

**APPENDIX L**  
**PUBLIC COMMENT RESPONSE TABLE**

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**COMMENTS FOR THE PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT  
FOR WASTE DISPOSITION ACTIVITIES AT THE PADUCAH SITE, PADUCAH, KENTUCKY  
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<i>Robert R. Loux, State of Nevada</i>			
1.	Fig. 3.6	The highway route shown assumes that waste would be shipped into Nevada on I-15 and connect with U.S. 95 in Las Vegas. NNSA/NTS requires that shippers of LLW to NTS for disposal use highway routes that avoid the metropolitan Las Vegas area, Hoover Dam, and the I-15/U.S. 95 interchange. This policy has been in effect for over two years. A “representative” highway route for shipments of LLW from Paducah must conform with these stipulations. The map in Fig. 3.6 should be revised to reflect an acceptable “representative” route.	Text and Figure will be modified. See comments on last page of this document.
2.	Fig. 3.13	The rail route shown assumes that waste would be shipped into Las Vegas on the Union Pacific mainline. There is no intermodal facility in Las Vegas—or in Nevada—for the transfer of LLW from rail cars to trucks. The State of Nevada strongly opposes ANY intermodal transfer of LLW within its borders. The map in Figure 3.13 should be revised to reflect either (1) that rail/intermodal transport is not feasible to the NTS or (2) that an intermodal facility outside Nevada must be used for such shipments.	See comments on last page of this document.
3.	p. 66	The predecisional draft EA assumes that “the container used for transportation of TRU waste is 55-gal drums in one truck shipment.” The WIPP Land Withdrawal Act requires that TRU waste be transported using NRC-certified shipping containers. The reference TRU waste shipping container for contact-handled TRU waste should be the TRUPAC II or the HALFPAC container. The Western Governors’ Association has negotiated a series of protocols with DOE governing shipments of TRU waste. These protocols require that TRU waste be transported in appropriate and certified TRUPAC II or HALFPAC containers.	Noted. Text has been added to state that the 55 gallon drums will be overpacked in TRUPAC II or HALFPAC containers.
<i>Ruby English, Neighbor and Chairman of ACT</i>			
1.	General	What guarantee can the Department of Energy give to us, the neighbors, that in the process of loading these contaminants in containers and loading them on trucks or by rail that NO accidents will take place to contaminate the surrounding area to the public?	During waste handling DOE procedures will be followed. These procedures are prepared with attention to the workers, public and the environment and are in place to minimize the possibility of accidents. All workers will be trained in these procedures. Appendix G analyzes the potential risk impacts from container handling.

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2.	General	How can you determine that at the end of the 10-year period the risk of an on-site accident is eliminated for humans? I don't see how you can evaluate what you don't or haven't had happen at this time, let alone ten years down the road. You cannot say that in five years an earthquake won't occur, nor a train derailment will not occur, or that one or more containers will not rupture and release toxic chemicals into the air and ground, as they are in such poor condition. There is no way you can assume what may or may not happen in the future.	The EA does not assume that all risks are completely gone at the end of 10 years. This clarification will be made in the section defining the scope of the analysis (Section 1.2). The 10-year time frame is for bounding the risk analysis for legacy wastes. However, the risk is anticipated to greatly reduce due to the majority of wastes having been moved or disposed.
3.	General	As you state in your report, your evaluation of an earthquake affects all stored containers. Your idea of a large air crash is also probable. Look at New York. No one expected that to happen, but it did. So don't think it couldn't happen at Paducah or one of your other locations.	Point noted.
4.	General	In the rail transportation route, what assurance will be made to make sure that the general public along the route will be protected from any mishaps or accidents that will or could possible harm the public?	All waste packaging will be done in accordance with applicable DOT and rail requirements. During waste transportation applicable procedures will be followed. These procedures are prepared with attention to the workers, public and the environment and are in place to minimize the possibility of accidents. All workers will be trained in these procedures. Appendix H analyzes the potential risk impacts from waste transportation.
<b><i>Helen Belencan, DOE</i></b>			
1.	General	The authors of this document have incorrectly cited and misinterpreted the Department's Record of Decision for the treatment and disposal of LLW and MLLW. The correct citation for the ROD is " <i>Record of Decision for the Department of Energy's Waste Management Program: Treatment and Disposal of Low-Level Waste and Mixed Low-Level Waste; Amendment of the Record of Decision for the Nevada Test Site, February 25, 2000, 65 Federal Register 10061.</i> "	Citation has been corrected. Misinterpretation will be revisited (see next comment).
2.	General	In the EA, the authors state "DOE has determined to dispose LLW and MLLW at the Hanford Site in Washington state and at the Nevada Test Site ..." Further, Table 1.3, the summary of waste management PEIS RODs, identifies disposal at NTS or Hanford as the decision for LLW disposal. These interpretations are not fully correct.  As noted in Table 1.3 for MLLW disposal, the programmatic decision did not preclude DOE's use of commercial disposal facilities. The same condition holds for LLW. Under the programmatic ROD, LLW from any DOE site may be disposed at Hanford, NTS, or commercial disposal facilities. Table 1.3, LLW disposal, should be corrected. Use of	Agreed. Document text and tables will be modified to provide DOE the maximum flexibility in selecting a disposal facility for wastes.

