

L-0041 (contd)

State of Oregon Comments
Revised Draft Hanford Solid Waste EIS
June 5, 2003
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- 57 CERCLA must be completed prior to construction of waste sites so that compensatory mitigation can be determined. Additionally, by assessing damage prior to construction, appropriate mitigation actions can be incorporated into design and implementation plans, thereby improving project efficiency and minimizing impacts.
- m) Develop performance criteria for:
- site, including a large scale infiltration test
 - vadose and groundwater monitoring system
 - liner system, including construction quality assurance
 - leachate collection system
 - cushion system
 - waste form
 - daily cover material
 - dust suppression and water treatment
 - final grading material
 - cap system
- 58 44) Conduct characterization and modeling studies and waste characterization and treatment studies of each individual site. The variability in the magnitude of release and the temporal distribution curves presented in Appendix L clearly demonstrate the wide range of uncertainty in the modeling results. These studies are necessary to develop model predictions that exhibit greater certainty.
- 59 45) DOE should consider siting new waste disposal facilities in areas that already contain vadose zone contamination. The clean excavated surface soils can be stockpiled for future caps use. The contaminated soils can be segregated into lightly contaminated soils for daily cover and more contaminated soils requiring remediation and stabilization. A strategy that uses contaminated areas will help minimize long-term impacts on the environment.
- 60 46) Monitoring should occur prior to, during and following operation of waste disposal facilities. Long term monitoring should include leachate monitoring, shallow and deep vadose zone monitoring, and groundwater monitoring. Each facility's design should include key monitoring points that incorporate cutting-edge approaches for moisture movement.
- 61 47) Following establishment of siting criteria, and investigation of potential sites, DOE should construct geo-technical test pads that represent proposed capping and lining systems to verify their constructibility and performance in the Hanford environment. It has been previously noted that the modified RCRA Type "C" cover is inadequate to store the moisture volume that would infiltrate from a 5-year storm. This inadequacy drives the need to develop a robust cover that can withstand the anticipated meteorological variabilities of the Hanford site. Establishing and testing the proposed cover at the field scale should be a key "go-no" decision for the permitting of a MLLW or citing a LLW disposal facility due to the numerical model's dependence upon 0.01 cm/year of infiltration through the vadose zone. Additionally, the waste cover design should include specific consideration for drainage of excess water to controlled points that preclude it impacting wastes. Such drainage systems might include deep drains into the subsurface to route water past all waste disposals.

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JUNE 5, 2003

Michael Collins
U.S. Department of Energy
P.O. Box 550, A6-38
Richland, WA 99352

Mr. Collins:

I'm tired of getting jacked-around by bureaucrats! How about pretending that Washington State is your home and treating us the way you would like to be treated? We don't want anymore nuclear waste. Washington State did its' share while the U. S. was developing nuclear weapons and we deserve some consideration now.

I am writing you as a citizen concerned with the cleanup of Hanford, one of the most contaminated places in the world. You, the U.S. Department of Energy (USDOE), are proposing to double the amount of radioactive waste buried in unlined soil trenches at Hanford, which doubles the risk of more soil and groundwater contamination. Once again, you have failed to adequately address the human health and environmental impacts of adding this radioactive waste to Hanford in your *Revised Draft Solid Waste Environmental Impact Statement* (SW EIS). I urge you to choose not to import any offsite waste to Hanford. Your mission is to clean up the huge radioactive mess already contaminating the Columbia River at Hanford, not to add more contamination to this problem.

The analysis of human health and environmental impacts in this revised SW EIS still fails in several ways:

- You do not include in your cumulative risk analysis many of the long-lived radionuclides, such as iodine-129, that occur in significant quantities at Hanford. You must complete the inventory and classification of these wastes before you can assess the impacts of adding more waste to Hanford.
- Dumping more new radioactive and chemical waste will increase contamination groundwater flowing towards the Columbia River for "thousands of years." In your impact analysis, you have placed the point of compliance for groundwater at the Columbia River, miles away from the burial grounds, in order to meet drinking water standards. Allowing the groundwater to become contaminated destroys any possibility of the public enjoying a safe and usable Hanford Reach.
- Transporting nuclear waste to Hanford creates unnecessary risks to human and environmental health in Washington and Oregon. The new EIS still does not

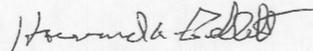
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- 1
- adequately address risks to all communities along transportation routes, specifically the risks from dangerous "transuranic wastes."
- The SW EIS contains several alternatives to line and monitor the burial trenches for radioactive waste. You do not provide any timeline for achieving this. I want these burial grounds to be lined by the end of 2003!
 - Finally, you still do not provide an alternative in your EIS that would only assess burial of onsite Hanford cleanup waste. Your current "no action" alternative considers stopping all cleanup at Hanford – this is unacceptable!

We are spending billions of dollars cleanup up the radioactive mess at Hanford. Why would we risk adding more waste to the already contaminated soil and groundwater? I ask again that you reconsider all the impacts to our region before making a decision based on a faulty analysis. The *Solid Waste Environmental Impact Statement* is still not responsive to citizen concerns and does not effectively analyze all alternatives. **I request that you stop all future import of radioactive and chemical wastes to Hanford for burial and stop burying radioactive waste in unlined soil trenches by the end of 2003.**

I would appreciate a complete response to my comments.

Sincerely,


Howard A. Pellett

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June 4, 03

Yvonne Sherman
 USDOE - Richland
 P.O. Box 550, A7-75
 Richland, WA 99352

Dear Ms. Sherman,

1 | Hanford's radioactive and hazardous waste
 | burial grounds must be closed down! The future of
 | nuclear power depends upon its ability to safely dis-
 | pose of its wastes. And that has proven impossible, with
 | experiments prohibitably expensive and unreliable.

2 | I surely hope for my grandchildren's sake, and for
 | all future generations, that we do everything possible
 | now to arrest this nuclear nightmare. Yet the USDOE
 | is in violation today of the Tri-Party Agreement, by
 | its refusal to provide basic information, essential to
 | crucial cleanup of Hanford.

3 | Citizens by the thousands - who live and work in
 | the area - have given comments, testimony. The
 | single message has been loud and clear - the cleanup
 | of existing dangerous, leaking, explosive-prone wastes
 | needs to be top priority.

Yet, this winter, plutonium waste has made its way
 from weapons plants to Hanford and now lies buried in
 unlined pits. Carbon tetrachloride, a known carcinogen,
 has also been reported buried there. Needless to say,

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the public trust has been wantonly betrayed.

Moreover, Hanford poses serious danger to the Northwest. We speak of cleanup as if it were really possible, when all we can hope for is containment, to be vigilantly monitored, and renewed, as needed, over the next 10,000 years, a dismay legacy we leave the future.

4 Short of the best containment within our know-how today, we face certain destruction of a magnificent river system of inestimable commercial and recreational value, and greatly increased cancer deaths. Because of the tidal influence, the Willamette River will also be compromised.

5
6 Economics, whose goal is to maximize profits for a few at any cost to the environment that sustains life for all, is stupid economics. Five decades of reliance on nuclear weaponry for security has left us very insecure, and at immense cost (not only for clean-up) but also for education, health, environment, clean energy technology, and world peace.

It is time for voices of integrity and courage to override the conformist "Yes" men; time for those in positions of authority to act out of care and compassion, so vital toward resurrecting our sense of being human from the barbarism of our times.

Sincerely,
Nancy Lou Tracy
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Portland, OR 97223