delays today will likely extend the mission from spanning decades to one spanning generations. A planning assumption that funding below the estimated Tri-Party Agreement-compliant budget is valid - but public facing planning documents should reflect the cleanup obligations established in the Tri Party Agreement. Oregon continues to request a companion document to this placemat which presents which milestones are due during the 5 years, and clearly communicating which will not be met if the plan is implemented as presented. This companion will be a good tool to support additional funding requests and will provide some context for compounding delays.

We also reiterate our request for the inclusion of Natural Resource Damage Assessment (NRDA) activities in the plan. NRDA plays a crucial role in the Hanford cleanup by quantifying the environmental impacts of contamination and guiding restoration efforts. It assesses damage to natural resources such as water, soil, plants, and wildlife, and helps develop comprehensive plans to restore or replace lost service. Incorporating NRDA ensures that cleanup addresses not only immediate contamination but also long-term


ecological recovery, supporting the goal of restoring the area for future generations. Oregon commends the ongoing work along the river corridor and urges DOE to acknowledge NRDA activities in future iterations of the plan.

Maintaining a culture of safety is critical as a complex industrial-scale treatment facility with molten radioactive and hazardous glass begins 24/7 operations. Continued investment and upgrades to the HAMMER training facility will go a long way towards making the workforce at the site and around the nation more prepared to safely deal with emergent situations. Additional props and repair/maintenance of props at HAMMER is money well spent.

Finally, we suggest revisiting the utility of the final map page. Its zoomed-out view and small markers are difficult to read. We propose expanding the graphic at the bottom of page three, which effectively illustrates progress in waste treatment, water treatment, and energy use. Additionally, the map could include accomplishments beyond waste cleanup, worker safety metrics, miles of restored Columbia River shoreline, or employee training hours. These positive metrics would improve the clarity and usefulness of the document. Optionally, DOE could display projects that could be initiated at various budget levels so that the public would better understand what an increased outlay could achieve.

The 5-year plan placemat remains a valuable communication tool, and we appreciate DOE's commitment to its continual improvement. While it offers a high-level overview, DOE should consider providing a more detailed companion report, complete with milestones and planned activities. This would provide a more comprehensive understanding of the 5-year plan. Overall, the placemat is informative and effective, and we look forward to future updates. Oregon commends DOE's efforts in enhancing public communication. Should you have any questions, please contact Matt Hendrickson of my staff at matt.hendrickson@energy.oregon.gov.

Sincerely,



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