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807 E. Rollingwood Rd
Aiken, SC 29801

Mr. Andrew R. Grainger
NEPA Compliance Officer
U. S. Department of Energy
Savannah River Operations Office
Building 742-A, Room 183
Aiken, SC 29801

Comments on Salt Processing Alternatives SEIS
DOE/EIS-0082-S2D, March 2001

I would like to provide the following comments on DOE/EIS-0082-S2D.

General Comments:

1. After reviewing the SEIS, I conclude that the environmental consequences of the four salt processing alternatives are low and there is no significant difference between any of the four alternatives. Since there are no significant environmental consequences between the technologies, the decision on technology selection should be made on the easiest technology to implement at the earliest time with the least cost. L6-1

2. Of the four salt processing alternatives Direct Disposal in Grout seems to have the lowest environmental consequences, cost, and time to get it in operation. The technical unknowns in this alternative are least but the political uncertainty, in my judgment, is the highest. I could find no mention of this uncertainty in the SEIS. Please add appropriate text describing the political uncertainty for each alternative. L6-2

3. The SEIS seems to try to write-off the Direct Disposal in Grout Alternative by several sentences by stating the requirement of DOE Order (or what ever it is – it is called different things in different part o the SEIS) 435.1-1 requires further cesium removal meet "technically and economically practical" wording. (One such statement is the one on page 2-7 at the bottom of Section 2.4.) The discussion on page 7-3 seems to be more appropriately cover the requirement and does not specify the need for this constraint. Delete the bias statements and allow Direct Disposal as Grout to compete as an appropriate alternative and be judged with the other alternatives. L6-3

4. The analysis of the No Action Alternative is poor and underestimates the consequences of that action. The SEIS analysis seems to rely on the analyzed consequences from the Tank Closure EIS which is inappropriate since the two No Actions Alternatives are totally different. This EIS should contain the consequences of the alternative described on page 2-4 in Section 2.3 which is to remove all sludge and leave existing tanks with salt waste containing 160,000,000 curies of activity, L6-4

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primarily Cs-137. The analogy to the Tank Closure EIS No Action (which contained 200 curies of long lived radionuclides and 9,900 curies of Cs-137 in empty tanks is inappropriate. It is also inappropriate to state "it is clear that the impact to human health resulting from a No Action Alternative would be **catastrophic**" with no calculated impacts to back up the term catastrophic.

The EIS misses the largest long-term contribution to the risk to the public by assuming all radionuclides will reach the public by moving through the ground to the water table then with delay factors built in with the groundwater to the creek. The delay time allows significant radionuclide decay. The analysis should reflect the SRS precipitation filling the tanks, dissolving the salt, and overflowing to the ground surface and flowing to the surface streams after the HLW tank failure (page 2-45) after a few hundred years. (As is known SRS precipitation rate significantly exceeds infiltration rates.) L6-4

5. The impact of the No Action Alternative should be given on the various tables in the Summary and in Sections 4, and 5. The No Action consequences are the motive force to accept one of the Salt Processing Alternatives. As presented in this EIS the consequences cannot be found except by diligent study and they don't show the need for one of the action alternatives. L6-5

6. There seems to be some confusion in the EIS on defining this No Action Alternative. Several places the EIS says it may be necessary to "suspend operation of the DWPF" (page 2-4 item 5 in the right hand column). One cannot remove the sludge (as is required by the definition of the No Action Alternative) with the DWPF shutdown. Perhaps "reduce operating rates at the DWPF" is a more appropriate condition. L6-6

7. The No Action Alternative Sections 2.3.2 – 2.3.4 also seem to be confused.

   - Section 2.3.2 continues to use existing HLW Tanks 4 – 8 (which are Type I tanks with a capacity of 750,000 gallons and a fill limit of about 650,000 gallons. If four tanks are used, the maximum that could be stored is about 2.6 not 3.75 million gallons. Also these tanks already contain some waste.
   - Section 2.3.3 describes building 6 new Type I (Wastewater Treatment Regulated Tanks). Each Type I tank is designed for a maximum capacity of 750,000 gallons and probably has a fill limit of 650,000 gallons. The section says 800,000 gallons (see page 2-5). L6-7
   - Section 2.3.4 describes building 18 new Type III tanks. The text gives a storage capacity of each tank to be 800,000 gallons. Type III tanks have a design capacity of 1.3 million gallons and a fill capacity of probably 1.15 million gallons.
   - The tank capacity requirements given in these three section are inconsistent. Section 2.3.2 gives 3.75 million gallons, Section 2.3.3 provides 4.8 million gallons, and Section 2.3.4 gives 14.4 million gallons capacity

