

**Commentor No. 161: David Skakel
Columbia Gorge Audubon Society**

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

ON BEHALF OF COLUMBIA GORGE AUDUBON SOCIETY, WE EMPHATICALLY OPPOSE ANY PROPOSAL TO RE-START THE FFTF AT THE HANFORD FACILITY. REPRESENTING A MEMBERSHIP OF APPROXIMATELY 300 RESIDENTS OF THE MID-COLUMBIA GORGE REGION IN WASHINGTON AND OREGON, THE COLUMBIA GORGE AUDUBON SOCIETY PRIMARILY INSISTS THAT THE D.O.E. FOCUS ALL AVAILABLE RESOURCES ON HAZARDOUS WASTE CLEAN-UP AT HANFORD PRIOR TO ANY NEW ACTIVITIES THERE.

AS A VOLUNTEER FOR HEART OF AMERICA NORTHWEST DURING 1992, I FEEL CONFIDENT THAT THE D.O.E. (AND ITS CONTRACTORS) ARE NOT REMOTELY UPHOLDING THEIR PROMISE TO SUBSTANTIALLY CLEAN UP HANFORD.

REGARDING THE D.O.E. ARGUMENT FOR THE BENEFIT OF CREATING LARGE VOLUMES OF MEDICAL ISOTOPES, WE FEEL THAT A MAJOR MEDICAL HAZARD CONTINUES TO EXIST BECAUSE OF THE HAZARDOUS WASTE CLEAN-UP WHICH HAS NOT BEEN ACCOMPLISHED.

PLEASE SUBSTANTIALLY COMPLETE THE HANFORD CLEAN-UP (VIA VITRIFICATION) OR WHATEVER MEANS DEEMED BEST, BEFORE PURSUING ANY NEW USES AT HANFORD.

I VOTE TO SHUT DOWN FFTF PERMANENTLY. There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): DAVID SKAKEL

Organization: COLUMBIA GORGE AUDUBON SOCIETY

Home/Organization Address (circle one): _____

City: White Salmon State: WA Zip Code: 98672

Telephone (optional): 509-493-3891

E-mail (optional): _____

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For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 1990 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
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7/12/00

Response to Commentor No. 161

161-1

161-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF.

161-2

161-2: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

161-3

DOE notes the commentor's and concerns regarding the existing cleanup at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

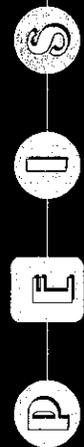
The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Therefore, restart of FFTF would not impact current cleanup schedules.

161-3: See response to comment 161-1.

Commentor No. 162: Anonymous

Response to Commentor No. 162

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

continue the cleanup!

Do NOT START FFTF again!!!

Alternative 5 is the only solution

162-1

162-2

162-1: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

162-2: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.

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- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: _____

Home/Organization Address (circle one): _____

City: _____ State: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

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 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 163: Catherine Zangar

Draft PEIS Comment Form

I oppose alternative #1 adamantly, I support Alt. #5 - shut down the FFTF.
 - I see that the draft EIS does NOT address impact broadly or thoroughly. The waste stream is discussed vaguely and in elusive terms - 'plan' vs 'preference' & commercial disposal (what specifically) - nor do they address - the trenches are inadequate and illegal. - impacts (negative) to ecosystems including creatures besides humans.
 - impacts besides cancer
 - impacts from accidents, error, sabotage, vandalism, greed/dishonesty, etc. (worst case scenarios are possible + catastrophic)
 - your ARROGANCE in asking any citizens if this plant to accept MORE nuclear risk + waste is so offensive.
 - the selfishness of any person/group/agency in requesting to restart the FFTF for any, but especially such non-compelling reasons, is outrageous.
 - CLEAN UP HANFORD, make NO MORE NUCLEAR WASTE, NOR STORE IT THERE. The safe lands are NOT nuclear dumps.

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- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Catherine Zangar

Organization: _____

Home/Organization Address (circle one): 721 Pine Ave.

City: Wood River State: OR Zip Code: 97031

Telephone (optional): 541 386 9228

E-mail (optional): _____

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NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Response to Commentor No. 163

- 163-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF.
- 163-2:** See response to comment 163-1.
- 163-3:** Management of wastes that would be generated under implementation of Alternative 1 (Restart FFTF) is discussed in Section 4.3 of Volume 1 (e.g. see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.
- 163-4:**
- 163-5:**
- 163-6:**
- 163-7:**

The trenches (i.e., Hanford Site's 200 Area's Low-Level Waste Burial Ground) are regulated by DOE under the Atomic Energy Act of 1954, as amended, and under DOE Order 435.1, Radioactive Waste Management. The 200 Area's Low-Level Burial Ground also contain the following three active permitted mixed waste trenches whereby mixed low-level waste is both stored and disposed of: (1) Trench 31 is a permitted, lined Subtitle C disposal trench that is currently utilized for greater than 90-day storage of mixed low-level radioactive waste; (2) Trench 34 is permitted, lined Subtitle C disposal trench currently utilized for the disposal of mixed low-level radioactive waste that has been treated and is compliant with Land Disposal restrictions; and (3) Trench 94 is a permitted, unlined disposal trench utilized for the disposal of decommissioned naval reactor components. Use of Trench 94 for naval reactor compartments is authorized under a special exemption from the State of Washington Department of Ecology (Ecology). Currently, the Low-Level Burial Ground has a Part A Permit approved by Ecology under the State of Washington Dangerous Waste Regulations, State of Washington

Commentor No. 163: Catherine Zangar (Cont'd)

Response to Commentor No. 163

Administrative Code (WAC) 173-303, and, as such, is an interim status treatment, storage, and disposal (TSD) unit under the Resource Conservation and Recovery Act (RCRA). The permitted active and future mixed waste units of the Low-Level Burial Ground meet all regulatory requirements of WAC 173-303 and RCRA and will be incorporated into the Hanford Site RCRA Facility Part B Permit and will operate under final status regulations. In early June 2000, a working draft of the Hanford Site RCRA Facility Part B Permit application was submitted to Ecology.

- 163-4:** The NI PEIS identifies (in Chapter 3 of Volume 1) endangered species that live on or near all of the candidate sites, as well as aquatic and wetlands areas that may be impacted by operations at candidate locations. According to an International Atomic Energy Agency (IAEA) publication (IAEA Technical Report Series No. 332, Effects of Ionizing Radiation on Plants and Animals at Levels Implied by Current Radiation Protection Standards), a dose rate of 100 millirem per year to the most exposed human will lead to dose rates to plants and animals of less than 0.1 rad per day. The IAEA concluded that a dose rate of 0.1 rad per day or less for animals and 1 rad per day or less for plants would not affect these populations. The largest individual dose for any of the nuclear infrastructures alternatives under normal operations would be less than 0.1 millirem, which is three orders of magnitude less than the IAEA threshold for adverse effects. Therefore, implementation of any of the range of reasonable nuclear infrastructure alternatives would not be expected to result in adverse impacts on plants and animals living in potentially affected areas around the candidate sites.

Appendix H provides information on potential health effects other than fatal cancers. Of the three health impacts from low levels of radiation exposure (non-fatal cancers, hereditary effects, and fatal cancers), fatal cancers have the highest probability of occurrence, roughly 500 excess cancer fatalities per million person-rem. Non-fatal cancers and hereditary effects appear at rates of approximately 20 and 26 per cent of this number. Using a single number for human health impacts provides a simple direct means to compare impacts and risks among the alternatives. Cancer fatalities, being the largest impact, were selected for presentation throughout the NI PEIS.

- 163-5:** The NI PEIS presents the incremental risk associated with each of the alternatives. Sections 4.2-4.6 of Volume 1 provide the results of the

Commentor No. 163: Catherine Zangar (Cont'd)

Response to Commentor No. 163

evaluation of potential health impacts that would be expected from implementation of the alternatives, including normal operations and a spectrum of accidents that included severe accidents. The accident review included internal events, external events, natural phenomena, common-cause events, and sabotage and terrorist activities. The environmental analysis showed that radiological and nonradiological risks associated with each alternative would be small.

163-6: Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure for the purposes of addressing three primary needs:

1) to support the need for increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee;

2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238, a fuel source that is required for deep space missions and which the U.S. has no long-term, assured supply; and

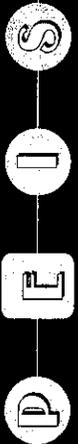
3) to support civilian nuclear research and development needs in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio. Section 1.2 of Volume 1 has been revised to clarify the purpose and need of the proposed action.

163-7: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

It is DOE's policy that all wastes be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

Draft PEIS Comment Form

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



THE D.O.E SHOULD CONSIDER A WIDER VIEW OF ENERGY SOURCES AND BURY THE DEAD TECHNOLOGIES OF THE PAST. LOOK INTO ALTERNATIVES AND SHOW THE PUBLIC OF INTEREST IN ALTERNATIVES.

164-1

164-1: DOE notes the commentor's interest in alternative energy sources, although issues of research and development of alternative energy sources are beyond the scope of this Nuclear Infrastructure PEIS. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

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- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: _____

Home/Organization Address (circle one): _____

City: _____ State: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

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7/12/00

Commentor No. 165: Ann McKinney

Draft PEIS Comment Form

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

It is clear we need to rewrite or abolish the atomic energy act of 1954. There have been no new reactor orders in the US since the 1970's. The people of the US do not want nuclear energy. Safety is not as important as the continued use of toxins that stay for generations. Space exploration does not depend on the use of plutonium any longer. How the funds that were used to build FFTF to clean up the present unforgivable mess at Hanford.

It is hard to trust the draft without proper documentation of the studies. How much is really disclosed - how much hidden in the name of national security? Why was the cost to the environment (birds, animals, fish) not discussed. How about Goddard - down wind - down river. And department of energy forget about solar energy? Why isn't this developed. I approve of # 5 - Shut it down & clean it up.

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- commenting via e-mail: Nuclear-Infrastructure-PEIS@hq.doe.gov

Name (optional): Ann M McKinney

Organization: _____

Home/Organization Address (circle one): 13138 S New Era Rd

City: Ore City State: OR Zip Code: 97045

Telephone (optional): _____

E-mail (optional): _____

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E-mail: Nuclear-Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 165

- 165-1: The commentor's opposition to nuclear energy is noted. DOE, however, is committed to its charge to meet the national needs for isotope production and nuclear energy research, as directed by the U.S. Congress, under the Atomic Energy Act, as amended. The alternatives evaluated in the PEIS address these needs. The PEIS, along with other reports and information, will help DOE reach a decision on its nuclear infrastructure that will not only meet future needs, including nuclear isotopes and energy, but also provide good long-term stewardship of the environment.
- 165-2: Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA space missions; no viable alternative to using plutonium-238 to support these missions currently exists. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted by approximately 2005. Without an assured domestic supply of plutonium-238, DOE's ability to support future NASA space exploration missions may be lost. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.
- 165-3: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 165: Ann McKinney (Cont'd)

Response to Commentor No. 165

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

- 165-4:** DOE made every effort to obtain, analyze, and disclose all required information to make a decision on expanding nuclear infrastructure. All references used in preparing the NI PEIS are cited in the reference section of each chapter and appendix. DOE has made these references and other material relevant to review of the NI PEIS available to the public in the designated public reading rooms. No material has been withheld for national security reasons as the facilities under consideration would be operated to support civilian missions only, which will be affirmed in the Record of Decision for this NI PEIS, when issued. Subsequent proposals to operate the selected facilities to support missions other than those selected in the Record of Decision, such as for defense related missions with national security implications, would require the preparation of subsequent NEPA documentation along with the opportunity for public comment in accordance with NEPA.
- 165-5:** The NI PEIS does address impacts to ecological resources for each of the proposed alternatives and options, including the No Action alternative. Specifically, impacts to terrestrial resources, wetlands, aquatic resources, and threatened and endangered species were addressed. Potential impacts to down wind and down river resources are discussed under air quality and water resources sections. The impacts associated with the FFTF Restart Alternative are given in Section 4.3.1.1.3, "Air Quality"; Section 4.3.1.1.4, "Water Resources"; and Section 4.3.1.1.6, "Ecological Resources" of the NI PEIS. Impacts are shown to be small.
- 165-6:** DOE notes the commentor's interest in alternative energy sources, although issues of research and development of alternative energy sources are beyond the scope of this Nuclear Infrastructure PEIS. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

Commentor No. 165: Ann McKinney (Cont'd)

Response to Commentor No. 165

- 165-7:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF. DOE also notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site.

Commentor No. 166: Kathy Sneider

Response to Commentor No. 166

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

These meetings are a waste of taxpayers dollars! We have told you we are opposed to the restart of the FFTF reactor.
You need to listen to the public

166-1
166-2
166-1

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- commenting via e-mail: Nuclear.Infrastructure.PEIS@hq.doe.gov

Name (optional): Kathy Sneider
 Organization: _____
 Home Organization Address (circle one): Bx. 153
 City: Husum State: Wa Zip Code: 98623
 Telephone (optional): (509) 387-3786
 E-mail (optional): _____

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 E-mail: Nuclear.Infrastructure.PEIS@hq.doe.gov



7/12/00

- 166-1: DOE is committed to providing the public with comprehensive environmental reviews of its proposed actions in accordance with NEPA, and holding public hearings is an essential and required part of the NEPA process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS DOE carefully considered comments received from the public.
- 166-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

Chapter 2—Written Comments and DOE Responses

Commentor No. 167: Ruth Olin

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

Dear Collette

Please don't do this. ^{quality of the} ~~Their lives of our~~ children depends on it. ~~the fact that~~ ^{very lives...} ~~pledge don't further pollute~~ the Columbia River via precious ^{Re: Cleanup - where are you gonna put it?} ~~mission?~~ ^{in New York?} ~~No one wants it!~~ ^{to FFTF.}

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Name (optional): Ruth Olin

Organization: _____

Home/Organization Address (circle one): _____

City: Hood River State: OR Zip Code: 97031

Telephone (optional): _____

E-mail (optional): _____

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7/12/00

Response to Commentor No. 167

167-1
167-2
167-3
167-1

- 167-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.
- 167-2:** Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.
- FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.
- 167-3:** The restart of FFTF or any of the other proposed alternative facilities would not have an impact on the cleanup missions at Hanford, INEEL, or ORR. The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and appropriate DOE orders.

Commentor No. 168: Jerry Gabay

Response to Commentor No. 168

Draft PEIS Comment Form

It seems to me that 2 years ago you had similar hearings in the NW. It seems to me that the voice of the public was loud at that time, and exquisitely clear: NO MORE PRODUCTION AT HANFORD.

Now you are having hearings on the same subject again. That tells me you either did not hear the public, or you don't care.

Whichever, whether you don't listen or don't care, why not stop the charade, and say you are adding to the economic interests that want a start-up.

You have poisoned our environment for too long. We don't want you - go home and defoul your own backyard.

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- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Jerry Gabay

Organization: Concerned private citizen

Home/Organization Address (circle one): PO Box 151

City: Mosier State: OR Zip Code: 97040

Telephone (optional): _____

E-mail (optional): sjsg@pacifi.com

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toll-free telephone: 1-877-562-4593 • toll-free fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

168-1

168-2

168-1

168-1: The public meetings referenced by the commentor concerned the October 1997 tentative agreement among the U.S. EPA, Washington State Department of Ecology, and DOE Richland Operations Office DOE-RL) to delete the FFTF's M-81 milestones (for both standby and transition activities) from the Tri-Party Agreement (TPA). This followed the January 1997 decision to place FFTF in standby. This Class I TPA modification was the specific focus of the TPA-required public review and comment period, which ran from November 24, 1997, to February 20, 1998. As a result of comments from the public, the milestones were placed in abeyance (temporary suspension), as opposed to being deleted, until such time as a decision is made by DOE regarding the future of FFTF. In August 1999, DOE-RL, Washington State Department of Ecology, and the U.S. EPA signed Tri-Party Agreement Change No. M-81-98-01 agreeing to the abeyance of FFTF's M-81-00 series milestones. Should the Secretary of Energy decide to return FFTF to operation, the TPA signatories have agreed that the aforementioned milestones will be considered deleted. Should the Secretary of Energy decide to permanently shut down FFTF, the signatories have agreed to either negotiate a new FFTF TPA transition milestone series within 120 days of receipt of DOE-RL's proposed changes or allow reinstatement of the M-81 milestones if the 120-day timeframe is not met. At this time, the extent of any TPA-required public involvement, if at all required, will be determined. It should be noted that the TPA and its associated public involvement process and NEPA, under which this NI PEIS is being prepared, are legally and functionally independent of each other. Specifically, the TPA's public involvement process, as per the TPA's Community Relations Plan, is not required for NEPA reviews and public involvement, including public scoping meetings and Draft NI PEIS public hearings.

