

U.S. DEPARTMENT OF ENERGY

DRAFT TANK CLOSURE AND WASTE MANAGEMENT
ENVIRONMENTAL IMPACT STATEMENT

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1109 MAIN STREET
BOISE, IDAHO 83702

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Ms. Mary Beth Burandt, U.S. Department of Energy,
Office of River Protection

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Ecology, Hanford Project Office

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FORMAL COMMENT SESSION

ANDREA SHIPLEY: Thank you for this opportunity to comment on the Department of Energy's plans for cleanup of the Hanford Reservation analyzed in the Tank Closure and Waste Management Environmental Impact Statement.

My name is Andrea Shipley. I am the executive director of the Snake River Alliance. The Snake River Alliance serves as Idaho's nuclear watchdog and Idaho's advocate for renewable nuclear-free energy. We raise community awareness about the dangers of nuclear waste, weapons, and power while working to identify and promote sustainable alternatives.

We do our work through advocacy, collaboration, education, and grassroots organizing. I make the following comments on behalf of the Alliance's dues-paying members.

Before I address the plans to decommission the Fast Flux Test Facility, let me

1 first voice the Alliance's support for the
2 justifiable concerns of the people of Washington
3 and Oregon about the long-term health, safety, and
4 environmental threats posed by Hanford.

5 Radioactive and hazardous pollution
6 there have made it the most contaminated place in
7 the western hemisphere. At the same time, it sits
8 on the banks of the Columbia River, one of the
9 most valuable water resources on the planet. This
10 is a perilous combination.

11 That peril could only be made worse by
12 the importation to Hanford of more nuclear waste
13 from other DOE sites. The DOE must abandon that
14 misbegotten plan, particularly in light of the
15 draft EIS summary's acknowledgement that "there is
16 substantial uncertainty associated with the
17 sources, volumes, and potential long-term
18 performance of radiological and chemical offsite
19 waste inventories forecast for disposal at
20 Hanford."

21 It is certain that abandoning the plan
22 will mean something like 3 million cubic feet of
23 radioactive and hazardous materials stay off the
24 Northwest's major transportation corridors, such
25 as I-81, which runs right through Boise.

1 We understand that cleanup of Hanford's
2 high-level wastes tanks faces immense, intractable
3 obstacles. Those obstacles have not been lowered
4 by years of mismanagement. Nonetheless, the
5 Alliance is convinced that lowering the goal posts
6 cannot be substituted for lowering the obstacles.

7 The DOE must remove 99.9% of the waste
8 or to the limits of technical capability from the
9 tanks, pipes, and ancillary equipment. After all,
10 the waste that can be removed has been removed.
11 The DOE must evaluate the contaminated soil around
12 the tanks and, if appropriate, remove it.

13 According to the National Academy of
14 Sciences, plutonium was buried at Hanford and at
15 the Idaho National Laboratory under the assumption
16 that it would remain essentially immobile for tens
17 of thousands of years.

18 That assumption was proven wrong in a
19 couple of decades. INL has been successfully
20 exhuming plutonium-contaminated waste for a number
21 of years, and the Snake River Alliance is puzzled
22 by the DOE's decision to abandon, so close to
23 groundwater, the plutonium at Hanford.

24 We read with interest a newspaper
25 account of the Richland, Washington, hearing on

1 the tank waste draft EIS. Half the commenters
2 called for saving the Fast Flux Test Facility.
3 That led an Alliance member to compare the FFTF's
4 fan base to a nuclear National Rifle Association.

5 We urge the DOE to go ahead. Tear that
6 reactor away from their cold, stiff fingers.

7 It is our understanding that the
8 Washington State standard for nuclear reactor
9 decommissioning requires removal and site
10 restoration. That was the course taken for the
11 Trojan reactor in Oregon.

12 As part of FFTF decommissioning,
13 alternatives in this draft EIS call for shipping
14 radioactively contaminated bulk sodium or remote
15 handled equipment to INL for treatment and then
16 shipping it back to Hanford or shipping
17 remote-handled special components to INL and then
18 shipping them back after treatment.

19 The Alliance has objected to these
20 proposals in the past, and with the support of our
21 allied organizations in Washington, we do so again
22 today. The risks of shipping radioactive sodium
23 or remote-handled equipment are simply
24 unacceptable and the benefits of treatment in
25 Idaho are relatively modest.

1 There are no licensed shippings casks
2 that could be used for the large special
3 components envisaged for shipment. The FFTF waste
4 should be stored and treated as safely as possible
5 at Hanford. Thank you.

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R E P O R T E R ' S C E R T I F I C A T E

I, Roxanne K. Patchell, Court Reporter,
a Notary Public, do hereby certify:

That I am the reporter who took the
proceedings had in the above-entitled action in
machine shorthand and thereafter the same was
reduced into typewriting under my direct
supervision; and

That the foregoing transcript contains a
full, true, and accurate record of the proceedings
had in the above and foregoing cause, which was
heard at Boise, Idaho.

IN WITNESS WHEREOF, I have hereunto set
my hand April 29, 2010.

Roxanne K. Patchell

Roxanne K. Patchell, RPR, CSR No. 733



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