

----- Forwarded by Drew Grainger/DOE/Srs on 05/16/01 07:27 AM -----

Jim Hardeman <Jim_Hardeman@mail.dnr.state.ga.us>

To: drew.grainger@mailhub.srs.gov

05/14/01 05:45 PM

cc: Jim Setser <Jim_Setser@mail.dnr.state.ga.us>
Subject: Comments re: DOE/EIS-0082-S2D

Drew -

Attached please find comments related to DOE/EIS-0082-S2D, the Savannah River Site Salt Processing Alternatives Draft Supplemental Environmental Impact Statement. I also ask that this e-mail be considered a formal comment on the EIS.

As I indicated in my earlier e-mail, I am disturbed news that we just heard today that DOE has decided not to immobilize plutonium using the Defense Waste Processing Facility (DWPF). If this news is indeed true, the timing of this decision, while the Salt Processing Alternatives SEIS is still out for comment, appears to be suspect, even in the best possible light. The decision not to immobilize (and thus, to no longer require that cesium be separated from salt), coupled with the aggressive schedule for publication of a final EIS (a draft final EIS is scheduled to be transmitted to DOE headquarters less than three (3) weeks after closure of the comment period on the draft EIS) makes it appear that DOE has, in fact, already made a decision regarding the technology to be used for salt processing, and that the NEPA process is mere window dressing.

Thanks again for the opportunity to comment on this document. We trust that DOE will seriously consider our views in this matter.

Jim Hardeman, Manager
Environmental Radiation Program
Georgia Environmental Protection Division
4244 International Parkway, Suite 114
Atlanta, GA 30354
(404) 362-2675
Fax: (404) 362-2653
E-mail: Jim_Hardeman@mail.dnr.state.ga.us

Attachment: MS Word document "Comments on Salt Treatment Alternatives EIS.doc"

5/16/2001

L9-1

Georgia Department of Natural Resources

4244 International Parkway, Suite 114, Atlanta, Georgia 30354

Lonice C. Barrett, Commissioner
Environmental Protection Division
Harold F. Reheis, Director

May 14, 2001

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

Re: Salt Processing Alternatives SEIS (DOE/EIS-0082-S2D)

Dear Mr. Grainger:

The Georgia Environmental Protection Division (EPD) appreciates the opportunity to comment on the Savannah River Site (SRS) Salt Processing Alternatives Draft Supplemental Environmental Impact Statement (SEIS).

As you know, the State of Georgia is opposed to the disposal of high-level radioactive waste onsite at SRS, and has expressed this opposition to the Department of Energy (DOE) and its predecessor agencies many times over the years, dating as far back as the administration of Governor Jimmy Carter. We consider "Direct Disposal in Grout" to be nothing more than onsite disposal of high-level waste, and for this reason, we are strongly opposed to the "Direct Disposal in Grout" option as presented in the SEIS. We also note that both the "No Action" and "Direct Disposal in Grout" alternatives are inconsistent with the "Record of Decision for the Surplus Plutonium Disposition Final Environmental Impact Statement", published in the Federal Register on January 11, 2000 (65 FR 1608). We therefore view both the "No Action" and "Direct Disposal in Grout" alternatives as "Unacceptable", and strongly urge the Department of Energy not to consider either of these alternatives in its technology selection process.

Of the remaining three (3) alternatives, "Small Tank Tetraphenylborate Precipitation" ("Small Tank Precipitation"), "Crystalline Silicotitanate Ion Exchange" ("Ion Exchange"), and "Caustic Side Solvent Extraction" ("Solvent Extraction"), we urge the DOE to select Ion Exchange as the technology of choice for removal of cesium from high-level waste salt at SRS. Ion Exchange appears to have several technical and operational advantages over the other two technologies, including operational simplicity and reduced worker and public radiation doses. In addition, both the Small Tank Precipitation and Solvent Extraction processes generate secondary wastes for which there is currently no identified disposal path.

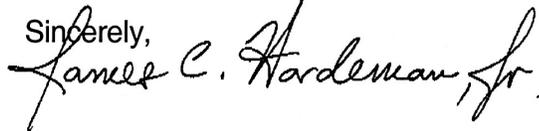
L9-2

L9-3

L9-4

Comments on Salt Processing Alternatives SEIS
May 14, 2001
Page 2 of 2

Thank you again for the opportunity to comment on this document. If you have any questions regarding these comments, please contact me by letter, by telephone at (404) 362-2675, or by electronic mail at Jim_Hardeman@mail.dnr.state.ga.us

Sincerely,


James C. Hardeman, Jr., Manager
Environmental Radiation Program

Response to Comment Letter L9:

- L9-1 DOE has not canceled the Plutonium Immobilization project for disposition of certain quantities of surplus plutonium, nor has DOE selected a technology for HLW salt processing (although this Final SEIS states DOE's preferred alternative). 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. In addition, because DOE now anticipates that a salt processing alternative would not be operational until about Fiscal Year 2010, cesium-bearing HLW would not be available to support the immobilization project until that time, if DOE selects a salt processing alternative that would produce cesium-bearing HLW for vitrification. The environmental evaluation in this EIS is an important factor in DOE's selection of a salt processing alternative.
- L9-2 DOE acknowledges the State of Georgia's opinion regarding the Direct Disposal in Grout alternative. Section 7.1 of the EIS describes DOE's process for making waste incidental to reprocessing determinations. Any salt processing alternative that DOE selected for implementation would be subjected to this process which, as described in Section 7.1, would include consultation with the Nuclear Regulatory Commission.
- L9-3 DOE recognizes that the Direct Disposal in Grout alternative would not allow the production of vitrified HLW that would support the plutonium immobilization described in DOE/EIS-0283, Surplus Plutonium Disposition (November 1999), and selected for disposition of certain quantities of plutonium in the Record of Decision (65 FR 1608, January 11, 2000). DOE describes this situation in Section 2.8.3 of the SEIS. Nonetheless, DOE has considered the Direct Disposal in Grout alternative throughout the technology review and evaluation process, as described in the SEIS.
- L9-4 DOE acknowledges the State of Georgia's preference for the Ion Exchange alternative.