HLW & FD

EIS PROJECT - AR/PF
Control # DC-26

HLW EIS Web Comments

From: HLWFDEIS Web Site
Sent: Friday, February 18, 2000 9:29 AM
To: web@jason.com
Cc: web_archive@jason.com
Subject: HLW EIS Web Comment

RECEIVED FEB 23 2000

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Date Entered: {ts '2000-02-18 09:29:05'}
Comment:
I have over 25 years experience dealing with HLW in the DOE complex (including the INEEL wastes) and am commenting from that perspective, but as a private citizen.

I prepared a comment a few minutes ago, but it apparently got lost in our server. I will try again with this comment.

1) Learn from the past. One of the most costly decisions make at Hanford was to shut down PUREX before it has processed all of the spent fuel. The management of that fuel is now costing the taxpayer over a $1 billion and the price will go up when it is sent to the repository. It could easily become a $2B mistake. The implications of this comment is keep the calciner running and process off all of the liquid wastes. Get them into a stable and low dispersible solid form.
26-1 III.C(1) 26-2 VII.D(6) 26-3 II.E(4)

2) Make the decision to immobilize for disposal soon. I also favor use of the Hanford future vitrification facility. The sooner the decision the easier and low cost will be the introduction of the waste into the process. I have not studied the specifics, but I suspect that there will be the opportunity to reduce the total volume of wastes if the feed streams from Hanford and INEEL are blended. Some of the constituents of the INEEL calcine (Zr for example) will increase the chemical durability of the Hanford Glass. The large volume of the Hanford waste will dilute the low solubility in glass components in the INEEL calcine (e.g. Zr again).
26-4 II.E(4)

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EIS PROJECT - AR/PF
Control # DC-27

Preliminary Comments of the State of Oregon
on the Idaho High-Level Waste and Facilities Disposition
Draft Environmental Impact Statement
February 22, 2000

Good evening, I am Ken Niles, Deputy Administrator of the Oregon Office of Energy's Nuclear Safety Division. We are the lead state agency for Hanford issues.

We appreciate the opportunity to provide comments to the U.S. Department of Energy and the State of Idaho on their draft Environmental Impact Statement concerning the treatment of high-level radioactive waste at the Idaho National Engineering and Environmental Laboratory. Our comments focus solely on one element of the draft EIS – the proposal to bring Idaho's high-level waste to Hanford for vitrification. Oregon is directly impacted by major activities at Hanford.

27-1 II.E(5) It is Oregon's position that it is premature to consider bringing Idaho waste to Hanford for two reasons: one, Hanford does not currently have a vitrification facility; and two, once it does, there is a pressing need to treat Hanford's waste as soon as possible. These discussions should not occur until after Hanford's waste is completely treated. Under current schedules, that means about 45 years from now.

27-2 II.E(4) We recognize the financial constraints that drive this proposal to bring Idaho waste to Hanford rather than build additional treatment facilities at Idaho. We believe it may make sense to consider this proposal at some future time. However, even then – sometime in the distant future – the State of Oregon would not consider treatment of Idaho's high-level waste at Hanford unless the following conditions were met: use this statement as a preface to each of the next 5 comments

- Idaho waste would not be treated at Hanford until all of Hanford's high-level waste is treated.
- Idaho waste would not come to Hanford until it is time for treatment.
- Upon vitrification of Idaho waste, it must then be returned to Idaho or to a national repository, if one is available. It must not remain in storage at Hanford.
- The transportation of this waste must adhere to enhanced transportation safety protocols developed by Western states for shipments to the Waste Isolation Pilot Plant.
- Oregon must be allowed to participate fully in Hanford decision-making meetings in order to assure these conditions are met.

Let me elaborate on each of these conditions.

27-3 II.E(5) 27-4 II.E(1) **Idaho waste cannot be treated at Hanford until all of Hanford's high-level waste is treated.** Hanford has 54 million gallons of high-level waste stored in 177 aging underground tanks. The waste in these tanks, along with more than one million gallons that have already leaked from failing tanks, poses a direct threat to the Columbia River. The current timetable calls for Hanford's pre-treatment and high-level vitrification facilities to be operational in 2009, but that only 10 per cent of Hanford's high-level waste will be treated by 2018. At that point, waste will still remain – waiting for treatment – in 147 of Hanford's 149 single shell tanks.

