

NEPA

To: Drew Grainger/DOE/Srs@srs, L Ling/DOE/Srs@Srs
cc:
Subject: additional comment for seis

05/07/01 12:34 PM

----- Forwarded by NEPA/WSRC/Srs on 05/07/01 12:38 PM -----



bill lawless
<lawlessw@mail.pai
ne.edu>

To: nepa@mailhub.srs.gov
cc:
Subject: additional comment for seis

05/01/01 12:07 PM
Please respond to
lawlessw

Mr. Grainger, please find attached an additional comment for the draft
SEIS, thanks, bill lawless


lawless.new.seis.comment

Andrew R. Grainger, NEPA Compliance Officer
U. S. Department of Energy
Savannah River Operations Office
Building 742A, Room 183
Aiken, South Carolina 29802

Subject: Comments on the March 2001 Savannah River Site Salt Processing
Alternatives Draft Supplemental Environmental Impact Statement
(DOE/EIS-0082-S2D)

Dear Mr. Grainger:

Subject: Additional comment on the draft salt processing SEIS:

After consideration of the no-action alternative which would require SRS to build new tanks as needed in the event that no decision on the salt processing alternatives occurs, or in the event that a decision is rendered but no funding or inadequate funding occurs, in my opinion, the likely possibility of this set of circumstances renders the no-action alternative currently in the SEIS unrealistic for the following reasons:

1. DHEC is on record on more than one occasion stipulating that it is unlikely that new HLW tanks will be permitted to be constructed at SRS.
2. If new HLW tanks are precluded, DWPF will have to cease operations, sometime after 2010.
3. If new HLW tanks are precluded, ending the operations of DWPF earlier than the time it takes to remove and vitrify all of the sludge at the bottom of the tanks, where most of the plutonium and actinides are contained, the residual burden of contamination in the HLW tanks after the cessation of operations at SRS means that plutonium and other long-lived actinides will remain in the tanks in addition to the supernate (e.g., fission products including cesium-137).
4. In this more realistic no-action scenario, higher releases of contamination from the tanks to the environment and the public will increase significantly over the next few hundred to thousands of years, compared to the currently presented no-action case.

Therefore, in my opinion, the no-action alternative is unrealistic; a more realistic no-action alternative should be drafted to help the public better understand the gravity of not making a timely choice for one of the salt processing alternatives, or, given that a choice is

L3-1

L3-2

made, not having the chosen alternative adequately funded in time, provoking SRS to propose the construction of new HLW tanks, or the shutdown of DWPF.

Thanks,

W.F. Lawless

L3-2

Response to Comment Letter L3:

- L3-1 DOE is unaware of official documentation from SCDHEC on the feasibility of permitting new HLW tanks at SRS.
- L3-2 DOE has revised the sections on the long-term impacts of the No Action alternative. The Summary, Sections 2.9.2 and 4.2, and Appendix D have been modified to incorporate the results of the analysis of long-term impacts of the No Action alternative. For purposes of analysis, DOE assumes only salt waste remains in the HLW tanks. Section 1.2 includes a discussion of the consequences of a project delay in terms of the cost of producing salt-only canisters.

NEPA

To: Drew Grainger/DOE/Srs@srs, L Ling/DOE/Srs@Srs
cc:
Subject: DOE/EIS-0082-S2D Comments

05/07/01 12:35 PM

----- Forwarded by NEPA/WSRC/Srs on 05/07/01 12:38 PM -----



william willoughby
<**willow_II@msn.com**>
m>

To: nepa@mailhub.srs.gov
cc: Rick McCloud <crescentemc@aol.com>, bill lawless
<lawlessw@mail.paine.edu>, wade waters <wwaters258@aol.com>,
lee poe <leepoe@mindspring.com>, karen patterson
<PattersonK@ttnus.com>, Kelly Dean <kelly.dean@mailhub.srs.gov>
Subject: DOE/EIS-0082-S2D Comments

05/01/01 05:21 PM

Mr. A. Grainger,
Attached are comments on the Salt Processing SEIS.
William Willoughby II
506 Killington Ct



Columbia, SC 29212 DOE EIS-0082-S2D comments.doc

DOE/EIS-0082-S2D 3/2001 comments William Willoughby II

Comments are made on the base documents and would also apply to the summary document where applicable

p 1-4 insert, 4th line from bottom – the sentence should end with “----managed by compaction.”, and the balance of the sentence deleted.

