Oregon
Tina Kotek, Governor

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U.S. Department of Energy
Attn: Jennifer Colborn
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Submitted via email to:
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Ms. Colborn,

Oregon appreciates the opportunity to provide comment on the Engineering Evaluation and Cost Assessment (EE/CA) for the Fast Flux Test Facility (FFTF) in the 400 area of the Hanford site. Oregon's core value for our policy positions at Hanford is to protect the Columbia River; and the best way to protect the Columbia River is to prevent releases from happening in the first place. We also see the value in maintaining an experienced work force, one of the stated goals of the FFTF removal action. Because of this, we generally support the work outlined in alternative 3 of the non-time critical removal action. Oregon trusts that DOE and its regulators will ensure that this work does not delay other critical investigation and remediation projects on the River Corridor or the Central Plateau, and that any debris disposed at the Environmental Restoration Disposal Facility will be balanced with contaminated soil from remediation projects to the extent possible.

The EE/CA presented three alternatives: 1- No Action; 2- Surveillance and Maintenance (S&M) of the complex with mitigation of 6 structures; and 3- all activities in 2 with additional mitigation. While we realize that "no action" is a standard mandatory option on all these evaluations, we do not believe that DOE as the responsible party would neglect their obligation to ensure that the facility is monitored and maintained. The report acknowledges this in a footnote to Table 5-3. If this cost assessment more accurately reflected a viable option, the "No Action" alternative would reflect the baseline operational costs for surveillance and monitoring for the next decade. And, if doing so would violate a guideline for completing EE/CA reports, then a 4th option should be added reflecting the costs of S&M associated with activities specified in DOE/RL-2009-26 (S&M plan for FFTF). While not stated explicitly, it appears that amount would be ~$16.1 million based on Table 5-4. Regardless, Oregon would prefer to see forward progress rather than a S&M holding pattern at the site.

The report's largest budget item in alternatives 2 and 3 is "Sodium Treatment," at ~$40.5 million. This value takes a cost estimate for a sodium treatment facility from 2011, escalates it to 2020 dollars, and reduces the quantity of sodium treated by 95% to reflect that the treatment is not of bulk sodium (ECE-HANFORD-21-00002). While this is a cost that would be incurred if sodium is going to be treated, it would more accurately be attributed to Milestone Series M-092-09, which addresses the bulk sodium treatment. As such, all costs associated with the sodium treatment facility should either be listed or excluded in all alternates. The only difference between the no mitigation options and the mitigation options would then be the pro-rated treatment costs ($0.97 million).

The resulting cost estimate with a fourth alternative would look something like the following table:

Alternative	**Removal Action Description**	**Present-Worth Cost**
1	No Action (not a legal option)	$0
1a	Minimally Required Action 10 years S&M, Construction of Sodium Treatment facility	$55.6 Million
2	Alternative 1a actions, plus; • Hazard Abatement of eight Tier 2 Structures (403, 408A, 408B, 408C, 491E, 491S, 491W, and 4717) • Treatment of residual sodium	$67.8 Million
3	**Alternative 2 actions plus:** **• Hazard Abatement of Tier 1 Structure (405)**	**$69.9 million**

Oregon supports the principle of investing in mitigation and cleanup to prevent releases before they enter the environment. Based on our above interpretation, the difference in cost between the minimally required action and abating all the listed structures is approximately $15 million. We support this additional near-term expenditure, as it will pay dividends by reducing the cost of Surveillance and Monitoring in the coming decades, remove hazards to the workforce, and safely dispose potential sources of contamination in ERDF. As the site's allocated budget is increasingly directed to the mission to retrieve, treat, and immobilize tank waste, investments such as this will ensure that cleanup and environmental restoration funds are being spent on cleanup, rather than simply watching and waiting as structures decay and waste moves towards the river. Please contact me or my division director, Max Woods (maxwell.woods@energy.oregon.gov) if you have any questions.

Sincerely,

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