

Table L-2. DOE Responses to Comments on Draft EIS
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June 29, 1987

STATEMENT BY DR. ZOE G. TSAGOS,
NATURAL RESOURCES CHAIR,
FOR THE LEAGUE OF WOMEN VOTERS OF
NORTHERN BEAUFORT COUNTY,
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON
WASTE MANAGEMENT AT THE SAVANNAH RIVER PLANT

Mr. S. R. Wright
Director, Environmental Division
U.S. Department of Energy
Savannah River Operations Office
P. O. Box A
Aiken, S.C. 29802

Dear Mr. Wright:

The League of Women Voters of Northern Beaufort County thanks the Department of Energy for the work done in the preparation of the Draft Environmental Impact Statement on Waste Management at the Savannah River Plant.

Our specific interest in the waste management changes at the SRP which are now being proposed is on how these would affect the water quality of the Savannah River from which we, living in Beaufort, get our drinking water. However, as residents of South Carolina and located as we are about 100 miles from the SRP, we are also concerned about the broader issues of the impact of the SRP operation upon the environment inclusively.

On the DEIS waste management proposals at SRP we wish to bring to your attention the following points in our position to which we hope you will give serious consideration:

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Comment number	Comments	Responses
1.	<p>We support the <u>Elimination Strategy</u> for the removal of all hazardous, low level radioactive, and mixed wastes at all existing waste sites and for the storage of such wastes for the following reasons:</p>	
N-1	<p>a) In the <u>Combination Strategy</u> advocated by DOE, it is proposed that out of the 168 waste sites (DEIS, 2-11) 77 sites only would be considered for new waste management action, less than 50% of the total number. The program would concentrate on 8 out of the 77 sites for full cleanup operations and the remaining 69 sites would be capped and monitored. (DEIS, S-8, 9, 15)</p>	<p>The 77 sites considered for waste management action are those which contain or may have received hazardous, low-level radioactive, or mixed waste ("criteria wastes") that fall within the scope of this EIS.</p>
N-2	<p>To concentrate on 8 out of 77 out of 168 waste sites consisting of "seepage basins for liquids; disposal pits and waste piles for solids; and solid wastes burial grounds for low-level radioactive wastes" (DEIS, S-1) is to do a very limited cleanup job leaving the 69 areas chosen for capping as potential future waste problems, along with the 91 sites not considered in the proposed new cleanup program.</p>	<p>The exact number of sites to be closed by implementing waste removal and remedial actions will be determined through future regulatory actions. The 91 sites not considered in this EIS for cleanup do not contain the criteria wastes cited in response to comment N-1. See the response to comment C-21.</p>
	<p>b) In considering the <u>Elimination Strategy</u> which we support, the DEIS (S-14) states that "The environmental benefits expected from the implementation of the Elimination strategy include improvement to onsite groundwater and surface-water quality from the removal and closure of all existing waste sites..., reduction of potential public health effects and atmospheric releases (except increased tritium air releases under the evaporation option) and no requirement for dedication of sites at SRP."</p>	

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N-3	<p>Further, the DEIS (S-14) states that the use of the Elimination Strategy, "would result in the lowest future risks to future occupants at the waste sites and contaminated areas following the extensive removal, remedial and closure actions."</p> <p>Two major objections to the Elimination Strategy on the part of DOE as indicated in the DEIS are the cost of the program and the risks involved in carrying it out. Quoting the DEIS this strategy has "The greatest risk of spills, leaks, and fires, and the greatest worker exposures due to waste removal and transportation." (DEIS, S-14)</p>	<p>Cost estimates have been revised in the FEIS. See Appendix E and Chapter 2, new Tables 2-11 and 2-12.</p>
	<p>Both of these are serious problems but not insurmountable. The capital cost of the Elimination Strategy as estimated in the DEIS would be \$12.7 billion (DEIS, S-14) while the Combination Strategy favored by the DOE to clean only 8 sites and to cap 69 others would be an estimated \$0.5 to 2.0 billion. (DEIS, S-15). Separate estimates have been made for maintaining and monitoring the capped and other waste sites.</p>	
	<p>When one considers the amount of waste site cleanup proposed in each of these strategies, the cost difference is not out of line. It is unfortunate, of course, that so many polluted areas were allowed to develop in the years when the management at SRP was "self-regulated."</p>	
	<p>The danger to the workers who will have to excavate the waste sites and to load, move and unload the hazardous, low level radioactive, and mixed wastes will have to be approached with the greatest care. But</p>	

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	<p>surely the Department of Energy which is, after all, part of our Federal government must have access to information about the latest and safest means for protecting the workers.</p> <p>Du Pont, the contracting company at the SRP, with its many years of experience in managing the plant must also be able to find means to provide the greatest possible physical safety for the workers who will be involved in the cleanup as well as measures to take to alleviate the stress and anxiety among them.</p> <p>Because of the above reasoning, we are convinced that the Elimination Strategy is the only acceptable method for waste cleanup at the SRP. As for the magnitude of the estimated capital cost, we consider a complete removal of the dangerous wastes at SRP to be of the highest priority and that money must be found to clean out all the waste sites.</p>	
N-4	<p>2. Our second major concern about the SRP has to do with the increasing number of problems which have developed there besides waste removal. We are convinced that a legally empowered, peer group is needed to maintain an oversight role over the conditions at the plant and the work being done be it waste management or any other operation in a very complex system.</p> <p>We have been drawing the attention of DOE on the need for independent oversight supervision at SRP since 1983. Other organizations and individuals have also stressed such a need. Some have advocated that all plants run by the</p>	<p>See the responses to comments C-153 and E-1 on oversight and peer review.</p>

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Comment number	Comments	Responses
N-5	<p>government and working on nuclear programs should be placed as are commercial nuclear power reactors under the requirements and supervision of the Nuclear Regulatory Commission (See editorial in the Charlotte Observer 4/19/87)</p> <p>Since the fall of 1986 there have been many articles in the press on conditions and events at SRP. Some of the newspapers that we have seen containing such coverages have been The New York Times, The Charlotte Observer, The State, The Columbia Record, The Greenville News, and the Beaufort Gazette.</p> <p>They have covered topics ranging from the General Accounting Office report on pollution at SRP which was found to be at a very high level; to the report on SRP by a representative of Physicians for Social Responsibility who advocates NRC oversight; a panel from the National Academy of Sciences whose report was responsible for the lowering of the power level in the three operating reactors because the cooling systems were inadequate; Senator John Glenn's statement that he would introduce a bill for the creation of an independent oversight group to monitor the SRP operations; the GAO's announcement that there are cracks on the reactor walls at SRP, and a statement by SCDHEC (South Carolina Health and Environmental Control) on the 11 enforcement actions taken against the management of the SRP and the appreciable amount paid in fines for environmental pollution since 1979.</p> <p>We hope that our choice of the Elimination Strategy for waste management at SRP and our stress on the</p>	<p>Cracks have been observed in piping components of C-Reactor only. C-Reactor is now in standby status.</p>

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N-6	need for an oversight group for the operation of the plant will be considered helpful in the decisions that must be made on the contents of a final EIS. Please include this among the DOE statements. Sincerely,	DOE considers all comments from the public in its preparation of the FEIS and its Record of Decision.
	Zoe G. Tsagos for LWNBC	

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Comment number	Comments	Responses
<p>STATEMENT OF RUTH S. THOMAS, PRESIDENT ENVIRONMENTALISTS, INC.</p>		
<p>June 30, 1987</p>		
<p>Mr. S. R. Wright Director, Environmental Division U.S. Department of Energy Savannah River Operations Office Post Office Box A Aiken, South Carolina 29802</p>		
<p>RE: Draft Environmental Impact Statement (DEIS), Waste Management Activities for Ground Water Protection at the Savannah River Plant, April 1987.</p>		
<p>Dear Mr. Wright:</p>		
<p>Enclosed please find Environmentalists, Inc.'s written testimony regarding the above-cited Draft Environmental Impact Statement.</p>		
0-1	<p>In summary, we find the Draft EIS to be remarkably defective in that it reports evidence of contamination but chooses to continue dangerous practices, and it ignores the scientific recommendations of the National Academy of Sciences, the General Accounting Office, and the Environmental Protection Agency.</p>	<p>The purpose of the EIS is to assess the environmental impacts of modifications of waste management activities at the SRP.</p>
0-2	<p>We find its proposed actions, if implemented, to be dangerous to the environment and its inhabitants. Its recommendations disregard the intent of the National Environmental Policy Act (NEPA). We strongly urge a complete reformulation of proposed waste management practices for the Savannah River Plant.</p>	<p>See the response to comment G-2.</p>

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	Please keep us informed of further developments in this matter.	
	Very truly yours,	
	Ruth S. Thomas President	