These sections should be corrected and expanded to show when this new capacity would be required, when budgeting and licensing would be required and what each would cost. L6-7

8. The SEIS should identify the Long-Term Stewardship assumptions made in the analysis. I find no mention of these except to maintain surveillance over the Waste Tanks, and the saltstone vaults for 100 years. EISs should identify whatever controls are considered appropriate and the SEIS should start the process of institutionalization of the needed controls. For example, This EIS describes the consequence to people who live on the waste site and dig into the waste with no controls applied after 100 years. I hope DOE plans controls that prevent/minimize those actions. I think other institutional controls are appropriate for the waste sites and they should be identified in the EIS L6-8

9. The Summary and Sections 1 and 2 each have a Table that is a primer. This is a good idea but the primers contains inconsistencies. Make a single primer table and use it for all sections. L6-9

Specific Comments:

Number	Page Location	Comment	
1	S-1	Add a paragraph following the second paragraph describing how salt cake was formed.	L6-10
2	S-1	Third full paragraph in right column should mention the 1980's ITP testing and why it was then thought to be viable.	L6-11
3	S-1	What significance should I place on the bottom paragraph of the right column? ITP had been suspended before the DNFSB determination. Put the paragraph in perspective.	L6-12
4	S-4	Explain the meaning of "production goals and safety requirements" in the top paragraph.	L6-13
5	S-4	Need to state why this is a SEIS before the information box.	L6-14
6	S-5	Include Direct Disposal on Table S-8	L6-15
7	S-5	Top paragraph in right column says that the number of canisters produced would be "greatly" increased. Quantify the word greatly. From the information I have a several year delay will only marginally increase the number of canisters produced. Even that could be corrected by reducing the canister production rate.	L6-16
8	S-5	Section S.4 describes a supplement analysis. Provide a reference.	L6-17
9	S-7	This page couples the Record of Decision to EPA. Is this correct?	L6-18
10	S-7	In the middle of the right column, DOE established a siting requirement of "within 2,000 feet". Is this siting limit an excludable limit and does it influence site selection? What is the significance/basis of the limit?	L6-19

11	S-7	The bottom full paragraph stated analysis selected four sites. Site A was subsequently excluded. No justification was given. Add it.	L6-20
12	S-13	Precipitate Hydrolysis Aqueous in right column is bolded but not included in Table S-8.	L6-21
13	S-14	The last sentence in Section S.7.4 states SCDHEC is required to be notified if salt stone exceed Class A limits. Where is this requirement and how much waste is involved before this notice must be made?	L6-22
14	S-15 Table S-2	The capacity given in the first two lines for Direct Disposal show the capacity the same. I also understand that all of these throughput rates are based upon 75% availability. Please fix this table so the reader will not think that Direct Disposal is shown operating at 100% attainment.	L6-23
15	S-15 Table S-2	Planned canister production row assumes that adequate funding is made available. I think that qualification should be added to this section. (It seems to be an item discussed each year.)	L6-24
16	S-16	Section S.7.7 needs to state why a new Direct Disposal Building is required.	L6-25
17	S-16	Section S.7.7 should discuss timing and how funding will be justified for each of these new facilities.	L6-26
18	S-18	Fix figure to be more reader friendly. Are the sections marked infiltration a drain or do they cause infiltration? Define the three sump appearing devices (left, center, and right on the drawing) on the figure and where do they drain? Add the word Normal to the bottom Water Table line.	L6-27
19	S-21 thru S-24	Simplify the Table (perhaps break it into several tables) to make it more reader friendly and to show major differences between alternatives. Most of the information presented is not significant.	L6-28
20	S-25	I find the second paragraph under accidents, states No Action is safer than the other alternatives. This doesn't seem correct. Expand paragraph to more properly state why this is true, if it is.	L6-29
21	S-26 thru S-29 & S-30	Same comment apply to Tables S-6 and S-7 as made for Table S-5 in comment 19. Select major parameters and give them and tell readers all of the calculated information is presented in Section 4.	L6-30
22	S-30	Logic described for No Action under General Comment 4 applies here.	L6-31
23	S-31	Table S-7 provides a range of information for each entry with no rationale as to why a range is given.	L6-32
24	S-31	Table S-7 shows the results of Agricultural scenario and Residential scenarios for 100 and 1,000 years. (I expect there is a typo error in the last line – should be 1,000 years not 100 years.) The associated text does not describe what is contained and the intended significance of it.	L6-33

