HLW & FD

EIS PROJECT - AR/PF
Control # DC-43

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MAR 17 2000

3/09/00
Thomas L. Wichmann
US Department of Energy
850 Energy Drive, MS 1108
Idaho Falls, ID 83401-1563
Attn: Public Comment: Idaho HLW

Dear Mr. Wichmann

43-1 IX.D(1) The Department of Energy doesn't exactly have a good track record of keeping deadlines. They do have a good track record of studying issues to death. They then often fail to make decisions implementing the conclusions of those studies. It appears that the INEEL's approach to implementing the HLW-related provisions of the Batt Agreement will be no different. This will continue to undermine public trust in the Lab, and in us as individual employees of the DOE contractor. 43-2 XI(7) The INEEL's single greatest accomplishment as the "Lead Lab" on waste issues is to have convinced the public that nuclear technology is too difficult to be a viable energy option.

43-3 III.C(2) In reality, there are no especially difficult technology issues associated with HLW. In fact, the solutions to our "problems" were designed decades ago. Solutions such as sugar addition to sodium-bearing HLW prior to calcining was demonstrated here on a pilot scale in 1965. 43-4 III.C(2) Solutions to calcine offgas emission of NOx and Hg were also identified and ignored. 43-5 III.D.4(8) Calcine conversion into monolithic concrete (FUETAP) was developed at Oak Ridge in the 1970's. A similar process was used in the UK, where these difficult problems were solved long ago. 43-6 III.D.1(3) The existing solutions are effective, and only dangerous in the imagination.

43-7 IX.D(1) The continued pretense that these issues are too complex to be dealt with in an expeditious and economical manner will only continue to erode public confidence in the Lab, and ultimately result in the loss of our mission.

43-8 III.C(1) The remaining liquid should be immediately calcined, and the calcine should be rendered ready for disposal via a FUETAP-like process, and shipped for disposal. 43-9 VII.D(2) If we got serious about actually solving this problem it could be done prior to the Batt Agreement deadlines. Our continued employment may depend on it. Thank you for the opportunity to comment. 43-10 VIII.1(1)

Sincerely yours,

Bruce J. Mincher, Ph.D.

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EIS PROJECT - AR/PF
Control # DC-44

P.O. Box 308
Wilson, WY 83014
March 16, 2000

Thomas L. Wichmann, Document Manager
U.S. Department of Energy, Idaho Operations Office
850 Energy Drive, MS 1108
Idaho Falls, Idaho 83401-1563
Attention: Public Comment: Idaho HLW & FD EIS

The issues facing the INEEL are public trust, our responsibility to future generations, and present day safety.

44-1 IX.D(3) Without trust, we cannot move on. An oversight committee should consist of at least three citizens from each down wind and down stream community, plus competent scientists whose wages and reputation do not depend on the government or the nuclear industry. All activities and decisions should be as open as possible. Not only will this engender trust, it will also increase the hope of useful input.

44-2 X(9) We chose the activities which made the waste and we have a duty to clean it up as well as we possibly can. We should spend whatever money and effort it takes to do that, and not leave the burden to our grandchildren and great grandchildren.

44-3 IV.C(1) Unavoidable contaminated residue should be stored in well-defined, isolated, impervious spots. 44-4 VIII.A(10) We should assume short term risk, if necessary for long term safety.

43-5 VIII.C(4) It's important not to contaminate the aquifer because such contamination is insidious and hard to clean up. It could hurt people without their realizing it for hundreds of years. Maybe more.

43-6 XI(7) Until we have the technology to make the by-products of nuclear energy safe, we had better cease activities that produce radioactive waste, and find some other source of power and weaponry. It's ridiculous to foul our own nest in the name of progress.

Anne Newcomb

Anne Newcomb
ph: 307-734-0970
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HLW & FD
EIS PROJECT - AR PF
Control # DC-45

BEFORE THE DEPARTMENT OF ENERGY

OF THE UNITED STATES OF AMERICA

PUBLIC HEARING

UNITED STATES DEPARTMENT OF ENERGY'S IDAHO HIGH LEVEL WASTE AND FACILITIES DISPOSITION DRAFT ENVIRONMENTAL IMPACT STATEMENT

HEARING OFFICER: PETER RICHARDSON, ESQ.

