



*USW Local 12-369*

P.O. Box 524 Richland, WA 99352 (509) 943-8441 Fax (509) 943-8443

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April 21, 2014

Ms. Carol Laundry, USW Int'l VP at Large  
United Steelworker  
Five Gateway Center  
Pittsburgh, PA. 15222

Dear Ms. Laundry;

**SUBJECT: WASTE SAMPLING CHARACTERIZATION FACILITY (WSCF), HANFORD SITE, RICHLAND, WA**

The United Steelworkers Union local 12-369 (USW) are against the closure of the Waste Sampling Characterization Facility (WSCF), Hanford Site, Richland, WA. The USW has serious concerns regarding worker safety, clean-up delays, increased cost, and Tri-Party Agreement modifications.

**Worker Safety:**

Recent media coverage of Hanford on King Five News in Seattle (Hanford's dirty secrets recipient of Peabody award) focuses on many issues of Hanford. One being unknown tank vapors has caused worker injury/illness. WSCF capabilities can analyze air samples within 24 hours providing valuable information in the treatment of the workers.

The risk to the Hanford worker force is increasing with the age of the Tank Farms. The organic compounds were placed in 1 million gallon tanks and mixed with highly radioactive material that emitted Alpha, Beta, Gamma, and Neutron radiation. There was enough Beta radiation for the formation of X-rays due to Bremsstrahlung. So much heat was produced from radiation that over the years thousands of gallons of water was added to the tanks. With time, heat, radiation, and mixture of many organic compounds Hanford has created a unique hazard to the workforce. And personnel have, are, and will continue to be exposed and suffer health effects from the vapors.

Hanford has many more hazard concerns such as beryllium, asbestos, tank vapors, and unknowns. During countless events/releases, WSCF has provided immediate real time analyses aiding in the minimization of contamination to workers and the environment, as well as reducing risk to health and injury. Richland office of Department of Energy (DOE/RL) thinks that to eliminate the ability to analyze any known toxic material in real time onsite is a good business practice. The United Steelworkers union couldn't disagree more with this business decision. The USW believes DOE/RL will destabilize the Hanford cleanup effort. WSCF has successfully supported the Hanford site for over twenty years with onsite analyses.

Waste Sampling and Characterization Facility (WSCF) annually receives and tests 50,000 to 70,000 thousand samples. Most are radioactive, containing low-level isotopes. The vast majority are shipped across the Hanford site and handled without incident, but not all. The shipping industry handling future samples will be the same one you use to send packages.

Thousands of radioactive samples will go to offsite labs, shipped through our communities. Any sample leaks happen at Hanford. If WSCF closes, accidents will be closer to home. To save a half penny out of every two dollars it spends, DOE/RL is shifting vulnerabilities to our communities.

Our workers have expressed deep concern for their safety with the closure of WSCF. They do not believe off site laboratories have the capabilities for accurate real time results. Over the years our brothers and sisters have developed a trust in WSCF abilities to provide honest reliable data with regards to their safety. WSCF staff has over 1000 years of laboratory experience and education in responding to events at Hanford.

The way in which 10 C.F.R. 851 Worker Safety and Health Program is implemented and viewed by the workers at Hanford will be grossly diminished with the closure WSCF. Requirements such as 24 hour turnaround times (quick turns) on samples will be effected. Quick turn samples are usually taken for the protection of the workers from unexpected releases. Quick turn samples are also used prior to the start of a job to insure the environment is safe to work in.

#### **Costs and Clean up delays:**

DOE/RL recently announced the closure of this laboratory (RL No.: 14-0062) citing cost savings of twelve million dollars per year. However, these savings are unaccredited.

In 2010, the Mission Support Alliance, LLC (MSA) had a contract deliverable CD0078 (SIU-O01) ANALYTICAL SERVICES MASTER PLAN (ASMP). This plan laid out several possible cost saving strategies labeled A, B, C, and D. DOE/RL responded with an Assessment Report of the Analytical Services Master Plan A-I O-ISI-MSA-WSC-009 March 24, 2010 (also attached).

Strategy D in the ASMP called for closure of WSCF and the shipment all samples off site. DOE/RL's response, **"Plan D is not considered viable due to the site issues and hold times that require an analytical lab within 25 miles."**

Site issues and hold times remain. Shipping tens of thousands of samples thousands of miles will significantly slow the progress of cleanup, also reducing as many as four hundred groundwater (wells) samplings per year. Work will stop earlier in the day in order to prepare samples for shipment in a timely manner. Industrial hygiene samples will also be delayed due to shipping times. Workers will sit idle while samples travel across country for analysis. DOE/RL recognized these issues in 2010.

Again, the DOE/RL closure letter outlines cost savings of 12 million dollars per year. The accompanying Master Plan cited projects' savings of above 60 million dollars over 10 years. However, I suspect you'll find the DOE/RL evaluation of the ASMP as interesting as I do. **"Based on the review and analysis of the ASMP's proposal for the Commercialization of the WSCF, the potential cost savings, as stated at \$60 million over ten years could not be validated. The IR&V Team identified the need for additional investigation into other cost considerations that would have an impact on the potential for cost savings as presented in the ASMP."**

Not only did DOE/RL's 2010 assessment report dismiss the various strategies to out-source laboratory work, it made an additional request. **"However, please respond within 60 days of receipt of this letter with an answer as to what is required for MSA to operate WSCF as a "Best-in-Class" laboratory. The response should include the necessary actions, the schedule, and a rough order of magnitude (ROM) costs, plus a description of reasonable methods of measurement that would be used to determine how well WSCF is doing to achieve "Best-in-Class" over time."** Clearly, with this statement DOE/RL viewed WSCF as a valued asset in the mission to cleanup Hanford.

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Close examination of the DOE/RL assessment of the master plan also reveals yet more costs for sending samples offsite. The plan claimed additional costs of only 2.8 million dollars per year. However, that just took into account one quarter of the sample volume that would go offsite with closure of WSCF. A more accurate (yet still conservative) estimate of additional cost is 11.2 million dollars ( $2.8M \times 4 = \$11.2$  million). *And note, that figure includes only extra expenses involved in sending rad analysis offsite.* (It is also worth pointing out that currently used generators do not have capacity to hold proper temperature for all of the samples now awaiting shipment. That capacity must be added at considerable additional cost.)

Further, the cleanup will incur a great deal of lost time, the efforts of 125 workers putting in an approximately two hours per day at an average wage of 50 dollars per hour.  $250 \text{ hours} \times \$50 \times 250 \text{ work days} = \$3.125 \text{ million per year}$ . (In reality, this number undoubtedly will be much higher.)

When you examine the DOE/RL Assessment Report, you find still more costs for out-sourcing analytical work. These total expenditures (and those not included in the report) will greatly exceed the 12 million dollars savings claimed by DOE/RL.

In addition to the extra costs that are identified, the time table for numerous Hanford projects will have to be prolonged creating more budgetary increases and tri-party modifications.

The United Steelworkers supports a laboratory being onsite and operational, WSCF has provided unique expertise teamed with quick response that has ensured worker health and safety remains the number one priority.

Sincerely,



Dave Roberts, President  
USW Local 12-369

DR/drt

cc: File