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25	1-3	Since this section is the same as in the summary, I offer the same comments as I offered on the Summary (Numbers 1 – 4).	L6-34
26	Sect 2 General	Remove the calculated consequences from section 2. They have been summarized in the Summary and are given in Section 4. (Delete Tables 2-6, 2-7, & 2-8.)	L6-35
27	Sect 2 General	If calculated results are not removed from Section 2 as requested in comment number 26, simplify the tables as requested in comments 19 –21.	L6-36
28	2-1	Add a table with the radioactive nuclides and the chemicals that are in the waste tanks. Might be good to show the variation in the HLW at the same time. I would expect to see the 160 million curies of Cs-137 in such a table (see p4-49).	L6-37
29	2-3	Are Pu judgments based on mass or activity? I would expect Pu-238 to be the largest Pu by activity.	L6-38
30	2-6	First full paragraph on page gives a 5-year schedule for design, permit and construct of four tanks. It is unclear what this refers to. John Renolds told the FG in July that it would require 4 years to do the same thing for wastewater treatment permitted tanks (like the Type I tanks or 5 years for RCRA permitted tanks. Correct this statement to show the estimate for both type tanks.	L6-39
31	2-6	The second paragraph says new tanks would be extremely costly to build. Do not use unsupported terms like "extremely costly". Provide an estimate for the tanks so the reader will be able to make his/her own judgment.	L6-40
32	2-7	Reference site selection in the bottom paragraph of left column.	L6-41
33	2-11 Table 2-2	The definition of centrifugal contactor should be made more generic. As written it describes the extraction stages but not the strip stages. Centrifugal contactors perform both functions.	L6-42
34	2-15	Include Direct Disposal in Table 2-2.	L6-43
35	2-15	Same comment as #7.	L6-44
36	2-19	Include a sentence or two in the bottom full paragraph telling the reader how the MST precipitate would be handled in Z-Area.	L6-45
37	2-25	Section 2.8.2 should be expanded or omitted because of the budget causing significant delay or canceling the Pu vitrification facility. If that facility is canceled this section has no value, if delayed, will the Pu be available in time to be incorporated into the borosilicate glass from the DWPF.	L6-46
38	2-26	Update the costs described in Section 2.8.3. The costs described are 1998 costs and badly out of date. The FG was told new costs would be available by now but they have not been shared with us.	L6-47
39	Table 2-6	Treatment of No Action is inadequate in Table 2-6. Air pollutants for continued management of No Action are for the entire site not the tank farm. This and other SRS reference footnotes should be reconsidered. Alternative-specific values should be given.	L6-48

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40	2-36	Source of the 12 additional LCF couldn't be found. What does the "additional" mean? List total LCF for the Alternative.	L6-49
42	2-39	Table 2-7 is very difficult to get a comparison of alternatives out of. Suggest listing the risk of each accident to Onsite population and totaling the risk. Do the same for off-site population. The sum of the risks for accidents is an appropriate comparator. I have attached an example that shows the risk of accidents to onsite population is greatest for Small Tank and least to Direct Disposal. Ion Exchange and Solvent Extraction are essentially equal and in-between the two extremes.	L6-50
43	2-45	The conclusion of Geologic Resources section seems to be in error. It seems to me that when the No Action tanks fail by collapse and the waste contaminates the soils, that condition would be an impact to geologic resources.	L6-51
44	4-3	It is unclear why tank space optimization for the No Action Alternative stops in 2010. All of the sludge would not have been removed by that time.	L6-52
45	4-4	The call out reference in the last paragraph seems to be in error. Section 4.1.1 does not discuss the 18 tanks. It is discussed in Section 2.3.4.	L6-53
46	4-7	What does the stipulation "previously disturbed area" mean as it is used in the second full paragraph? Please clarify so all of us will understand it.	L6-54
47	4-13	Why is the siting statement in Section 4.1.3.2 significant? Why not locate waste tanks in previously contaminated areas rather than continue to contaminant new land?	L6-55
48	4-15	The air emission statement in the second paragraph for the No Action Alternative does not seem to be correct. As tank space management continues to get tighter and tighter, HLW transfers will increase in frequency and emissions should increase. Long term emissions will also be significantly.	L6-56
49	4-15	The term "slight increases above baseline" for the No Action Alternative should be quantified. Statement seems to be unsubstantiated.	L6-57
50	Pages 4-41-45	Compare the total exposure risk from these accidental releases so the various alternatives can be compared. Similar to comment 42.	L6-58
51	Section 4.2 General	No Action consequences should show up in all of Section 4.2. See General Comment 5.	L6-59
52	Section 4.2 General	Detailed comments on No Action are not provided. Analysis approach seems to be faulted. See General Comments # 4 through 7.	L6-60
53	Chapter 5 General	Add No Action consequence to this section. See General Comment #5.	L6-61