DATE: February 15, 2000
TIME: 6:00 p.m.
PLACE: College of Southern Idaho
CITY: Twin Falls, Idaho

call your name, please come forward to the microphone at podium to my left, please preface your comments by stating and spelling your name, and providing your mailing address if you wish to receive a copy of the final Environmental Impact Statement. If you are representing an organization, state the name of that organization and the capacity in which you represent them. If the court reporter is having trouble following you or hearing, he may ask for your help to slow down or speak up or directly into the microphone in order to make a complete record of your comments.

I will now begin the formal comment portion of this evening's hearing. I would stress that this is a formal hearing and recorded this evening with a full transcript being prepared.

Finally, I want to thank you for attending the hearing and for your cooperation in observing the procedures I have just outlined.

My first commentor is Steve Hopkins.

MR. HOPKINS: My name is Steve Hopkins, S-t-e-v-e, H-o-p-k-i-n-s. I'm with the Snake River Alliance of Idaho. My mailing address is P.O. Box 1731, Boise, Idaho 83701.

I'm speaking tonight on behalf of the Snake River Alliance. I also will be submitting more

detailed written comments at a later time.

The Snake River Alliance has been watchdogging activities at the Idaho National Engineering Laboratory for 20 years now. So I think we can provide a very fresh and honest perspective as to how to approach the treatment of high-level waste at facilities disposition.

45-1 IX.C(4) For starters, I would like to thank the Department of Energy and the State of Idaho for putting on the hearing and allowing the public to testify. I am concerned about the timing of the 45-2 IX.C(2) release of the document. Originally, the document was supposed to be released back in August of '99 or even April of '99, and it's been delayed many times. And timing by which it came out coincided a lot with the RICRA process on the advancement waste treatment facility, and there was not adequate time allowed for review of the document before the public hearings. The public hearings should have been adjusted to reflect the release of the Environmental Impact Statement.

45-3 XI(7) One thing that appears over and over again as it concerns treatment of spent fuel through reprocessing historically at INEEL is it's never fully admitted that INEEL in bomb production activities

throughout the Department of Energy complex. The reprocessor reprocessed weapon-grade uranium that was later used to produce tritium and plutonium at Hanford; however, the open and honest role that the reprocessor played has never been fully explained, and that needs to be adjusted.

In looking at the document thus far, 45-4 III.D.3(1) I see that there is much more science fiction and politics in this document than science itself. Looking especially at the separations technologies in the document, it seems to me that the Department of Energy and the State might as well look at turning waste into wine because there is as much of a technical basis for doing so as there is, say, for something like transuranic separations. 45-5 III.D.3(1) One of the things in terms of the handout concerning areas of uncertainty and controversy is the technical maturity of alternative treatment processes. Alternatives have varying maturity levels. And it must be addressed in the final Environmental Impact Statement. Either options that have no technical basis need to be dropped for consideration in the final EIS or there has to be supporting technical documents to give some assurance to the public that the technology could actually work because, as things stand, the separations technology

there is little basis in reality in terms of how these technologies could really work.

In terms of the politics that's in the -- that is so dominant in the document, which is unfortunate because treatment of the waste should proceed strictly out of concern for environmental protection. It seems to me that separations is pursued strictly because of problems with Yucca Mountain in an attempt to engineer around Yucca Mountain to go to the Waste Isolation Pilot Plant, and this is really unfortunate because we should look at how best to isolate this waste from the environment where it is because there are tremendous uncertainties as to whether or not it can actually be shipped offsite. And, therefore, we must look at the best way to solidify the waste and protect it from where it's at.

I do believe I have five minutes because I'm representing an organization.

I point out that this has actually been done at Hanford, that the Tank Waste Task Force, which is a precursor to the site-specific advisory board consisting of tribes, the State, and stakeholders, basically they have been saying since 1994 that, as it concerns Hanford waste, which is much, is much greater

45-6 II.A(5)
45-7 III.D.3(3)
45-8 III.E(1)

volume and presents more problems because of the leakage of the tanks, that treatment should proceed to best solidify the waste without regard to Yucca Mountain. And I think Idaho could do well to learn from that example.