168-2: DOE notes the commentor's opposition to any production mission at the Hanford Site.

Section 1.2 of the NI PEIS provides information on the purpose and need for DOE's proposed expansion of the nuclear infrastructure to ensure the availability of isotopes for medical, industrial, and research applications; providing plutonium-238 for NASA, and undertaking research and development activities related to development of nuclear power for civilian use. With respect to plutonium processing, no weapons material will be produced within the stated mission. All missions are for civilian purposes.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 169: Concerned ex Tri Citian

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

until April 2000 I lived directly west of Hanford in the farming community by Matthews Corner. I was born in the area and lived there most of my life. I went through Radiation Training at WPPSS (now Energy NIS) and have worked for many years on the Hanford Reach as a Fishery Biologist. I do not belong to any ecoterrorist group or any other organization. However, until you show a very strong need to start the reactor for the benefit of our society it should remain closed. We do not need to start it as a government waste machine to pump more taxpayer money into the Tri-Cities. It needs to contribute for the continued containment of radioactive wastes. We all know that "cleanup" is not reality but we need to continue down that path until we figure out a better way to contain and recycle radioactive material.

Keep FFTF closed until a compelling reason arises!

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Concerned ex Tri Citian

Organization: none

Home/Organization Address (circle one): _____

City: Underwood State: WA Zip Code: 98651

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colene E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 169

169-1: DOE notes the commentor's opposition to restarting FFTF for enhancing its existing nuclear facility infrastructure. Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure for the purposes of addressing three primary needs:

1) to support the need for increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee;

169-1

2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238, a fuel source that is required for deep space missions and which the U.S. has no long-term, assured supply; and

169-2

3) to support civilian nuclear research and development needs in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio. Section 1.2 of Volume 1 was revised to clarify the purpose and need of the proposed action. As discussed in Section 4.3 of Volume 1, implementation of Alternative 1 would have no significant impact on jobs in the Hanford Area.

169-1

169-2: Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Waste management activities are safely conducted in compliance with applicable state and federal requirements and appropriate DOE Orders.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

Commentor No. 170: Don Anderson

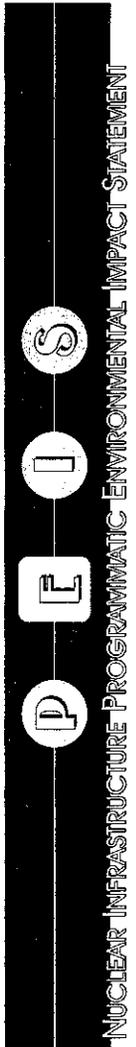
Response to Commentor No. 170

Draft PEIS Comment Form

I would prefer you NOT Do it!

170-1

170-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.



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• faxing your comments toll-free to: 1-877-562-4592
• commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Don Anderson

Organization:

Home/Organization Address (circle one): 406 W. 8th St.

City: The Dalles State: OR Zip Code: 97058

Telephone (optional): 541-506-5518

E-mail (optional):

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Email: Nuclear.Infrastructure-PEIS@hq.doe.gov

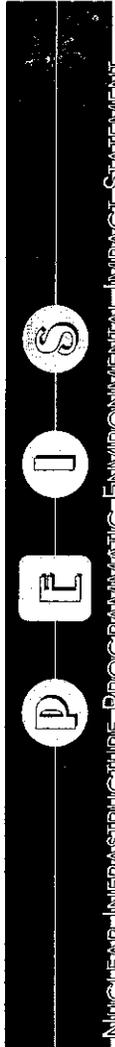


7/12/00

Commentor No. 171: Leon Swenson

Response to Commentor No. 171

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

SEE ATTACHED

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• commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): LEON SWENSON

Organization: N.A.

Home Organization Address (circle one): 336 SNYDER

City: Richland State: WA Zip Code: 99352

Telephone (optional): 509-375-6063

E-mail (optional): lswenson@out.com

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Email: Nuclear.Infrastructure-PEIS@hq.doe.gov



Commentor No. 171: Leon Swenson (Cont'd)

08/28/00

My name is Leon Swenson. I am a resident of Richland Wa, where I have lived since 1975. I am a former worker at the Hanford site, with over 30 years experience in nuclear technology and waste disposal. For the past five years I have worked on the staff of First Presbyterian Church, Kennewick, WA.

I have two basic concerns which I wish to share at this hearing this evening. In 1993 I lost my seven year old grandson to a malignant brain tumor. That was one of the hardest things that I have ever gone through. While various techniques were used to combat his tumor, the technology was not sufficiently advanced to save him. And now, as I work on the staff of our church, I have many occasions to just "be there" for a number of my friends as they are going through various stages of cancer diagnosis, treatment, and in many cases, death. Life is an interesting process, and none of us is going to get out of this alive. But to die of cancer can be a particularly difficult way to spend your last days. And the appropriate use of medical isotopes offers great promise in dealing with the ravages of cancer.

I believe that it is time for the Department of Energy and our government to truly lead, and get out of the mode of merely reacting to various kinds of lobbying and other input. I believe the current NI PEIS process is a good example of where strong leadership is needed. On Page S-4 of the Summary of the NI PEIS, it points out that "in the area of therapeutic medical isotopes, several ... are currently unavailable or are available only in limited quantities." That, ladies and gentleman, seems to me to be the crux of the issue, and should be the focus of the PEIS.

While the other two major concerns of the PEIS are indeed important, the tremendous impact on the health, and on the health care costs of this country, could alone justify going forward with a vigorous program to produce medical isotopes. In the grand scheme of things, national health care is a major concern of our country. And the use of medical isotopes offers a huge potential for impacting that health care. As also noted on Page S-4, "Currently, more than 12 million nuclear medicine procedures are performed each year in the United States, and approximately one-third of all patients admitted to U.S. hospitals undergo at least one medical procedure that employs the use of medical isotopes." Those are staggering figures. And the potential for significantly greater application is enormous.

During my career as a nuclear engineer, I spent nearly 15 years on the design, construction and operation of FFTF. I know the plant, its capabilities, and its potential. I also live just a few miles down the road from FFTF in North Richland. Do I want to see FFTF restarted and used for isotope production? You better believe it. I do not buy the rhetoric that insists that restart of FFTF will cripple the clean-up efforts at the Hanford site.

While I am qualified and could spend considerable time critiquing the technical merits of the PEIS, I have chosen not to do that. I believe the PEIS process is adequately addressing the issues that should be considered in restarting FFTF, or in choosing one of the other alternatives. I personally believe that restart of FFTF makes the most sense both technically and financially. But I am willing to let the process move forward to completion. In the final analysis, however, I believe the Department of Energy should provide strong leadership to assure that an adequate supply of medical isotopes will be

Response to Commentor No. 171

171-1

171-1: DOE notes the commentor's support for greater availability of medical isotopes. For nearly 50 years, DOE's use of its unique technologies and capabilities to develop isotopes for civilian purposes has enabled the widespread application of medical isotopes seen today. Consistent with the mandates under the Atomic Energy Act, DOE seeks to to maintain and enhance its infrastructure to support production of radioisotopes for medical applications and research.

171-2: DOE notes the commentor's support for Alternative 1, Restart FFTF.

171-2

Commentor No. 171: Leon Swenson (Cont'd)

08/28/00

available, both for current needs, and for the emerging needs of this life-saving technology.

Finally, I must note that I take exception to the idea that these hearings are to be treated as an informal plebiscite to determine the future course of action. Hearings of this type lend themselves to being "stacked" by those that have passionate feelings about the spoken and unspoken issues. For the broad mass of our population, that do not even understand the implications of this decision, silence is interpreted as "don't care." I contend that if they really understood the implications of the decisions about to be made, in terms of the impact on the health care of them and their loved ones, the flavor of these hearing would be very different. That is why I feel it is so important for the Department of Energy to lead, not follow, as the country sets priorities for meeting the needs for medical isotope production for the next 35 years.

Thank you.

Leon D. Swenson, PE
336 Snyder
Richland, WA 99352
509-375-6063
lswenson@owt.com

171-2
(Cont'd)

171-3

Response to Commentor No. 171

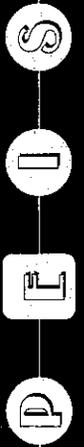
171-3: DOE policy encourages effective public participation in its decision making process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.

Commentor No. 172: Tina Cameron
Fluor Hanford Solid Waste Mgmt./Treatment

Response to Commentor No. 172

Draft PEIS Comment Form

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



We do need and want FFTF as an asset to this state and the US. It should be restarted and used to its fullest potential.

172-1

172-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Tina Cameron
 Organization: Fluor Hanford Solid Waste Management/Treatment
 Home/Organization Address (circle one): Hm: 102204 Vaca Rd
 City: Kennewick State: WA Zip Code: 99338
 Telephone (optional): 509-628-8248
 E-mail (optional): Swiftred@email.msn.com

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 E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 173: Lawrence J. Wolf

Draft PEIS Comment Form

THE FAST FLUX TEST FACILITY AT HANFORD MUST BE SAVED. IT IS EXCEEDINGLY VALUABLE FOR THE MANUFACTURE OF ISOTOPES. IT WOULD BE A TERRIBLE WASTE TO DECOMMISSION THIS FACILITY WHICH COST SO MUCH TO COMPLETE.

173-1

Response to Commentor No. 173

173-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): LAWRENCE J. WOLF

Organization: OREGON INSTITUTE OF TECHNOLOGY

Home/Organization Address (circle one): _____

7726 SE HARMONY RD.

City: PORTLAND State: OR Zip Code: 97222

Telephone (optional): 503 725 9775

E-mail (optional): WOLF@OIT.EDU

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 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



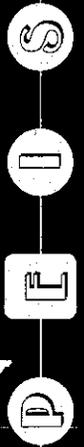
Draft PEIS Comment Form

We need FFTF for many reasons, one important one being to develop and test isotopes for medical use. We quit depend on other countries to supply them for us. Why waste billions of dollars to develop the facility by abandoning it. Please restart FFTF!!

174-1

174-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Glenda Hawley

Organization: _____

Home/Organization Address (circle one): 740 S. Logan
Moscow, ID 83875

City: _____ State: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

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E-mail: Nuclear.Infrastructure-PDS@hq.doe.gov



7/12/00

Commentor No. 175: Marle Sullivan

Response to Commentor No 175

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

Just a quick note to add my encouragement to putting FFTF back on line and to a useful purpose. This is the newest and most versatile of reactors, its history for safety is unparalleled, its potential has been proven time & time again.

I believe it would be a tragedy to finally close this plant. For the past 10 years it has been in limbo - while the potential is untapped and other nations supply the U.S. with valuable radioisotopes that could be produced in FFTF.

We heard many of the economic reasons for not doing medical isotopes and liken them to those that face an entrepreneur on startup company. Take the chance! Produce the isotopes & watch the market grow. It will pay back - maybe the ROI won't be immediate, but it is certain. This is the now & future of medicine and science. Don't "lose" this national asset - preserve it & put it back

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- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Marle Sullivan

Organization:

Home Organization Address (circle one): 1007 Rogers St NW

City: Olympia State: WA Zip Code: 98502

Telephone (optional): (360) 754-4945

E-mail (optional): mntsullivan@earthlink.net

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7/12/00

175-1

175-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 176: Donna McParlan

Response to Commentor No. 176

Draft PEIS Comment Form

PLEASE RESTART THE FFTF.
 WE WILL BE BETTER PREPARED FOR OUR
 FUTURE.

Donna McParlan
 8/24/00

176-1

176-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



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- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Donna McParlan

Organization: _____

Home/Organization Address (circle one): 1751 BRANDON

City: ROCKFORD State: IL Zip Code: 61107

Telephone (optional): _____

E-mail (optional): dmparlan@aol.com

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 E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 177: Virginia Knapp

Response to Commentor No 177

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

08/24/2000

Dear Ms. Brown

I FEEL WE NEED TO KEEP THE
FFTF REACTOR IN RICHLAND, WA
RUNNING

PLEASE RESTART AND MAINTAIN FFTF
REACTOR

THANK YOU,

Virginia Knapp
Seattle, WA

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Virginia Knapp

Organization:

Home Organization Address (circle one): PO Box 33026

City: Seattle State: WA Zip Code: 98133

Telephone (optional):

E-mail (optional): VKnapp8356@aol.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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 E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



177-1

177-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

PEIS Comment Form

U.S. DEPARTMENT OF ENERGY,
 MY NAME IS TERRI MORSE AND I AM AN ELECTRICAL
 ENGINEERING SENIOR MANAGER AT THE BOEING COMPANY. I AM
 WRITING TO EXPRESS MY CONCERN OVER THE UNNECESSARY
 CLOSURE OF THE FAST FLUX TEST FACILITY. THERE IS NO
 TECHNICAL RATIONAL INVOLVED IN THIS DECISION, BUT THE
 RESULTS ARE A THROW-AWAY OF OUR TAX INVESTED DOLLARS
 IN AN ENVIRONMENT WHERE WE ARE SO HEAVILY DEPENDANT
 ON FOREIGN SOURCES TO PROVIDE ISOTOPES FOR MEDICAL
 NEEDS - WHY ARE WE EVEN CONSIDERING THE CLOSURE OF A
 FACILITY THAT CAN SATISFY THOSE DEMANDS, WITH THE
 CONTINUED EMPHASIS ON SPACE EXPLORATION AND REQUIREMENTS
 FOR POWER SOURCES THAT CAN BE PROVIDED - WHY ARE WE
 ALLOWING UNINFORMED POLITICAL RHETORIC TO MAKE COSTLY
 TECHNICAL DECISIONS ON THEIR AVAILABILITY. PLEASE DRAW ON
 YOUR EXISTING TECHNICAL EXPERTS TO DETERMINE WHEN THE
 LIFE SPAN OF THE FFTF IS OVER. IN THE MEANTIME - LET'S
 GET OUR MONEY'S WORTH OUT OF OUR INVESTMENT. KEEP
 IT OPEN!

178-1

178-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

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- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): TERRI F. MORSE

Organization: _____

Home Organization Address (circle one): 2236 56TH PL

City: RENTON State: WA Zip Code: 98055

Telephone (optional): _____

E-mail (optional): _____

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 NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT

Commentor No. 179: K. Burk

Draft PEIS Comment Form

He need FFTE. Please restart it.

179-1

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faxing your comments toll-free to: 1-877-562-4592
commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): K Burk

Organization:

Home/Organization Address (circle one): 27 Beasts

City: Peralta State: NM Zip Code: 87042

Telephone (optional):

E-mail (optional):

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NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Response to Commentor No. 179

179-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

Commentor No. 180: John G. Ward

Response to Commentor No. 180

Draft PEIS Comment Form

Dear Madam,

The FFTF should be returned to Operational Status ASAP. This is a fine machine and should not be scrapped. The Department should be proud of the outstanding operating record. FFTF has made and will make great contributions. What are the options? The not heard of any that are cost effective.

180-1

180-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): JOHN G. WARD

Organization: _____

Home/Organization Address (circle one): _____

P.O. Box 1048

City: Joseph State: OR Zip Code: 97846

Telephone (optional): _____

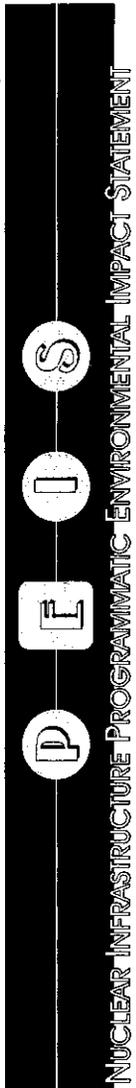
E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact:曹Lette E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00



Commentor No. 181: Dianna L. Stone

August 23, 2000

Colette E. Brown, NE-50
U.S Department of Energy
19901 Germantown Road
Germantown, MD 20874

Dear Ms. Brown,

Please support restarting the Fast Flux Test Facility.

And please encourage others to consider the magnitude of the benefit this facility is capable of providing. Cures for cancers and the long reaching benefits of interplanetary exploration are highly complex technologies that every basic citizen does not understand, nor should they be obligated to in order for all of us to benefit from related research. We have advanced technologies because a precious handful of people make their life work about exploring such issues. To turn our backs on the benefits of their accomplishments in a knee-jerk reaction to highly publicized fears is a sad mistake. And to allow the shut down of FFTF would be to abandon our self-reliance in such crucial matters and place them in the hands of others who may not always be our friends and allies. Please restart the Fast Flux Test Facility.

Thank you, in advance, for your effort in this matter.