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		<p>commercial disposal facilities is consistent with DOE's waste management order (O 435.1) and the commercial disposal policy. Additionally, LLW may also continue to be disposed on site at Los Alamos, Savannah River, INEEL, and Oak Ridge. The programmatic ROD does not restrict DOE facilities to disposing of LLW only at Hanford and NTS. The authors of the Paducah EA have unnecessarily restricted the site's flexibility in choosing an off-site disposal facility.</p> <p>To allow Paducah the greatest flexibility in its disposition of LLW, the EA should instead identify off-site disposal, at either of DOE's regional disposal sites (NTS or Hanford) or at a commercial disposal facility. The decision as to which off-site disposal facility should be used should be based upon the characteristics of the waste stream, the waste acceptance criteria of each disposal facility, the schedule requirements, and the full cost of disposal, which includes the disposal fee as well as the costs to characterize, package, and transport the waste.</p>	
<i>Mark Donham, RACE/Heartwood</i>			
1.		<p>We believe that your finding that the enhanced storage alternative was not feasible and was not fully developed was wrong. For one thing, the reason given for rejecting the alternative only applies to about 1/3 of the waste. Even so, we believe that it is possible that an enhanced storage facility alternative could be feasible for that 1/3 of the waste, because the agency is supposed to consider feasible alternatives even if it requires a change in the law.</p>	Your concern is noted and the enhanced storage alternative has been added.
2.		<p>For the agency to conclude that an enhanced storage alternative is so severely outweighed by the shipping and landfilling alternative seems very suspect. For example, if there is an accident the cost of cleanup and liability could be considerable. Is this possibility figured into the cost/benefit analysis? What about long term stewardship? You are proposing to dump these wastes into landfills, but what if, in the future, they leak? You have to admit this is likely. Is long term stewardship dollars included in the cost benefit analysis?</p>	See #1.
3.		<p>Why can't the agency consider building new structures around the existing ones? That way none of the waste would have to be moved, but the containment could be significantly improved, and we could avoid the risks associated with shipping and landfilling. Even new buildings only would require 3 acres, which is an insignificant part of the site. However, these structures would have to consider and design for the significant earthquake risk associated with the Paducah site at the edge of the zone 10 intensity (maximum) of the New Madrid seismic zone.</p>	See #1.

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4.		While we appreciate the fact that DOE is sharing the proposed waste shipping routes with the public, we doubt if the communities along the route have been adequately notified about the volumes and content of the shipments planned through their proposal. For example, some of your shipping routes propose that rail shipments will go to Carbondale, Illinois where the track south across the Mississippi will be accessed south to Texas. This track runs right through the center of Carbondale, and yet, we don't believe that the city officials nor the public have been properly notified. We believe that is probably the rule and not the exception along all the shipping routes. The EA should be reissued for public comment with notices in all of the papers along the shipping routes.	Public involvement for the EA included: <ol style="list-style-type: none"> <li>1) EA availability was published in the Federal Register</li> <li>2) The EA was sent to states through which the wastes would travel. A list of states to which the document was distributed is presented in Appendix B.</li> <li>3) The EA is posted in its entirety on the DOE public web page.</li> <li>4) Public involvement that is tiered under the public involvement performed for the higher-level NEPA documents presented in table 1.2. For example, the Programmatic Waste EIS where a nation wide public involvement process was executed</li> <li>5) Compliance with requirements described in 40 CFR 1506.6</li> </ol>
5.		We wonder what is going to happen to all of the other legacy waste not dealt with in this EA. For example, it has been commonly stated for years that there are approximately 50,000 barrels of legacy waste at the site, and yet this EA only covers approximately 11,000 cubic meters, including the DMSAs (DOE Material Storage Areas) or at least part of it. A cubic meter has to be approximately equivalent to a barrel, and so the waste volumes provided only represent a small percent of the previously identified legacy waste. What is going to happen to the rest?	One cubic meter is equal to 35.3 cubic feet. One 55-gallon drum is equal to 7.4 cubic feet. So there are 4.8 55-gallon drum in one cubic meter. So 11,000 cubic meters will be approximately 52,470 55-gallon containers. Therefore this EA addresses all the legacy waste located at the Paducah Site.