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	<p>(ENVIRONMENTALISTS, INC.) Written Testimony regarding The Department of Energy's WASTE MANAGEMENT PROPOSALS SAVANNAH RIVER PLANT</p>	
	<p>In its report, <u>Waste Management Activities for Groundwater Protection, Savannah River Plant, Aiken, South Carolina (the Report)</u>, the Department of Energy (DOE) proposes future waste management practices for the Savannah River Plant (SRP) complex of atomic weapons facilities.</p>	
	<p><u>DOE Repeats Mistakes of the Past</u></p>	
	<p>1. DOE proposes to continue using seepage basins despite evidence that this waste management practice has caused contamination both on- and off-site (GAO 1987, GAO 1986a, GAO 1968b, GAO 1984).</p>	
	<p>2. DOE proposes that land burial of wastes continue despite evidence that this practice has also caused contamination (GAO 1987, GAO 1986a, GAO 1986b, GAO 1984).</p>	
0-3	<p>3. DOE will continue using existing above-ground high-level waste storage. The storage of highly radioactive liquid in above-ground tanks has been recognized for decades as an extremely dangerous practice. Sixteen years ago, the GAO recommended that high-level liquid wastes be converted to a retrievable solid (GAO 1987). Several reports document actual leaks which have occurred (GAO 1974, Du Pont 1974). In all, DOE persists in taking a piecemeal approach to decision-making by omitting information from the <u>Report</u>. This conflicts with the objectives of the National Environmental Policy Act (NEPA).</p>	See the response to comment E-4.

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0-4	<p>4. The <u>Report</u> ignores the waste management option of reducing the amount of waste generated at SRP. For example, discontinuing the operation of aging and dangerous nuclear reactors is not discussed, yet these and other SRP facilities produce large quantities of waste when accidents occur. During a November 9, 1970 accident at K-Reactor, 80,000 curies, mostly of antimony 122 and 124, which are gamma ray sources, were released into the Process Room. An additional 39,000 curies of radio-antimony and beryllium remaining in a failed neutron rod were dumped into the Disassembly Basin. A majority of the highly radioactive materials stuck to the charge machine, requiring manual cleanup. Cleanup operations took 3 months and 850 people (Du Pont 1973).</p>	<p>Waste minimization and reduction are discussed in the EIS. Discussions of reactor operations and nuclear accidents are beyond the scope of this EIS. See the response to comment 0-1.</p>
	<p><u>DOE Ignores the Evidence</u></p>	
0-5	<p>1. DOE claims that discharging waste to seepage basins and disposing of wastes in landfills "continue to ensure protection of offsite environment" without providing any evidence to support this claim (the <u>Report</u>, p. S-1).</p>	<p>Ongoing waste management and cleanup activities such as groundwater remedial actions in the M-Area, construction of effluent treatment facilities in the F- and H-Areas, and removal of wastes and soils at the CMP pits are cited in the EIS as examples of environmental protection. See page 1-1.</p>
0-6	<p>2. DOE fails to explain the conflict between this claim and the fact that contamination was caused by both waste disposal practices at SRP. In fact, the <u>Report</u> itself contains information about chemical and nuclear waste migrating into the environment from seepage basins and land disposal sites (the <u>Report</u>, pp. B-5, B-21, B-23, B-25, B-36, B-38, B-39, B-42, B-44, B-46, B-47, B-63, B-74, B-84, B-109, B-111).</p>	<p>Tritium, other radionuclides, and chemicals that are found in surface streams are below standards and guidelines in offsite surface water and groundwater systems and in the atmosphere and vegetation.</p>
0-7	<p>3. DOE also fails to support the claim of adequate environmental protection in the light of the evidence compiled by the U.S. General Accounting Office (GAO) regarding waste operations at SRP</p>	

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	<p>and evidence based on land burial experience at other chemical and nuclear waste sites (GAO 1987, GAO 1986a, GAO 1986b, GAO 1984, OTA 1985, USGS 1982, EPA 1977, EPA 1975).</p> <p style="text-align: center;"><u>DOE Ignores Scientists' Advice</u></p>	
0-8	<p>1. DOE continues to ignore the warnings of earth scientists with the National Academy of Sciences (NAS) who concluded that the SRP site is a dangerous location to have radioactive materials, much less dump them into seepage basins and burial pits (NAS 1957, NAS 1966).</p>	
0-9	<p>2. The <u>Report</u> does not address the fact that the chemical and nuclear waste dumping of the past 35 years has weakened the SRP environment. In a suppressed 1966 report of radioactive waste management at SRP and other Federal facilities, the National Academy of Sciences warned against the choice of "disposal practices (which) are conditioned on over-confidence in the capability of the local environment to contain vast quantities of radionuclides for indefinite periods without danger to the biosphere" (NAS 1966).</p> <p style="text-align: center;"><u>DOE Documentation Inadequate</u></p>	<p>The EIS addresses the fact that past waste management practices are no longer acceptable in terms of recently enacted regulations.</p>
0-10	<p>1. DOE fails to include adequate information regarding waste disposal and storage sites. There are even uncertainties about what is buried at some sites, while other sites are documented only with "limited data," according to the <u>Report</u> itself (the <u>Report</u>, pp. B-18, B-35, B-38, B-39, B-40, B-44, B-60, B-61, B-71, B-73, B-83, B-92, B-93, B-110, B-119, and B-123).</p>	<p>In some analysis cases, data are limited or missing. The data gaps are identified in accordance with 40 CFR 1502.22.</p>
0-11	<p>2. The <u>Report</u> contains very little specific information connecting referenced documents and</p>	

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	<p>their contents with statements in the text. This defect interferes with its being possible to compare the quantity and quality of evidence presented by the DOE with the quality and quantity of evidence supporting an opposing position.</p>	<p>Citations to over 250 supporting documents are presented in the EIS. A master reference list and the referenced documents are available for review in the public reading rooms.</p>
	<p>LITERATURE CITED</p>	
	<p>The <u>Report</u>: Waste Management Activities for Groundwater Protection, Savannah River Plant, Aiken, South Carolina, Draft Environmental Impact Statement. U.S. Department of Energy, April, 1987. DOE/EIS-02100.</p>	
	<p>GAO 1987. Environmental, Safety, and Health Aspects of the Department of Energy's Nuclear Defense Complex. J. Dexter Peach, Assistant Comptroller General. Resources, Community and Economic Development Division, U.S. General Accounting Office. Testimony of March 12, 1987 before the Committee on Governmental Affairs, U.S. Senate. GAO/T-RCE0-87-4.</p>	
	<p>GAO 1986a. Nuclear Energy: Environmental Issues at DOE's Nuclear Defense Facilities. J. Dexter Peach, Assistant Comptroller General. Report to the ranking minority member, Subcommittee on Energy, Nuclear Proliferation, and Government Processes of the Committee on Governmental Affairs, U.S. Senate. September 1986. GAO/RCED-86-192.</p>	
	<p>GAO 1986b. Nuclear Waste: Impact of Savannah River Plant's Radioactive Waste Management Practices. J. Dexter Peach, director. Report to the Honorable Ernest F. Hollings, U.S. Senate. July 1986. GAO/RCED-86-143.</p>	

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Comment number	Comments	Responses
	<p>GAO 1984. Department of Energy Acting to Control Hazardous Wastes At Its Savannah River Nuclear Facilities. J. Dexter Peach, director. Report to the Honorable Ernest F. Hollings, U.S. Senate. November 21, 1984. GAO/RCED-85-23.</p>	
	<p>DOE 1982. Savannah River Plant (SRP) Burial Ground Building 643-G Management Appraisal Report, Appraised June 2-13, 1980. William F. Lawless. U.S. Department of Energy Savannah River Operations Office draft report, 1982.</p>	
	<p>OTA 1985. A Review of EPA's Decision Under the Superfund Program for an Onsite Cleanup of the Lipari Landfill. Prepared for Senator Bradley, Senator Lautenberg, Congressman Hughes and Congressman Florio for review of documents on the onsite cleanup of the Lipari Superfund Site. Staff, Industry, Technology and Employment Program, Office of Technology Assessment, November 5, 1985.</p>	
	<p>USGS 1982. Hydrology of the Low-Level Radioactive Solid Waste Burial Site and Vicinity near Barnwell, South Carolina. James M. Cahill, U.S. Geological Survey. Report No. 82-863. 1982.</p>	
	<p>EPA 1977. Summary Report on the Low-Level Radioactive Waste Burial Site, West Valley, New York. Paul A. Giardina, Michael F. DeBonis and Jeanette Eng, U.S. Environmental Protection Agency, Region II. Issued February 1977, reissued October 1977. EPA-902/4-77-010.</p>	
	<p>EPA 1975. Preliminary Data on the Occurrence of Transuranium Nuclides in the Environment at the Radioactive Waste Burial Site, Maxey Flats, Kentucky. G. Lewis Mayer, Office of Radiation Programs, U.S. Environmental Protection Agency. For presentation at IAEA/ERDA International</p>	

