Document 63, John Tanner, Idaho Falls, ID
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HLW EIS Web Comments

Subject: HLW EIS Web Comment

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Comment:

[Comment text]

A positive aspect is the positive support for the project from the National Research Council. However, there seems to be a lack of coordination with the local community. I believe that this project could be damaged by poor public relations. The project should be well publicized and the public should be informed of its benefits. The project is important for the future of the town and the region.

The project is important for the future of the town and the region. The project is important for the future of the town and the region. The project is important for the future of the town and the region.
The following comments and questions are submitted on behalf of the 1,300 doe-paying members of the Snake River Alliance, an Idaho-based grassroots group that has monitored activities at the Idaho National Engineering and Environmental Laboratory since 1979.

We would like to thank the Department of Energy for extending the public comment period. In your own words this document details “the largest, most expensive, and technically complex environmental management project at INEL...” and therefore the additional time was helpful.

The Alliance concurs with the Department’s intent, as analyzed in all alternatives except “no action,” to accelerate the remaining liquid waste and eventually place the wastes in a less dispersible form. However, given that there is no repository in existence to receive this waste, any assumption of a repository should be dropped from the final EIS. Currently, the DES is too influenced by the assumption of a near-term high-level waste repository, and by the 1995 settlement agreement, and not enough by a fundamental need to better isolate the waste from the environment where it resides. Overall, there is too little concurs for environmental protection in this EIS.

The DES’s limited scope makes it nearly useless as an analytical tool in terms of making the decisions it aims to make. Probably the two most important variables in analyzing these alternatives are (1) the question of technical risks associated with an alternative (in other words, Will it work?) and (2) the costs of the alternatives. Both of these considerations are outside the scope of the DES. Without cost or technical viability analysis, the ROD will be based on the EIS scopes out considering that the Yucca issue will never accommodate DINFEL waste (because of AEC rules). Therefore, this EIS is analyzing alternatives to come to the following conclusion: If DINFEL were not bound by the realities of the current repository situation, if DINFEL were not bound by the scientific realities of the physical world, and, if INEL had all the money in the world, this is the option we would choose.

Separation options

We would also like to see the so-called “separations” alternatives analyzed in the DES are not in the best interest of environmental protection, and are instead driven by the current repository situation and a leftover need to fulfill the terms of the settlement agreement. These alternatives, Planning Bases, Transuranics Separations and Full Separations, if they were to work, and that is a big if, might reduce the “high-level” waste volume, but in the process, the overall volume of waste would increase. In the real world this would not decrease the overall danger of the waste. In fact, if you were to decide to leave the “low-level” waste great fraction in the tanks, you would be saving billions of dollars, but losing the biggest fraction and greatest near-term threat behind. It should also be noted that the “Monitored Tank Waste Task Force” recently recommended that the DES not permit of this technology because of the tremendous cost and technical uncertainty. In addition, the Transuranics Separations alternative involves a greater risk of a critically accident as stated in the document.
Defining High-level Waste

Let's please continue to be consistent on the definition of high-level waste and not further confuse the public. The Office of Environmental Management defines high-level waste (HLW) as "highly radioactive material containing fission products, traces of transuranics and plutonium, and other transuranics, that could be used as nuclear weapons. The radiological and material safety of HLW, despite its initial radiotoxicity, is also of concern. Therefore, the DOE's contention that this waste is not high is out of sight.

Conflicting Flood Plain Studies

The U.S. Geological Survey estimates the INEL site within the 140-year flood plain while the U.S. Bureau of Reclamation estimates 100 years. Because we are dealing with some of the most hazardous material known to man, we recommend that the DOE assume the more conservative USGS estimate.

