



Fred E. Humes
Director

May 7, 2001

Andrew Grainger
NEPA Compliance Officer
Savannah River Operations Office
U. S. Department of Energy
Building 730B, Room 2418
Aiken, SC 29802

Attn: Salt Processing Alternatives SEIS

Dear Mr. Grainger:

We are pleased to provide comments on the *Savannah River Site Salt Processing Alternatives Draft Supplemental Environmental Impact Statement (EIS) (DOE/EIS-0082-S2D)* as provided by your letter of March 23, 2001. We have one general comment and four specific comments on this document and SRS high level waste activities.

General Comment: We believe that the approximately 34 million gallons of high level liquid wastes, containing approximately 480 million curies of activity, represent the greatest potential SRS hazard to the offsite public and the environment. As such we have continually supported the removal of these wastes from the aging underground tanks and its placement into the significantly more stable vitrified form. We continue to encourage DOE to accelerate all aspects of the high level waste program to vitrify these wastes at the earliest possible time.

L7-1

Specific Comments:

1. The impacts of the “no action” alternative are significantly understated in the SEIS document. The document narrative states that the no action alternative would lead to eventual failure of the HLW tanks and release of approximately 450 million curies of activity to groundwater and eventually surface water (pages S-29 and 30). On page S-30 the impacts of such a release are described as “catastrophic.” This level of concern is not conveyed in Table S-5 (Summary comparison of short-term impacts) or Table S-7 (Summary comparison of long-term impacts). In Table S-5 the comments under the “no action” alternative are “No change” or “minimal.” In Table S-7 the “no action” alternative is not included. We recommend that the no action alternative be included in these tables on a basis comparable to the other alternatives, and that the no action alternative be based on the failure of the underground tanks and

L7-2

L7-3

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release of 450 million curies of radioactive waste into the environment. Other tables in the document need to be modified in a similar manner.

L7-3

2. We note that there are no significant differences in the safety and environmental consequences between the four action alternatives. Accordingly, we recommend that DOE select its salt processing alternative on the basis of the following criteria in priority order: (1) earliest schedule for emptying all HLW tanks, (2) highest level of technical surety and (3) cost. As noted in our general comment above, we believe that waste should be removed from the underground tanks at the earliest possible time.

L7-4

3. It is not clear how DOE will evaluate the "Direct Grout" alternative vis-à-vis the other three action alternatives. There has been much discussion of direct grout as "an alternative of last resort" or "the regulatory approval and public acceptance processes may be too difficult." There should be no undue bias against direct grout in the alternative selection process. Selection of the preferred alternative should be on the basis of schedule, technical and cost merit. If there is concern about regulatory approval, we recommend that the regulatory agencies be approached now with a specific proposal so they can provide a definitive response. If public reaction is a concern, consider public input on this SEIS or specifically solicit public input. Without hard data, DOE should not presuppose regulatory or public acceptance of the direct grout option.

L7-5

4. We recommend that the final SEIS include a discussion of the basis for selecting the alternative(s) included in the preferred alternative.

L7-6

Thank you for the opportunity to comment on this very important document.

Sincerely:



Fred E. Humes

Response to Comment Letter L7:

- L7-1 DOE's goal, and DOE's commitment under the Federal Facility Agreement, is to remove waste from the HLW tanks and place it in a form suitable for safe disposal.
- L7-2 Refer to comment response L3-1. Under the No Action alternative, DOE would process sludge to the extent practicable. For purposes of analysis, DOE assumes only salt waste remains in the HLW tanks. (See response to comment L6-4.)
- L7-3 DOE has added the impacts of the No Action alternative in Tables S-7 and 4-30.
- L7-4 See response to comment L6-1. DOE evaluated each alternative on the following criteria in the process of selecting a preferred alternative: cost, schedule, technical maturity, technology implementability, environmental impacts, facility interfaces, process simplicity, process flexibility, and safety.
- L7-5 See response to comment L6-3.
- L7-6 DOE has discussed the basis for selecting the preferred alternative in Section 2.6.