

SAY WHAT? COMMENT WRITING GUIDE Dec 2021

Waste Treatment Plant Inspection Plan

Take Action!
Track Progress on Tank Waste Treatment
COMMENT DEADLINE: FRI DEC 17, 2021



The U.S. Department of Energy is holding a public comment period on a permit modification that involves the Waste Treatment Plant (WTP), which is projected to begin treating tank waste in 2023. This proposed modification addresses the plan to inspect facilities where Hanford tank waste will be immobilized in glass, once they are up and running.

BACKGROUND

The first operational part of the Waste Treatment Plant is called Direct Feed Low-Activity Waste, a series of facilities that will work together to remove cesium and immobilize tank waste in glass that will be permanently disposed of on the Hanford site. Liquid waste is held in a double-shell tank, tank AP-107, which will be run through a treatment facility to remove cesium. The treated waste will be held in double-shell tank AP-106 and then sent to the Low Activity Waste facility where it will be mixed with glass. The glass will be disposed of at the Integrated Disposal Facility, a big lined landfill on the Hanford site.

U.S. DOE must make sure everything is in order, like having permits ready to go when the tank waste treatment starts. There are a lot of permits that are a part of this process, including the one that is out for public comment right now on the WTP inspection plan.

The permit sets conditions that have to be met under the various laws and regulations that govern management, treatment, disposal and closure at Hanford. This permit modification is about specifying how inspections will work once the WTP is up and running.

There are three kinds of inspection methods: Physical (a person in close proximity to the item being inspected), Remote (not in person, using Closed-Circuit Television, observation windows, control panels, process control system), and Functional (testing to see if equipment/instrument works). The timing of inspections can be daily, weekly, monthly, bimonthly, quarterly, semi-annual or annual.

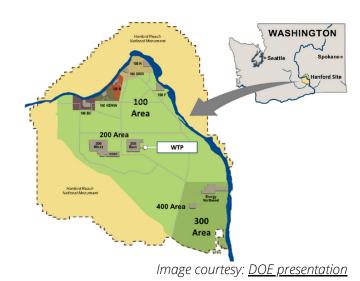
HANFORD CHALLENGE CONCERNS

Our biggest concern relates to the Low Activity Waste facility. A draft report in 2014 flagged some major issues. The current plan is to respond to these problems as they come up. We're concerned that this approach may put inspectors and other workers at unnecessary risk. We'd like more information about why this approach is being taken and what data inspectors will have access to, in order to ensure they are looking out for these pre-flagged issues. The point of the inspections is to keep people safe and the facility in safe working order. We'd like to know more about what could be done before operations begin in order to resolve the issues flagged in the 2014 draft LAW report.

The second concern is a question about the increase in remote inspections. We understand and appreciate measures to protect worker health and safety, and we would also like a better understanding of what issues might be missed in the absence of physical inspection. What are the high-radiation areas in the Low Activity Waste facility? What are the limitations to remote inspection and how will these be overcome?

The third concern is a question about access to the different inspection areas. It must be obvious to workers what areas are off-limits and hazardous for entry and what areas are safe to enter. In order to protect workers, how is access enforced so there are no inadvertent entries?





HANFORD CHALLENGE SUGGESTED COMMENTS



Please Take Action! and send in comments through the online portal <u>here</u>, by Friday, December 17th. The following are suggested comments.

To Whom it May Concern,

Thank you for providing an opportunity to comment on the Permit Modification for the WTP Inspection Plan. A transparent, accountable, and safe cleanup is important to me.

- 1. Please explain plans in place to ensure inspectors have access and training related to issues that have already been flagged related to the Low Activity Waste Facility and other areas they will be inspecting.
- 2. Please take the time to deal with issues before startup.
- 3. Please explain why there was such a big shift from physical to remote inspections and how limitations posed by remote inspections are being overcome.
- 4. Please explain how worker access is enforced so there are no inadvertent entries to hazardous areas.

Thank you so much for considering my comments, [YOUR NAME]

Resources

- U.S. DOE Fact Sheet
- WTP Permit Application
- U.S. DOE <u>Virtual Public Meeting</u> on Nov 9, 2021 (video)
- Hanford Challenge comments
- Hanford Challenge suggested comments

SUBMIT COMMENTS

electronically by midnight on Friday, December 17th



This Say What? Guide is funded through a Public Participation Grant from the Washington State Department of Ecology. The content was reviewed for grant consistency, but is not necessarily endorsed by the agency.