Sincerely,



Dianna L. Stone
1701 121st St. SE Apt. M103
Everett, WA. 98208

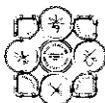
Home – 425-357-6102 Work – 425-485-5668
E-mail: duxiana@prodigy.net

Response to Commentor No. 181

181-1

181-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 183: Gary R. Barcom
UA Local Union: 598



UNITED ASSOCIATION
of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889
Letters should
be confined to
our subject

UA Local Union:

598 1328 Road 28, Pasco, Washington 99301

Subject:

FFTF RESTART SUPPORT

August 24, 2000

COLETTE E. BROWN, NE-50
US DEPARTMENT OF ENERGY
19901 GERMANTOWN RD
GERMANTOWN MD 20874

Dear Ms. Brown:

I appreciate being given the opportunity to comment on the Department of Energy's Draft PEIS concerning the future plans for the nation's nuclear infrastructure, specifically the potential restart of the Fast Flux Test Facility (FFTF) located at the DOE Hanford Site.

The PEIS states, "Of particular need over the longer term are dependable sources of research isotopes and reactor facilities providing high volume flux irradiation for nuclear fuels and materials testing." I agree the nation must move forward in clinical medicine, scientific research, and industrial endeavors, and this already-existing facility has a proven track record in reliable and safe conduct of these operations.

Previous studies have noted inhibited growth in the use of radioisotopes to provide a better life for our citizens. We have drifted towards a reliance on foreign suppliers, which is detrimental to the best interests of our country. First, we place our country in the position of having to rely on a foreign entity, but more important we are funding jobs outside this country. We need to assure we take steps to sustain our loyal workers.

I fully support the intent of the NI PEIS in trying to determine the best answer to filling the gaps in the DOE infrastructure. The decision that the DOE has to make is not an easy one. There are many complex issues that need to be addressed. Choosing an already proven operating facility with a replacement value of almost \$2 billion makes the most sense to me. For the reasons mentioned above, I urge you to consider restart of the FFTF as the best alternative.

Fraternally,

GRB/mh

opeiu #11
afl-cio

Gary R. Barcom
Business Manager

Response to Commentor No. 183

183-1

183-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

183-2

183-2: DOE notes the commentor's view. If DOE decides to expand its nuclear infrastructure this will reduce our reliance on foreign suppliers. However, it is not the intention of the DOE to become the sole supplier of domestic medical isotopes.

183-1

Commentor No. 186: Fred Monette

From: Monette, Frederick A.[SMTP:FMONETTE@ANL.GOV]
 Sent: Thursday, August 24, 2000 10:13:27 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Comment on the PEIS; Appendix J
 Auto forwarded by a Rule

To Whom It May Concern:

I thought that Appendix J, "Evaluation of Human Health Effects of Transportation," was extremely well written. Perhaps that is because I wrote most of it. The original source of much of the text in Appendix J was a submittal that I provided in April, 1994 in support of the Final Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel. Although it is flattering that SAIC gets so much use out of the material, it is generally customary to reference or otherwise acknowledge the work of others. Again, I thought that the writing was excellent.

Name: Fred Monette
 Organization: Self
 Home Address: 229 S. Linden St.
 Westmont, IL 60559
 Phone: 630_271_0988

186-1

Response to Commentor No. 186

186-1: Preparation of the Final Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel (FRR SNF EIS) was directed and funded by DOE. Portions of the FRR SNF EIS, such as general description of the transportation of radioactive materials, descriptions of the codes used and the analytic approach, are directly applicable to this PEIS, and were used with minimal modifications. This is common practice in the preparation of government documents, and causes a significant cost saving to the government. The references cited in Appendix J are to the original source of information, rather than to the source of the language, which was sometimes the FRR SNF EIS. The FRR SNF EIS is frequently referenced in Appendix J.

Commentor No. 187: Donna Smollen Rockwell

DONNA SMOLLEN ROCKWELL

Fax : 509-493-4373

Aug 30 '00 16:46 P.01

AUGUST 28, 2000

TO WHOM IT MAY CONCERN,

MY NAME IS DONNA SMOLLEN ROCKWELL. I LIVE AT 503 N.E. SPRING STREET, WHITE SALMON, WASHINGTON. I AM A RESIDENT, A BUSINESS OWNER AND MOST IMPORTANTLY A MOTHER.

TWO AND ONE HALF YEARS AGO, SOME OF US WERE HERE IN THIS ROOM TO EXPRESS OUR FEELINGS TOWARDS THE RESTART OF THE FFTF. THE MISSION AS EXPLAINED BY THE D.O.E. AT THAT TIME WAS AN URGENCY TO PRODUCE TRITIUM SO THAT OUR NATIONS NUCLEAR ARSENAL WOULD BE KEPT IN TACT. SECONDARY TO THAT WAS THE PRODUCTION OF MEDICAL ISOTOPES.

TODAY YOU COME HERE ONCE AGAIN TO HEAR PUBLIC COMMENT ON THE POSSIBLE RESTART OF THE FFTF. THIS TIME AROUND MEDICAL ISOTOPES ARE IN THE STARRING ROLE AND FUEL FOR POSSIBLE, NOT YET FUNDED NASA MISSIONS IS THE BACK UP REASON.

MEDICAL ISOTOPES ARE CURRENTLY BEING MANUFACTURED IN CANADA AND ARE PURCHASED BY THE UNITED STATES. SO IN EFFECT, THE D.O.E. IS ASKING THE CITIZENS OF OREGON AND WASHINGTON, THE DOWN RIVER PEOPLE, TO INCUR A NEW WASTE STREAM AT HANFORD AND JEOPARDIZE OUR HEALTH, OUR ENVIRONMENT, OUR HOME FOR FUEL FOR SPACE EXPLORATION.

SURELY YOU ARE JOKING.

IT'S OBVIOUS THAT D.O.E. IS DESPARATE TO CREATE A FUNCTION FOR THIS BUILDING THAT DRAWS SUSPICION.

UNTIL THE D.O.E. CAN IDENTIFY AND CLEAN UP THE WASTE AT HANFORD, DON'T EVEN CONSIDER CREATING NEW WASTES. I AM THOROUGHLY OPPOSED TO THE RESART FOR ANY REASON OF THE FFTF.

Response to Commentor No. 187

187-1: DOE notes the commentor's views. DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information.

The United States currently purchases approximately 90 percent of its medical radioisotopes from foreign producers, most notably Canada. However, Canada only supplies a limited number of economically attractive commercial isotopes (primarily molybdenum-99), and it does not supply research isotopes or the diverse array of medical and industrial isotopes considered in the NI PEIS. As such, reliance on Canadian sources of isotopes to satisfy projected U.S. isotope needs would not meet DOE's mission requirements. Section 1.2.1 of Volume 1 has been revised to clarify DOE's isotope production role and other producers' capabilities to fulfill U.S. isotope needs.

Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA

187-1

187-2

187-1

187-3

187-4

Commentor No. 187: Donna Smollen Rockwell (Cont'd)

Response to Commentor No. 187

space missions. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted by approximately 2005. Under the No Action Alternative, DOE would continue to purchase plutonium-238 to meet the space mission needs for the 35-year evaluation period considered in the NI PEIS. However, DOE recognizes that any purchase beyond what is currently available to the United States through the existing contract would likely require negotiation of a new contract and may require additional NEPA review. Section 1.2.2 of Volume 1 has been revised to clarify the need for domestic plutonium-238 production to support future NASA space missions.

- 187-2:** DOE notes the commentor's concerns regarding the migration of contaminants to the Columbia River. Ongoing activities to remediate existing contamination at Hanford are of high priority to DOE. The Hanford Site has a comprehensive waste minimization and pollution prevention program in place as summarized in Section 3.4.11.8 of Volume 1 that would govern any proposed site activities.

More specific to the alternatives presented in the NI PEIS, FFTF is located approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to the groundwater. Analyses presented in Chapter 4 of the NI PEIS (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4) indicate that there would be no discernible impacts to groundwater or surface water quality at Hanford from normal operation of the existing Hanford facilities in support of the stated missions. Also, no water quality impacts would be expected as a result of permanent deactivation of FFTF (Section 4.4.1.2.4).

- 187-3:** DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

Commentor No. 187: Donna Smollen Rockwell (Cont'd)

Response to Commentor No. 187

The environmental impacts associated with operation of the FFTF and support facilities at Hanford during normal operations and from postulated accidents are presented and discussed in Section 4.3 of the NI PEIS. All impacts to human health and to ecological resources would be small in the immediate area of the Hanford Site and negligible at all distant locations.

187-4: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

Commentor No. 188: C. David Cook

NI PEIS Toll_Free Telephone

8/28/00

C. David Cook
206_725_6886

I am strenuously opposed to any restarting of the FFTF. I think it is a very unwise idea and I don't think it is necessary. I am very concerned about the storage of the waste that we already have at that facility, let alone adding more waste to it.

188-1

188-2

Response to Commentor No. 188

188-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

188-2: As identified in Section 4.3.1.1.13 of the NI PEIS, the restart of FFTF would generate about 63 cubic meters of additional radioactive waste (e.g., solid low-level radioactive waste) annually, in addition to nonhazardous wastes. This would account for about 2,205 cubic meters of additional radioactive waste to be generated over the 35-year period of nuclear infrastructure operations and is small in comparison to wastes generated by other Hanford activities. It is DOE's policy that all wastes be managed (i.e., treated, stored and disposal) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

The NI PEIS addressed the environmental impacts due to the treatment storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision.

Commentor No. 189: Nancy Jones

NI PEIS Toll_Free Telephone

8/30/00

Nancy Jones
3037 NW Market Street
Apartment 314
Seattle, WA 98107

I am calling to register our position to the restarting of the reactor. It is totally, totally irresponsible. For God's sake, clean up the mess there. We don't need any more nuclear waste to take care of and the medical establishment doesn't need this either, they said so. So, I don't know who you are pandering to, but I hope you won't start it up. Thank you.

189-1

Response to Commentor No. 189

189-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF. The NI PEIS addresses environmental impacts due to the treatment, storage, and disposition (prior to final disposition) of waste generated for all alternatives, including Alternative 1, Restart FFTF. It also addresses cumulative impacts related to waste generation. However, environmental impacts associated with existing waste storage, site contamination, and cleanup programs at candidate sites are not within the scope of the NI PEIS and, therefore, are not addressed.

With regard to the need for medical isotopes, an Expert Panel convened by DOE recently reviewed several industry projections for growth in demand for medical isotopes and concluded that the growth rate will be significant over the next 20 years. Further discussion on the need for medical isotopes is presented in Volume 1, Section 1.2.1 of the NI PEIS.

Commentor No. 190: Jeff Luke

NI PEIS Toll_Free Telephone

8/30/00

Jeff Luke

I am a registered voter in Benton County in Washington State. I am calling to say that I would very much like to see FFTF continue operation. I'd like to see it continue operation either for the production of medical isotopes. I am not adverse to seeing FFTF continue operations for other missions as well, including the production of tritium, should that be necessary in order to preclude the possibility of running out of tritium and being dependent upon an external source for the maintenance of a bare minimum number of weapons. So with that in mind, those are my thoughts. Thanks very much for listening.

190-1

190-2

Response to Commentor No. 190

190-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

190-2: DOE notes the commentor's support for the expanded use of FFTF. Under the proposed action and consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its existing nuclear facility infrastructure to support production of isotopes for medical research, and industrial uses; production of plutonium-238 for use in future NASA space exploration missions; and U.S. nuclear research and development needs for civilian application. However, no component of the proposed action is for the purpose of producing tritium, nor is it for the purpose of supporting any other defense or weapons-related mission.

Commentor No. 191: Tony Mitzle

NI PEIS Toll_Free Telephone

8/30/00

Tony Mitzle

I am in favor of FFTF for medical isotope production. || 191-1

Response to Commentor No. 191

191-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 192: Dan Melkonian

From: Dan Melkonian[SMTP:MELKONIAN@LVSCAP.COM]
 Sent: Tuesday, August 29, 2000 5:17:15 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: 'cruwa(a)gorge.net'
 Subject: FFTF restart
 Auto forwarded by a Rule

Colette Brown,
 NE_50, USDOE,
 19901 Germantown Rd.,
 Germantown, MD 20874

Dear Colette:

Obviously listening comprehension is not high on the list of skills necessary for employment with USDOE. I don't believe I heard anyone at any meeting in Hood River seriously intimate support for use of FFTF and FMEF for plutonium 238 production. Why are you going on these listening exercises if you cannot hear. Shut it down, clean it up, and forget about producing plutonium the USA does not need.

* Your compilations of prior public comment are grossly incorrect and show your failure to listen to the public. You state that only 320 comments were submitted on Hanford and yet Columbia River United sent in 420 written comments opposing restart not including comments from Seattle, Portland or Richland. You erroneously state that there were "roughly equal numbers" supporting and opposing use of FFTF and FMEF for plutonium 238 production. You also failed to mention the 5 City Council Resolutions opposing FFTF restart which means you have representatives of entire cities opposing it and their numbers should be included. Appendix N_4.

192-1

Response to Commentor No. 192

192-1: While all comments received during the scoping periods for both the Plutonium-238 Production EIS and the NI PEIS are part of the Administrative Record for the NI PEIS, Section 1.4 of Volume 1 and Appendix N are intended to provide a summary of the issues and associated trends identified during the scoping process rather than a tabulation of comments by specific issue. It should be noted, however, that NEPA and CEQ regulations do not require an agency to include and respond to each scoping comment as is required for public comments on a Draft EIS. In preparing the NI PEIS, DOE carefully considered scoping comments received from the public. Any perceived discrepancy in the grouping of comments raising any one particular issue or set of issues is attributable to the manner in which they were originally categorized and counted. For example, a number of statements, letters, or resolutions signed by multiple persons, such as city council resolutions mentioned by the commentor, were received by DOE (both for and against FFTF restart) in response to the request for scoping comments. Each such comment document was considered and counted as a single comment in the NI PEIS comment tracking system.

DOE did not receive 420 written comments opposing FFTF restart from Columbia River United as claimed by the commentor. The number of comments to which the commentor refers to on page N-4 of Section N.1.1 of the Draft NI PEIS is related only to the Plutonium-238 Production EIS scoping meetings which were held in November 1998, not the NI PEIS. The NI PEIS scoping comments are summarized beginning on page N-5. Nevertheless, the Plutonium-238 Production EIS scoping meetings were held in November 1998 in Idaho Falls, Idaho; Oak Ridge, Tennessee; and Richland, Washington. The scoping period was specifically focused on the production of plutonium-238 using one or more DOE research reactors and facilities. DOE received a letter from the Columbia River United. The NI PEIS scoping meetings were held in October 1999 in Oak Ridge, Tennessee; Idaho Falls, Idaho; Seattle, Washington; Portland, Oregon; Hood River, Oregon; Richland, Washington; and Washington, D.C. The scoping period focused on the enhancement of the existing nuclear infrastructure, including production of plutonium-238. DOE received a campaign from the Columbia River United that focused on the shutdown of FFTF, not the production of plutonium-238. This campaign represented about

Commentor No. 192: Dan Melkonian (Cont'd)

* You've failed to demonstrate a compelling need for the production of 1) plutonium for space, 2) medical or research isotopes or 3) nuclear energy research. Neither is there adequate justification for the need to produce all of them at one site. Neither is there justification for the need to produce them domestically (other than reference to some DOE policy) which makes no sense when we would continue to buy foreign nuclear fuel to run FFTF.

192-2

* You must include the recommendations of your own blue ribbon panel (Subcommittee for Isotope Research and Production Planning) that advised against the use of FFTF for medical isotope production. Furthermore, EIS Isotope demand projections are outdated and inadequate. They also fail to take into account possible cancer cures like gene therapy that could make medical isotopes unnecessary. In addition, medical isotopes can be adequately produced at other DOE sites if they are a high priority as implied. Current isotope production levels for DOE reactors are misstated in the EIS at near capacity when most are only at around 50%.

192-3

* You must include the current demand estimates from NASA for Plutonium 238 which are considerably lower than your need projections and could easily be met under the current contract with Russia. A discussion of alternatives to plutonium fuel must be included. A renegotiated contract with Russia (at double the current cost) could meet future NASA needs at 1/3 the cost of FFTF restart.

192-4

* It is improper to release the draft EIS for public comment without the critical information requested by the public in the scoping meetings including:

192-5

* cost analysis of restart and all alternatives with reasonable review time (FFTF will be much more expensive than reasonable alternatives by at least \$2 Billion.)

192-6

* studies on treatment of wastes at all proposed sites and
* nonproliferation impacts from FFTF and the importation of its necessary radioactive fuel from Europe. (Violation of the Nonproliferation Agreement by use of Highly Enriched Uranium fuel alone is reason enough to stop restart of FFTF!)

192-7**192-5****192-8****Response to Commentor No. 192**

250 comments and all were counted. Attached to the campaign was a signed petition.