Looking at the options, I see the Planning Basis option as completely unrealistic. That it's done by the State basically to stick an alternative in the document that could potentially, if everything went as planned, which never happens, would meet the Governor's agreement. And that's where politics come in. The State should instead be cooperating with the Department of Energy to look at the best way to isolate the waste from the environment.

There is also a clause in the Governor's agreement that Ms. Dold spoke about earlier where modifications could be made to the Governor's agreement based upon equi-analyses, which would be one such analysis that could lead to adjustment of the Governor's agreement. So there is flexibility allowed there, and, therefore, I would like the State to not consider pushing for the Planning Basis option. Instead look at realistic ways to best treat the waste and put it in a solid form.

True separations should be entirely dropped

45-9 II.D(1)
45-10 II.D(1)
45-11 II.D(1)
45-12 III.D.3(1)

from the document unless there can be some support -- technical support offered in the final EIS.

45-13 11.E(2) Another option that should be dropped at this point is minimal processing because it assumes that the waste could go to Hanford. This is extremely unrealistic. For one, Hanford is not planning on separation for its waste, so Hanford would have to build additional facilities in addition to the WIPP plant in order to do separations of our small quantity of high-level waste compared to their waste.

MR. RICHARDSON: Mr. Hopkins, I note that five minutes can fly by, so if you can wrap up your remarks, I would appreciate it.

MR. HOPKINS: Finally, I would like to point out that it's mentioned in the document that the National Resource Counsel study, which is basically the National Academy of Sciences, is pointed out in the document that it does not present a substantially different picture than the EIS. But I would like to point out that in reading the NAS report that I found this not to be the case. That the NAS report looks at separations in a very critical light and basically concludes that separations are not realistic. The quote from page 41 and 42 of the NAS report, It is much less likely that the objective, meaning

45-15 III.D.3(1) + 45-16 III.D.1(8)

separations, can be met for intergrated operations at a realistic plant conditions without encountering undesireably complex problems, exorbitant costs, and generation of excessive amounts of secondary wastes.

MR. RICHARDSON: Thank you for your comments.

I would remind you that March 20th is the deadline for submitting written comments, and I would encourage you to finish your thoughts in writing and submit them in one of the variety of ways that we have provided.

Todd Martin.

MR. MARTIN: My name is Todd Martin, and I am representing an organization under the same name, my name, licensed in Washington state. My address is P.O. Box 58, Northport, Washington 99157.

MR. RICHARDSON: Excuse me. I didn't catch the name of the organization.

MR. MARTIN: The organization's name is Todd Martin. It's a sole proprietorship in Washington state. I need that loophole for that extra two minutes.

MR. RICHARDSON: Mr. Martin, we'll give you five minutes.

MR. MARTIN: I'm here at the pleasure of

Snake River Alliance who asked me to come down and take a look at this document and comment. I'm not going to pretend I know a lot about INEEL because I don't. And I also come from a site, Hanford, which is probably one of the biggest glass houses in this complex that nobody should throw rocks from.

So what I would like to talk about is what Hanford has done wrong, what mistakes we've made as a site in terms of our high-level waste program. Hanford has 60 percent of the nation's defense high-level waste; INEEL has about three percent. We have 177 tanks, nearly a third of which are leaking, over a million gallons of waste that has reached the groundwater that will some day enter the Columbia River. Eleven tanks at INEEL, most of the waste is already in a solid form. It's not to minimize the challenge in Idaho, but rather to just emphasize the challenge we have at Hanford.

In 1989, we desided to pursue TRUEX, do a separations process, vitrify the high-level, grout the level, much, many of these options that are outlined in the EIS. That facility was to start operating exactly two months ago, December 1999. Obviously, it didn't happen. TRUEX was too risky from a technical standpoint. Essentially it wouldn't work. It was too

expensive. The grout part was not found to be protective of human health and safety and was also abandoned. Five years, 1.2 billion dollars Hanford spent before we finally threw in the towel. Hanford then moved to a simple pretreatment process, essentially the solid liquid separation, cesium and strontium removal, which are the first three treatment steps in many of the options over there, and got rid of the grout program and to vitrify all of its low-activity waste.