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Comment number	Comments	Responses
	Symposium on Transuranium Nuclides in the Environment, San Francisco, California, November 17-21, 1975. EPA-520/3-75-021.	
	NAS 1957. The Disposal of Radioactive Waste on Land. Report of the Committee on Waste Disposal of the Division of Earth Sciences. National Academy of Sciences--National Research Council, September 1957.	
	NAS 1966. Report of the Committee on Geologic Aspects of Radioactive Waste Disposal. Prepared for the Division of Reactor Development and Technology of the U.S. Atomic Energy Commission (AEC) National Academy of Sciences--National Research Council. May 1966.	
	GAO 1971. Progress and Problems in Programs for Managing High-Level Radioactive Wastes. Report to the Joint Committee on Atomic Energy of the Congress of the United States. Elmer B. Staats, Comptroller General. December 18, 1974. U.S. GAO RED-75-309.	
	Du Pont 1974. Leakage from Waste Tank 16: Amount, Fate and Impact. W. L. Poe, with J. W. Fenimore, J. H. Horton, I. W. Marine, and W. E. Prout. E. I. du Pont de Nemours Co., Savannah River Laboratory, Aiken, S.C. 29801. Document No. DP-1358. November 1974.	
	Du Pont 1973. Source Rod Failure and Subsequent Decontamination. F. B. Longtin, Works Technical Department, Savannah River Plant. E. I. du Pont de Nemours Co., Savannah River Laboratory, Aiken, S.C. Document No. DP-1305. November 1973.	

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Comment number	Comments	Responses
30 June 1987	STATEMENT OF WILLIAM A. LOCHSTET, Ph.D. UNIVERSITY OF PITTSBURGH at JOHNSTOWN	
	Mr. S. R. Wright Director, Environmental Division U.S. Department of Energy Savannah River Operations Office Post Office Box A Aiken, South Carolina 29802	
	Dear Mr. Wright:	
	Enclosed are my comments on the Draft Environmental Impact Statement on Waste Management Activities for Groundwater Protection, Savannah River Plant, Aiken, S.C., DOE/EIS-0120 D. Please note that the opinions presented do not necessarily reflect the position of the University of Pittsburgh.	
	I will be looking forward to your response to these comments.	
	Sincerely,	
	Wm. A. Lochstet, Ph.D.	

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Comment number	Comments	Responses
	<p>Some Comments on Waste Management at SRP by William A. Lochstet University of Pittsburgh at Johnstown* June 1987</p>	
P-1	<p>The Department of Energy (DOE) has prepared a Draft Environmental Impact Statement on Waste Management Activities for Groundwater Protection Savannah River Plant, DOE/EIS-01200 (Ref.1). This document does not consider the high level wastes, or the transuranic (TRU) wastes at SRP (Ref. 1, P 2-38). The document shows the results of calculations which are intended to show the risks of this waste storage. The volumes of the wastes are described in Appendix E at pages 15 and 16, in particular. However, neither the concentrations nor the total waste contained is given. This makes it impossible to perform an independent assessment of the hazard. It is not possible to determine the total radioactivity contained on the wastes considered.</p>	<p>See the response to comment E-4.</p>
P-2	<p>Such secrecy is in violation of the National Environmental Policy Act of 1969 (NEPA). It is particularly distressing that DOE has taken this position when it was specifically asked to address this question in the Scoping Comments prepared by the Energy Research Foundation and NRDC, which appear at page K-5. This comment (A-6) specifically requested DOE to specify the amounts of wastes. Thus the total curie content should have been given.</p>	<p>Appendix E has been revised in the FEIS. Chapters 2 and 4 of the EIS discuss the quantities and characteristics of hazardous, low-level radioactive, and mixed wastes from ongoing and planned SRP operations, wastes in storage, and wastes from remedial and closure actions requiring disposal. A description of all releases and effluents that are currently generated and not related to the protection of groundwater resources is outside the scope of this EIS; however, these releases are discussed in U.S. Department of Energy Savannah River Plant Environmental Reports for 1984, 1985, and 1986 (DPSPU 85-30-1, DPSPU-86-30-1, and DPSPU-87-30-1).</p>

*Affiliation for identification purposes only.

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Comment number	Comments	Responses
P-3	<p>The DOE takes the position that is only necessary to evaluate impacts for the first 1000 years as stated at Ref. 1, P. 4-4. This might be adequate if the radioactivity had half lives which were all much less than 1000 years. Unfortunately, this is not the case, and in particular the impact due to Iodine -129 is greatly underestimated. There is no such legal cut off for NEPA after 1000 or even 10,000 years, so that this analysis is not what NEPA requires.</p> <p>I hope that these issues are addressed in a second draft document which satisfies NEPA.</p>	<p>NEPA requirements for evaluation of impacts relate to the "reasonably foreseeable future." For the purpose of this EIS, DOE considers 1000 years adequate for modeling and risk assessments. 1000 year analyses are sufficient to include the long-term consequences as recommended by NRC and EPA guidelines.</p>

REFERENCE

- 1 Draft Environmental Impact Statement, Waste Management Activities for Groundwater Protection, Savannah River Plant, Aiken, South Carolina DOE/EIS-0120D, Draft, DOE, April 1987.

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June 30, 1987	STATE OF SOUTH CAROLINA OFFICE OF THE GOVERNOR	
	Mr. R. L. Morgan Manager Savannah River Operations Office United States Department of Energy Post Office Box A Aiken, South Carolina 29802	
	Dear Mr. Morgan:	
	The South Carolina Project Notification and Review System has conducted an intergovernmental review on the Draft Environmental Impact Statement "Waste Management Activities for Groundwater Protection at Savannah River Plant, Aiken, South Carolina". The intergovernmental review was conducted in accordance with Presidential Executive Order 12372, "Intergovernmental Review of Federal Programs". The resulting comments from the following agencies are enclosed for your use: South Carolina Department of Health and Environmental Control; South Carolina Department of Archives and History; South Carolina Department of Highways and Public Transportation. These comments represent the only responses received by this office as of this date.	
	The State Application Identifier number for this project is EIS-8705-008. This number should be used in any future correspondence with this office regarding this proposal. The State of South Carolina is appreciative of the opportunity to review this proposed activity, and looks forward to reviewing the Final Environmental Impact Statement	

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	<p data-bbox="470 395 1075 472">upon its completion. If I may answer any questions, or be of further service in any way, please do not hesitate to contact me.</p> <p data-bbox="470 491 600 515">Sincerely,</p> <p data-bbox="470 592 846 663">Danny L. Cromer State Single Point of Contact Intergovernmental Review</p> <p data-bbox="470 687 1100 809">(Comments of the South Carolina Department of Health and Environmental Control furnished by Mr. Cromer were previously received during the public hearings at Aiken, South Carolina, June 4, 1987, and are given as comments F in this Appendix.)</p>	

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	June 25, 1987	
	<p>Mr. R. L. Morgan Manager, Department of Energy Savannah River Operations Office P.O. Box A Aiken, South Carolina 29802</p>	
	<p>Re: Waste Management Activities for Groundwater Protection at Savannah River Plant, Aiken, County DEIS</p>	
	<p>Dear Mr. Morgan:</p>	
	<p>Thank you for sending the Draft EIS for the Savannah River Plant's proposed waste management activities for groundwater protection.</p>	
Q-1	<p>We have previously commented on the "Archaeological Survey for the Plantwide Waste Management/Groundwater Protection of the Savannah River Plant, Barnwell and Aiken Counties". That report dealt with the proposed closing of 82 existing waste sites and six potential locations for new waste management facilities. It was our opinion, after reviewing the report, that the proposed activities would not affect National Register eligible cultural resources. We have enclosed a copy of our October 6, 1986, comments. We note the proposal has not changed; our comments therefore remain unchanged.</p>	<p>The text of the FEIS, Sections 3.1.4 and 4.2.1.6, has been revised to reflect this comment.</p>
	<p>The Federal regulations for the protection of historic properties (36 CFR Part 800) require that the Federal agency official in charge of a</p>	

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	<p data-bbox="485 443 1146 730">federally funded or licensed project consult with the appropriate State Historic Preservation Officer. The regulations do not relieve the Federal agency official of the final responsibility for reaching an opinion of his own as to whether or not historic values have been adequately taken into account in allowing the project to proceed. The opinion of the State Historic Preservation Officer is not definitive, either by law or by established Federal procedure. In reaching a conclusion of his own, the Federal agency official may well wish to consult other experts.</p> <p data-bbox="485 786 1094 855">If you have questions, please contact Ms. Nancy Brock, Environmental Review Specialist, at 803/734-8609.</p> <p data-bbox="485 882 617 903">Sincerely,</p> <p data-bbox="485 954 940 1002">Charles E. Lee State Historic Preservation Officer</p> <p data-bbox="485 1029 583 1050">CEL/vdw</p> <p data-bbox="485 1054 814 1123">cc: Mr. Ron Jernigan Department of Energy Savannah River Plant</p> <p data-bbox="552 1150 842 1198">Dr. Bruce E. Rippeteau State Archaeologist</p> <p data-bbox="552 1225 751 1273">Mr. Glen Hanson SCIAA</p> <p data-bbox="552 1300 800 1342">Mr. Danny Cromer State Clearinghouse</p>	

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June 24, 1987

Mr. Danny Cromer
Office of Governor's State Clearinghouse
1205 Pendleton Street
Room 477
Columbia, South Carolina 29201

Subject: EIS-8705-008 - Aiken County

Dear Mr. Cromer:

The Department has reviewed the subject project and has no comments or objections.

