



June 27, 2017

Mr. Doug S. Shoop, Manager
Richland Operations Office
U.S. Department of Energy
PO Box 550, MSIN: H5-20
Richland, Washington 99352

Mr. Ty Blackford, President
CH2M Hill Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

RE: Continued Response Actions to Partial Collapse of PUREX Tunnel 1

Dear Mr. Shoop and Mr. Blackford:

In the May 11, 2017 letter to Secretary of Energy, Mr. Rick Perry, from Chairman Goudy, Yakama Nation expressed our initial concerns regarding the collapse of the PUREX tunnels and these concerns remain valid. Subsequently, we have learned of DOE's intention to proceed with an action to grout fill Tunnel 1, which we believe confounds the cleanup/closure process, resulting in a pre-decisional action, without public input or comment. We believe the current proposal to grout-fill Tunnel 1 by November 2017 is premature and cannot support this action. In this letter, we state our position concerning any further immediate response actions.

Yakama Nation believes the use of grout biases the final closure options towards grout and leaving large volumes of waste Transuranic and high-activity wastes in place on the Hanford Site. There are acknowledged different waste streams and grouting at this time will prohibit segregation of these different components. The equipment is contaminated with cesium-137 and strontium-90 which will decay to a stable element in about 250 years. The equipment is also contaminated with thousands of curies of plutonium and americium-241 - transuranic radionuclides with extremely long half-lives (in the thousands to millions of years). An assurance of accurate knowledge of what is in each railcar is not available for public scrutiny or review and remains questionable, along with the true integrity of the rest of Tunnel 1's structure.

WA State Dept of Ecology's recent Administrative Order (#14156) required several submittals associated with what has been described as *interim stabilization* of PUREX Tunnel 1, corrective actions to ensure the safe storage of the wastes in Tunnels 1 & 2, and a Closure Plan with closure action details and a schedule to perform these actions (all prior October 1 2017). These submittals should resolve most of the uncertainties noted above. As we were assured, current actions (i.e. dirt-fill and tarp covering of Tunnel 1) *provide protection from a radiological spread in the event of another collapse and keeps water from adding weight to the tunnel.*

Regarding any future agency actions at the PUREX Tunnel 1:

1. Yakama Nation expects DOE and Ecology to approach the remediation of the PUREX Tunnels in an open and transparent process. Yakama Nation expects the agencies to consult with YN in their development of the *Emergency Response/Recovery Plan*.
2. Yakama Nation requests the following: Construct a temporary remediation facility ("tent") over the tunnel that can withstand the outside environment to allow access to the

tunnel (remote cameras, equipment, etc.). The tent shall remain in place until any response and/or cleanup action is completed. The tent will allow DOE develop a cleanup plan for the sampling and characterization of the wastes (i.e. contaminated equipment, debris, etc), its treatment, removal, and proper disposal including the shipment of Transuranic Wastes (TRU) wastes to WIPP.

3. Yakama Nation requests DOE take actions to evaluate potential vibrational impacts from site activities (including some type of long-term soil settlement monitoring program).
4. Yakama Nation expects the opportunity to review and comment on any RCRA permit modifications related to Corrective Actions associated with the PUREX Tunnels. This review should include opportunity to review the current Closure Plan/Contingency Plan for the tunnels.

Please respond to Ms. Rose Longoria, at (509) 865-5121 x6365 / (509) 452-2502 or lonr@yakamafish-nsn.gov regarding our concerns and requests listed above.

We look forward to meeting with you to discuss our concerns regarding the Hanford Site and its very serious issues.

Sincerely,



for Phil Rigdon, DNR Superintendent
Yakama Nation

CC:

Dave Shaw – BIA Superintendent, Yakama Agency

Elizabeth Nason, Yakama Nation Tribal Director

George Selam – Yakama Nation Radioactive / Hazardous Waste Committee

Asa Washines – Yakama Nation Radioactive / Hazardous Waste Committee

Edwin Lewis – Yakama Nation Radioactive / Hazardous Waste Committee

Virgil Lewis – Yakama Nation Radioactive / Hazardous Waste Committee

Administrative Record

Marlene George, ERWM