HLW EIS Web Comments

HLW & FD EIS PROJECT - AR/PF
Control # DC-63

From: HLWFDEIS Web Site
Sent: Tuesday, April 18, 2000 4:25 PM
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Subject: HLW EIS Web Comment

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Comment:

I appreciate having had the comment period extended. 63-1 IX.C(2)

Why has DOE not given serious consideration to other methods of calcining the sodium bearing waste, such as use of sugar to reduce the nitrate? I sense that we are going to lose the Calciner because of failure to develop an intelligent method of employing it. 63-2 III.C(2)

I agree with the National Research Council that processing of existing calcine should have a low priority. 63-3 III.D.3(1)

The DOE has biased the selection of methods by arbitrarily defining a metric ton of heavy metal as equal to two "canisters". This definition has no relation to the real limit in disposal density inside a repository, which is heat load, i.e. radioactivity. The result is to bias the economic analysis against high volume waste forms which might otherwise be desirable. One example is grouting of calcine, in case it is some day decided to treat the calcine. 63-4 III.F.2(1)

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IDAHO HIGH-LEVEL WASTE & FACILITIES DISPOSITION
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PUBLIC COMMENT
APRIL19, 2000

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Attention: Public Comment: Idaho HLW & FD DEIS

PUBLIC COMMENT FROM: MARGARET MACDONALD STEWART
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64-1 VIII.G(7) Having lived for nearly 30 years in Blaine County, Idaho, I am, and have been for decades, very concerned by activities at the Idaho National Engineering and Environmental Laboratory. With alarming frequency, these activities, particularly those dealing with radioactive waste treatment and storage, are rarely based with protection of human health and the environment as the primary concern.

64-2 IX.D(4) If we are to ever get the mess of nuclear waste and contamination at the government's nuclear weapons and storage facilities under some sort of reasonable control, we must begin to deal with the mess in a logical and rational manner. This must be done with a concerted effort by the Department of Energy to fully engage - and listen to - its most important business partner – the public. Had this business partner been involved from the get-go, this nation would not be in the critical situation we find ourselves in today. People who live and work in the shadow of nuclear facilities have an uncanny ability to know what is going right, and what is going terribly wrong. They know when they are being lied to and they know how to best rectify a project that is terribly misguided. Enough said. Don't forget to listen to us. We have a voice and we will use it en mass to get this situation reversed to start protecting us and the world we depend on for survival.

64-3 II.A(4) The Idaho HLW & FD DEIS is a complicated mass of options in how to deal with INEEL's deadly high-level waste problem. There is really no good option currently available to correct the damage that has been done by this waste and by the future damage it will cause. Each option presented has its own pitfalls. However, it is clear that with any reasonable thought going into the possible processes, ANY TREATMENT METHOD CHOSEN MUST HAVE AS ITS # 1 GUIDELINE PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT. Anything less, is completely unacceptable. 64-14 II.A(5) 64-15 II.A(5)

64-4 III.E(1) To base a treatment program on an uncertain target – a non-existent permanent geologic repository – is sheer idiocy. We have waste. We have no where to dispose of it other than the site where it is right now. We must be realistic and not dwell on an over-the-

64-6 X1 (7) rainbow destination for nuclear waste. The AEC and DOE have been denial for decades about the entire picture of nuclear weapons production. It is time to face the music that what we have now we will always have and we must care for it where it is now as safely as possible.

64-7 III.D.3(1) No "separation technologies" should be considered. Separation of existing waste creates more waste streams to manage; separation produces greater volumes of waste than non-separation; and separation technologies have not been proven safe or effective. This is 64-16 III.D.3(1) not the time or place for experimentation. Calcine and liquid wastes should be treated independently.

64-8 II.A(1)

64-9 VII.B(1) Treatment must address all forms of contamination – soil, groundwater, structures and facilities, and the high-level waste.

64-10 VII.D(1) No treatment of high-level waste should be chosen just to comply with the Settlement Agreement of 1995. The timelines in the Settlement Agreement were unrealistic from the beginning and compliance with words on paper rather than protection of people and their earth is an obscene thought.

64-12 III.D.2.C(1) Given the list of high-level waste treatment options, I would have to vote for the option of least offensiveness - Early Vitrification. It appears to be the treatment most readily do-able with the least amount of further harm done to people and the land. No matter what, it must be scrutinized carefully, every step of the way, with full public involvement, and the contractor must be thoroughly investigated for past and present safety and ethical work practices – with that information made available to the public.

64-13 IX.D(6)

Thank you,

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HLW & FD

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Comments on the
Idaho high-level waste and facilities disposition draft environmental impact statement

Snake River Alliance

April 19, 2000

The following comments and questions are submitted on behalf of the 1,300 dues-paying members of the Snake River Alliance, an Idaho-based grassroots group that has monitored activities at the Idaho National Engineering and Environmental Laboratory since 1979.

65-1 IX.C(2) We would like to thank the Department of Energy for extending the public comment period. In the your own words this document details "the largest, most expensive, and technically complex environmental management project at INEEL," and therefore the additional time was helpful.

65-2 III.E(1) The Alliance concurs with the Department's intent, as analyzed in all alternatives except "no action", to solidify the remaining liquid waste and eventually place the calcine in a less dispersible form. However, given that there is no repository in existence to receive this waste, any assumption of such a repository should be dropped from the final EIS. Presently, the DEIS is too influenced by the assumption of a near-term High-level waste repository, and by the 1995 settlement agreement, and not enough by a fundamental need to better isolate the waste from the environment where it resides. Overall, there is too little concern for environmental protection in this DEIS.

65-3 III.F.1(2)

65-4 III.D.1(1)

65-5 VII.A(4) The DEIS's limited scope makes it nearly useless as an analytical tool in terms of making the decisions it aims to make. Probably the two most important variables in analyzing these alternatives are: (1) the question of technical risk associated with an alternative (in other words, Will it work?); and (2) the costs of the alternative. Both of these considerations are *outside the scope of the DEIS*. Without cost or technical viability analysis, the ROD will be baseless. Also, the EIS scopes out considering that Yucca Mtn will not accommodate INEEL waste (because of RCRA issues). Therefore, this EIS is analyzing alternatives to come to the following conclusion: If INEEL were not bound by the realities of the current repository situation; if INEEL were not bound by the scientific realities of the physical world; and, if INEEL had all the money in the world, this is the option we would choose.

65-6 VII.A(4)

Separations options

65-7 III.D.3(3) Clearly the "separations" alternatives analyzed in the DEIS are not in the best interest of environmental protection, and are instead driven by the current repository situation and a burning need to fulfill the terms of the settlement agreement. These alternatives, Planning Basis, Transuranics Separations and Full Separations, if they were to work, and that is a big if, might reduce the "High-level" waste volume, but in the process, the *overall* volume of waste would *increase*. In the real world this would not decrease *the overall danger* of the waste. In fact, if you were to decide to leave the "low-level" waste grout fraction in the tanks, you would after spending billions of dollars, be leaving the hottest fraction and greatest near-term threat behind. It should also be noted that the "Hanford Tank Waste Task Force" recently recommended that the DOE forgo pursuit of this technology because of the tremendous cost and technical uncertainty. In addition, the Transuranics Separations alternative involves a greater risk of a criticality accident as admitted in the document.

65-8 III.D.3(1)

65-9 III.D.3(1)