Sincerely,

Noel K. Yobs
Director of Preconstruction

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R-1	<p style="text-align: center;">WRITTEN STATEMENT OF MR. J. LEONARD LEDBETTER, COMMISSIONER GEORGIA DEPARTMENT OF NATURAL RESOURCES</p> <p>July 28, 1987</p> <p>Mr. S. R. Wright, Director Environmental Division U. S. Department of Energy Savannah River Operations Office Post Office Box A Aiken, South Carolina 29802</p> <p>Dear Mr. Wright:</p> <p>The State of Georgia has reviewed the Department of Energy's (DOE) Draft Environmental Impact Statement (DEIS), "Waste Management Activities for Groundwater Protection at Savannah River Plant, Aiken, South Carolina" (DOE/EIS-01200). Our comments have been coordinated with the South Carolina Department of Health and Environmental Control.</p> <p>The major concern of the Georgia Department of Natural Resources is that the wastes and impacts of dealing with buried waste at the Savannah River Plant be kept within the site boundaries.</p> <p>Georgia DNR appreciates this opportunity for comment.</p> <p>Sincerely,</p> <p>J. Leonard Ledbetter Commissioner</p> <p>JLL/jm</p> <p>cc: Mr. R. Lewis Shaw</p>	<p>Discussion of modifications of waste management activities at the SRP and the related environmental impacts are discussed in Chapters 2 and 4 and Appendixes E, F, and G of the EIS.</p>

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Table L-2. DOE Responses to Comments on Draft EIS
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Comment number	Comments	Responses
	<p>WRITTEN STATEMENT OF MR. J. LEONARD LEDBETTER, COMMISSIONER GEORGIA DEPARTMENT OF NATURAL RESOURCES</p>	
	<p>July 28, 1987</p>	
	<p>Mr. R. Lewis Shaw Deputy Commissioner for Environment South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201</p>	
	<p>Dear Lewis:</p>	
	<p>The State of Georgia recently completed review of the Department of Energy's Draft Environmental Impact Statement (DEIS), "Waste Management Activities for Groundwater Protection at Savannah River Plant, Aiken, South Carolina." Comments on this document are attached.</p>	
	<p>Since this major federal facility is located entirely in South Carolina, DNR feels that comments relative to the proposed activities for management of waste should more appropriately come from your office. If you feel the attached comments are appropriate, please forward to Mr. R. S. Wright at the Savannah River Operations Office and provide this Department with a copy.</p>	<p>[DOE responses to these referenced comments follow.]</p>
	<p>Sincerely,</p>	
	<p>J. Leonard Ledbetter Commissioner</p>	
	<p>JLL/jm</p>	

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Comment number	Comments	Responses
<u>COMMENTS</u>		
S-1	<p>(1) The DEIS is very long and technically quite complex. The Table of Contents, itself, is ten pages long. Because of the complexity of the document, extensive use of high quality graphics (mainly maps) is necessary for any reader to be able to understand the document. For example, there are 77 sites where hazardous, mixed, and low level radioactive wastes have been disposed. DOE's maps generally show these sites as points rather than areas, large sites are treated the same as small sites. Moreover, the inter-relationship of the sites to actual contamination is not shown. The locations of monitoring wells are not shown nor can occurrences of contamination be related to ground-water flow direction. In this regard, the following regional maps (all of which should be at a consistent and readable scale) are necessary:</p> <p>(a) A geologic map is needed so that the outcrop distribution of aquifers and confining units can be understood.</p> <p>(b) A topographic map showing all waste disposal sites. The 77 hazardous, mixed, and low-level radioactive waste sites should be separately delineated.</p> <p>(d) A map showing the location of all wells where contamination was detected. Areas of soil contamination also should be shown.</p> <p>(e) A water table map with data points (e.g., wells).</p> <p>(f) Potentiometric maps with data points (e.g., wells) of each confined aquifer.</p>	<p>The incorporation of more detailed maps of waste sites, including detailed topographic and geologic data, is not feasible for an Environmental Impact Statement, nor is it considered necessary. Much of the information requested is available in the figures and tables in Appendixes A and B and in documents referenced in Appendixes A and B. More detailed information will be provided as required in support of site-specific regulatory/permitting activities.</p>

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Comment number	Comments	Responses
S-2	<p>In addition, several cross-section parallel and perpendicular to strike are needed. The cross-sections should show changes in facies so that the inter-relationships between aquifers and confining units are illustrated. In particular, the cross-section should taken into account the known and well documented interfingering and pinch-out characteristics of the Tertiary and Cretaceous strata of the SRP. The above types of maps and cross-sections are generally considered to be standard as part of any ground-water presentation.</p> <p>(2) The ten waste disposal areas containing the 77 disposal sites are in need of consistent maps for the reasons cited above. The existing maps provided in Appendix B are merely geographic and provide little actual hydrogeological data. In this regard, the following maps are needed:</p> <ul style="list-style-type: none"> (a) A topographic map of each waste area showing the actual sites (e.g., not as points, but as areas). (b) A map showing all monitoring wells, with contaminated wells being delineated. (c) A map showing plumes of contaminated ground-water or contaminated soil superimposed on water table or potentiometric maps. Data points (e.g., wells) should be shown. 	See the response to comment S-1.
S-3	<p>(3) Approximately 91% of the wastes are disposed in the Radioactive Waste Burial Grounds. Because these sites dominate both closure and monitoring costs, these areas need special attention and should not be lumped with the other waste sites, some of which are a few</p>	Appendix E and Chapter 2 of the FEIS discuss the effects and costs of the Burial Grounds separated from other existing waste sites.

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Comment number	Comments	Responses
	<p>feet wide and a few feet deep. It would be to DOE's advantage to develop a general ground-water protection plan which would cover the other sites and a separate Radioactive Waste Burial Ground ground-water protection plan which could have its own special closure and monitoring program.</p>	
S-4	<p>(4) In the "combination" strategy, there will be continued releases to the seepage basis, most of which are associated with ground-water contamination. Since the soil and vadose zone beneath the seepage basis are most likely contaminated, these contaminated releases will provide a flux for leachate to continue to enter the ground-water regime. This issue should be addressed in the DEIS.</p>	<p>The only seepage basins proposed for continued use under the Combination strategy are those receiving disassembly basin purge water in the reactor areas. No other "leachate" has been observed from these basins. Corrective/remedial actions as required for existing waste sites are discussed in the EIS under all the waste management action strategies, especially in Section 4.2 and Section F.1.</p>
S-5	<p>(5) The attenuation characteristics of the vadose zone are not fully addressed. Considering that over much of the SRP, the water table is about 30-40 meters below ground-surface, it may be that the bulk of the contamination has not yet reached the water-table. This seems to be suggested by the gross nonvolatile beta concentrations increasing over the last few years in the old Radioactive Waste Burial Ground. This issue should be addressed by the DEIS. Monitoring of the vadoze zone, therefore, should be a part of future monitoring efforts.</p>	<p>The attenuation characteristics of the vadose zone are generally presented in the discussion of the individual waste sites or groupings; generally the vadose zone outcrops to surface streams within the SRP boundaries. Monitoring of this zone is being considered by DOE as a part of the groundwater monitoring program. DOE is performing vadose zone monitoring for volatile organics in the M-Area.</p>

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Comment number	Comments	Responses
	(6) Quality Control of the DEIS is lacking. Some examples are:	
S-6	(a) Figure A-5 - scale is incorrect;	Figure A-5 has been revised in the FEIS.
S-7	(b) Figure A-5 - only three wells shown; potentiometric maps cannot be derived from data.	Figure A-5 was calculated from a three-dimensional groundwater flow model referenced in Appendix H.
S-8	(c) Page B-19 notes that solvents are from sources other than the basin and yet Figure B-4 shows basin to be at ground-water high.	The basin shown originally in Figure B-4 is the Metallurgical Laboratory Basin. The SRL Seepage Basins discussed on page B-19 are located northwest of the Metallurgical Laboratory Basin and are shown on revised Figure B-4. The source of VOCs in the SRL Basins is not definitely known.
S-9	(d) Figure B-4 - data points mentioned but not shown.	Figure B-4 shows the A/M-Area and has been revised.
S-10	(e) Figure A-23 - shows water table in Burial Ground to be about 73 meters; whereas Figure B-7 shows the water table 275 feet (84 m). A difference of 11 meters seems unreasonable.	Both figures have been corrected; there is little or no difference in water table elevations between 1968 and 1982 figures. The 275-foot contour should have read 235 feet or about 72 meters.
S-11	(f) Figure A-14 shows flow lines that cannot be derived from Figure A-10, which is a potentiometric map for the same aquifer.	Figure A-14 has been revised to reflect the comment.
S-12	(g) Terms such as Cretaceous Sediments Aquifer and Tuscaloosa Aquifer are used interchangeably.	An effort has been made in the EIS to use terminology as consistently as possible; however, the differences in geologic and stratigraphic nomenclature are discussed in Section A.1.1.2 and are given tentative correlation in Table A-2. "Black Creek/Middendorf" is also used interchangeably with "Tuscaloosa."