192-2: DOE notes the commentor's opposition to restarting FFTF for enhancing its existing nuclear facility infrastructure. Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure for the purposes of addressing three primary needs: 1) to support the need for increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee; 2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238, a fuel source that is required for deep space missions and which the U.S. has no long term, assured supply; and 3) to support civilian nuclear research and development needs in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio. Section 1.2 of Volume 1 was revised to clarify the purpose and need of the proposed action.

There is no requirement to conduct all of these missions at one site. In the Record of Decision process, DOE could choose to combine components of several alternatives in selecting the most appropriate strategy. For example, DOE could select a low-energy accelerator to produce certain medical, research, and industrial isotopes, and an existing operating reactor to produce plutonium-238 and conduct nuclear research and development. Should FFTF be selected for restart in support of these missions, DOE expects it could utilize a 15-year supply of mixed-oxide fuel that would be available from Germany under favorable economic terms (i.e., no charge for the fuel.)

192-3: DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and

Commentor No. 192: Dan Melkonian (Cont'd)

* You have failed to adequately characterize environmental impacts from FFTF restart. An example is the statement, "Environmental impacts associated with the existing inventory of spent fuel at Hanford site are minimal." To imply that the existing spent nuclear fuel inventory poses no problems is massively incorrect. More than 2100 tons of corroding spent fuel sites in aging water-filled basins near the Columbia River posing one of the largest problems for cleanup and an expected cost of more than \$1.6 billion. You must address all impacts on waste management and the environment at Hanford not dismiss them with erroneous statements.

192-9

* You must include the cost of FFTF and all companion facilities decommissioning in the restart not just every other alternative.

192-10

* You have failed to assess all existing contaminant sources at Hanford and all other sites before adding additional waste. You must assess current waste inventories and then assess the addition of any new waste to existing waste sources.

192-11

* You fail to consider use of the Advanced Test Reactor (ATR) in Idaho and the High Flux Isotope Reactor (HFIR) in Oakridge for medical isotopes and acquiring Plutonium 238 from another source. You also fail to analyze lower cost alternatives such as subsidizing university reactors or buying time from private accelerators or reactors.

192-12

* The No Action Alternative must include the shutdown of FFTF not maintaining it on stand-by based on prior commitments of Secretaries O'Leary and Watkins and TPA milestones.

* You failed to address the conflict of interest of using PNNL's evaluations when they are a proponent of restart and stands to gain financially.

192-13

* You failed to include the standby costs of FFTF which are estimated to be \$360 million.

192-14

Response to Commentor No. 192

endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

The conclusions presented in the NERAC Subcommittee for Isotope Research and Production Planning Final Report, April 2000 regarding the suitability of FFTF to produce research isotopes in a timely and cost-efficient manner were made in the context of the facility producing research isotopes as its sole mission. It would not be cost effective to restart FFTF for the singular purpose of producing small quantities of various research isotopes. However, sustained operation of FFTF for the production of larger quantities of both research and commercial isotopes would be viable if operated in concert with producing plutonium-238 and conducting nuclear energy research and development for civilian applications. As the NERAC report states: "In limited instances, the DOE possesses unique resources, e.g., the high flux of fast neutrons and large irradiation volume in FFTF, that could be utilized for the production of some radioisotopes, but is best suited for commercial interests who might consider its use for isotope production." In recognition of these constraints on its operational feasibility, the NI PEIS only evaluates the use of FFTF when coupled with the other stated missions. While some existing reactors may possess the potential capability or capacity to support research isotope production, as suggested in the NERAC report, it is unlikely that reliable, increased production of these isotopes to support projected needs could be accomplished without impacting the existing missions of these facilities.

DOE does not believe that isotope production levels were misstated in the Draft NI PEIS. Section 1.2.1 of Volume 1 identifies that approximately 50 percent of DOE's isotope production capability is being used.

Commentor No. 192: Dan Melkonian (Cont'd)

* You fail to access the legality of introducing new programs and wastes into the highly contaminated 306 e or 325 buildings at Hanford that would be used with FFTF.

192-15

* You must admit that the real reasons to restart FFTF are in a hidden agenda that includes preserving jobs and starting new weapons research or other classified missions.

192-16

* The draft EIS must state the preferred alternative for adequate public review.

192-17

USDOE should choose Alternative 5_ SHUT DOWN FFTF, or Alternative 2_ Produce at existing sites with shutdown of FFTF.

192-18

Name: Dan Melkonian
Address: 210 Dogwood Lane
White Salmon, WA 98672

Additional Comments:

Response to Commentor No. 192

192-4: A May 22, 2000, correspondence from NASA to DOE identified that NASA no longer has a planned requirement for small radioisotope thermoelectric generator (SRTG) power systems. This does not mean that NASA no longer requires DOE to provide the necessary plutonium-238 to support deep space missions. Rather, the SRTG development efforts were stopped in order to permit reprogramming of funds to support development of a new radioisotope power system based on a Stirling technology generator. This new radioisotope power system, referred to in the subject correspondence, requires 1/3 less plutonium as its fuel source. However, the Stirling technology is developmental and NASA has requested in a September 22, 2000 letter to DOE that the plutonium-238 needed for large RTG may be maintained as a backup.

DOE could purchase plutonium-238 from Russia; however, for supply reliability reasons and concern of nuclear nonproliferation, DOE's preference is to establish a domestic plutonium-238 production capability. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

192-5: The costs and nuclear nonproliferation impacts of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report and Nuclear Infrastructure Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 505.1(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. DOE mailed these documents to approximately 730 interested parties on August 24 and September 8, 2000, respectively. Both reports were made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided summaries of the Cost Report and Nuclear Infrastructure Nonproliferation Impact Assessment in Appendixes P and Q, respectively, in the Final NI PEIS.

192-6: DOE notes the commentor's opinion.

192-7: The NI PEIS addressed the environmental impacts due to the treatment storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste

Commentor No. 192: Dan Melkonian (Cont'd)

Response to Commentor No. 192

minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. It is DOE's policy that all wastes be managed (i.e., treated, stored and disposal) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

- 192-8:** If restarted, the FFTF would be fueled with Hanford MOX fuel for about 6 years. During that time, use of German MOX fuel would be explored, which would fuel the FFTF for an additional 15 years. Also during this initial period, in compliance with nonproliferation policy, the use of low-enriched uranium (LEU) fuel would be analyzed under the Reduced Enrichment Research and Test Reactor (RERTR) program. If this analysis were to establish the infeasibility of using LEU fuel in the FFTF to meet mission needs, only then would HEU fuel be used. Such use of HEU fuel would then have met, under RERTR, nonproliferation and HEU-use policy requirements, and would not violate U.S. nonproliferation agreements. This is discussed in PEIS Volume 1, Section 2.3.1.1.3.
- 192-9:** The discussion in the Summary and Section 4.8.3.5 of Volume 1 on the cumulative impacts for spent nuclear fuel management at Hanford was revised to clarify that the management of the existing spent nuclear fuel at Hanford results in a dose of less than 0.1 millirem per year of the maximally exposed member of the public. This dose is well within the DOE limits given in DOE Order 5400.5. As discussed in that Order, the dose limit from airborne emissions is 10 millirem per year, as required by the Clean Air Act; drinking water is 4 millirem per year, as required by the Safe Drinking Water Act; and the dose limit from all pathways combined is 100 millirem per year. DOE has committed to remove the spent nuclear fuel at Hanford for ultimate disposition in a geologic repository.
- 192-10:** DOE assumes that the commentor is referring to deactivation, not decommission. Decommission costs were not included for any alternative. Deactivation of FFTF is not part of implementing Alternative 1, Restart FFTF. Deactivation of FFTF is part of implementing Alternatives 2, 3, 4, and 5 and including the cost of FFTF deactivation in the implementation costs for these alternatives is appropriate. The Cost Report was structured to identify the

Commentor No. 192: Dan Melkonian (Cont'd)

Response to Commentor No. 192

implementation costs of the various alternatives so the Secretary of Energy would have this information along with other data for consideration.

- 192-11:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The current inventory of wastes managed at the Hanford Site are identified in Section 3.4.11.1 of Volume 1. In addition, the generation rates of wastes associated with the NI PEIS options that use Hanford facilities are compared with the current waste generation rates at the site in Section 4.3 of Volume 1. As stated in Sections 4.3.1.1.13, 4.3.3.1.13, and 4.4.3.1.13, the generation rates of wastes at Hanford associated with the options that utilize either FFTF, FMEF and/or RPL/306-E would be much smaller than the current waste generation rates at the site. These volumes would also be small in comparison to the existing inventory at the site Section 3.4.11.1, Volume 1). These comparisons were also made for the other options which involved INEEL and ORR facilities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram funds designated for Hanford cleanup, regardless of the alternative(s) selected.

- 192-12:** Both ATR and HFIR are currently producing medical isotopes and under the No Action Alternative both would continue to do so. Further, under this alternative DOE would not establish a domestic source of polonium-238 production but could instead continue to purchase it from Russia to meet the needs of future U.S. space missions. Thus, the No Action alternative addresses the commentor's concern.

With regard to the commentor's second concern, DOE did consider the use of irradiation facilities other than those addressed under

Commentor No. 192: Dan Melkonian (Cont'd)

Response to Commentor No. 192

Alternatives 2 through 5. However, their use was dismissed for a variety of reasons as discussed in Volume 1, Section 2.6.1.

The No Action alternative is required under Council on Environmental Quality regulations (40 CFR 1502.14(d)). It provides a point of comparison for the action alternatives. The No Action Alternative generally represents the status quo; that is, it includes those actions that would normally take place without the proposed action. Since the status quo involves maintaining FFTF in standby and not its deactivation, it is not appropriate to include its deactivation as part of the No Action Alternative. Deactivation of FFTF is included as Alternative 5, Permanently Deactivate FFTF, and as part of Alternative 2, Use Only Existing Operational Facilities, Alternative 3, Construct New Accelerator(s), and Alternative 4, Construct New Research Reactor.

- 192-13:** PNNL is not preparing this PEIS, although it has offered technical comments on it. These comments have been evaluated by DOE and the contractor preparing the PEIS. PNNL has also previously provided technical and cost analyses on matters related to the FFTF, which have undergone independent scrutiny, and have helped confirm the need for the environmental review now being independently developed. PNNL's work does not present a conflict of interest. Ultimately, DOE has full control over the contents of the PEIS.
- 192-14:** The costs of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. The costs already incurred by the DOE, e.g., the FFTF Standby Costs, are not a part of the financial evaluation of the funding that is required for future actions. Consequently, they are not included.
- 192-15:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). DOE is fully committed to honoring this agreement.

Commentor No. 192: Dan Melkonian (Cont'd)

Response to Commentor No. 192

DOE-RL, EPA, and Ecology agreed to a change in the Tri-Party Agreement to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on FFTF's future. Public meetings were held on this formal milestone change. The NI PEIS missions would not have an impact on Hanford cleanup activities.

FFTF and any associated facilities remain subject to compliance with environmental laws regardless of its future operational status. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

The 306-E facility is not contaminated and is being proposed as a location to conduct activities that do not involve radioactive materials. While the 325 Building has a large inventory of radionuclides associated with ongoing activities at the facility, the building is not contaminated in worker accessible areas. Operations at the 325 Building are conducted in accordance with applicable federal and state regulations and appropriate DOE Orders.

The 300 Area Revitalization Plan (DOE 1999) provides for continued multi-program R&D operations in the 300 Area, including operation of various laboratories, office facilities, and services. It also provides for consolidation (but not complete elimination) of radiological operations, with support for Hanford Site facility transition and environmental restoration efforts. The plan does not require closure of the 325 and 306-E buildings as long as they are needed for active research projects. Operation of these facilities would not violate any existing agreements between DOE and stakeholders or other legal obligations, nor would it affect ongoing or planned environmental restoration and facility transition activities.

- 192-16:** DOE notes the commentor's concern relating to job creation at the Hanford site. The socioeconomic impacts of restarting FFTF and for all of the other alternatives are presented in Chapter 4 of the NI PEIS. The economic welfare of Hanford and all DOE sites is important to DOE. However, any economic impact is secondary to the proper expenditure of taxpayer dollars.

Commentor No. 192: Dan Melkonian (Cont'd)

Response to Commentor No. 192

As discussed in Section 1.2 of Volume 1, plutonium-238 would be produced to support NASA's deep space missions. Plutonium-238 is not used to produce nuclear weapons. All missions considered in the NI PEIS are for civilian purposes. If changes in policy are required the public will be informed and the appropriate NEPA reviews would be conducted.

- 192-17:** At the time the Draft NI PEIS was completed and published, DOE did not have a preferred alternative. DOE used the environmental evaluation in the Draft NI PEIS, and also other reports on cost and nonproliferation impacts, as well as input from the public to develop its preferred alternative. Council on Environmental Quality regulations (40 CFR 1502.14(e)) do not require the inclusion of a preferred alternative in a draft EIS if one has not been identified at that time. However, the regulations do require identification of a preferred alternative in the final document. DOE has identified a preferred alternative in Section 2.8 of the Final NI PEIS.
- 192-18:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF, or Alternative 2, Use Only Existing Operational Facilities.

Commentor No. 193: Kathryn Roberg

From: Kathy Roberg[SMTP:KROBERG@HSCIS.NET]
Sent: Tuesday, August 29, 2000 7:20:59 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF_restart
Auto forwarded by a Rule

I am sending my comments in regards to the proposal of restarting the FFTF (Fast Flux Testing Facility) in Hanford, WA. These are my concerns: Already in this world, we are experiencing a drastic global warming, as evidenced by the draught, lack of vegetation and harvests, horrible forests fires this summer. I am afraid that a restart of the FFTF will send more gases into the Universe, whether in the air, water or soil and add to this horrendous problem we are faced with.

Rivers, watersheds, lakes are becoming highly contaminated, we are loosing fish, foliage and water creatures. Isn't a restart of FFTF another way to add to this contamination that is globally being seen?

DOE promised to shut down FFTF in 1995, and use the resulting additional source of funding for clean_up at Hanford Nuclear Reservation. \$100 million designated for waste clean_up has instead been used to keep FFTF on hot standly. Isn't this a highly dishonest misuse of allocated funds?

Is plutonium really needed for the medical system?

If plutonium is produced, what are the SAFEST MEANS OF TRANSPORTING this material to Hanford? We already have had problems with the transporting of unwanted waste. Do we want a disaster to happen through transportation?

The deadly radioactive waste of Hanford will, if not contained properly and thoroughly, for thousands of years and countless generations, contaminate the Northwestern US and beyond. What are we sending on to our children and their children...a contaminated and hazardous world???

Response to Commentor No. 193

193-1: DOE notes the commentor's concerns on the potential for environmental impacts of FFTF operation. FFTF operation would result in a small impact to the environment and would not contribute to global warming. Section 4.3 of the NI PEIS includes an evaluation of potential environmental impacts due to air emissions and wastewater discharges associated with the proposed operation of FFTF and existing Hanford support facilities. All air emissions and wastewater discharges would be in accordance with applicable permit and regulatory requirements. The release of criteria air pollutants would result in concentrations well below Federal and state air standards (Table 4-13); impacts from emissions of hazardous chemicals would have a negligible effect on human health or the environment (Table 4-19); and there would be no discernible impacts to groundwater or surface water quality (Section 4.3.1.1.4).

193-2: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

DOE-RL, EPA, and Ecology agreed to a change in the Tri-Party Agreement to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on FFTF's future. Public meetings were held on this formal milestone change. The NI PEIS missions would not have an impact on Hanford cleanup activities.

193-1

193-2

193-3

193-4

193-2

Commentor No. 193: Kathryn Roberg (Cont'd)

177 massive, underground high_level nuclear waste tanks, some explosive, dozens leaking are the reality at Hanford, WA. The Department of Energy wants to RESTART the dangerous FFTF Nuclear Reactor and add even more waste to these tanks. What are we doing to this world???

DESTRUCTION!!!

Almost every day I am hearing more and more cases of CANCER...My question is could this air, water, food we are taking into our systems, that are in part being contaminated, be the root of this cancer. Are we going to allow it to grow... OUT OF HAND????

Thank you for hearing my concerns. I live in Walla Walla, WA, just about 75 miles south of Hanford, WA and the Hanford Nuclear Reservation.

Kathryn Roberg, a very concerned citizen

**193-2
(Cont'd)**

193-5

Response to Commentor No. 193

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

FFTF can be operated safely to accomplish the stated missions. There have been no serious safety-related accidents or accidental releases of hazardous or radioactive materials causing significant injury or harm to workers, or posing any threat or harm to the offsite public at FFTF during its lifetime. Also, no waste would be added to the underground waste tanks at Hanford from operation of FFTF.