What I want to talk about is the lessons learned from this process. First of all, don't rely on advanced separations. They're not science; they're science fiction. Hanford couldn't make it pay with 60 percent of the waste; it's unlikely that INEEL will be able to make it pay with only three percent of the waste. On top of that, the National Research Council document says, It's a long shot, in a nut shell.

4502-1
III.D.3(1)

Second lesson learned, don't rely on Yucca Mountain. As Steve pointed out, the Hanford stakeholders adopted a resolution in 1994 that said, Hanford's assumptions and programatic planning should not be based on Yucca Mountain costs. It's a speculated repository with speculated costs that currently is not sized and may never be licensed to

4502-2
III.E(1)

receive this waste.

4502-3 II.E(5) On the option of sending waste to Hanford. I personally am welcoming that waste with open arms. It is unlikely, however, from a political standpoint that before Hanford waste is truly vitrified and finished any Idaho waste will be vitrified at Hanford. Right now the planning basis, if everything falls into place perfectly, Hanford will be done in 2047, after which we can receive INEEL waste. It's not a particularly realistic option at this point.

4502-5 VII.A(4) Looking at the document itself, I think the scope is too limited and needs to be altered. The final decisionmaker, and this is the document on which I'm making the decision, it doesn't do the job because I have too many questions. One, which option will work; two, which option can I pay for? Both of those characteristics are scoped out of this EIS. It's inappropriate to scope those out because the decisionmaker will not be able to make a reasonable decision without those two pieces of information.

4502-6 VII.A(4) Picking up on Steve's waste into wine option, we could add an alternative to the document that did essentially result in turning the waste into wine. It would be extremely difficult from a technical standpoint, but that's not considered in the

EIS. It would be obviously extremely expensive, but neither is that considered. But it would be very good on the cultural end of things, from the socioeconomic aspects, from the transportation aspects, it would fare very well in this EIS. It's an extreme and ridiculous example, but it demonstrates the uselessness of evaluating these alternatives without cost and technical viability. Those should be added.

Three times in the last decade, Hanford asked for everything in its high-level waste program. We went to Congress with an all or nothing proposal. Treat this stuff in a generation at Hanford. Minimize lifecycle costs by minimizing high-level waste volume to Yucca Mountain. Three times we got nothing. 4502-7 III.D.3(1) What I am here to urge INEEL to not do is go with the all or nothing bargain. Don't go for TRUEX advanced separations, 4502-8 III.E(1) don't rely on Yucca Mountain. Do store the calcine safely 4502-9 III.E(1) and do aggressively try to treat the liquids. 4502-10 III.A.(1) Get them into a solid form as soon as you can.

I appreciate the opportunity to comment.

MR. RICHARDSON: Thank you for your thoughtful comment.

Mr. Martin was the last individual that I have who has preregistered to comment. Is there

anyone in the audience who would like to comment but has not yet had an opportunity to do so? Indicate so and I will call you up to the podium and we'll get your comments on the record.

I note for the record that no one has so indicated. We will be at ease and off the record and subject to call of the chair.

(A RECESS WAS HAD.)

MR. RICHARDSON: It is now 8:30. We will be back on the record.

I would ask if there is anyone in the audience who would like to make a comment formally who has not had an opportunity to do so. Indicate by raising your hand and we will call you up and get you on the record.

I note that no one has so indicated.

I will mark as Exhibit 1 of the Twin Falls hearing a multi-page document entitled Idaho High-Level Waste and Facilities Disposition Draft, Environmental Impact Statement, Tom's Talking Points-Twin Falls. That will be Exhibit No. 1. I will note for the record no other Exhibits were submitted to me this evening, and everyone who would like to have commented has had an opportunity to do so.

HLW & FD

EIS PROJECT - (AK) PI
Control # DC-46

Mr. Mark M. Giese
1520 Bryn Mawr Ave.
Racine, WI 53403

Mark M Giese
E-mail: mmk@juno.com

MAR 14 2000

RECEIVED MAR 20 2000

Mr. T. Wickman
Document Mgr
DOE Operations Off
Idaho Falls ID 83401

Dear Sir:

46-1
III.C(3)

[Please cancel plans to restart the Calcine high-level radioactive waste incinerator.

The risks of restarting are unacceptably high for the residents, workers, and environment.]

Thank you.

Sincerely,

100% Salvaged Paper