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Richard A. Guida
Associate Director for Regulatory Affairs
Naval Nuclear Propulsion Program
Department of the Navy--Naval Sea Systems Command
2531 Jefferson Davis Hwy.
Arlington, VA 22242-5160

Dear Mr. Guida:

With reference to the Navy Draft EIS for a Container System for the Management of Naval Spent Nuclear Fuel and the formal comment period (61 FR 24933), I would like to make several comments.

A 1 - The Multi-Purpose Cannister seems to be the best idea if the research and development have been adequate and the cannister will be available.

a. There seems to be less handling after being "canned"

b. The cancer rate at the ICPP might be a bit higher, but essentially there is little risk.

c. There might be increased employment with this option, but jobs would be minimal because of the decrease of total INEL staffing.

d. Option would make rail shipment most feasible, but what of Sho-Ban activities.

B 2 - Mentioning rail brings to mind the plan to build an extensive rail system through Nevada. This seems such a waste. The regional disposal of waste at existing sites has seemed to me to be more efficient.

C 3 - Discussion of the Lemhi and Birch Creek areas seemed to show that because of faulting, etc., they were really not good, even though they are "off" the Snake River Aquifer. It has always amazed me as I read more about the INEL that they picked quite a seismically stable site, as well as one where the seepage over the last 50 years has not affected the aquifer. This is true in spite of all the bally-hoo.

I really enjoyed my participation on the EM Site Specific Advisory Board for INEL. It was a tremendous learning experience and although I rotated off the Board in May, I remain interested. Thank you for asking for my comments.

Genevieve M. Paroni

Genevieve M. Paroni, Member 1994-1996
EM Site Specific Advisory Board - INEL

Commenter: Genevieve Paroni, Idaho

Response to Comment:

A. In Chapter 3, Section 3.8, Comparison of Alternatives, the EIS states that the impacts for most categories are small or nonexistent for all alternatives. Since 1957, the Navy has safely shipped over 660 containers of spent nuclear fuel from the shipyards and prototype sites to the Naval Reactors Facility. All of the shipments were made safely by rail and without release of radioactivity. Since any container alternative selected for dry storage and transportation (either by rail, heavy-haul truck, or a combination of both) must meet the requirements of 10 CFR Part 71, Packaging and Transportation of Radioactive Material, and 10 CFR Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Waste, other containers can also be used safely and reliably.

B. The location of a geological repository or centralized interim storage facility is beyond the scope of this EIS.

C. The Navy evaluated these two areas in an attempt to identify a technically feasible location for dry storage of spent nuclear fuel at the Idaho National Engineering Laboratory, which would not be above the Snake River Plain Aquifer, as required in the agreement with the state of Idaho. A complete discussion of this evaluation is presented in Appendix F of the EIS. This EIS shows that there is no technically feasible area at Idaho National Engineering Laboratory which does not contribute water to the Snake River Plain Aquifer. The preferred alternative would not make use of the Lemhi Range or Birch Creek areas.