EXHIBIT #2
HLW F&D EIS
Portland, OR
February 22, 2000
Name: Ken Niles – State of Oregon

By 2018, the newest of Hanford's single shell tanks will be 52 years old. The oldest tanks will be more than 70 years old. And keep in mind these were designed to have a 20 year operational life. With nearly 70 leaking tanks in the first 50 years of Hanford operations, how many more leakers should we anticipate during the next 20 years?

The double shell tanks are aging as well. By 2018, the oldest of Hanford's double shell tanks will be 47 years old. The newest Hanford tank – presuming more don't have to be built in coming years – will be 32 years old.

The U.S. Department of Energy predicts it will take until 2047 to treat all of Hanford's tank waste. By then, some of Hanford's single shell tanks will be 100 years old. The newest double shell tanks would be 61 years old. Given the age and condition of the tanks, the extent of contamination in the vadose zone and groundwater beneath the Hanford Site, and the fact that the Columbia River is at risk from this contamination, it will take a compelling argument for the State of Oregon and Oregon's residents to support treatment of Idaho's high-level waste at Hanford before all the waste has been removed from Hanford's tanks and treated. We believe that's an argument the Department of Energy can not convincingly make.

27-5 II.E(6)

Our second condition is that **Idaho waste would not be brought to Hanford until it is time for treatment.** The draft Environmental Impact Statement suggests two possible timeframes to bring waste to Hanford – beginning in 2028 or sometime thereafter – presumably after Hanford's wastes have been treated, or between 2012 and 2025, and building new storage facilities at Hanford for interim storage prior to treatment at some undesignated time. The calcined waste at Idaho is currently stored in bin sets, which are designed to safely store the waste for up to 500 years. It would be financially irresponsible to squander many millions of dollars on temporary storage facilities at Hanford, when the waste is safely stored at Idaho. Moving the waste from Idaho to Hanford between 2012 and 2025 or any time prior to actual treatment makes absolutely no sense from a scientific standpoint, from a regulatory standpoint, and most certainly not from a financial standpoint.

27-7 II.E(6) 27-8 II.E(5) 27-15 II.E(1)

Upon vitrification of Idaho waste, it must then be returned to Idaho or to a national repository, if one is available. It must not remain in storage at Hanford. Hanford already has a significant burden of waste – a burden of environmental risks from 50 years of mis-managing waste which even now we do not fully understand. The current draft Environmental Impact Statement for a national repository at Yucca Mountain offers little hope that there will be room for disposal of Hanford's vitrified high-level waste. If Yucca Mountain is not the final destination for this waste, it will be stored indefinitely in Hanford's new Canister Storage Building. That facility – impressive as it is – is not designed for permanent storage. Sometime before the end of this century, new or additional storage facilities would have to be constructed. Waste from another site should not be added to this burden.

27-9 II.E(8) 27-10 VIII.H(5)

The transportation of this waste must adhere to enhanced transportation safety protocols developed for shipments to the Waste Isolation Pilot Plant. For the past ten years, Western States, including Idaho, Oregon and Washington, have worked with the U.S. Department of Energy to develop a comprehensive transportation safety plan for the shipment of transuranic waste to the Waste Isolation Pilot Plant. This transportation program was intended as a model

for transport of other, more radioactive materials such as spent fuel and high-level waste. The transportation program developed for WIPP shipments includes a number of safety elements that go well beyond the minimum legal requirements, such as higher driver and carrier standards, bad weather protocols, shipment tracking, and enhanced truck inspections. High-level waste moved from Idaho to Hanford – and then back again – would travel through about 200 miles of northeast Oregon. The State of Oregon could not support any proposal to treat Idaho waste at Hanford unless the enhanced transportation safety program was used for all of these shipments.

27-11 IX.C(5) 27-12 VII.A(2)

Oregon must be allowed to participate fully in Hanford decision-making meetings in order to assure these conditions are met. The environmental hazards presented by Hanford do not recognize state boundaries. The State of Oregon and its residents are at risk from Hanford, and the state should have every opportunity to influence the decisions that are made that affect Hanford cleanup.

Any proposal which is not consistent with the five conditions we have outlined here is one which the State of Oregon cannot accept.

Again, we appreciate the opportunity to provide comments on the draft Environmental Impact Statement. We will submit more detailed comments in writing prior to the end of the comment deadline. We look forward to seeing how our comments are considered.