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Comment number	Comments	Responses
S-13	(h) Setbacks on areas of influence around waste disposal sites (e.g., the patterned areas shown on the various Appendix B figures) are arbitrary rather than being based on actual ground-water flow conditions.	The level of detail used to determine the waste disposal site areas of influence are consistent with the scope of the EIS and its purpose and need.
S-14	(i) The ground-water model PATHRAE was developed for low-level radioactive wastes; its significance to transport of solvents and heavy metals is questionable. These latter constituents are not characterized by radioactive decay.	The transport of nonradioactive constituents is accommodated in PATHRAE by assuming an infinite half-life. Direct gamma doses and radioactive decay terms are dropped from the modified code for modeling nonradioactive constituents. Appendix H discusses models.
S-15	(7) The relative effectiveness of the different closure scenarios is based on the ground-water model PATHRAE. The general viability of PATHRAE is based on the work of Looney, et al, 1986 in which predicted concentrations are compared against measured concentrations. Looney, et al, performed this work on behalf of Du Pont, a DOE contractor. In other words, DOE, rather than an independent group, made the determination that the PATHRAE model is appropriate. Also comparison of a transport model such as PATHRAE to a flow model such as MOD3D, is inappropriate. Independent confirmation of PATHRAE to the hydrogeologic conditions of the SRP is needed.	See the responses to other comments on PATHRAE in regard to applicability and representativeness. Revisions have been incorporated in the Summary and Appendix H of the FEIS in response to comments related to the PATHRAE model and its appropriateness.

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Comment number	Comments	Responses
T-1	<p style="text-align: center;">ORAL STATEMENT OF MR. HANS NEUHAUSER, COASTAL DIRECTOR GEORGIA CONSERVANCY</p> <p>I am Hans Neuhauser, Coastal Director of the Georgia Conservancy. The Georgia Conservancy is a state-wide citizens organization, working actively to maintain and improve the quality of Georgia's environment for present and future generations.</p> <p>While the Savannah River Plant physically exists in South Carolina, its operations have effects on Georgia, as well. It is of particular concern to the Georgia Conservancy that when those effects are the result of release of radioactive and hazardous wastes into the air we breathe and into the water we drink.</p> <p>Our concerns over the management or mismanagement of the Savannah River Plant have twice led us to court, once over the issue of the restart of the L-Reactor, where the Department of Energy contended that the restart would have no significant effect on the environment, and here, over the inappropriate handling of hazardous and radioactive wastes.</p> <p>The Georgia Conservancy wants the Savannah River Plant cleaned up, so that contamination of the Savannah River and the principal aquifers that lie underneath the plant are not going to occur. Our preferred strategy is to excavate the waste sites and properly confine the contaminated material. We realize that this strategy will be an expensive one, but the blame for having to pay such a high cost should be squarely laid on the Department of Energy and its predecessor agencies. As we have learned from many other examples, it is far less expensive to control pollution at its source than</p>	<p>The proposed project actions include waste removal at selected sites or all sites, closure of all the sites, and remedial actions as required (See Chapter 2).</p>

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Comment number	Comments	Responses
T-2	<p>to try to clean up the mess after the contaminants have been released into the environment. By not controlling waste at its source, DOE has led us into a very expensive clean-up operation.</p> <p>The Georgia Conservancy wants to see the clean-up job done right, so that our water supplies, both surface and groundwater, will not be at risk. To ensure that the job is done right requires the DOE be supervised every step of the way. The supervision needs to be provided by an independent watchdog group that has, one, the legal authority to force DOE to do the job right if necessary; two, the technical ability to be able to evaluate complicated methodologies and results; three, has the necessary security clearances to deal with nuclear weapons production information; four, has the resources and money and manpower; and, five, has the commitment necessary to ensure both the safety and environment are adequately protected.</p> <p>In our view, the oversight should be provided by the combination of the Environmental Protection Agency and the South Carolina Department of Health and Environmental Control, with the Georgia Environmental Protection Division and public citizens working in an advisory capacity.</p> <p>At this point, we wish to point out three major deficiencies in the draft Environmental Impact Statement, deficiencies that are sufficiently great as to require a rewrite of the draft and not just publication of a final.</p>	<p>See the response to comment C-153 on oversight.</p>
T-3	<p>First, we find that DOE has failed to address waste disposal issues within the regulatory requirements of the Resource Conservation and Recovery Act. The EIS is almost ... almost totally ignores the permitting process of RCRA and the fact that all actions will be subject to EPA and South Carolina</p>	<p>See the response to comment C-1.</p>

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Comment number	Comments	Responses
T-4	<p>Department of Health and Environmental Control review. The EIS overlooks the requirement that corrective action is necessary at all solid waste sites that are releasing hazardous wastes into the environment.</p> <p>Our second criticism relates to the first. Many people and organizations commented on the need to comply with RCRA during the scoping process; we did, but DOE has chosen to ignore these concerns, making a mockery of the scoping process and thereby showing contempt for the entire National Environmental Policy Act process.</p>	See the response to comment C-1.
T-5	<p>Our third criticism relates to the standard of groundwater cleanliness to which DOE will adhere. Instead of inventing standards, such as minimum concentration limits and alternative concentration limits which have no legal or regulatory validity, DOE should use standards appropriate for RCRA sites, which is background level. In other words, sites should be cleaned to a quality equal to surrounding noncontaminated areas.</p>	See the response to comment C-5. EPA has frequently indicated their concerns that cleaning sites to background levels may not be economically or technically feasible.
	<p>These criticisms force us to conclude that DOE still lives in a world of its own, where it adheres to rules of its own making and ignores standards and requirements that are applicable to everyone else. It's about time that this double standard was changed.</p>	
	<p>In conclusion, let me remind the audience, and especially the citizens of Georgia and South Carolina, that corrective action is up to Congress. It will take the Congress to appropriate the money necessary for clean-up and it will take a Congressional action to establish an independent agency to oversee DOE and the Savannah River Plant to make sure that the job is done right.</p>	
	<p>Thank you.</p>	

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Comment number	Comments	Responses
<p>ORAL STATEMENT OF MR. NEIL DULOHERY, VICE-CHAIRMAN STUDENTS FOR ENVIRONMENTAL AWARENESS UNIVERSITY OF GEORGIA</p>		
U-1	<p>We, at Students for Environmental Awareness, are glad to have an opportunity to voice our concerns at this hearing but we are aware that as of now, this is, you know, not a democratic process, unless Congress decides otherwise in the future. So our appeal, now, is directed toward the DOE administrators, who will have control of this matter.</p> <p>When I received the two-volume draft Environmental Impact Statement that was thicker than most of my college texts that take about three months to read, I was a little intimidated, but it did not take long to find some damning evidence. In fact, the first bad news comes in the cover letter that comes along with the Environmental Impact Statement that tell us that South Carolina groundwater is contaminated with volatile organic compounds, heavy metals, radionuclides and other chemicals. I wasn't really sure of that fact before hav- ... you know, before receiving the Environmental Impact Statement, but the fact that the groundwater is contaminated at all ... at all is a bad sign. An abundant amount of data in the Environment Impact Statement goes on to identify the seepage basins as the ... as the main source of groundwater contamination and I have spoken with a former plant engineer, Bill Lawless, who I'm sure you may have heard from in the past, who tells me that the seepage basins are undoubtedly the main source of groundwater contaminants and the Environment Impact Statement itself tells us that a tritium plume is present in groundwater at all active reactor seepage basins. Some of the amounts of chemicals released to the basins are ... are staggering. Over a period of years, forty thousand liters --</p>	<p>Chapters 2 and 4 and Appendix F discuss remedial and closure actions at hazardous, low-level radioactive, and mixed waste sites. Appendix B characterizes each of the waste sites considered. Chapters 2 and 4 and Appendix G discuss new disposal facility alternatives for hazardous, low-level radioactive, and mixed waste, including waste removal and remedial and closure actions at existing waste sites. Chapters 2 and 4 discuss alternatives to the continued use of seepage basins for the discharge of disassembly-basin purge water from C-, K-, and P-Reactors.</p>