Wastes are treated, stored, and disposed in a safe manner in compliance with state and federal regulations and appropriate DOE Orders.

- 193-3:** The plutonium that would be produced under the proposed action would not be intended for medical applications. Rather, it is intended for use in NASA space exploration missions.
- 193-4:** DOE notes the commentor's concern regarding the safety of nuclear materials transportation. DOE is committed to safety and safeguards for its facilities and the transport of materials. As discussed in Appendix J of the NI PEIS, all transportation activities conducted by DOE (including SST/SGT operations discussed in section J.3.4) would take place in accordance with U.S Nuclear Regulatory Commission (NRC) and U.S. Department of Transportation (DOT) regulations. Transatlantic shipments would also be in accordance with the International Atomic Energy Agency (IAEA) regulations which are consistent with DOT and NRC regulations (see Section J.3.1). Type B shipping casks, which are designed to protect and retain their contents under transport accident conditions, and purpose-built ships, which are specifically designed to safely transport casks containing radioactive materials, would be used to transport most nuclear materials covered in the NI PEIS. Type B shipping casks have been used for thousands of shipments by road, rail, and water and there have been no cases of a major release of radioactive materials (see Section J.3.2.1). As shown

Commentor No. 193: Kathryn Roberg (Cont'd)

Response to Commentor No. 193

in Volume 1, Section 2.7, the transportation impacts would be small for any of the NI PEIS alternatives. Transportation risks are summarized in Section 2.7.1.6 of Volume 1 and are discussed in more detail throughout Chapter 4 and Appendix J.

- 193-5:** The commentor's concern about increasing cancer rates is noted. Chapter 4 of Volume 1 and Appendixes H through J discuss radiological exposures to the public that would be expected to result from implementation of the nuclear infrastructure alternatives. The analysis in Chapter 4 shows that under normal operating conditions and for severe accidents, implementation of the nuclear infrastructure alternatives would pose a low radiological risk to human health; the most likely impacts are no additional cancer fatalities. See, for example, Sections 4.3.1.1.9, 4.3.2.1.9, and 4.3.3.1.9 in Chapter 4 and the Summary Tables in Chapter 2 of Volume 1 of the NI PEIS.

Commentor No. 194: Peter Giese

From: PETERG4@aol.com%internet
 [SMTP:PETERG4@AOL.COM]
 Sent: Tuesday, August 29, 2000 11:24:09 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Hanford
 Auto forwarded by a Rule

Dear Sirs:

It appears Hanford is a nation unto itself, acting without regard for anyone but itself. My question to you is: what will you do with the nuclear waste at Hanford?

Peter Giese
 PO Box 16303
 Seattle, WA 98116

194-1

Response to Commentor No. 194

194-1: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "- ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

Chapter 3, Affected Environment, addresses waste produced for each alternative evaluated in the NI PEIS. The Hanford Site has a comprehensive waste minimization and pollution prevention program in place as summarized in Volume 1, Section 3.4.11.8, that would control any new site activities. It is DOE's policy that all wastes be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

Commentor No. 195: Lois Jewell

From: Loisjew@aol.com%internet
[SMTP:LOISJEW@AOL.COM]
Sent: Wednesday, August 30, 2000 1:15:55 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: (no subject)
Auto forwarded by a Rule

PLEASE RESTART THE FFTF

Thank you,
Lois Jewell

195-1

Response to Commentor No. 195

195-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 196: Robin Pichahchy

From: Robin/Alice Pichahchy[SMTP:ROBALI@HCTC.COM]
 Sent: Wednesday, August 30, 2000 12:47:45 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: No More Nukes!
 Auto forwarded by a Rule

Please do not start that thing again. We have enough nuclear damage to the environment as it is. There are natural ways to treat diseases that do not impact the earth.

Robin Pichahchy

196-1

196-2

Response to Commentor No. 196

196-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

196-2: Comment noted.

Commentor No. 197: Dawnegoll@aol.com

From: DAWNEGOLL@aol.com%internet
[SMTP:DAWNEGOLL@AOL.COM]
Sent: Wednesday, August 30, 2000 12:54:47 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF.....
Auto forwarded by a Rule

I am in support of FFTF for medical isotopes. Please
re_start FFTF for medical isotopes.

Thank you.

197-1

Response to Commentor No. 197

197-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 198: John E. Tanner, Jr.

From: facts(a)coalition21.org[SMTP:FACTS@SNAKE.SRV.NET]
 Sent: Wednesday, August 30, 2000 1:13:27 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: pust@srv.net%internet
 Subject: Comments on above
 Auto forwarded by a Rule

Restart of FFTF to meet as many as possible of the needs for medical isotopes, plutonium_238, and general nuclear research seems to be the most reasonable of the alternatives presented, for the following reasons:

1) We already have FFTF and are paying maintenance on it. No new irradiation facility would be needed.

2) FFTF is the last fast neutron reactor left in the US. We should be doing research on the disposition of TRU from spent fuel in preparation for the inevitable resumption of reprocessing.

I would encourage use of INEEL facilities for target fabrication and processing for the plutonium_238 production.

John E. Tanner, Jr., Idaho Falls, home address pust@srv.net

198-1**198-2****198-1****Response to Commentor No. 198**

198-1: DOE notes the commentor's support for Alternative 1, Restart FFTF, and specifically Option 2, whereby INEEL facilities would be used to fabricate and process neptunium-237 targets for plutonium-238 production.

198-2: Spent nuclear fuel is not reprocessed in the United States. Reiterating President Clinton's September 1993 statement on Nonproliferation and Export Control Policy, "the United States does not encourage the civil use of plutonium and, accordingly, does not itself engage in plutonium reprocessing for either nuclear power or nuclear explosive purposes."

Commentor No. 199: E. Louis Towne

From: Louis Towne[SMTP:LTOWNE@OWT.COM]
 Sent: Wednesday, August 30, 2000 12:19:24 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Fast Flux Test Facility, Richland, WA
 Auto forwarded by a Rule

I am strongly in favor of restarting the FFTF located in the Hanford Reservation near Richland, Washington.

This facility is located in an isolated area some distance from any populated area. It is in an area which pioneered much of the Nuclear work. Adequate staff is available to restart the facility.

Much discussion concerning nuclear activities fails to recognize that this location does not change the fact that other nuclear facilities are here. Also this plant has operated. It can be used for significant benefits to humanity in its present location.

We have been hearing of significant research in nuclear medicine, much of it being done here. My wife, Irene, had heart problems in the recent past. The hospital put her through examination which involved the use of nuclear medicine. We were shocked to find that for her to complete the tests, the only nuclear medicine available came either from Canada or France.

It seems strange that the country which has led in nuclear development must go to other sources to find nuclear medicines. We lead in development and it seems we should be able to utilize this facility to provided these needed medicines.

E. Louis Towne
 6335 W. Willamette Ave.
 Kennewick, WA 99336

Response to Commentor No. 199

199-1 **199-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 200: Julie Rogers

From: Julie Rogers[SMTP:JULIEROGERS@HOTMAIL.COM]
Sent: Wednesday, August 30, 2000 1:24:33 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Auto forwarded by a Rule

I strongly support restart of the FFTF. It's a more flexible solution to the alternative.

200-1***Response to Commentor No. 200***

200-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 201: Dennis Bod

From: Dennis Bod[SMTP:BODD@GTE.NET]
Sent: Wednesday, August 30, 2000 2:02:41 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Restart the FFTF
Auto forwarded by a Rule

Please Restart the FFTF. Thank you

|| 201-1

Response to Commentor No. 201

201-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 202: Louise M. Durrant

From: LOUISE M DURRANT
[SMTP:LMDURRANT@YAHOO.COM]
Sent: Wednesday, August 30, 2000 3:02:34 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Hanford FFTF
Auto forwarded by a Rule

I support the restart of the FFTF Reactor Facility at Hanford to meet the national needs for medical isotopes and other peaceful nuclear materials. The FFTF is the most economical, safe, and environmental friendly method available to meet these standards.

202-1**Response to Commentor No. 202**

202-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 206: Christopher Derez

Response to Commentor No. 206

Hanford Watch
2285 SE Cypress
Portland, Oregon 97214



Ms. Colette Brown
U.S. Department of Energy
Office of Space and Defense Power Systems
NE-50
19901 Germantown Road
Germantown, Maryland 20874-1290

20874+1207

Public comment on Nuclear Infrastructure Draft Programmatic Environmental Impact Statement (NI PEIS)

I am opposed to restart of the Fast Flux Test Facility reactor because:

- #1 THE COLD WAR IS OVER!
- #2 THERE IS NO SAFE WAY TO DISPOSE OF WASTE
- #3 EMPHASIS MUST BE PLACED ON CLEANING UP HANFORD BEFORE THE LEAKING WASTE REACHES THE COLUMBIA RIVER!!!

Name CHRISTOPHER DEREZ
Address 1969 SE WALNUT
City, state HILLSBORO, OR Zip 97123

- 206-1
- 206-2
- 206-3
- 206-4

- 206-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.
- 206-2: Comment noted. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, are not national defense missions.
- 206-3: It is DOE's policy that all wastes be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.
- 206-4: DOE notes the commentor's concerns regarding the existing cleanup mission and migration of contaminants to the Columbia River. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 207: Carlos Romano

Response to Commentor No. 207

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

To Whomever may concern
FFTF is a great opportunity for
Research, Production and Development of
Nuclear Technology that our Nation
Needs. Stopping it would be short-sighted
and counter productive.

Please Restart the FFTF Program
for all our benefits.

Thanks

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Carlos Romano

Organization: _____

Home/Organization Address (circle one): 2373 NW 185th Ave #649

City: Hillsboro State: OR Zip Code: 97124

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 1901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

207-1

207-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 208: Richard E. Rust

Richard E. Rust, MD
18747 Ridgely Rd. NW
Shoreline, Wa. 98177

Collette E. Brown
U.S. Department of Energy
NE-50
19901 Germantown road Germantown MD 20874-1290

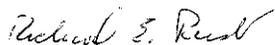
Dear Collette E. Brown:

Please add my voice to those of the multitude of Washington State Physicians- Washington State Medical Society, Washington Academy of Family Physicians, and Washington Physicians For Social Responsibility- in urging the prompt shut-down of the Hanford Fast Flux Test Facility. The proposed reasons to restart the reactor are all suspect in their true need, and the reasons to proceed with shut-down are cogent to public health and essential to the future safety of our Northwest environment.

While radio-active isotopes are important for their treatment of malignant disease and in testing for disease, there is no need for production of these materials at Hanford. Power for space exploration will continue to be a need in the future, but NASA has stated that production of Plutonium-238 at Hanford is not necessary for their program. The FFTF reactor was designed to produce weapons grade material, and not for research. In the new century, the world depends on reduction of further weapons production. Continuing the capacity for such production is not desirable or necessary, and will be counterproductive to furtherance of a peaceful world.

As one of many, I urge shut-down of the Fast Flux Test Facility as soon as possible. More, I urge expeditious progress on the Hanford cleanup, which has been far too long delayed.

Sincerely,



Richard E. Rust

Response to Commentor No. 208

- 208-1:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.
- 208-2:** DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.
- A May 22, 2000, correspondence from NASA to DOE identified that NASA no longer has a planned requirement for small radioisotope thermoelectric generator (SRTG) power systems. This does not mean that NASA no longer requires DOE to provide the necessary plutonium-238 to support deep space missions. Rather, the suspension of SRTG development efforts was conducted in order to permit reprogramming of funds to support development of a new radioisotope power system based on a Stirling technology generator. This new radioisotope power system, referred to in the subject correspondence, requires one-third less plutonium-238 as its fuel source. However, the Stirling technology is developmental and NASA has requested in a September 22, 2000, letter to DOE that large RTGs be maintained as backup. Section 1.2.2 was revised to clarify plutonium-238 mission needs.
- 208-3:** FFTF was built for research as described in Volume 1, Section 2.3.1.1, not for weapons production. FFTF has never been used for weapons production, although it is capable of being used for tritium production and

208-1

208-2

208-3

208-4

Commentor No. 208: Richard E. Rust (Cont'd)

Response to Commentor No. 208

very limited production of plutonium-239. DOE is not considering restart of FFTF with the intent of preserving a weapons production capability. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, are not national defense missions.

- 208-4:** See response to comment 208-1. DOE notes the commentor's concerns regarding the existing cleanup mission and migration of contaminants to the Columbia River. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 209: Derek D. Jones

August 28, 2000

Attn: Colette E. Brown
U.S. Department of Energy, NE-50
19901 Germantown Road,
Germantown, MD 20874-1290

Ladies and Gentlemen,

Now that we have the draft PIES in hand, there are plenty of facts available to prove what restart supporters have known for years, that FFTF is safest, lowest cost option to produce the isotopes that are needed for future generations.

This year one million people will hear from their doctor that their worst fear is now a reality. They will be told that they have cancer. Many will know that they face surgery, chemotherapy or both. This person could be you, a friend, or a close family member. If you know a cancer survivor you know that there is no cure for cancer. You know that they face several years of treatment and suffering to hopefully be able to go into remission. What most people don't want to admit is that these people now face the very likely possibility that this or another form of cancerous growth will return again later in their life. Often the treatment that was used before will not work the second time around. These people need options. We as a society need those options now. They do not need sympathy. They need a new form of treatment. We do need medical isotopes and we need them now!

Last year over one half million real men, women and children died from cancer. We can't change that statistic, but the eventual restart of FFTF can give our children options that are not available today. We can turn the tide on cancer. We can make a difference. We must put aside antiquated environmental phobias and see the restart of FFTF for what it is, it is hope for the future.

Response to Commentor No. 209

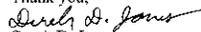
209-1

209-1: DOE notes the commentor's support for Alternative 1, Restart FFTF, and opposition to the No Action Alternative and Alternative 2, Use Only Existing Operational Facilities.

Commentor No. 209: Derek D. Jones (Cont'd)

The no action option^{and Alternative 2 are} is totally unacceptable. The no action option is a death sentence for untold millions of people. I realize that by law the report had to include this option, but it should not be seen as a viable option. While it might be popular to some very vocal environmentalists, it is no less than medical malpractice followed by euthanasia. Cancer means suffering! Some Medical isotope treatments reduce pain and suffering. Some provide life extensions, time for a mother to help finish the rearing of a child. One is even used to help patients with Heart Disease a better chance of surviving bypass surgery.

Let's stop wasting time and money studying cancer, it is time to start truly winning the war against cancer. It is time to start saving lives. It is time to restart the Fast Flux Test Facility!

Thank you,

 Derek D. Jones
 1106 W. 29th Ave.
 Kennewick, WA 99337-4315
 (509) 582-5077

209-1
 (Cont'd)

Response to Commentor No. 209

Commentor No. 210: U.S. Representative Earl Blumenauer

EARL BLUMENAUER
Third District, Oregon

COMMITTEE:
TRANSPORTATION AND
INFRASTRUCTURE

SUBCOMMITTEES:
GROUND TRANSPORTATION
WATER RESOURCES AND
ENVIRONMENT



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email: write.earl@mail.house.gov
website: <http://www.house.gov/blumenauer>

COMMENTS OF U.S. CONGRESSMAN EARL BLUMENAUER FAST FLUX TEST FACILITY PUBLIC HEARING Portland, Oregon August 29, 2000

- As a citizen of the Northwest, and an elected official, I think nuclear contamination at Hanford is our most serious threat facing citizens and our environment today.
- Hanford is one of the most polluted sites in the country. Clean-up must be our Number 1, long term priority. Every action we take must be viewed through the prism of protecting citizens and the environment from further contamination.
- Restarting the FFTF reactor would increase contamination by creating **6,000 cubic meters of new radioactive waste**. It would also contaminate new facilities that have never been contaminated.
- DOE states FFTF start-up will facilitate manufacturing of medical isotopes. Yet private markets and other facilities could be explored to meet demand.
- This remains “a reactor in search of a mission.”
- Extending the life of the reactor will only increase costs of eventual decommissioning and extend period of time for clean-up.

210-1

210-2

210-3

210-4

Response to Commentor No. 210

210-1: DOE notes the commentor’s concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM). Congress also funds FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram funds designated for Hanford cleanup, regardless of the alternative(s) selected.

210-2: As identified in Sections 4.3.1.1.13 and 4.3.3.1.13 of the NI PEIS, the restart of FFTF would generate about 63 cubic meters of additional radioactive waste (i.e., solid low-level radioactive waste) annually, in addition to nonhazardous wastes. High-level radioactive waste would not be generated from merely operating FFTF. This would account for about 2,205 cubic meters of additional radioactive waste to be generated over the 35-year period of nuclear infrastructure operations and is small in comparison to the waste generated by current Hanford activities. It is DOE’s policy that all wastes be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision.