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6.		Finally, the cumulative impact analysis is inadequate. We have told the agency over and over that what is needed is a site wide analysis with public involvement. The agency is doing every sidestep to avoid doing this, when all of the major oversight groups who have looked at the site, including even the GAO, all agree that it should be done. A cumulative impacts analysis during the EA process must consider past, present, and reasonably foreseeable future actions in a cumulative impact analysis. Those impacts must be considered in combination. At the PGDP, there is a variety of activities which are reasonably foreseeable, such as production, groundwater remediation, surface water remediation, construction and reconstruction of landfills, UF6 conversion, metals decontamination and recycling, and other activities. Each of those activities has an environmental impact, and we would like to know what the cumulative impact of all those activities is? DOE's own attorney's argued in court when we sued for the site wide EIS that we should challenge the cumulative impact analysis in an ongoing EA, and this is precisely the vehicle, and we are taking your advice and challenging it.	The cumulative impacts analysis has been revisited and the DOE feels the impacts analysis is in compliance with NEPA requirements.
7.		We also are very concerned about how the site characterizes waste as wither LLW, MLLW, and TRU. We think a full rationale should be articulated in the EA about how DOE makes that determination. It seems to us that wastes that likely should be classified as TRU is being classified as LLW. This needs to be reviewed.	Waste is characterized through the use of physical sampling and process knowledge. Waste types are categorized in accordance with DOE order 435.1 that defines the characterization parameters for each waste type. Sampling to ensure compliance with the Waste Acceptance Criteria (WAC) of the disposal facility is performed before waste shipment.
8.		We favor enhanced storage at the Paducah site, combined with intensive research into ways to stabilize the wastes to facilitate enhanced storage. It will take some real effort to make this an environmentally sound method to deal with this waste, but in the end it deals with the transportation and disposal risks, and improves the status quo. If it doesn't comply with current regulations, which we question, then the agency needs to look at changing regulations. This needs to be considered in the EA.	See #1.
9.		Finally, if you did a proper cumulative impact analysis, we believe that it would be difficult if not impossible to support a FONSI. Of course, we have advocated for a site wide EIS for how many years now? Considering that DOE is now asking for a clean slate and a new cleanup plan overall, don't you think the time is right for the site wide EIS?	Comment noted.
<b><i>John Owsley, Department of Environment and Conservation, DOE Oversight Division</i></b>			
1.	General	The major issues of concern for the state are issues relating to the potential treatment and/or storage of waste from other DOE facilities at the Oak Ridge Reservation.	Concern noted.