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Comment number	Comments	Responses
	<p>and this is from the Environment Impact Statement -- forty thousand liters of sixty-five percent nitric acid were released to one basin, and over a period of years, about nine hundred thousand kilograms of volatile organic solvents were released to another, and that's out of a long list of many compounds and radionuclides released to many seepage basins at the Savannah River Plant. So it's no mystery that the groundwater is contaminated.</p>	
U-2	<p>Surface streams are contaminated also, as this Environmental Impact Statement points out. In the 1984 Environmental Impact Statement concerning the L-Reactor revealed a surface outcropping of strontium 90 in Four Mile Creek that, I believe, measured three hundred and forty thousand picocuries per liter, which is forty-two thousand times the Environmental Protection Agency's drinking water standard and eleven hundred times the Department of Energy's own guidelines, which also points out the ... the great disparity between the Environmental Protection Agency's standards and the Department of Energy's standards.</p>	<p>EPA drinking-water standards are applicable at the public drinking water treatment plant and at the point of use, not in the surface stream.</p>
U-3	<p>And, of course, wildlife has ... excuse me, wildlife has access to the streams and seepage basins and has become contaminated, also. Turtles contaminated with up to one thousand times background of strontium 90 have been found off of the Savannah River Plant grounds. That's certainly an odd way for radionuclides to migrate away from the Savannah River Plant area.</p>	<p>The Operating Contractor has developed a program for management of contaminated wildlife at the Savannah River Plant, which identifies and monitors potential human exposure pathways to wildlife contaminated by hazardous and radioactive substances. The locations, contaminants, and descriptions of those areas of potential contamination are contained in various reports (DPSP-83-1008, DPSP-84-1054, DPSPS-84-1051, DPSPU-84-302, DPSPU-85-30-1, DPSPU-86-30-1, and DPSPU-87-30-1).</p>

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Comment number	Comments	Responses
U-4	<p>There are other problems, as well. In 1982, the Savannah River Plant gathered data on strontium 90 concentrations in milk near the Savannah River Plant, and again, I'd have to credit Mr. Lawless, since he pointed this out in these scoping comments. And that data showed that along certain wind paths, strontium 90 concentrations approached and in one case exceeded the EPA drinking water standard, and most measurements were well above the Southeastern average attributed to atmospheric nuclear test fallout from several decades ago.</p> <p>The Savannah River Plant is responsible for contamination on and off DOE property. I would like to briefly mention some problems experienced at other DOE facilities similar to the Savannah River Plant.</p>	<p>Chapter 4 of the EIS assesses the environmental consequences of the proposed modifications to waste management activities at the SRP, including impacts to aquatic and terrestrial biota and potential health effects from radiological releases that take into account known pathways of exposure.</p>
U-5	<p>At the Hanford facility in Washington, roughly twelve million cubic meters of soil are contaminated with various wastes. There are also or ... excuse me, there also, a hundred and forty-nine high-level waste storage tanks have failed and now cannot be drained safely. At the Oak Ridge facility, in 1983, the largest mercury spill in U.S. history was discovered, having occurred over a period of years. These failures and the ones at the Savannah River Plant point to one fact that has been repeated at this hearing, before I got here apparently -- self-regulation does not work.</p>	<p>Discussion of other DOE facilities such as Hanford and Oak Ridge is beyond the scope of this EIS.</p>
U-6	<p>In 1973, the Atomic Energy Commission, which then ran the Savannah River Plant, recommended in its guidelines that seepage basins be phased out. Well, eleven years later that guideline was rewritten, a rewrite that, incidentally, accommodated the failed storage tank problem at Hanford, put no limits on air emissions and allowed</p>	<p>Chapter 6 discusses the applicable Federal and State regulatory requirements for the proposed modification of waste management activities at the SRP, including the requirements of the Resource Conservation and Recovery Act, as amended, and DOE Orders.</p>

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Comment number	Comments	Responses
U-7	<p>the continued use of cardboard containers to store low-level wastes. One year later, in 1985, a new seepage basin was opened to serve the L-Reactor at the Savannah River Plant. Failed self-regulation may also be responsible for the fact that, if I'm not mistaken here, and I wasn't sure, one of your reactors is in mothballs right now, another one is shut down and a third is having some operating problems and ... of your six reactors, three are operating at less than fifty percent capacity. Is that an accurate assessment, I guess?</p>	<p>There are five production reactors at the SRP: C, K, L, P, and R. R-Reactor has been out of service since 1964; C-Reactor is in standby status; K-, L-, and P-Reactors are operating.</p>
U-7	<p>The basic idea is that there are lot of operations problems out there that I think may be not environmental concerns but strictly operational problems that have resulted from self-regulation ... failed self-regulation. And with that kind of record of operational difficulty, I would think that the Department of Energy might even invite regulation.</p>	
U-8	<p>Returning to reality, I compliment the Department of Energy for an excellent job of problem identification. The groundwater and soils are indeed contaminated and the seepage basins are the main source of contamination. It appears to me, however, that you have chosen a waste management strategy that will allow the seepage basins to remain intact and be expanded. The Environmental Impact Statement tell us that under the Department of Energy's preferred strategy, existing ground and surface water effects associated with the seepage basins will continue, whereas, under the elimination strategy, paired with the implementation of evaporation facilities, the effects on ground and surface water would be eliminated. Students for Environmental Awareness, then, rejects the combination strategy outright.</p>	<p>Seepage basins will be closed except for reactor seepage basins which receive periodic purges from reactor disassembly basins.</p>

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Comment number	Comments	Responses
U-9	We must insist that the elimination strategy is the only acceptable one. Furthermore, we would insist that the relatively inexpensive evaporation facilities, to replace seepage basins, be considered in connection with any strategy to be implemented out there, not just the elimination strategy, and I didn't understand why the evaporation facilities were grouped under that one strategy alone.	DOE's preferred waste management strategy will be formalized in the Record of Decision on this EIS. The evaporation or direct discharge actions under the Elimination strategy are intended to eliminate the use of reactor seepage basins for the discharge of disassembly basin purge water and are appropriate under the Elimination strategy.
U-10	The Savannah River Plant is a disgrace to this nation right now. If we are to buy nuclear weapons, or anything else for that matter, they cannot be discounted at the expense of our vital natural resources, soil, water and air. The U.S. Government, through the Department of Energy, has shown little respect for its citizens or nature itself. The Savannah River Plant is, in my opinion, an ugly sore on this otherwise beautiful nation, known for its national parks and well-managed natural resources.	The SRP is a National Environmental Research Park. Over 90 percent of the SRP is forested.
U-11	We must insist, as well, that Savannah River Plant at least be comparable to commercial reactors in terms of safety. We must insist that all use of natural soil columns for waste filtration be eliminated. This twelve billion dollar problem will not go away if you chose the wrong strategy. The combination strategy is not fiscally sound. Under the Department of Energy's preferred strategy, that twelve billion dollar bill will only get bigger as more wastes accumulate. Running a dirty operation like the Savannah River Plant is like running up a debt on one of these twenty percent interest charge cards. It's always cheaper to pay as you go in waste management than it is to defer clean up until later.	The cost for the alternative waste management strategies are preliminary costs and are used for comparative purposes only.
U-12	Now is the time to pay that inevitable bill, as honorably as is possible, and to look to the future with a clean slate. I sincerely hope that as a result of this hearing that the so-called	The final decision on the choice of alternative waste management strategies will be made in DOE's Record of Decision.

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Comment number	Comments	Responses
	<p>combination strategy will be abandoned in favor of the only acceptable one, the elimination strategy, that evaporation facilities will be constructed to replace seepage basins, and that no new reactor be built until clean-up is completed.</p>	
	<p>Thank you.</p>	

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Comment number	Comments	Responses
<p>ADDITIONAL STATEMENT OF MR. NEIL DULOHERY STUDENTS FOR ENVIRONMENTAL AWARENESS UNIVERSITY OF GEORGIA</p>		
	<p>Instead of repeating my earlier statement, I have a couple of copies of it, I can make it available to anybody that'd like to look at it, I'm just going to try to review some of the main points and elaborate a little bit.</p>	
U-13	<p>The first thing I'd like to do is stand corrected on the number of reactors at the Savannah River Plant; there are five, not six, so the one fact that I tried to recall from memory I was in error on, but the point, still, with the reactors was just that ... with ... with ... with the five of them, I believe one is ... is not ... is in mothballs now, not operating at all, another one is having some difficulties with cracks near the reactor core or something to that effect and the other three are operating at less than fifty percent capacity. Any my contention was that self-regulation, just operation of the reactors under self-regulation might have brought that situation about and with the apparent increased demand and desire from more production with the ... the talk of a new reactor, that might not be necessary if the other ones had been built and operated adequately.</p>	See the response to comment U-6.
U-14	<p>I'd also like to respond to the notion that worker safety might be threatened under the elimination strategy that I prefer, and that being one of the reasons that the Department of Energy would not like to adopt that strategy. I'm familiar with how the EPA handles toxic waste clean-up, and their workers are exposed to toxic waste continuously.</p>	<p>The occupational risk at the low-level radioactive waste burial ground to workers under the Elimination strategy is stated to be the highest of the three action strategies. Proper protective clothing, shielding, air supplies, and other equipment will be provided to workers involved in</p>