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54	5-11	In Table 5-3, quantify salt processing liquid releases. What is "reportable" – footnote d?	L6-62
55	5-11	Cumulative effect given in this table shows that the four alternatives all will triple the consequence of airborne releases of the remainder of SRS, (both present and projected) combined with Plant Vogtle releases. My judgment tells me there is no way this could be true. I think the values used in this table contain some problem.	L6-63
56	5-11	Quantify the consequence of liquid releases from salt processing and include in this table.	L6-64
57	7-3	Discussion in Chapter 7 and in particular on this page does not seem to preclude Direct Disposal in Grout as has been done in other parts of the SEIS.	L6-65

I did not review the Appendices in this SEIS. Where they are the source of the information on which I commented, they should be revised as needed.

I hope these comments are useful in reaching a decision that allows salt processing to start as soon as possible. The process should recognize the potential that salt processing will be more difficult and perhaps more expensive than planned and include a pre-planned process to accepts the uncertainty and get on with the job. This includes emptying and closing waste tanks, and managing the risks from the salt so it will not significantly impacting safety of future generations downstream from SRS. I consider it imperative to get on with the salt processing. Leaving the salt in the waste tanks longer than necessary would increase the risk to the public and should be minimized.

If I can answer questions or shed additional light on these issues, please call me.

Sincerely,

W. Lee Poe, Jr.

Attached is an example table for Accidental Risk four salt processing alternatives to On Site Population

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Attachment to Poe's Comments on Salt Processing SEIS

Risk of Latent Cancer per Year To On Site Population During Operational Phase

Accident	Small Tank	Ion Exchange	Solvent Extraction	Direct Disposal
Loss of Confinement	5.30E-04	2.70E-04	2.70E-04	5.70E-05
Beyond DBE	1.80E-03	6.90E-04	6.80E-04	2.10E-04
Loss of Cooling to Loaded Resin Hold Tank		1.70E-09		
Fire in Process Cell	1.50E-05	8.90E-06	8.90E-06	1.90E-06
Benzene Explosion	6.80E-05			
H_2 Explosion in Ext. Cell			2.10E-08	
Helicopter Impact	1.90E-05	9.50E-06	9.60E-06	2.50E-06
Aircraft Impact	2.30E-05	8.80E-06	8.90E-06	2.70E-06
Sodium Hydroxide Release				
Nitric Acid Release				
Benzene Release				
Total Risk	**2.46E-03**	**9.87E-04**	**9.77E-04**	**2.74E-04**

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Response to Comment Letter L6:

L6-1 DOE agrees with the commenter's conclusion. DOE has established a number of criteria on which a technology selection would be made. The criteria include those requested by the commenter (but in different words): "easiest technology to implement" (technology implementability); "at the earliest time" (schedule); "with the least cost" (cost). However, DOE does not consider the cost estimates at this time to be reliable enough to be a significant discriminating factor for decision making.

L6-2 The purpose of the SEIS is to describe the environmental impacts of the alternatives for salt processing. Political considerations are beyond the scope of the SEIS.

L6-3 Section 2.4 has been modified to address this concern. The discussion in Section 7.1 describes DOE's process for making waste incidental to reprocessing determinations. One criterion is that wastes must have been or will be processed to remove key radionuclides to the maximum extent that is technically and economically practical. This criterion must be applied to any technology that would result in management of waste as low-level waste. DOE believes it objectively analyzed all alternatives.

L6-4 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 and that it reaches onsite streams via surface flow rather than through the groundwater.

L6-5 The Summary, Sections 2.9.2 and 4.2, and Appendix D have been modified to incorporate the results of an analysis of the long-term impacts of the No Action alternative.