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2.	Sect. 1.2, p. 4, para. 4, 4th sent.	This sentence states that “ <i>Some MLLW is proposed for off-site treatment at the TSCA incinerator in Oak Ridge, Tennessee.</i> ” The state will continue to reiterate its position regarding the management of out-of-state wastes that are treated in Oak Ridge, which is that, all the residues from these wastes must be properly disposed or returned to the generator. The document should clearly explain the disposition methods and pathways of residual wastes that result from these wastes that are sent to Oak Ridge for treatment.	Text will be added to state the state’s position. Residual wastes will be dispositioned in accordance with TSCA operating procedures and the Residual Management Plan fort the TSCA incinerator which is shared with the state of KY under the STP..
3.	Table 1.2, p. 5	Additional DOE documents addressing Paducah Site wastes: This table outlines the various documents pertaining to the wastes as well as their proposed actions. The table includes information on transuranic waste (TRU) proposed for staging and for transportation from Oak Ridge National Laboratories (ORNL) for disposal at Waste Isolation Pilot Plant (WIPP). Likewise, in a letter of February 14, 2001, addressed to the manager of DOE’s Carlsbad, New Mexico office, on the subject of Transuranic Waste Shipment Schedules to the Waste Isolation Pilot Plant, we stated “ <i>Oak Ridge is shown as a potential destination for three shipments from Battelle Columbus beginning March 2001. This is not an option. Tennessee will not become an interim radioactive waste storage facility for the DOE complex. As discussed with Oak Ridge Operations Staff, the state will consider treatment and packaging of out-of-state transuranic waste on a case-by-case basis after the Oak Ridge TRU Processing Facility is operational and Oak Ridge Waste is routinely shipped to WIPP.</i> ”  This document should reflect the state’s contention that off-site TRU waste shipments to Tennessee shall be for undelayed treatment and packaging in preparation to WIPP, and furthermore is contingent upon routine ORR TRU waste shipments to WIPP.	A text insertion was made to section 2.1.5.4 to include the state’s position on out of state TRU waste shipment through Oak Ridge in route to WIPP.
<b>Charles &amp; Vicki Jurka</b>			
1.	P K-7, K.1.6, Noise; p 11, 2.1.1	Storage is inconsistent and will be rewritten stating only “existing facilities would be used” and that no new buildings “would be constructed”.	Agreed. Correction will be made.
2.	p. 2, Table 1.1	Paducah EA waste information shows the approximate total volume of TRU waste at 5m-3 while other sections of this EA indicate greater amounts (eg: pg. 11, 2.2.2 On-Site Treatment, “10m-3 of TRU waste”). Page 6, Quantities of Legacy Waste On-site, presented during the April 9, 2002 public meeting, put the quantity of TRU waste at “about 6 cubic meters”. This entire EA should be adjusted to reflect the correct amount of TRU waste at Paducah. Further, any analysis in this EA that was based on incorrect volumes of TRU waste should be recalculated and all pertinent risk re-evaluated.	Agreed. Page 11 was corrected to reflect the 6m <sup>3</sup> of TRU waste presented in Table 1.1. This also makes the volume consistent with the public meeting information. Analysis was confirmed for 6m <sup>3</sup> of TRW waste.

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3.	p. F-15, 5.	“.....during a worst-case accident scenario (earthquake), sufficient PCBs potentially could reach the Ohio River and slightly exceed the toxicological benchmark for aquatic biota.” When modeling this earthquake scenario, what was the <u>source</u> of the PCBs and were the <u>levels</u> of PCB currently in the soil and ground/surface water, at PGDP and surrounding environment, included in the calculations?	Current contamination levels in the soil and water resources was considered in the site baseline conditions. The breach of stored waste containers were the source of the PCB release and these levels were additive to the baseline. Appendix table C-2 presents the baseline concentration numbers as well as the concentrations and volumes of the modeled accidental releases.
4.	p. C.3, C.3.1	“Under the earthquake scenario, it is assumed that 5% of the radioactivity in the liquid waste is released.” Further, Table C.1 shows Pu-239 as one of the radionuclides considered under the 5% assumption. When modeling this earthquake scenario, what was the <u>source</u> of the Pu-239 and were the <u>levels</u> of total Pu, currently in the environment (at and around PGDP), included in the calculations? During the public meeting the response to this question was that the 5% assumption was based on industry standard. Please provide the titles of the documents that present that standard and answer the rest of this question.	Current Pu contamination in the soil and water resources was considered in the site baseline conditions. The breach of stored waste containers are the source of the release under this accident scenario and these levels were additive to the baseline. Appendix table C-1 presents the baseline concentration numbers as well as the concentrations and volumes of the modeled accidental releases.
5.		What is the name of the nitric acid/TRU neutralization process?	The TRU waste treatment process will include sedimentation, pH neutralization, and cementation or solidification.
6.	p. I-4, 4.1.1	Methodology “.....nearest boundry...550m...” Page J-3, Human Health Impacts..., “.....located approximately 520m...”. During the public meeting it was agreed that the distances in this EA would be standardized to reflect the correct distance.	Agreed. Measurement will be confirmed and corrected.

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7.	p. K-3&4	What is the derived concentration guide for Pu-239? What outfall(s) releases the Pu-239 found in Little Bayou Creek? What PGDP operations (EM, USEC, etc.) release effluent to each individual outfall bearing Pu waste?	No reference to Pu239 was found on these pages. The source for the Uranium numbers presented on these pages is the 1998 ASER, pages 4-4 and 4-5. Plutonium concentrations at various surface water locations are presented in the ASER on page 5-3. A map showing the location of the sampling locations is on page 5-2 of the ASER. Although no specific effluent limits for radiological parameters are included in the KPDES permit for the Paducah Site, DOE Order 5400.5 lists derived concentration guides (DCGs), which are concentrations of specific radionuclides that would result in an effective dose equivalent of 100 mrem/year, the maximum allowable annual dose to a member of the public via all exposure pathways from radionuclides from DOE operations (10 CFR 835.100). DOE Order 5400.5 also provides the requirements to keep exposures as low as reasonably achievable (ALARA).
8.	p. F-15, 5	For this earthquake scenario, how many gallons of PCB would need to be released from the site in order to “slightly exceed the toxicological benchmark for aquatic biota”?	The analysis for the biological assessment is the same as for that of the EA (appendix C). The appendix states that for the terrestrial and aquatic resource impact analysis 13,700 gallons (Table C.2) of PCB contaminated liquid (not pure PCBs) were assumed released. The impact analysis is extremely conservative; this analysis is approximately 2 times greater than what would be anticipated in the event of an accident.
9.	p. 23	Threatened and Endangered Species: The scientific name Plethobasus cooperianus is incorrectly spelled throughout this EA as Plethrobasus cooperianus.	Agreed. This was corrected.