L4-1

p 2-24, 2nd column, 2nd para; and p 2-25, section 2.8.2, 1st para – do you really mean that **ALL** salt Cs must go into the surplus Pu canisters and there are no low Cs level tanks that after Pu and Sr removal could not go direct to saltstone? How are these paragraphs affected by the reevaluation of surplus scrap Pu disposition?

L4-2

L4-3

p 2-35 identify source of dose conversion factors (pCi/vol to mrem)

L4-4

Table 3-1- does note “d” apply to Cs-137 ?

L4-5

Tables 3-1,3-3,3-6 uses inconsistent dose conversion factor references and inconsistent dose conversion factors

L4-6

p 3-45, section 3.9.2, 5th from last line– The sentence should end with “-----than incinerated.”, and the balance of the sentence deleted.

L4-7

p 3-49, section 3.9.6, 2nd line- “ atomic weights” should be “atomic numbers”

L4-8

Table 4-10 do not understand relation between 50-year committed effective dose equivalent and footnote “a.”; also how does dose conversion here compare with those for Tables 3-1,3-3,3-6 ?

L4-9a

L4-9b

Table 4-30- need an explanation here as why 1000 yr doses are greater than 100 yr doses as well as later in text

L4-10

Response to Comment Letter L4:

- L4-1 The description of CIF suspension has been revised.
- L4-2 DOE believes it is more cost effective and environmentally acceptable to operate a single processing facility rather than multiple processing facilities tailored to variable levels of cesium removal. Therefore, DOE has evaluated alternatives that either remove or do not remove cesium from the salt component.
- L4-3 DOE has not canceled the Plutonium Immobilization project for disposition of certain quantities of surplus plutonium. Rather, the Secretary of Energy has decided to suspend plutonium immobilization activities because the President's budget for Fiscal Year 2002 and beyond would not simultaneously support the peak construction of the Pit Disassembly and Conversion Facility, the Mixed Oxide Fuel Fabrication Facility, and the Plutonium Immobilization Facility. Delay in implementing the Plutonium Immobilization project would not affect the availability of plutonium for immobilization in DWPF glass, because DOE plans to operate DWPF until all SRS HLW has been vitrified, in about 2023.
- L4-4 The sources of the dose conversion factors (picocuries per volume to millirem) are numerous. References are found in Chapter 4 under the environmental dosimetry calculations (e.g., Simpkins, 1999).
- L4-5 No. Table 3-1 has been corrected.
- L4-6 These tables use different units of measurement and different standards appropriate to the parameter being measured. DOE does not use dose conversion factors in any of these tables.
- L4-7 The sentence has been revised.
- L4-8 The text has been corrected.
- L4-9a Footnote "a" applies to doses associated with the No Action alternative. The footnote will be relocated in Table 4-10 and associated with the Maximum dose heading.
- L4-9b Refer to response to L4-6.
- L4-10 The information in Table 4-30 has been clarified.



United States Department of the Interior

OFFICE OF THE SECRETARY
OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE

Richard B. Russell Federal Building
75 Spring Street, S.W.
Atlanta, Georgia 30303

May 4, 2001

ER-01/209

Andrew R. Grainger
NEPA Compliance Officer
Savannah River Site
Building 742-A, Room 185
Aiken, SC 29802

RE: Savannah River Site Salt Processing Alternatives Draft Supplemental EIS

Dear Mr. Grainger:

The Department of the Interior has reviewed the referenced document and has no comments to offer at this time. Thank you for the opportunity to review this material.

Sincerely,

James H. Lee,
Regional Environmental Officer

CC: FWS-ES, RO, Atlanta
OEPC, WASO

L5-1

Response to Comment Letter L5:

L5-1 Thank you for your review.