L6-6 It is DOE's intent to continue operations of DWPF under the No Action alternative until HLW tank space management restrictions dictate otherwise. Section 2.3.1 identifies reduced DWPF production as one method for optimizing tank farm operations. DOE considers suspension of DWPF operations to be an option of last resort.

L6-7 DOE's attempts at quantification of potential scenarios under the No Action alternative are rough approximations of events that could occur. Section 2.3.2 dealt with five tanks (Tanks 4 through 8) with a gross total capacity of 3.75 million gallons (5 tanks x 750,000 gallons). Nevertheless, DOE adjusted Section 2.3.4 on RCRA - compliant tanks in response to this comment.

L6-8 For purposes of analysis, DOE conservatively estimates institutional control for no more than 100 years for projection of environmental impacts to persons exposed to radiological release from the salt processing facilities and waste disposal sites.

L6-9 DOE has corrected the inconsistencies in the primer tables.

L6-10 DOE has incorporated an explanation of the formation of saltcake.

L6-11 The SEIS discussed ITP for the purpose of introducing the need for an alternative technology. Therefore, further discussion of the development of the ITP process provides no additional value to this section of the SEIS.

L6-12 DOE has revised the text to put the paragraph in perspective.

Response to Comment Letter L6 (continued):

L6-13 These are production goals and safety requirements realized by satisfactory separation of highly radioactive constituents (cesium, strontium, and actinides) from HLW salt solution without excessive tetraphenylborate decomposition (benzene generation).

L6-14 Refer to the Cover Sheet, S.4 of the Summary or Section 1.3 of the main document for an explanation of the rationale for the Supplemental EIS.

L6-15 DOE included the Direct Disposal in Grout alternative in Table S-8.

L6-16 See response to comment L1-5.

L6-17 References are not provided in the Summary. Refer to Section 1.3 for the reference to the Supplement Analysis.

L6-18 The Notice of Availability is published by EPA. The Record of Decision is issued by DOE no sooner than 30 days after the Notice of Availability appears.

L6-19 Site Selection for the Salt Disposition Facility at Savannah River Site (WSRC-RP-99-00517 Rev. A, pg. 4) cites site specific technical requirements as locations within 2000 ft radius of the low point pump pit, the Late Wash facility, or the south end of 221-S (DWPF). Transfer of product slurries at proper solids concentration farther than 2000 ft is impractical because either dilution, which reduces salt processing rate, or an additional costly pump pit would be required.

L6-20 An explanation for the exclusion of Site A has been included in S.6 and Section 2.5.

L6-21 The term “precipitate hydrolysis aqueous” has been removed from Summary.

L6-22 The requirement is found in Industrial Wastewater Permit IWP-217, Z-Area Saltstone Disposal Facility. Section 7.2 provides more detail of the saltstone permit requirements.

L6-23 Tables S-2, 2-3, and A-3 have been amended to indicate facility throughput for each technology specified at 75% attainment. The throughput of all action alternatives is limited to 6 million gallons per year due to physical constraints on removing waste from the waste tanks. Required capacity throughput for Direct Disposal in Grout facility (6.0 million gallons/year) is less than for the other technologies because the Direct Disposal in Grout facility can operate even if DWPF is in an outage for melter replacement. The other technologies cannot operate if DWPF is in an outage; therefore, they would have to operate at a higher production rate so that the salt processing schedule could be maintained even in the event of DWPF down-time.

L6-24 The reference is based on the High-Level Waste System Plan (HLW-2000-00019, Rev. 11, pg. 2-50) target case that assumes adequate funding is available. This is noted in Table 2-3.

L6-25 A new Direct Disposal process building is needed to provide capability for MST treatment to remove Sr and actinides from salt solution before immobilization in grout and to provide enhanced shielding and remote handling for grout processing operations. This has been inserted in Sections S.7.5 and Section 2.7.3.

Response to Comment Letter L6 (continued):

L6-26 DOE plans to have a salt facility on line by 2010. Projects would be funded through the federal budget process.

L6-27 The figure has been modified.

L6-28 The largest impacts for select parameters have been bolded so it is easier for the reader to identify the alternative with the highest impacts.

L6-29 DOE has clarified that this paragraph refers to the short term No Action alternative. The reader is referred to the long-term No Action alternative in Section S.9.2.