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10.	p. 24 4, F-12, F15&16	In the 1990's, populations of the federally endangered <i>Plethobasus cooperianus</i> were found in the lower Ohio River near and below the "Paducah site". The Commonwealth of Kentucky has identified <i>Plethobasus cooperianus</i> habitat at Ohio River mile 940.7 to 943.3 (McCracken County, Ky.) and at Ohio River mile 966.3 to 969.5 (Ballard County, Ky.). The Kentucky State Nature Preserves Commission lists <i>Plethobasus cooperianus</i> and <i>Obovaria retusa</i> as endangered species with Ballard County, Ky., Ohio River habitat. Also, the U.S. EPA, Office of Pesticide Programs, similarly identifies <i>Plethobasus cooperianus</i> Ballard County, Ky., Ohio River habitat. Their literature states "other populations (of <i>Plethobasus cooperianus</i> ) <u>survive</u> in the lower Ohio River between Metropolis and Mound City, Illinois". Others have identified a shoal containing endangered mussels on the Kentucky side of the Ohio River (opposite Mound City, Il.) at Ohio River mile 971.3 to 973.3. The Illinois Department of Natural Resources identified <i>Plethobasus cooperianus</i> Ohio River habitat near Mound City, Il. and near Cairo, Il.. They also cite federally endangered <i>Lampsilis ovata</i> habitat in the Ohio River at Alexander County, Il... Shawnee National Forest (USDA) publications identify federally endangered <i>Lampsilis abrupta</i> , Ohio River habitat, at Massac County, Il. and <i>Plethobasus cooperianus</i> , Ohio River habitat, at Pulaski County, Il.. Additionally, the U.S. Army Corps of Engineers speaks about "two mussel beds containing the "endangered orange-footed pearly mussel ( <i>Plethobasus cooperianus</i> )".. "near Olmsted, Il." (Ohio River) below the Paducah site. The endangered orange-footed pearly mussels in the beds near Olmstead "are suspected to be reproducing, so any adverse effect on this population could <u>threaten the survival of the species.</u> "	The EA looks at the locations in the Ohio River where potential populations of mussels would be most greatly affected, i.e. at the conveyance of Bayou Creek with the Ohio River. The accident analysis found that no or little impact would occur to populations located in the area of the conveyance. Therefore, any subsequent populations located downstream would suffer less impact due to dilution of contaminants in the Ohio River.

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11.	General	<p>After reading this EA we are not satisfied that “qualified biologists” have adequately assessed the “potential impacts” of waste disposition activities and determined how “the proposed project might (may) affect the species” (pg. E-8). 1) In this situation actual calculations, specific to the Paducah site, should be the measure; rather than relying on assumptions based on industry standards that can vary from project to project. 2) Well researched reports regarding the impact of radionuclides and PCBs on mussels are readily available and should be reviewed before determining this projects impact on the endangered mussels below the Paducah site (Ohio River). 3) Particular attention should be given to the future impact of long-term on-site disposal (i.e. landfills).</p>	<p>1) Actual calculations specific to the Paducah site were performed based on the specific Paducah Site waste characteristics. All impact analysis considered available site data from Paducah Site reports. The industry standards were only used in making assumptions as to the potential release of contaminants due to accidents. The standard, which is a 5% release of materials, is a low probability high consequence scenario that binds the analysis within the document. There is no existing data for an actual percentage of container breaches resulting from a significant accident therefore industry standards are acceptable.</p> <p>2) Literature review was performed. The states of Kentucky and Illinois as well as the EPA and FWS were sent copies of the EA for review and comment. As of this date no comments have been received from these agencies.</p> <p>3) No on-site disposal is considered within the proposed action of this document.</p> <p>Biologists’ qualifications are presented in Appendix A.</p>

