Appendix D

New Information -
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- DOE has promised to calcine all of INEL's reprocessing waste, which would simplify its conversion to good-quality waste forms and can be done on time (by 2012 N) for a reasonable number of additional years. Now, this ES discloses sensitive information about the timeline and feasibility of this process.

- DOE has explained that INEL has managed to calcine only about 10% of its SBW during the last eight years, which is its decision-makers deliberately decided not to use the only efficient approach available to do it, i.e., some sugar to the waste, but not enough to kill the solution. This is a well-established and easy way to calcine SBW. If you are interested, I'm happy to discuss this with you.

- The "technical" reason that INEL has managed to calcine only about 10% of its SBW during the last eight years is that its decision-makers deliberately decided not to use the only efficient approach available to do it, i.e., some sugar to the waste, but not enough to kill the solution. This is a well-established and easy way to calcine SBW. If you are interested, I'm happy to discuss this with you.

- Also, DOE has stated that calcination is the primary method used to reduce the toxicity of the waste, and it is a highly efficient process. However, it is not a perfect process, and some of the waste may still be hazardous after calcination. DOE has also stated that calcination is not a "preferred" method for the treatment of SBW, and alternative methods such as incineration or disposal in a geologic repository are also being considered.

- DOE has also stated that the calcination process is expensive and time-consuming, and it may not be the most cost-effective method for treating SBW. DOE has also stated that alternative methods such as incineration or disposal in a geologic repository are also being considered.

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Since this EIS is just a draft, let me suggest the following changes for the final version.

First, make it very clear up front just exactly what it is you're trying to accomplish. If it's already been decided that it's OK to not honor the commitments made in the "Joint Agreement," say so. Otherwise, some of the scenarios in the Draft that still propose that SWW will be injected, assume a completion time of 2044 AD, not 2012 AD - does this two-year slip reflect a change in policy?

Second, when you present/discuss treatment scenarios that don't make much sense, be sure that you explain the assumptions/conditions that would make them plausible.

Third, you might want to consider integrating some of INEEL's other waste treatment/disposal problems into your final version (e.g., using ANL's waste caustic as the activator for hydroceramic maids out of INTED caclations.) Doing so would prevent a lot of unnecessary duplication, cause a higher percentage of INEEL's radwaste to be prepared for offsite disposal (which would delight local stakeholders), and save taxpayers a lot of money. (The "slave piping" of EM projects to march existing engineering structures/definitions is another of the "symptoms" identified in "Barriers to Science".)

Fourth, when you present/discuss treatment scenarios that have not received programmatic research support, e.g., "Direct Cement/hydoceramic," make it clear to the reader that that's indeed been the case & also that information about can be obtained from sources other than therefore non-existent official Government reports. (For example, I've compiled/published dozen open-literature research papers that anyone interested in why "direct cement" makes sense might want to see - the "Draft EIS" doesn't acknowledge that non-government report-type technical literature even exists."

Fifth, be sure that your EIS preparation subcommittee does a fairer job of representing alternatives such as "Direct Cement" in the final version, insist that it actually contact the persons responsible for developing/championing them - the "draft" doesn't accurately represent what my colleagues & I have done or would recommend.

Sixth & finally, please don't characterize DOE's decision to tell its employees/applicants to assume that all waste forms made from its reprocessing waste will have 0.3 MTHU per m as being merely "controversial" (p. 6-21). A policy that is inconsistent with both the intent and letter of the law (see 40 CFR 191) and which is largely responsible for DOE's inability to deal efficiently with its own "high level" waste requires a more forceful adjective.

Do not change your Publisher. The quality of the photography, printing, general layout, etc. of this EIS is the best I've ever seen in a large government-sponsored document. Yes, the "hypothetical INEEL Processing Narrative" suggests that we are to bundle up our calcined into some sort of transportation (you can't stop powders) temporary waste form (HPV-type rubber cement is being studied for this purpose) & then ship it all off to Hanford where they will injection until it's solidification process, separate the stuff into various fractions, HIP/41 of them, and then ship it all back here for a few more decades worth of "Yucca" storage. This is too clever to be much sense to the casual reader unless considerable additional background information is provided.