L6-30 See response to comment L6-28. Accident impacts in Table S-6 are accident consequences, not risks. It is not appropriate to tally consequences to determine a cumulative effect because the accidents would not occur simultaneously.

L6-31 See response to L6-4.

L6-32 DOE has eliminated the range of values from Table S-7 and from the EIS. Although the doses listed are quite conservative, the higher doses were retained.

L6-33 The typographical error has been corrected in Table S-7. A more detailed explanation is found in Chapter 4 and Appendix D of the EIS.

L6-34 DOE has made changes to Chapter 1 as described in the responses to comments L6-10, -12, and –13. No change was made in response to comment L6-11.

L6-35 DOE has chosen to leave the tables in Chapter 2. They have been modified as discussed in the response to comment L6-30.

L6-36 See response to comment L6-35.

L6-37 DOE has revised the text to indicate that 158 million of 160 million curies is Cs-137. DOE does not believe the additional information requested by the commenter would assist the reader in describing the HLW inventory or differentiating between alternatives.

L6-38 Pu-238 is greatest by radioactivity, Pu-239 by mass. The commenter's judgement is correct**.** Both are included in radioactivity tables in the Summary and Chapter 1.

L6-39 The commenter is correct and the text has been modified in Section 2.3.3.

DOE has estimated that about 4 years would be required to design, permit under wastewater treatment regulations, and construct 6 waste water storage tanks. This activity would be initiated about 2006.

L6-40 Cost estimates are not provided because constructing new tanks would not meet purpose and need.

L6-41 The appropriate reference is given in paragraph 1 of Section 2.5.

Response to Comment Letter L6 (continued):

L6-42 DOE has revised the definition.

L6-43 DOE has included Direct Disposal in Table 2-2.

L6-44 Refer to the response to comment L1-5.

L6-45 DOE has included the following description: MST processing [to remove strontium and actinides from salt solution prior to Direct Disposal] would be the same as far as the CST Ion Exchange and Solvent Extraction technologies. Equipment required as shown in Figure 2-7 and A-16 would include an alpha soprtion tank and filter unit to separate the MST sorbed constituents prior to grouting the cesium-containing salt solution for disposal in saltstone.

L6-46 See response to comment L4-3.

L6-47 Refer to response to comment L1-13.

L6-48 Table 2-6 represents short-term impacts for each of the salt processing alternatives. The short term impacts of the No Action alternative are described in Section 2.9.1. In response to comments L6-4, -5, and -6, DOE has revised the analysis of the long-term impacts of the No Action alternative.

L6-49 The source of the 0.12 LCF is found in Table 2-6. Additional LCF means the incremental cancers attributable to the operation of the salt processing alternative.

L6-50 Accident impacts calculated in Table 2-7 are accident consequences, not risk. It is not appropriate to tally consequences to determine a cumulative effect because the accidents would not occur simultaneously. Chapter 4 analyses the impacts of these accident scenarios. Section 2.9.1, Accidents Summary, indicates the highest accident impact to the receptors.

L6-51 The commenter is correct. DOE has revised Sections 4.2 and 2.9.2 accordingly.

L6-52 Tank space optimization would continue as long as such activities facilitated the continued operation of DWPF.

L6-53 The section reference has been corrected.

L6-54 “Previously disturbed area” means an area used in the past for industrial activities.

L6-55 The statement in Section 4.1.3.2 refers to DOE’s intent to avoid construction in contaminated areas because of the potential radiological exposures to construction and operation workers. Radiological exposure to workers could occur if tanks were to be constructed in radiologically contaminated areas.

L6-56 Radioactive liquid waste would be returned to the HLW tank farms and treated in waste evaporators. No radioactive liquids would be released to the environment.

L6-57 Due to the hypothetical nature of the No Action alternative, DOE is unable to quantify the increases above baseline.

Response to Comment Letter L6 (continued):

L6-58 Refer to comment response to L6-50.

L6-59 Refer to comment response to L6-5.

L6-60 Refer to responses to comments L6-4 through L6-7.

L6-61 Refer to response to comment L6-5.

L6-62 Footnote (d) in Table 5-3 has been revised to explain that no radioactive liquids would be released to the environment because they would be returned to the tank farms and treated in the HLW evaporators.

L6-63 Table 5-3 accurately portrays the available data.

L6-64 Refer to response to comment L6-62.

L6-65 Other portions of the SEIS have been revised to be consistent with the discussion in Chapter 7.