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Comment number	Comments	Responses
	<p>In this process, the same people go from site and clean up and they do have techniques and ... and equipment that does adequately protect them and there's no reason why that ... those ... that equipment and those techniques couldn't be applied toward the, at least, nonradioactive wastes or some of the nonradioactive basin wastes out at the Savannah River Plant.</p>	<p>radioactive and nonradioactive waste removal activities.</p>
U-15	<p>And as far as the radioactive wastes, I don't doubt but that the potential for, you know, an accident with a worker might be there in the elimination strategy, with them trying to excavate the wastes, but ... and I'm not ... and I'm not familiar with the technicalities of protective gear and so forth for removing radioactive wastes or protecting persons from radioactivity during a clean-up operation involving radioactive waste, but I suspect that equipment is available. I intuitively suspect that equipment is available and that ... that ... that's possible. So at least on the fact that I know that for nonradioactive waste, equipment is available to protect workers, I think that contention is invalid.</p> <p>And I'd just to ... you know, to stress again, and you ... and you've already said it here, the groundwater is contaminated and ... and that might to start sound no so bad after a while, but it really is. It's pretty hard to remove waste and ... and radionuclides from groundwater when it becomes diffuse; it's a ... it's a bad problem. And I'd like to stress, also, that seepage basins are the main source of contamination.</p>	<p>See the response to comment U-14.</p>
U-16	<p>And it's beyond me that the Department of Energy would propose to continue operating seepage basins with that knowledge. I would hardly call that a corrective measure. You know, Mr. Wisenbaker's description of the elimination strategy sounded</p>	<p>See the response to comment U-8.</p>

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Comment number	Comments	Responses
U-17	<p>very nice, sounded like the thing was going to be cleaned up, but the Environmental Impact Statement tells us otherwise; it tells us that effects associated with seepage basin operation will continue unless tritium mitigation measures are implemented and then that particular element of waste being sent to the seepage basins would be mitigated somewhat, but that's no guarantee. What the strategy tells us, that tritium mitigation measures might be considered in the future. Well, since the ... the Atomic Energy Commission recommended that seepage basins be eliminated outright in 1973, the fact that the Department of Energy promises to consider tritium mitigation measures really doesn't give me a whole lot of confidence.</p>	<p>Section 4.8 of the EIS discusses other tritium mitigation measures.</p>
U-18	<p>The use of these industrial cesspools just has to stop. The list of compounds and radionuclides going to the seepage basins is ridiculous. Again, the fact of the matter is that discharge will continue under your preferred strategy and I just don't see that as being any kind of correct manner ... measure at all.</p>	<p>See the response to comment E-81.</p>
	<p>I also heard earlier today, after the morning hearing, I heard one of your representatives say to a press person that he wished ... he wished that the ... the public could get a better story from the Savannah River Plant more often or a more accurate story, but I'll tell you, I wasn't really too concerned about this issue until I happened to ... to luck up and see Bill Lawless speaking at the University of Georgia, a former plant engineer, who told me how bad the situation was, and I ... you know, the press accounts that I've read ... to respond to that, the press accounts that I've read in the news press, I haven't seen anything technically inaccurate in them and I think they've given adequate response time for the ... for the Department of Energy.</p>	

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Comment number	Comments	Responses
U-19	<p>I'd also like to make the point that this is, indeed, a financial issue and a financial consideration, but in my opinion, the elimination strategy is, in the long run, the cheapest one, as well as the safest one in the long run, as you pointed out ... or Mr. Wisenbaker pointed out. The ... it's only going to get more expensive. You've got a twelve billion dollar problem now, you're proposing to continue discharge to the seepage basins, those wastes are going to continue to build up and contrary to the ... contrary to the idea that ... that the wastes have been greatly mitigated already, that it's mu- ... a much better ... a much cleaner discharge than it once was, that ... that's not the impression that I ... that I got from the Environmental Impact Statement.</p>	<p>The Elimination strategy has the highest total capital and operating costs and occupational risks of all the alternative waste management strategies (Tables 2-11 and 2-12). The costs are preliminary and subject to revision.</p>
U-20	<p>And I'd like to clarify something I said earlier, that the Savannah River Plant should be comparable in terms of safety to commercial reactors; by that I didn't mean worker safety, and I've been informed and would suspect that they ... that y'all have pretty good worker safety record out there, but I meant that it should be comparable ... its guidelines should be comparable, the Department of Energy guidelines should be comparable to NRC regulations, for instance. If we're not going to have outside regulations, unless you see something deficient in the Nuclear Regulatory Commission guidelines, I think you should, basically, copy them. And so, in terms of potential safety problems for the public, I think the Savannah River Plant should be comparable to commercial facilities.</p> <p>And just another rather dramatic incident that occurred, and tell me if I'm approaching ten minutes, another dramatic incident that occurred at the Hanford facility and could potentially occur at the Savannah River Plant, but is an example of what</p>	<p>DOE standards are comparable to NRC regulations for commercial reactors (10 CFR 20).</p> <p>DOE-owned, contractor-operated facilities, such as the Savannah River plant, are excluded from NRC licensing requirements under Section 110(a) of the Atomic Energy Act as amended. DOE is therefore responsible for protecting the safety and health of the public and the environment from the effects of activities at DOE nuclear facilities.</p> <p>The need for specific engineered safety features for nuclear reactors varies according to the design and operating differences that exist between different types of reactors. Commercial light-water nuclear reactors, for example, have coolant conditions that are at high-pressure (over 2000 pounds per square inch) and high</p>

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Comment number	Comments	Responses
U-21	<p>can go on in an unregulated facility, a near criticality of plutonium occurred in a seepage basin out there and they actually had to go in and mine it out because they had an in- ... or y'all had an increase in reactivity because of the concentration of plutonium. This is not something you'd find happening at a commercial facility; in fact, at a commercial facility, I think some ... some of your folks would probably wind up in jail if they went out and found ... found these kind of things happening.</p> <p>I think that covers it, just basically, that ... basically, that it's ... it's, I think, fis- ... the decision that y'all want to make, going with the combination strategy, is both fiscally a bad decision and morally a bad decision. The contention is that y'all want to keep dumping waste into these pits that are going to leak right back down into the groundwater and wastes are going to continue to accumulate and I'm opposed to that.</p>	<p>temperatures (greater than 500°F). SRP reactors operate at much lower temperatures and pressures (212°F and 5 psi).</p> <p>See the response to comment U-8.</p>

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Comment number	Comments	Responses
	<p>ORAL STATEMENT OF MR. KEN MATTHEWS, CHAIRMAN SAVANNAH AREA CHAMBER OF COMMERCE'S NATURAL RESOURCES AND ENVIRONMENT COMMITTEE</p>	
	<p>I'm Ken Matthews, I'm the Comptroller for Chatham Steel Corporation here in town, I'm also the Chairman of the Savannah Area Chamber of Commerce's Natural Resources and Environment Committee. On behalf of the chamber, I want to thank you for the opportunity to express the concern of the chamber membership regarding the operations of the Savannah River Plant. The prospect of modification of the waste management activities for hazardous low-level radioactive and mixed wastes at SRP, indeed provides an opportunity for discussion of increased protection of human health and the environment in areas potentially affected by SRP.</p>	
	<p>Each year since 1983, the Chamber has selected as one of its national legislative priorities, support for independent evaluation of the operations and cumulative impact of nuclear developments, both present and in the future, at the Savannah River Plant. This is an example of one of our publications where we have advocated that since 1983.</p>	
	<p>NOTE: Mr. Matthews refers to publication.</p>	
V-1	<p>Suggestions have included the establishment of an independent Federal/state citizen oversight group, as well as oversight by the Nuclear Regulatory Commission.</p>	<p>See the response to comment C-153 on oversight.</p>
V-2	<p>Whatever the oversight mechanism, and that needs to be determined by the Congress, the nation's weapons facilities must be subject to regulation, at least as stringent as those required by the private sector, by the Federal Resources Recov- ... Conservation and Recovery Act. This is the message that we've been conveying to our congressmen and</p>	<p>DOE's commitment to comply with RCRA and other regulations is stated on page 1-2.</p>

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Comment number	Comments	Responses
V-3	<p>our senators in Washington since '83 and the chamber priority ... this chamber priority, the independent oversight, certainly applies to the subject at hand today, waste management activities at the Savannah River Plant, inadequate safeguards in the management of waste at SRP and the health hazards for the health and safety of citizens who live and work in the areas fed by the aquifers which lie beneath the plant and by the Savannah River.</p> <p>Outside technical oversight removes any doubt that the Savannah River Plant is operating in an environmentally unsound measure ... manner. We believe that the protection of the groundwater, as well as the surface water, is essential. The Savannah River Plant should be operated without any adverse effect on those important resources and the contamination of groundwater was, certainly avoidable and is very unfortunate.</p> <p>The measures for operation, waste management and environmental protection require, clearly, complex technical and subjective conclusions. Therefore, we again call for a highly competent and fully independent oversight group for groundwater protection, as well as all other aspects of the plant operations at the Savannah River Plant.</p> <p>Thank you.</p>	See the response to comment V-1.