The Calciner

I do request that the DOE inform the public about its decision regarding the use of the calciner under the new MAC guidelines as soon as this decision is made, and not wait until the NEPA process is completed. The calciner is integral to many of the alternatives in the DEIS and also the 1995 settlement agreement.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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EIS PROJECT - ARCPF

Control at N-W 4-10

APR 14 2000

Reply To
Attn: GSO: ECO-088

T.L. Wichmann, Document Manager
U.S. Department of Energy
850 Energy Drive, MS 1108
Idaho Falls, ID 83401-1563

April 19, 2000

Dear Mr. Wichmann:

Thank you for sending EPA multiple copies of the Idaho High-Level Waste & Facilities Disposition EIS. We requested multiple copies to better solicit comments from reviewers in our various programs here at EPA. We have finished reviewing the document and are returning two sets of the EIS. We hope that you can redistribute the copies we are returning.

In the future, please send us two copies of the EIS unless we request additional copies. Thank you for giving us the opportunity to review this draft EIS.

Sincerely,

Christian F. Gebhardt
Interim Records Manager,
Geographic Implementation Unit
We would like to thank the Department of Energy for extending the public comment period. In your own words, this document details the largest, most expensive, and technically complex environmental management project at INEEL, and therefore the additional time was helpful.

The Alliance concurs with the Department's intent, as analyzed in all alternatives except "no action," to solidify the remaining liquid waste and eventually place the calcine in a less dispersible form. However, given that there is no repository in existence to receive this waste, any assumption of such a repository should be dropped from the final EIS. Presently, the DEIS is too influenced by the assumption of a near-term high-level waste repository, and by the 1995 settlement agreement, and not enough by a fundamental need to better isolate the waste from the environment where it resides. Overall, there is too little concern for environmental protection in this DEIS.

The DEIS's limited scope makes it nearly useless as an analytical tool in terms of making the decisions it aims to make. Probably the two most important variables in analyzing these alternatives are: (1) the question of technical risk associated with an alternative (in other words, Will it work?); and (2) the costs of the alternative. Both of these considerations are outside the scope of the DEIS. Without cost or technical viability analysis, the ROD will be baseless. Also, the EIS scopes out considering that Yucca Mtn will not accommodate INEEL waste (because of RPSA issues). Therefore, this EIS is analyzing alternatives to come to the following conclusion: If INEEL were not bound by the realities of the current repository situation; if INEEL were not bound by the scientific realities of the physical world; and, if INEEL had all the money in the world, this is the option we would choose.

Separations options
Clearly the "separations" alternatives analyzed in the DEIS are not in the best interest of environmental protection, and are instead driven by the current repository situation and a burning need to fulfill the terms of the settlement agreement. These alternatives, Planning Basis, Transuranics Separations and Full Separations, if they were to work, and that is a big if, might reduce the "high-level" waste volume, but in the process, the overall volume of waste would increase. In the real world this would not decrease the overall danger of the waste. In fact, if you were to decide to leave the "low-level" waste out of the tanks, you would after spending billions of dollars, be leaving the hottest fraction and greatest near-term threat behind. It should also be noted that the "Hanford Tank Waste Task Force" recently recommended that the DOE forgo pursuit of this technology because of the tremendous cost and technical uncertainty. In addition, the Transuranics Separations alternative involves a greater risk of a criticality accident as admitted in the document.

Defining high-level waste
Let's please continue to be consistent on the definition of high-level waste and not further confuse the public. The Office of Environmental Management defines high-level waste (HLW) as "highly radioactive material containing fission products, traces of uranium and plutonium, and other transuranic elements, that result from chemical processing of spent nuclear fuel." The sodium bearing waste while not as radioactive as most batches of HLW, absolutely meets the basic criteria of the definition in that it resulted from chemical processing of spent fuel and contains fission products, as well as transuranics. Therefore, the DOE's contention that this waste is not hhw is out of line.

Conflicting flood plain studies
The U.S. Geological Survey estimates the INTEC lies within the 100-year flood plain while the U.S. Bureau of Reclamation estimates 500 years. Because we are dealing with some of the dangerous material known to man, we recommend that the DOE assume the more conservative USGS estimate.

The Calciner
We request that the DOE inform the public about its decision regarding pursuit of permitting the calciner under the new MANG guidelines as soon as this decision is made, and not wait until the NEPA process is concluded. The calciner is integral to many of the alternatives in the DEIS and also the 1995 settlement agreement.