***Commentor No. 210: U.S. Representative Earl Blumenauer
(Cont'd)***

- With regard to Hanford, we should in no way undertake any project that would divert resources or attention away from the overall goal: complete toxic clean-up, and improved public safety and environmental conditions. This proposal to restart FFTF fails to meet those criteria in every way.

210-5

Response to Commentor No. 210

The decision on the use of FMEF will take into account that it is currently not a contaminated facility.

- 210-3:** Although other private manufacturers produce medical isotopes, DOE remains the key provider for a large number of isotopes that are used in relatively small quantities by individual researchers at universities and hospitals. Because their application is initially experimental, these isotopes are not generally purchased in large-enough quantities to make their production financially attractive to private industry. Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure to support the production of radioisotopes for medical applications and research. DOE's intent is to fulfill its responsibility to ensure that there is a reliable supply of isotopes in the United States to meet future demand. DOE encourages the commercial sector to privatize the production of medical isotopes in certain instances. DOE does this by turning over production of certain isotopes to commercial entities once DOE has established that commercial production is economically viable. Section 1.2.1 of Volume 1 has been revised to clarify DOE's role and other producers' capabilities in fulfilling U.S. research and commercial isotope needs.

DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of the PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

- 210-4:** Decommissioning FFTF, including associated costs and cleanup, is not within the scope of the NI PEIS. Before decommission activities were undertaken, DOE would prepare the appropriate environmental documentation to address the associated environmental impacts. Cost assessments would also be prepared.

DOE remains committed to cleaning up the Hanford Site independent of ultimate decisions on FFTF. The amounts of wastes associated with

***Commentor No. 210: U.S. Representative Earl Blumenauer
(Cont'd)***

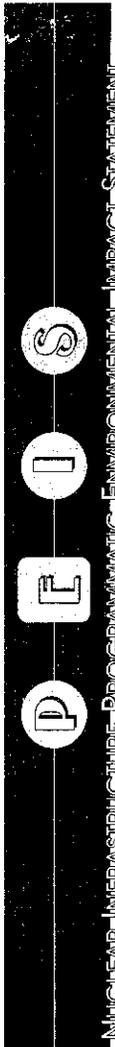
Response to Commentor No. 210

decommissioning FFTF would be small. The schedule for cleaning up these other wastes would not be affected if FFTF were restarted and its lifetime thereby extended.

- 210-5:** The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure mission described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Evaluations performed in Chapter 4 of the PEIS demonstrate that restart and operation of FFTF would have a very small impact on public safety or the environment.

Commentor No. 211: Chris Kerchum

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

The Hanford Reach has not been cleaned and leaking tanks full of plumbic radio active wastes. The fees should strongly take into account and not just to FTF

As a Portland area resident I worry that Hanford threatens not only my property value but my life.

FFTF is 20 years old. Decommission the plant. The DOE needs to fulfill an earlier promise to clean up Hanford Reach.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Chris Kerchum

Organization: _____

Home/Organization Address (circle one): 343 SE 30th AV S.W.

City: Portland State: OR Zip Code: 97217

Telephone (optional): 503-230-7759

E-mail (optional): ckerschum@spiritone.com

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 211

211-1

211-1: DOE notes the commentor's concerns regarding the existing cleanup mission and migration of contaminants to the Columbia River. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

211-2

No DOE waste tanks are located within the Hanford Reach. The underground waste tanks are located on the 200 Area Plateau of the Hanford Site, several kilometers from the Columbia River.

211-1

211-2: DOE notes the commentor's opposition to Alternative 1, Restart FTF, and support for Alternative 5, Permanently Deactivate FTF.

211-3

211-3: See response to comment 211-2. The FTF reactor was constructed and initiated operation in the mid 1980s, making it DOE's newest reactor. It has no structural flaws that would prevent safe operations. As stated in Volume 1, Section 2.3.1.1.2, several upgrades would be implemented if a decision to restart FTF was made by DOE. These upgrades would improve efficiency and reliability, minimize waste, and conform to current industry standards. Throughout the life of FTF, the FSAR has been maintained via approved change control and engineering change notices. All updates and revisions have had the required reviews and approvals. No deficiencies in the FTF design, analysis, facility condition, or operations have been identified or recognized that would prevent FTF from meeting the safety objectives and intent of commercial nuclear safety regulations for equivalent facilities. If the Record of Decision concludes that FTF should be restarted, a Probabilistic Risk Assessment would be completed and a new FSAR would be prepared in accordance with applicable regulations. With planned plant upgrades, FTF would be able to operate safely for the 35 year time period being considered in the NI PEIS.

211-1

WE the undersigned
want the DOE to
NOT restart the FFF
Nudra 2 Reader ^{Re PEIS}

211-2

① Chris Kerchum ^{7355 25th Ave}
^{PO Box 9724}

② Nancy Powell 7006 NE Prescott
97218

③ Jill Allen 96 NW Maywood Dr

④ Helen Worrall 12604 SW Barrow Rd.
97229

⑤ Bill Wilson 4936 NE 25th Ave
port 97211

⑥ Craig R Barber 7300 NE 16th Av apt 4
Vancouver wa 98665

⑦ RT Jones PO Box 8163 PDX 97207-8163

⑧ Christina Lindstrom 1731 NE 25th Ave #3 97212

⑨ Alth Fryman 2511 SE 52nd Av Port. OR, 97206

⑩ Keith R. Schopf 3210 N.E. 17th Dr #3 Gresham 97030

⑪ FC Poundstone 4264 SE 122 #6
PORTLAND, OR. 97236

Response to Commentor No. 211

Commentor No. 211: Chris Kerchum (Cont'd)

- ⑫ ~~Chris L...~~ 5928 SE Holgat
Test land, OR 97206
Farm & drive
- ⑬ 2618 SE 112TH DR
PORT OR 97266
~~Chris L...~~
Chris L. Williams 5928 SE Holgat

Commentor No. 212: Don Stephens

Response to Commentor No. 212

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

My government has a strong moral obligation to clean up Hanford, and at a pace that is as rapid as possible consistent with safety. Already, much of the project is already behind schedule.

The restart of the FFTF should not be done. It will impede the cleanup, and, in addition, generate additional wastes. Further, the need for radioisotopes is overstated. I work in the biomedical research area at OHSU and am familiar with these needs.

To conclude, Hanford should be cleaned up on time and the FFTF should not be implemented.

212-1
212-2
212-1
212-3
212-4
212-1
212-2

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Don Stephens

Organization: _____

Home/Organization Address (circle one): 905 SE Cona

City: Portland State: OR Zip Code: 97207

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephonenumber: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
Email: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

212-1: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Therefore, no evaluated alternative would impact the schedule or available funding for existing Hanford cleanup activities.

212-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

212-3: As identified in Section 4.3.1.1.13 of the NI PEIS, the restart of FFTF would generate about 63 cubic meters of additional radioactive waste (e.g., solid low-level radioactive waste) annually, in addition to nonhazardous wastes. This would account for about 2,205 cubic meters of additional radioactive waste to be generated over the 35-year period of nuclear infrastructure operations and is very small when compared to wastes generated by other Hanford activities. It is DOE's policy that all wastes be managed (i.e., treated, stored and disposal) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

The NI PEIS addressed the environmental impacts due to the treatment storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision.

Chapter 2—Written Comments and DOE Responses

Commentor No. 212: Don Stephens (Cont'd)

Response to Commentor No. 212

212-4: DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

Commentor No. 213: Sandra J. Gray

The Department of Energy has issued a Draft Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Mission in the United States, Including the Role of the Fast Flux Test Facility.

My name is Sandra Gray, and I am a resident of Richland, Washington. I claim the right to offer an opinion on the Draft PEIS from several points of view. I have lived in Richland since 1978 and take pride in the quality of life I enjoy in that community. As is true for many of you, cancer and other debilitating diseases that have the potential to be identified and treated with radioactive isotopes have cruelly touched my life. I have completed all requirements except the thesis towards a Masters degree in environmental science, so my position on environmental issues comes from knowledge as well as emotion. From personal, academic and professional perspectives I have concluded that the best option presented in the Draft PEIS is that which would restart the FFTF.

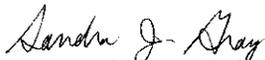
Detractors state that Hanford already has too much waste to clean up, and restarting the FFTF would increase that burden. I say that the FFTF has generated very small amounts of waste during its ten years of operation and contributed no unacceptable discharges to the environment in that time and this clean mode of operation will not change.

Detractors state that Hanford clean-up monies will be diverted from those valid efforts in order to fund the FFTF operation. I say that, by law, the operating funds for the FFTF cannot come from clean-up funds and this argument is not based in fact.

Detractors state that the other options proposed by the Draft PEIS are as effective as the FFTF would be. I say that those options cannot match the range, quality or quantity of isotopes that can be produced by the FFTF. This fact is documented in the PEIS and supporting documentation.

Detractors argue that the medical community has available all the medical isotopes that it needs for the uses currently understood. I say that numerous affidavits contradict that statement. Reputable doctors and scientists have written these affidavits from reputable institutions both in the United States and abroad.

I say that the Fast Flux Test Facility should be restarted and finish out her lifetime in offering life and hope for people who now have only unacceptable options available to them. Detractors say that the cost of restarting the FFTF is too high. I ask them, what is the cost to our society if we don't? My mind is clear; the right option is the restart of the FFTF.



Respectfully submitted by Sandra J. Gray,
Richland, Washington,
August 29, 2000

213-1

213-2

213-3

213-1

213-4

213-1

Response to Commentor No. 213

213-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

213-2: DOE notes the comment regarding waste generation.

213-3: The commentor is correct concerning the difference in funding sources from the different congressional subcommittees. In addition, the U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

213-4: For nearly 50 years, DOE's use of its unique technologies and capabilities to develop isotopes for civilian purposes has enabled the widespread application of medical isotopes seen today. While its market share is a small fraction of total world isotope production, DOE remains the key provider for a large number of isotopes that are used in relatively small quantities by individual researchers at universities and hospitals. Because their application is initially experimental, these isotopes are not generally purchased in large-enough quantities to make their production financially attractive to private industry.

The United States currently purchases approximately 90 percent of its medical radioisotopes from foreign producers, most notably Canada. However, Canada only supplies a limited number of economically attractive commercial isotopes (primarily molybdenum-99), and it does not supply research isotopes or the diverse array of medical and industrial isotopes considered in the NI PEIS. As such, reliance on Canadian sources of isotopes to satisfy projected U.S. isotope needs would not meet DOE's mission requirements. Section 1.2.1 of Volume 1 has been revised to clarify DOE's role and other producer's capabilities to fulfill U.S. isotope needs.

Commentor No. 214: Tom Cropper

Draft PEIS Comment Form

I can see a problem. The FFTF will produce a new generation of plutonium production facilities. The current plans call for space exploration programs with perhaps ten or five percent output geared to a supposed production of medical isotopes.

However, the facilities will outlast the current plans. What would keep the dangerous plutonium from being used for war or supposed enemies?

How could this dangerous nuclear material be kept out of the hands of blackmarket and other criminals?

The Hanford area is already the site of the largest dump of nuclear waste in the world. Our people suffer excessive rates of cancers and we have a large cancer hospital in Portland which seems to prove my point.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Tom Cropper

Organization: Multnomah Activists Arts

Home/Organization Address (circle one): P.O. Box 18025

City: Portland State: OR Zip Code: 97218

Telephone (optional): 503-281-2024 fax

E-mail (optional): tcropper@uswest.net

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact Collette S. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
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E-mail: NuclearInfrastructure-PEIS@hq.doe.gov

7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Response to Commentor No. 214

214-1

214-1: In the event that a decision is made to restart FFTF, the isotope of plutonium that would be produced is plutonium-238. Plutonium-238 is not used in nuclear weapons because its neutron physics properties are not suitable for this application. The FFTF core will not be designed to produce weapons grade plutonium. All spent nuclear fuel, including the separated non-weapons grade plutonium-238 as well as medical or industrial radioisotopes would be stored, handled, and transported in accordance with safety practices and procedures commensurate with their toxicity and quantities. All nuclear material at DOE facilities, including FFTF, are subject to safeguards and security controls for the specific intent of preventing any diversion of the material.

214-2

214-2: DOE notes the commentor's views. As discussed in Section 3.4.9.3 of Volume 1, the question of whether the population surrounding the Hanford Site is subject to elevated rates of cancer incidence or cancer mortality is unresolved. Existing studies and data suggest that cancer mortality and cancer incidence rates in the Hanford area are not elevated. A National Cancer Institute survey published in the Journal of the American Medical Association in 1991 showed no general increased risk of death for people living near nuclear facilities, including the Hanford Site (Jablon et al. 1991:1403-1408). Cancers are believed to be caused by a combination of hereditary and environmental factors, including radiological and chemical agents. In ongoing clinical testing, therapeutic radioisotopes have proven effective in treating cancers and other illnesses while minimizing adverse side effects, making their use an attractive alternative to traditional chemotherapy and radiation treatments.

Radiological impacts on the Portland area that would result from implementation of the Alternatives described in Section 2.5 of Volume 1 would be smaller than the radiological impacts described in Section 4.3 for the area immediately surrounding the Hanford Site. Radiological risks to the Portland area that would result from implementation of the alternatives would be essentially zero.

Commentor No. 215: Art Lewellan

My work is in TRANSPORTATION & URBAN PLANNING. IN MY FIELD, ENERGY consumption is greater than any other use of energy. Aluminum, oil refining, steel production, coal & other ores, plastic, glass, road & bridge construction, all contribute the greatest demand for energy. THIS SYSTEM OF TRANSPORTATION/DISTRIBUTION IS NOT SUSTAINABLE. IN THE NEAR FUTURE, PETROLEUM SUPPLIES ALONE WILL DWINDLE TO THE POINT WHERE THE SYSTEMS' ENERGY DEMAND WILL ALSO DWINDLE. SHOULD WE NEGLECT TO TAKE STEPS TOWARD AN ENERGY FUTURE THAT IS LESS THAN WE NOW REQUIRE, A DRASTIC "IMPLOSION" OF SHORTAGES WILL DEVASTATE WORLD ECONOMIES & LIVING STANDARDS.

I SHOULD STATE THAT INCREASED NUCLEAR POWER PRODUCTION WILL NOT PROVIDE AN ANSWER; FOR AN INDUSTRIAL TRANSPORTATION SYSTEM THAT HAS A "BUILT-IN" INCREASE OF ENERGY DEMAND. I AM NOT A LUDDITE, HOWEVER THERE ARE FUNDAMENTAL LIMITS, WE MUST FACE. IF WE MUST CONSERVE, ENERGY, WE MUST CUT OUT WASTE, NOT SEARCH FOR MORE SOURCES.

ART LEWELLAN
3205 SE 85 #9
PORTLAND, OR. 97202

215-1

Response to Commentor No. 215

215-1: DOE notes the commentor's interest in energy conservation, although issues of energy efficiency and supply are beyond the scope of this Nuclear Infrastructure PEIS. The DOE missions to be addressed in this PEIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

Commentor No. 216: Rose M. Rummel-Eury

Draft PEIS Comment Form

FFTF restart would add more radioactive waste to what's ~~already~~ already here. I talked to my retired nuclear physicist father last night & told him the DOE was considering reopening Hanford. The risks to the public are too great now, he said. He believes this country can't continue making more waste until we perfect the method for getting the old stuff disposed of safely. That takes more energy than it took to create it! When I asked him what we should do for power in the future - he said WIND POWER!

NO on FFTF.

Thanks for listening!

Rose Rummel-Eury

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Rose M. Rummel-Eury

Organization: _____

(Home/Organization Address (circle one)): 1500 NE 15th Ave., #551

City: Portland State: OR Zip Code: 97232

Telephone (optional): 503/528-2452

E-mail (optional): rummel_eury@hotmail.com

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-662-4693 • Toll-free Fax: 1-877-662-4692
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Response to Commentor No. 216

216-1

216-1: Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

216-2

216-2: DOE notes the commentor's interest in wind power, although issues of research and development of alternative energy sources are beyond the scope of this Nuclear Infrastructure PEIS. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

216-3

216-3: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

Commentor No. 217: Anonymous

Response to Commentor No. 217

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

I am completely opposed to the restart of the FFTF facility. I am demanding the permanent shut down of the FFTF reactor. I cannot believe that after years of consistent public opposition that DOE did not reflect the will of the public. I cannot believe that the DOE is trying to fabricate a "compelling need" through medical isotopes and public relations (smoke-screen). I cannot believe the PEIS does not include adequate evaluations of existing contaminant sources at Hanford. I cannot believe that the PEIS doesn't address the potential of waterborne accidents (which are likely) on the earth and public health. I cannot believe the PEIS does not include a shut down (permanent) option. I cannot believe that DOE is trying to waste more public money on this Northwest's most dangerous public safety threat - SHUT DOWN FFTF NOW! ALL MONEY, EFFORTS, STUDIES, ETC. SHOULD BE ORIENTED TOWARDS SHUT-DOWN and CLEAN-UP.