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<i>National Nuclear Security Administration Nevada Operations Office (NNSA/NV)</i>			
1.	p. 38, Fig. 3.6	<p>This figure is a map showing a proposed waste transportation route through the Las Vegas Valley. This map should show the preferred route identified by the state of Nevada stakeholders that avoids waste transportation through the Las Vegas Valley or over Hoover Dam. The NNSA/NV encourages generators to avoid the Las Vegas Valley and the Hoover Dam Area.</p> <p><u>Recommendation:</u> Please change route to avoid the Las Vegas Valley and/or Hoover Dam Area by showing the following route: Route to Topeka, Kansas, is unchanged from Topeka, Colorado, on I-25 to Cheyenne, Wyoming from Cheyenne, Wyoming, on I-80 to West Wendover, Nevada from West Wendover, Nevada, on US-93 to Ely, Nevada from Ely, Nevada, on US-6 to Tonopah, Nevada from Tonopah, Nevada, on US-95 to Mercury, Nevada</p> <p><b>An alternate route, used during winter conditions, would be:</b> From Paducah, Kentucky, on US-62 to Wickliffe, Kentucky from Wickliffe, Kentucky, on US-62 to the I-57 Interchange near Charleston, Missouri from I-57 Interchange in Missouri to I-55 Interchange in Missouri from I-55 Interchange in Missouri to the I-40 Interchange in West Memphis, Arkansas from I-40 Interchange in West Memphis, Arkansas, to Needles, California from Needles, California on US-95 to Searchlight, Nevada from Searchlight, Nevada, on Nevada State Route-164 to the I-15 Interchange in California from the I-15 Interchange in California to Baker, California from Baker, California, on US-127 to Nevada State Route 373 to Amargosa Valley, Nevada From Amargosa Valley, Nevada, on US-95 to Mercury, Nevada</p>	<p>The route will be changed as defined in the comment to avoid waste being transported through the Las Vegas Valley.</p>

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2.	p. 46, Fig. 3.13	<p>This figure is a map showing a proposed waste rail transportation route through the Las Vegas Valley. State of Nevada stakeholders prefer to avoid rail transportation of radioactive waste through Nevada. The NNSA/NV encourages generators to avoid rail transportation of radioactive waste through Nevada.</p> <p><u>Recommendation:</u> There are companies in Utah that are currently working on intermodal transportation routes. For example, one company stationed in Milford, Utah, would receive rail transported waste at its Utah site, transfer the waste to trucks, and transport the waste to Mercury, Nevada, using the following possible routes:</p> <ol style="list-style-type: none"> <li>1. From Milford, Utah- West on UT-21 (turns to NV-487) to US 6/50 to Ely, Nevada. From Ely, Nevada - Southwest on US-6 to Tonopah, Nevada. From Tonopah, Nevada - South on US-95 to Mercury, Nevada.</li> <li>2. From Milford, Utah - South on UT-257/130 to Cedar City, Utah. From Cedar City, Utah - West on UT-56 (turns to NV-319) to Panaca, Nevada. From Panaca, Nevada - Southwest on US-93 to NV-375 to Warm Springs, Nevada. From Warm Springs, Nevada - West on US-6 to Tonopah, Nevada. From Tonopah, Nevada - South on US-95 to Mercury, Nevada.</li> </ol>	<p>Intermodal options are not fully defined and are too numerous to present in detail. Text has been added to page 13, section 2.1.4, to present the option of intermodal transport as agreed to by DOE, the individual state, and stakeholders.</p>
<b><i>Envirocare of Utah, Inc.</i></b>			
1.		<p>As also noted in comments submitted by Helen Belencan, Mixed Low-Level and Low-Level Waste Program Manager of DOE's Office of Integration and Disposition, EM-22, DOE is not and should not be precluded from using commercial disposal facilities. Therefore, such restrictions should not appear in the Paducah Environmental Assessment nor should they be applied to the disposition of waste from the Paducah Gaseous Diffusion Plant.</p>	<p>Noted. Document text and tables will be modified to provide DOE the maximum flexibility in selecting a disposal facility for wastes.</p>
2.		<p>It is suggested that the Environmental Assessment Waste Disposition Activities at the Paducah Gaseous Diffusion Plant include an evaluation of implementation of the best-value alternative for disposition of wastes, also considering available commercial disposal options.</p>	<p>Agreed. Document text will be modified to provide DOE the maximum flexibility in selecting a disposal facility for wastes.</p>