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05/10/96

Department of Navy  
NAVSEA - 08U  
2531 Jefferson Davis Hwy.  
Arlington, VA 22242- 5160

Attention: William Knoll

Subject : DRAFT EIS- Naval Fuel Container System

Dear Sir :

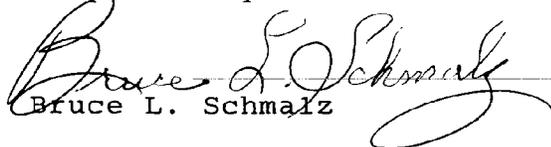
This DEIS should dispel any concern held by informed rational people. The following comments are not intended to be critical or to provoke change:

**A** A dry storage facility at the INEL which would not be over the Snake Plain Aquifer does not seem relevant to container selection; however, the hydrologic systems west of the Plain and the locations discussed in Appendix F are originally separate but tributary to the Plain Aquifer and should be considered as being the same. The only locations which do not contribute significant recharge to the Aquifer are volcanic buttes. Constructing a storage facility on, or in, this type of geologic structure is not necessary or feasible.

Exponential growth of human needs and use of fossil fuel is commonly ignored in environmental documents. The life of U.S. petroleum reserves has been estimated using various rates of use and production. The result is in a time frame of less than 50 years as compared to 40 years used in the DEIS. This relates to container design and storage time should it become necessary or feasible to recover the contained expended fuel assemblies as a source of energy.

**B** Evaluation of radiological health effects results in small differences between the container options. Final selection will evidently be made on the basis of economic principles. A major consideration should then be the waste of existing facilities at the INEL if they were not utilized or duplicated elsewhere.

Respectfully

  
Bruce L. Schmalz

Commenter: Bruce L. Schmalz, Idaho

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Response to Comment:

- A. In Chapter 1 of the EIS, the proposed action states that the location of the dry storage facility at the Idaho National Engineering Laboratory is an action related to the container system choice. In addition, the technical feasibility of building a dry storage facility within the Idaho National Engineering Laboratory at a point not above the Snake River Plain Aquifer is being considered by the Department of Energy pursuant to the October 17, 1995 Court Order in Civil Case No. 91-00540-5-EJL (U.S. District Court, 1995) and the agreement among the State of Idaho, the Navy, and the Department of Energy. The potential impacts of choosing either of the two locations evaluated are discussed in Appendix F of the EIS.
- B. This assessment is correct. Chapter 3, Section 3.9 of this EIS states that, ideally, the selected container system will economically allow naval spent nuclear fuel to be loaded and stored dry at the Idaho National Engineering Laboratory in the same container which will be used to ship the spent fuel outside the state of Idaho. In addition, the selection of an alternative, in the Record of Decision, will take into consideration the following factors: (1) public comments; (2) protection of human health and the environment; (3) cost; (4) technical feasibility; (5) operational efficiency; (6) regulatory impacts; and (7) storage or disposal criteria which may be established for a repository or centralized interim storage site outside the state of Idaho.