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____
 Organization: _____
 Home/Organization Address (circle one): 2227 SE MADISON
 City: PORTLAND State: OR Zip Code: 97214
 Telephone (optional): _____
 E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

217-1
217-2
217-3
217-4
217-5
217-1
217-2

I just add to the proposed alternatives that demand a new PEIS.

- 217-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF. DOE also notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site.
- 217-2:** DOE notes the commentor's position. DOE policy encourages effective public participation in its decisionmaking process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.
- No fundamental factors relating to purpose and need, the alternatives under consideration, or the associated environmental impact evaluations have changed since the Draft NI PEIS was published.
- 217-3:** DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to

Chapter 2—Written Comments and DOE Responses

Commentor No. 217: Anonymous (Cont'd)

Response to Commentor No. 217

clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

- 217-4:** DOE notes the commentor's concerns on NI PEIS evaluations of existing contaminant sources at Hanford. Section 4.8.3 of the NI PEIS, "Cumulative Impacts at Hanford," includes the impacts associated with existing contaminant sources. Specifically, the information presented in the tables of this section in the entry "Existing Site Activities" includes environmental impacts associated with past and present Hanford activities thus reflecting existing contamination impacts at the site.
- 217-5:** Sections 4.2-4.6 of Volume 1 provide the results of the evaluation of potential health impacts that would be expected to result from implementation of the alternatives, including normal operations and a spectrum of accidents that included severe accidents. The environmental analysis showed that radiological and nonradiological risks associated with each alternative would be small.

Commentor No. 218: John Gunn

Response to Commentor No. 218

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

- ① I am opposed to the ^{existing} (FFTF) ^{reactor} at Hanford.
- ② The Department of Energy has not demonstrated a need for the medical isotopes.
- ③ The Department of Energy (DOE) has not demonstrated a need for the Plutonium 238 for NASA.
- ④ The PEIS does not adequately address the additional wastes created by the FFTF in the existing wastes at Hanford.
- ⑤ The PEIS inadequately covers the cost of disposal and decommission.
- ⑥ I support alternative 5.

218-1
218-2
218-3
218-4
218-5

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): John Gunn

Organization: _____

Home/Organization Address (circle one): 1424 SW Freeman St.

City: Portland State: OR Zip Code: 97219

Telephone (optional): 245-9580 (502)

E-mail (optional): Shragunn@teleport.com

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For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

218-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF.

218-2: DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA space missions; no viable alternative to using plutonium-238 to support these missions currently exists. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted by approximately 2005. Without an assured domestic supply of plutonium-238, DOE's ability to support future NASA space exploration missions may be lost. Section 1.2.2 of Volume 1 was revised to further

Commentor No. 218: John Gunn (Cont'd)

Response to Commentor No. 218

clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

218-3: The current inventory of wastes managed at the Hanford Site are identified in Volume 1, Section 3.4.11.1 of the NI PEIS. In addition, the generation rates of wastes associated with the NI PEIS options that use Hanford facilities are compared with the current waste generation rates at the site in Section 4.3. As stated in Sections 4.3.1.1.13, 4.3.3.1.13, and 4.4.3.1.13, the generation rates of wastes at Hanford associated with the options that utilize either FFTF, FMEF and/or RPL/306-E would be much smaller than the current waste generation rates at the site. These volumes would also be small in comparison to the existing inventory at the site (Section 3.4.11.1). These comparisons were also made for the other options which involved INEEL and ORR facilities.

218-4: The costs of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Such an ancillary document need only be made available to the public prior to any decision being made under CEQ regulations (40 CFR Part 1505.1(e)). DOE mailed this document to approximately 730 interested parties on August 24, 2000. The report was made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided a summary of the Cost Report in Appendix Pin the Final NI PEIS.

Decommissioning FFTF, including associated costs and cleanup, is not within the scope of the NI PEIS. Before decommission activities were undertaken, DOE would prepare the appropriate environmental documentation to address the associated environmental impacts. Cost assessments would also be prepared.

218-5: See response to comment 218-1.

Commentor No. 219: Nancy Matela

Response to Commentor No. 219

Draft PEIS Comment Form

I support Alternative 5.
35 years is only 1/2 generations! We need
to consider "several generations"
The cleanup funds must not be diverted.
Accidents will happen!

219-1

219-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF. The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

The NI PEIS addresses the impacts from postulated accidents associated with the restart of FFTF in Section 4.3 of Volume 1.

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Nancy Matela

Organization:

Home/Organization Address (circle one): 2171 NE Schuyler #3

City: Portland State: OR Zip Code: 97212

Telephone (optional):

E-mail (optional): nmatela@pacifiex.com

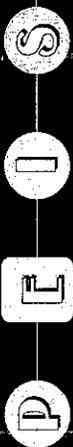
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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 220: Anonymous

Response to Commentor No. 220

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

I am opposed to the restart of the FFTF for more reasons than I can fit onto this page. I have serious concerns about the process and options presented in the Environmental Impact Statement. We already have the most environmental threat facing the Pacific Northwest at Hanford. We should not only not worsen the situation we are in now in terms of contamination, we need spend all of our time and attention on getting ourselves out of our current mess. The Department of Energy needs to clean up the mess and not come up with new missions for the site. There is not a legitimate reason for ~~the~~ plutonium that is already available on the market. The DOE needs to listen to its experts & the taxpaying public and CEATN UP the site NOW. The DOE is engaged for some reason on a mission to worsen our environment & threaten our health. Giving proper notice for hearings and ensuring there is a fair public participation process will certainly lead to a resounding "No" by the public.

220-1
220-2
220-3
220-2
220-4

220-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

220-2: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: _____

Home/Organization Address (circle one): 2946 NE 9th Ave

City: Portland State: OR Zip Code: 97212

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

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Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



Commentor No. 220: Anonymous (Cont'd)

Response to Commentor No. 220

the target fabrication and processing in FMEF and how this waste would be managed at the site.

220-3: DOE could purchase plutonium-238 from Russia; however, for supply reliability reasons and concern of nuclear nonproliferation, DOE's preference is to establish a domestic plutonium-238 production capability. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

220-4: DOE provided notice of scheduled public hearings in accordance with the requirements of CEQ and DOE regulations (i.e., 40 CFR Parts 1503.1 and 1506.6 and 10 CFR Part 1021.313, respectively). This included announcement of the hearings in the Federal Register as well as in the local media. In addition, copies of the Draft NI PEIS and/or the Summary (including the public hearing schedule) were sent to each individual or group listed to receive it at the address on record.

The public hearing format was designed to be fair and unbiased. The public hearing format used was based on stakeholder input and was presented in the Notice of Availability (65 FR 46443 et seq.) for the Draft NI PEIS. This format was intended to encourage public participation, regardless of the motivation for attending the hearing. It provided an opportunity for the participants to meet one another, exchange information, and share concerns with DOE personnel available throughout the course of each hearing to answer questions. The meetings were facilitated by an independent moderator to ensure that all persons wishing to speak had an opportunity to do so. Persons wishing to comment were selected at random from the audiences rather than according to the order in which they registered. This was accomplished by a random number drawing. In addition to the comment recorder stationed at the main hearing, a second recorder was available in an adjacent room to receive comments without the need to await selection at the main proceeding. The hearing format used promoted open and equal representation by all individuals and groups.

Commentor No. 221: Jane Civiletti

Response to Commentor No. 221

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

As stated unanimously by the Portland City Council, I strongly urge Alternative 5 - Permanently deactivating FFTF. We at the Pacific NW have seen to it that a commercial nuclear reactor along the Columbia River has been permanently shut down. We expect the Federal government to do nothing with our tax dollars at Hanford than to attempt a clean up of the disaster it has created over the past 60 yrs. No new reactors should be built. No old reactors should be restarted. No existing facilities should be converted to new uses. At the hearings our elected officials or their designees have stated unequivocally their opposition to any further production of nuclear materials. They represent us, listen to us.

221-1

221-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.

221-2

221-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and Alternative 4, Construct New Research Reactor, and concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

221-1

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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• calling toll-free and leaving your comments: 1-877-562-4593
• faxing your comments toll-free to: 1-877-562-4592
• commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Jane Civiletti

Organization:

Home/Organization Address (circle one): 14614 S.E. Fair Oaks Ave.

City: Milwaukie State: OR Zip Code: 97267

Telephone (optional):

E-mail (optional):

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For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



Draft PEIS Comment Form

DO
 JUST NOT Restart the
 FFTF
 and one again, clean
 The dang place up
 and quit stalling.
 Seven lawmakers at least have said
 New spending which is
 \$3.14 billion 60 making money
 100 million 45 fresh day science
 50 million 5 BFN wait
 They don't want it. The people have
 spoken.
 Plutonium does energy.
 Clean it all up.

222-1

222-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

222-2

222-2: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

A listing of current Hanford contractors and their respective missions can be found at <http://www.hanford.gov>.

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: _____

Home/Organization Address (circle one): _____

City: Portland State: OR Zip Code: 97202

Telephone (optional): _____

E-mail (optional): _____

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NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 223: Everett Anttila

Everett Anttila
3415 NE 22nd Avenue
Portland, Oregon 97212 – 2432

United States Doe

I'm here to say a definitive No to the starting the fff for any reason including isotopes for medical purposes or for nuclear weapons production be it material for the existing weapons under stewardship.

223-1

Nuclear weapons are and will be the scourge to all life on earth.

*AS A CIVILIAN
UNARMED
LIFE*

The war to end all wars was fought supposedly already in the first w.w. .

The third w.w. with nuclear weaponry will be the end of all wars ,there will nothing to live for, if any remain.

223-2

There is no better time or place to start an end to this nuclear madness than on the Hanford reservation though greedy corporations vehemently are in opposition . Thank you reading this,

Everett Anttila

Response to Commentor No. 223

223-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

223-2: DOE notes the commentor's view on nuclear weapons. The scope of this Nuclear Infrastructure PEIS is limited to analysis of alternatives to fulfill the requirements of the DOE missions, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development. The three missions are civilian missions and are not defense-related.

Draft PEIS Comment Form

Dear Friends,

Clearly, NASA's "apparent" need for U-238 must be weighed against public opposition. NASA has no direct authority over DOE's hearings results. NASA's own hearings are only a part, perhaps a less relevant part, since NASA is not holding hearings here where the public - taxpayers, your funders - is most potentially impacted.

Bottomline: There are sufficient supplies available for this nuclear material. This misuse of US/Oregonian/Washingtonian dollars is not justified and instead is much better off the table unbudgeted or applied to further research to find safe alternatives to U-238 and other such radioactive material.

Thank you.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: _____

Home/Organization Address (circle one): _____

City: _____ State: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Collette E. Brown, NE-50
 U.S. Department of Energy • 19501 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • TDD/Relay Texas: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

224-1

224-1: Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA space missions; no viable alternative to using plutonium-238 to support these missions currently exists. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted within the next several years. Without an assured domestic supply of plutonium-238, DOE's ability to support future NASA space exploration missions may be lost. DOE could purchase plutonium-238 from Russia; however, for supply reliability reasons and concern of nuclear nonproliferation, DOE's preference is to establish a domestic plutonium-238 production capability. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

Commentor No. 225: David Amundoon (Cont'd)

Response to Commentor No. 225

- 225-3:** The risks during normal operations and postulated accidents associated with the restart and operation of FFTF are addressed in detail in Section 4.3 of the NI PEIS. Decommissioning of the FFTF, including clean-up efforts, is not within the scope of the NI PEIS, nor is an assessment of any potential benefits that may, or may not, result from shutdown of FFTF. Before decommissioning activities were undertaken, DOE would prepare the appropriate environmental documentation to address the associated environmental impacts.
- 225-4:** DOE notes the commentor's views. However, a National Cancer Institute survey published in the Journal of the American Medical Association in 1991 showed no general increased risk of death for people living near nuclear facilities, including the Hanford Site. Cancers are believed to be caused by a combination of hereditary and environmental factors, including radiological and chemical agents. In ongoing clinical testing, therapeutic radioisotopes have proven effective in treating cancers and other illnesses while minimizing adverse side effects, making their use an attractive alternative to traditional chemotherapy and radiation treatments.

DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

Commentor No. 225: David Amundoon (Cont'd)

Response to Commentor No. 225

Although other manufacturers produce medical radioisotopes, DOE remains the key provider for a large number of radioisotopes that are used in relatively small quantities by individual researchers at universities and hospitals. Because their application is initially experimental, these isotopes are not generally purchased in large-enough quantities to make their production financially attractive to private industry. However, supplies of many research isotopes are not readily available from existing domestic or foreign sources, causing a number of medical research programs to be terminated, deferred, or seriously delayed. Consistent with the mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure to support production of radioisotopes for medical applications and research. DOE's intent is to complement commercial sector capabilities to ensure that a reliable supply of isotopes is available in the U.S. to meet future demand, and to encourage the commercial sector to privatize the production of isotopes that have established applications to a level that would support commercial ventures.

Commentor No. 226: Jack Spadaro

Response to Commentor No. 226

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Draft PEIS Comment Form

The FTFF restart ^{alternative} is not appropriate for several reasons; ① The alternative increases transportation needs for radioactive materials; ② The cost differential between FTFF restart and accelerator usage is less than 5% on the face of it, ~~but~~ an insignificant cost when considering risks of FTFF restart; ③ The United States has not nearly maximized its ability to purchase the necessary isotopes abroad, many available from our strongest democratic allies.

I do not believe that the Dept. of Energy track records mismanaging the current Hanford operations allows for a responsible restart of the FTFF. Nuclear criticality is not the only issue. Nuclear waste production, diversion of Hanford cleanup resources, and dismissal of less harmful alternatives are also issues. The Hanford site has seen numerous management failures over the past 5 decades, and official denial and then admission of management failures demonstrates a continuing inability to responsibly sit and carry out safe missions at the reservation. The Dept. of Energy needs to focus on performing one mission well - cleanup of the Hanford reservation.

Every year people develop cancer due to residue of nuclear production. Making more PEIS does not seem like a smart way to save cancer. Please follow your Treaty Agreement obligation to shut down the FTFF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Jack Spadaro

Organization: Oregon Physicians for Social Responsibility

(Home) Organization Address (circle one): 2234 SE Grant Street

City: Portland State: OR Zip Code: 97214

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
Email: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

226-1

226-2

226-3

226-4

226-5

226-4

226-6

226-4

226-1: DOE notes the commentor's opposition to Alternative 1, Restart FTFF. While there are differences in shipping distances and risks among the alternatives, risks from transportation are small for all the alternatives. Transportation risks are summarized in Section 2.7.1.6 of Volume 1 and are discussed in more detail throughout Chapter 4 and Appendix J.

226-2: The environmental impacts of reasonable alternatives to fulfill the requirements of the missions were disclosed and evaluated in the NI PEIS. DOE made every effort to obtain, analyze, and disclose all required information to make a decision on expanding nuclear infrastructure. The cost impacts of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make decision documents such as the cost report available to the public before a decision is made. DOE mailed this document to interested parties on August 24, 2000, and was made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided a summary of the Cost Report in Appendix P in the Final NI PEIS.

226-3: The United States currently purchases approximately 90 percent of its medical radioisotopes from foreign producers, most notably Canada. However, Canada only supplies a limited number of economically attractive commercial isotopes (primarily molybdenum-99), and it does not supply research isotopes or the diverse array of medical and industrial isotopes considered in the NI PEIS. As such, reliance on Canadian sources of isotopes to satisfy projected U.S. isotope needs would not meet DOE's mission requirements. Section 1.2.1 of Volume 1 has been revised to clarify DOE's isotope production role and other producers' capabilities to fulfill U.S. isotope needs.

With respect to the purchase of plutonium-238 from Russia, the United States has purchased 9 kilograms of plutonium-238 from the Russians since 1992. DOE is now considering re-establishing a domestic production capability of plutonium-238 at a United States facility because it is in our national interest to assure that the United States does not rely in the long term on any foreign government to support the NASA space program. A more detailed explanation of the need for a domestic source of plutonium-238 is found in Chapter 1 of Volume 1 of the Final NI PEIS.

Commentor No. 226: Jack Spadaro (Cont'd)

Response to Commentor No. 226

226-4: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy agreed to a change in the Tri-Party Agreement to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on FFTF's future. Public meetings were held on this formal milestone change. The NI PEIS missions would not have an impact on Hanford cleanup activities.