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Comment number	Comments	Responses
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ORAL STATEMENT OF
AMY ESTELLE

Although I represent myself, Amy Estelle, I also offer my statement in the name of Jane Doe, as representative of thousands of others who are so full of despair and hopelessness living in this nuclear age that they have temporarily chosen not to speak at this hearing. As a teacher, I've brought with me a classroom model of the earth, commonly called a globe. I would like to bring to the attention of this panel our location in time and space and who we, the people in this room, are.

In time, we are about halfway through the predicted lifetime of the star we call the sun, roughly, five billion years old; we are about three billion years into the evolution of life on the planet earth; we are a scant approximate three millions years into the evolution of our own species, Homo sapiens; and 1987 marks the two hundredth anniversary of the Constitution of this nation. Also, it marks just over forty years of our entry into the nuclear age.

In space, we are on the banks of the Savannah River, a river called Eisondega, the Blue Water, by the Indians called the Guales who lived here before us. We are within a one hundred mile radius of the Savannah River Plant, bordering Georgia and South Carolina; we are situated in a country, the United States, on the edge of the continent, North America, also within about twenty miles of the edge of one of the great oceans of this planet, the Atlantic.

Who are we? We are a handful of human citizens in a nation of about two hundred and thirty million, we are part of the global human family of over five thousand million or five billion, we are all members of one species, the dominant species on

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Comment number	Comments	Responses
	<p>this plant, one of only millions of species on the earth.</p>	
	<p>With that preface, I would like to say that the question before the citizens in this room is not, "Should DOE take certain actions to protect the groundwater, the environment, the human and animal environment from radioactive and chemical hazardous waste at Savannah River Plant?" I believe the question that should be asked in this room is, "Should the Savannah River Plant be operating, period?"</p>	
W-1	<p>When I look at the alternatives presented before us, I find them inadequate, irrational, absurd and immoral. The only way to absolutely safeguard present and future generations, much less the groundwater, from the dangers of all radioactive chemical and hazardous wastes is to eliminate the production of these wastes. I repeat, the only to adequately safeguard present and future generations or the groundwater from the dangers of all radioactive and chemical wastes, especially hazardous wastes at SRP, is to stop the production of these wastes.</p>	<p>Under the Atomic Energy Act of 1954, the Department of Energy is responsible for developing and maintaining the capability to produce all nuclear materials required for the U.S. weapons program. In accordance with the Atomic Energy Act, approval of proposals for defense nuclear materials by the President and subsequent authorization and appropriation by Congress constitute the legal authority and mandate for the Department of Energy to provide the required defense nuclear materials.</p> <p>The national policy on nuclear weapons, their deployment, and the need for weapons is beyond the scope of this EIS.</p>
W-2	<p>You may now be wondering, "Who is this strange, simple-minded person who wandered into this room? This is hearsay, everyone knows we need the Savannah River Plant to produce plutonium and tritium for national security reasons." To that, men and women, I say, "hogwash." The real question is, "Should DOE at SRP and Hanford, Washington, continue to produce fissionable material and its by-product, hazardous radioactive and chemical wastes?" My response is a resounding, "No."</p>	<p>See the response to comment W-1.</p>
W-3	<p>A few reasons, besides the safety factors already alluded to by other speakers. It is ridiculous to continue the production of these materials to be</p>	<p>See the response to comment W-1.</p>

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Comment number	Comments	Responses
	<p>used in the production of thermonuclear weapons when we already have a global arsenal of over fifty thousand nuclear weapons. The debate over this question, "Who has the most?" and "Who has the most sophisticated delivery system?" is absurd. Once you're dead, you're dead. There's bumper sticker seen in Savannah that says, "One nuclear bomb can ruin your whole day." Savannah River Plant has been described as the nuclear bomb that has already been dropped by us on ourselves. A similar bumper sticker might read, "One Trident submarine can destroy the whole human population of the six hundred largest cities in the Northern Hemisphere," and our nation proposes to build twenty such submarines.</p>	
	<p>Besides being ridiculous and absurd, I think the production of the nuclear materials at SRP is also illegal, a violation of the Nuremberg Principles signed by this country, which prohibits the preparations for genocide. Since the use of nuclear weapons, as evidenced in Nagasaki and Hiroshima, Japan, is evidence of genocide, mass death of the civilian population, I believe that it is illegal for us to continue the production of these weapons.</p>	
	<p>Third, immoral, for the reasons I stated above and also the fact that we are talking about mass destruction, mass death for civilians.</p>	
	<p>You may be wondering, "Well, if we're going to make these weapons, we're making them so no one can use them." Well, if we're making them because we'll never use them, why are we making them? Why are we allocating billions of dollars to build and produce weapons that can never be used? By whose authority does the government of this nation, the people of this room, the members of DOE, the members of Congress and Senate, the members of the Executive</p>	

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Comment number	Comments	Responses
W-4	<p>Branch make the decision, not only to produce the weapons, but also to leave the waste for countless generations of humans and other species?</p> <p>Let us talk about economics. I recently had a personal conversation with an engineer at Savannah River Plant and she said to me, "I took this job, Amy, because it was the best job in town; in fact, it was the only job in town." The economic violence done by the misappropriation of our federal dollars, at the tone of sixty-four cents out of every one hundred cents we pay to the Department of Defense, better called, the Department of War, to finance past wars in the form of eighty percent of the federal deficit and current preparations for war.</p> <p>Let's talk about economic violence, perpetuated by Congress, Senate, Executive Branch, by the military industrial complex, by companies like Boeing, Lockheed, Grumman, General Electric, General Dynamics, TRW, Du Pont, Morton Thiokol, the list goes on and on. Let's talk about the woman and children who are living in poverty in this nation. Let's talk about economic violence, the feminization of poverty, with thirty-eight percent of all families, and there are over twenty million of them in this country, living on less than \$10,699 a year for a family of four, thirty-eight percent of those families headed by single women. Let's talk about economic violence, where women are free in this nation to earn sixty-two cents to every one hundred cents that men make. Let's talk about economics, let's talk about the economic exploitation of North Americans . . . North American Indians, especially in their homelands in the American Southwest, where uranium has been mined, the tailings have been left on the ground to blow in the wind, even used by the Bureau of Indian</p>	<p>The purpose of this EIS is to assess the environmental impacts of the proposed implementation of modified waste management activities for hazardous, low-level radioactive, and mixed wastes at the SRP.</p>

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Comment number	Comments	Responses
W-5	<p>Affairs to build schools on reservations. Let's talk about the economic violence and exploitation of South African miners in uranium mines there.</p> <p>The economic violence perpetuated in our local communities in rural South Carolina and Georgia, where people with the least opportunities for adequate education to give informed consent to the operation of Savannah River Plant are abused.</p> <p>In summary, I would again point out that the wrong question is being asked by the Department of Energy here. What we need the Department of Energy to do is to call a national referendum, not how to protect the groundwater at SRP but should SRP and its sister plant --- although I hate to use that word, sister, referring to it; strike that, please -- and Hanford, Washington Plant, continue to produce plutonium and tritium? Do we, the people of this nation, want it?</p>	See the response to comment W-1.

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Comment number	Comments	Responses
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ORAL STATEMENT OF

MR. DERBY WATERS, DISTRICT DIRECTOR
FOR U.S. REPRESENTATIVE LINDSAY THOMAS

Mr. Waters read the letter prepared by U.S. Rep.
Lindsay Thomas - Shown in this Appendix as comments
A.

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Comment number	Comments	Responses
	<p>ORAL STATEMENT OF MS. TERESA MILLER, EXECUTIVE VICE PRESIDENT OF CONTAMINATION CONTROL SERVICE, INC.</p>	
	<p>Ms. Miller's statement is presented as comment B of this appendix.</p>	

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PRELIMINARY

ORAL STATEMENT OF
MR. JIMMY CHANDLER, REPRESENTING
ENERGY RESEARCH FOUNDATION AND
NATURAL RESOURCES DEFENSE COUNCIL

Mr. Chandler's statement is presented as comment C
in this Appendix.

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Comment number	Comments	Responses
	ORAL STATEMENT OF MR. JAMES E. BEARD, GREENPEACE	
	Mr. Beard's statement is presented in comment D in this Appendix.	