COMMENTS RE THE IDAHO HIGH-LEVEL WASTE DEIS: DOE/EIS-0287D

1. The purpose of an EIS doesn't have to include the effect of costs. However, cost effective comparisons of the various alternatives is (or should be) a major factor in the public's and DOE's evaluations and decisions. Environmental concerns are important, but are not the only important factors that determine the best interests of our United States. Therefore we, the public, need to know when the cost evaluation will be available to us. Such information could very possibly narrow down the alternatives worth considering.

2. We are not convinced that DOE supplied the National Research Council's (NRC) Committee on INEL with sufficient data for them to arrive at a more definitive evaluation of the different alternatives for handling high level waste (HLW). It is easy to postpone decisions and actions while waiting for better information, but once postponement does not get things done.

3. To support the State of Idaho's view that DOE's current method of calculating NTR, NTR, should be changed to one of the State's proposed methods to allow DOE HLW to be within the proposed repository's space allowance.

4. DOE should freeze the waste acceptance criteria without waiting for details of the repository. This would allow expediting a decision on INEL waste handling by eliminating bureaucratic procrastination.

5. Greater DOE emphasis on public comment input should be given to recommendations and comments from their Citizen Advisory Boards, who are selected to represent a real cross section of the public and who intensively study the issues before making consensus recommendations. Those of the public who make comments have an obligation to really study the issues and facts first, and base their comments on those rather than emotions.
Comment on High-Level Waste and Facilities Disposition Draft EIS

I appreciate the opportunity to provide input on the Idaho High-Level Waste and Facilities Disposition Draft Environmental Impact Statement (Draft EIS) and regret that I could not be here in person.

As a life-long Idahoan, I am a strong supporter of the people and programs at the Idaho National Engineering and Environmental Laboratory (INEL). The INEL has served the nation and contributed to the enhancement of Idaho for over fifty years, continues to do so today, and will continue to in the future.

Although the INEL has been and continues to be an asset to the nation and Idaho, the environmental legacy of Cold War weapons production and the INEL missions has left 4200 cubic meters of mixed high-level waste calcine and 1.4 million gallons of liquid mixed transuranic/sodium-bearing waste. This high-level waste must be safely disposed of so that future generations are not burdened by this legacy. The process established by the National Environmental Policy Act (NEPA) includes an Environmental Impact Statement as the method of ensuring that federal decisions that could significantly affect the quality of the environment are made considering all the facts. Paramount in this process are considerations of the environment and public and worker health and safety. This public comment period allows input to the decision making process prior to initiation of major federal actions.

As a step toward cleaning up the waste in Idaho, the 1995 Settlement Agreement between the State of Idaho and the Departments of Energy and Navy identifies milestones that must be met for treatment and removal of the waste from Idaho. I am a strong supporter of the 1995 Settlement Agreement and will do all that I can to ensure that the Department of Energy continues to meet its obligations to clean up the Cold War legacy at the INEL. To date, all portions of the agreement have been met.

This Draft EIS discusses actions that feed directly into meeting the milestones to complete calcination of sodium-bearing liquid high-level waste by December 31, 2012, and to complete treatment of all high-level waste so it is ready to be moved out of Idaho by December 31, 2035.

The Draft EIS identifies nine waste processing alternatives and six different facility disposition alternatives that must be carefully evaluated to ensure that the final EIS and subsequent record of decision reflect the best interests of Idahoans, the nation, and the environment.

Some of the waste processing alternatives, if chosen, would not meet all aspects of the Settlement Agreement. The Draft EIS states that two of the alternatives will not meet the 2035 milestone for having high-level waste ready for shipment out of Idaho. One of these two is the No Action Alternative, which is required to be investigated to provide a baseline for the NEPA process. In addition, the Draft EIS states that it may be difficult to have all liquid waste out of the underground storage tanks and cease using them by 2012 for seven of the alternatives.

I am a strong supporter of the Settlement Agreement and I urge the state and Department of Energy to choose an alternative that meets the milestones in the court-enforceable Agreement. I also want to encourage all Idahoans to review the Draft EIS and participate in the public comment period. Public comment is an important part of federal agency decision-making and is one of the factors that will be considered when choosing a course of action.

Sincerely,

Michael D. Crapo
United States Senator
The U.S. Department of Energy has some important decisions to make regarding management of high level waste and mixed transuranic waste now stored at the Idaho National Engineering and Environmental Laboratory. High-level waste management is a complex technical subject, but it’s important for Idahoans to understand that these decisions will determine how DOE will treat large amounts of radioactive and hazardous material stored over the Snake River Plain Aquifer, and how it will close contaminated facilities when they are no longer needed.

The Idaho High-level Waste and Facilities Disposition Draft Environmental Impact Statement that DOE Idaho has just issued for public review and comment is the critical first step in this decision-making process. While it is not a decision document itself, it provides the scientific information about the potential impacts to the environment of various management alternatives that DOE is considering. The document gives Idahoans the opportunity to study these environmental issues, compare the impacts of different actions, and to make their voices heard under the National Environmental Policy Act process.

The DOE project staff have obviously worked hard to convey technical information in a manner that the general public can understand. I encourage all Idaho citizens to review the EIS and send their comments to the Department of Energy. Public comment is an important part of federal agency decision making and is one of several factors that the Secretary of Energy will consider when choosing a course of action.
- New Information -

Richard Lindsay

2. [believe that the DEIS is lacking vital information necessary to allow informed decisions and discussion. The information needed is: What will the radiation level be in the canister and liquid wastes as a function of years, e.g., 100, 200, 300, etc., and how will those levels compare with the average levels of natural radioactive isotopes in Idaho soils? Unless and until DOE begins to put that basic information in EIS documents dealing with options for handling radioactive wastes of any type, the "no action" option cannot be meaningfully addressed. A thorough discussion of the PEBA (I think this is an old farm) new comparisons between waste stored over a period of time and natural isotopes in the rest is not a job for the EIS.]

Richard Lindsay