226-5: DOE notes the commentor's concerns. A range of reasonable alternatives are assessed in the NI PEIS. The development of these alternatives and descriptions of others considered, but dismissed, are presented in Chapter 2 of Volume 1. For each alternative assessed, a wide spectrum of postulated accidents has been evaluated and the management of all wastes generated during operations assessed. The environmental impacts, as given in Chapter 4, are small.

DOE remains committed to the cleanup of the Hanford site. The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

226-6: Cancers are believed to be caused by a combination of hereditary and environmental factors, including radiological and chemical agents. In ongoing clinical testing, therapeutic radioisotopes have proven effective in

Commentor No. 226: Jack Spadaro (Cont'd)

Response to Commentor No. 226

treating cancers and other illnesses while minimizing adverse side effects, making their use an attractive alternative to traditional chemotherapy and radiation treatments.

The NI PEIS provides an estimate of waste generation and potential human health impacts associated with each of the alternatives proposed for the production of medical, industrial and research isotopes, production of plutonium-238, and nuclear research and development. Any additional wastes generated in support of these missions would be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws, regulations, and applicable DOE orders. In terms of potential human health impacts, the NI PEIS analysis indicates that the most likely impacts would not result in additional cancer fatalities among the population surrounding the DOE facilities that may be selected for use.

Commentor No. 227: Spring Svart

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Draft PEIS Comment Form

To William D. Magwood, IV and Collette Brown and the Dept. of Energy including the Office of Nuclear Energy

The only responsible action at Hanford Nuclear Reservation is clean-up as quickly and completely as possible. The more than \$15.2 billion (by accepted contractor BNFL, Inc.'s latest estimate) which could begin the clean-up process MUST be paid NOW. Initiate the clean-up process as quickly and completely as possible. "What part of NO don't you understand?"

The only responsible action at Hanford is a start to clean-up the 54 million gallons of radioactive waste already stored there. Bottom Line. Enough!

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Spring SVART

Organization: _____

Home/Organization Address (circle one): _____

City: Portland State: OR Zip Code: 97212

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



Response to Commentor No. 227

227-1

227-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Commentor No. 228: Matthew Kenaga

Response to Commentor No. 228

Draft PEIS Comment Form

- Shut down the FTFF
 - Hanford Cleanup should be a core mission of the DOE
 - The Missions of Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States are flawed, we don't need them and don't want them. Candu has committed itself to medical work and Pu-238 can be made or purchased from existing facilities.

228-1
 228-2
 228-3

228-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FTFF.

228-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

228-3: The United States currently purchases approximately 90 percent of its medical radioisotopes from foreign producers, most notably Canada. However, Canada only supplies a limited number of economically attractive commercial isotopes (primarily molybdenum-99), and it does not supply research isotopes or the diverse array of medical and industrial isotopes considered in the NI PEIS. As such, reliance on Canadian sources of isotopes to satisfy projected U.S. isotope needs would not meet DOE's mission requirements. Section 1.2.1 of Volume 1 has been revised to clarify DOE's isotope production role and other producers' capabilities to fulfill U.S. isotope needs.

DOE could purchase plutonium-238 from Russia; however, for supply reliability reasons and concern of nuclear nonproliferation, DOE's preference is to establish a domestic plutonium-238 production capability. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Matthew Kenaga

Organization: _____

Home/Organization Address (circle one): 9714 N.E. 102nd Ave.

City: Portland State: OR Zip Code: 97220

Telephone (optional): 503/257-7432

E-mail (optional): FabulousGardner@roscopel.com

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 229: Anonymous

Draft PEIS Comment Form

First, the D.O.E. needs to completely re-evaluate their (our) missions: do the people (taxpayers) want nuclear powered space missions? do the people want more nuclear medical isotopes or nuclear isotope research? Who is pushing this agenda? It's not me. I completely oppose restarting the FFTF - ~~we~~ we haven't even finished cleaning up the existing mess at Hanford!

My "guess" is that the demand for med. isotopes is directly proportional to the nuclear waste ~~and~~ cancer-causing emissions from Hanford & other reactors. I don't care how "small" the FFTF would be, I want all nuclear power, fuel & medical isotope production + research out of my backyard and off this earth. Why don't we do the right thing for future generations and stop feeding & subsidizing big pharmaceutical companies (the U.S. government) →

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: human being

Home/Organization Address (circle one): _____

City: Portland State: OR Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
toll-free telephone: 1-877-562-4593 • toll-free fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Response to Commentor No. 229

229-1

229-1: Cancers are believed to be caused by a combination of hereditary and environmental factors, including radiological and chemical agents. In ongoing clinical testing, therapeutic radioisotopes have proven effective in treating cancers and other illnesses while minimizing adverse side effects, making their use an attractive alternative to traditional chemotherapy and radiation treatments. However, supplies of many research isotopes are not readily available from existing domestic or foreign sources, causing a number of medical research programs to be terminated, deferred, or seriously delayed.

229-2

229-3

229-1

The NI PEIS provides an estimate of waste generation and potential human health impacts associated with each of the alternatives proposed for the production of medical, industrial and research isotopes, production of plutonium-238, and nuclear research and development. Any additional wastes generated in support of these missions would be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws, regulations, and applicable DOE orders. In terms of potential human health impacts, the NI PEIS analysis indicates that the most likely impacts would not result in additional cancer fatalities among the population surrounding the DOE facilities that may be selected for use.

DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility

Commentor No. 229: Anonymous (Cont'd)

has historically paid lots of taxpayers money for research, then a "Bristol Meyers Squibb" gets this free research so they can turn around + charge the consumers (human beings) inflated drug prices) - it's a nasty cycle and you know it's happening. The people elected some of you in government and we pay all your salaries - if we don't like what you are doing, ~~then~~ ^{then} start packing!

Colette E. Brown, NE-50
U.S. Department of Energy
19901 Germantown Road
Germantown, MD 20874

*At the Portland Hearing:
I didn't appreciate your unprofessional response to the gentleman who didn't understand the "costs" of the alternatives. You said "There's no math to do here." You seem defensive and were lying ~~to~~ when you said you were here to be impartial + to listen. Pffave it!*

Place stamp here

229-1
(Cont'd)

229-4

Response to Commentor No. 229

infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

229-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

229-3: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

229-4: DOE disagrees with the commentor's characterization of the exchange between an audience member and the DOE PEIS Program Manager, Ms. Colette Brown, which took place during the short, interactive question and answer session immediately following DOE's overview presentation. Specifically, Ms. Brown was responding to one of several cost questions asked by an audience member, as the verbatim transcript from the hearing clearly shows. During this exchange, the audience member interrupted Ms. Brown while replying to the audience member's previous question regarding the cost of FFTF restart compared to building two new accelerators. The audience member then made the statements: "You

Commentor No. 229: Anonymous (Cont'd)

Response to Commentor No. 229

mentioned several different things. I wasn't able to do the math in my head. I apologize." To this, Ms. Brown replied, "There was no math to be done, sir." This was a conciliatory statement on the part of Ms. Brown and was not intended to be terse or demeaning. Instead, it was intended to convey Ms. Brown's understanding that the audience member appeared to be having difficulty with the cost analyses the audience member was questioning. Subsequently, the audience member asked an additional question on decommissioning which was then answered by Ms. Brown. DOE strives to ensure that all proceedings and matters of discourse are conducted in a professional manner.

Commentor No. 230: Lloyd K. Marbet
Don't Waste Oregon Council

Lloyd K. Marbet

19142 SE Bakers Ferry Road - Boring, OR 97009-9158 - Phone: (503) 637-3549, Fax: (503) 837-6130
 Email: marbet@mail.com

Tuesday, August 29, 2000

Testimony of Don't Waste Oregon Council

Representatives of the Department of Energy and members of the Public, my name is Lloyd Marbet and I represent a citizens activist organization known as Don't Waste Oregon Council. I appreciate the opportunity to appear before you today and testify on the "Draft Programmatic Environmental Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Missions In the United States. Including the Role of the Fast Flux Test Facility."

In reading this report it is not surprising that once again we find those directly involved in the nuclear industry telling us that we have to expand our reliance on nuclear power:

"There is an urgent sense that the nation must rapidly restore an adequate investment in basic and applied research in nuclear energy if it is to sustain a viable United States capability in the 21st Century." The chairman of NERAC

It not hard to tell who's urgent sense this really is, but the Department of Energy and this administration needs to know that there is another "urgent sense" out there and it is in the people and communities who have born the brunt of this ongoing experiment with Nuclear Technology.

The proponents of this industry never fail to remind me of the words contained in a song sung by Pete Seeger: "Waste deep in the big muddy and the big fool said push on." We are repeatedly told to "push on," one false promise after another. Compounding this tragedy is that once our government was through committing its acts of treachery on Native Americans, from broken treaties to uranium mines, it turned around and started in on ourselves.

Take the latest headlines: "Hanford will never be clean study says" Aug 8, 2000 Oregonian.

(Read quotes from the paper.)

Now juxtapose this with what we are being told in this draft study:

"It is the policy of this Administration that clean, safe, reliable nuclear power has a role in the future for our national energy security."

We can't clean our waste up but we've got to have "our own supply" of plutonium 238 for space missions because we obviously can't rely on Russian instability to keep us in large enough quantities. Like drug addicts in withdrawal, we are desperately being told that we need our own source of supply and there's nothing better than "home grown," especially if it keeps the failing infrastructure of the nuclear industry going.

But then there's "global warming" the new savior of the nuclear industry. Act two of the ongoing global drama of environmental deterioration, and what do you expect, when the policies of this administration has been to support business as usual. Surprisingly enough that is exactly what we have here "business as usual." And that is exactly what this document is,

Response to Commentor No. 230

230-1

230-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

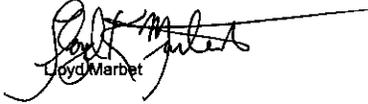
Commentor No. 230: Lloyd Marbet (Cont'd)

"business as usual!" Is there any wonder why we desperately need someone like Ralph Nader to become President?

How much longer do you think we are going to go down the road of the "big muddy" before we confront the fallacy of this Emperor persistently parading in front of us without any clothes. Instead of continuing the myth of dominating this throw away world, doesn't it make more sense to devote our precious resources to finding a way to live in balance on this earth, especially before importing anymore of our waste into outer space? Isn't it time for America to put the cart before the horse and have the decency to clean up the soiled radioactive diapers we have already produced before lulling ourselves into creating yet more national sacrifice zones?

The real urgency before us is the integrity of our ecological and biological life support systems and until we acknowledge this and accept the role we must play in protecting our planet, our government will forever bring these dog and pony shows into our communities asking us to embrace their predetermined goals of sanctioning yet another experiment upon the very fabric of life. Instead, let us take responsibility and wear the mantle of real accountability. This will not be done by starting up the Fast Flux Test Facility for one more round of nuclear experimentation. It will not be done by accepting any thing less than real alternatives, energy or otherwise. **Our only hope is to change the political leadership on our watch and putting stewardship back in our lives.**

Respectfully submitted,



Lloyd Marbet

230-1
(Cont'd)

Response to Commentor No. 230

Commentor No. 232: Anonymous

Response to Commentor No. 232

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Public Hearing Evaluation Form

Please place a check mark in the box next to the public hearing attended:

- | | |
|--|--|
| <input type="checkbox"/> August 22, 2000
American Museum of Science and Energy
300 South Tulane Avenue
Oak Ridge, Tennessee 37830 | <input type="checkbox"/> August 30, 2000
Washington State Convention and Trade Center
800 Convention Place
Seattle, Washington 98101 |
| <input type="checkbox"/> August 25, 2000
Westcoast Idaho Falls Hotel
475 River Parkway
Idaho Falls, Idaho 83402 | <input type="checkbox"/> August 31, 2000
Best Western Tower Inn and Conference Center
1515 George Washington Way
Richland, Washington 99352 |
| <input type="checkbox"/> August 28, 2000
Hood River Inn
1108 E. Marina Way
Hood River, Oregon 97031 | <input type="checkbox"/> September 6, 2000
Crystal Gateway Marriott
1700 Jefferson Davis Highway
Arlington, Virginia 22202 |
| <input checked="" type="checkbox"/> August 29, 2000
Oregon Museum of Science and Industry
1945 SE Water Avenue
Portland, Oregon 97214 | |

Please circle the appropriate number:

	Very Good			Poor	
	5	4	3	2	1
Your Level of Knowledge about the PEIS before the Hearing	5	4	3	2	(1)
Your Level of Knowledge about the PEIS after the Hearing	5	4	(3)	2	1
Time and Date of Hearing	(5)	4	3	2	1
Location of Hearing	(5)	4	3	2	1
Registration Process	(5)	4	3	2	1
Clarity of Displays and Handouts	(5)	4	3	2	1
Clarity of Presentations	5	4	(3)	2	1
Relevancy of Issues and Concerns Addressed	(5)	4	3	2	1
Opportunities for Discussion	5	4	3	(2)	1
DOE Officials' Willingness to Listen	5	4	3	(2)	1
Knowledge/Responses from Staff Attending	5	4	3	(2)	1

How could the public hearing format and materials be improved? Colette Brown turned off and read during public comment! Is the hearing just lip service from DOE?

Was the public hearing helpful to you? helpful to hear substantiated unity of Oregonians. LISTEN: WE ARE OPPOSED! I am concerned that the DOE has done nothing to foster trust in the public. DOE has created a black record of lying to the public around issues of safety and health impact!

Please continue on the other side if you run out of space. Please return your completed evaluation form to the registration desk or mail or fax to the address below.

THANK YOU – YOUR FEEDBACK IS IMPORTANT TO US

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Tel-free telephone: 1-877-562-4573 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/27/00

232-1

232-1: DOE is committed to discharging its responsibilities in an open manner and providing the public with comprehensive environmental reviews of its proposed actions. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the environmental impact analysis of DOE's proposed alternatives for meeting mission requirements. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.

Commentor No. 233: Anonymous

Response to Commentor No. 233

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Public Hearing Evaluation Form

Please place a check mark in the box next to the public hearing attended:

- August 22, 2000
American Museum of Science and Energy
300 South Tulane Avenue
Oak Ridge, Tennessee 37830
- August 25, 2000
Westcoast Idaho Falls Hotel
475 River Parkway
Idaho Falls, Idaho 83402
- August 28, 2000
Hood River Inn
1108 E. Marina Way
Hood River, Oregon 97031
- August 29, 2000
Oregon Museum of Science and Industry
1945 SE Water Avenue
Portland, Oregon 97214
- August 30, 2000
Washington State Convention and Trade Center
800 Convention Place
Seattle, Washington 98101
- August 31, 2000
Best Western Tower Inn and Conference Center
1515 George Washington Way
Richland, Washington 99352
- September 6, 2000
Crystal Gateway Marriott
1700 Jefferson Davis Highway
Arlington, Virginia 22202

Please circle the appropriate number:

	Very Good		Poor	
	5	4	3	2
Your Level of Knowledge about the PEIS before the Hearing	5	4	3	2
Your Level of Knowledge about the PEIS after the Hearing	5	4	3	2
Time and Date of Hearing	5	4	3	2
Location of Hearing	5	4	3	2
Registration Process	5	4	3	2
Clarity of Displays and Handouts	5	4	3	2
Clarity of Presentations	5	4	3	2
Relevancy of Issues and Concerns Addressed	5	4	3	2
Opportunities for Discussion	5	4	3	2
DOE Officials' Willingness to Listen	5	4	3	2
Knowledge/Responses from Staff Attending	5	4	3	2

How could the public hearing format and materials be improved? *I think for the 2nd comment form, maybe try 2 next time.*

Was the public hearing helpful to you? *Yes, but you didn't address the bigger picture concerns - the need for more red material when it's available already.*

Please continue on the other side if you run out of space. Please return your completed evaluation form to the registration desk or mail or fax to the address below.

THANK YOU - YOUR FEEDBACK IS IMPORTANT TO US

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4893 • Toll-free fax: 1-877-562-4992
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/27/00

233-1: The United States currently purchases approximately 90 percent of its medical radioisotopes from foreign producers, most notably Canada. However, Canada only supplies a limited number of economically attractive commercial isotopes (primarily molybdenum-99), and it does not supply research isotopes or the diverse array of medical and industrial isotopes considered in the NI PEIS. As such, reliance on Canadian sources of isotopes to satisfy projected U.S. isotope needs would not meet DOE's mission requirements. Section 1.2.1 of Volume 1 has been revised to clarify DOE's isotope production role and other producers' capabilities to fulfill U.S. isotope needs.

DOE could purchase plutonium-238 from Russia; however, for supply reliability reasons and concern of nuclear nonproliferation, DOE's preference is to establish a domestic plutonium-238 production capability. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

233-1