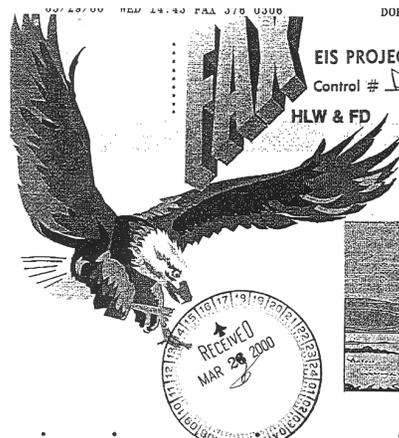


DOE AMI 001

EIS PROJECT **AR/PF**
Control # DC-52

DEPARTMENT OF ENERGY
Richland Operations Office
P.O. Box 550
Richland, Washington 99335

HLW & FD
Management Systems Division
NEPA




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MAR 28 2000

Cindy Brown
To: Tom Wichmann Fax: 208-526-1184

From: Paul F.X. Dunigan, Jr. Date: 3/29/00
(509) 376-6667
FAX (509) 376-0306

Re: INEEL HLW DRAFT EIS Pages: 3

CC:

Urgent For Review Please Comment Please Reply Please Recycle

*Thank you for sending msg, helps!
Hope this helps!
J. Bayers for
Paul F.X. Dunigan, Jr.*

HANFORD ADVISORY BOARD
A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

March 7, 2000

EIS PROJECT **AR/PF**
Control # DC-52

Mr. Thomas L. Wichmann
Document Manager
U.S. DOE, Idaho Operations Office
850 Energy Drive; Mail Stop 1108
Idaho Falls, ID 83401-1563

HLW & FD

Subject: INEEL High-Level Waste Draft EIS

Dear Mr. Wichmann:

Some members of the Hanford Advisory Board (HAB) attended the February 3 presentation conducted by staff of the U.S. Department of Energy on the Idaho High-Level Waste and Facilities Disposition Draft Environmental Impact Statement (EIS). On behalf of the HAB, we are submitting the following statement to be considered by DOE.

The HAB is not prepared at this time to provide specific comments on the EIS. The Hanford vitrification plant has not been constructed and thus will not be available for several years. In addition, when it becomes operational, it will take many years to vitrify Hanford tank wastes. Thus, it would be premature at this time for us to comment on the EIS alternative that would send INEEL high-level wastes to Hanford for vitrification.

However, three consistent positions of our Board relate to the issue.

- 52-1 11.E(6) 52-5 11.E(6) In Advice #13 and subsequent pieces of advice, we have stated that if another site sends waste to Hanford for treatment, it should not be sent until a treatment facility is built and operating. Once treated, the waste must be returned to the sending site.
- 52-2 11.E(6) We cannot support Idaho's waste coming to Hanford until all of Hanford's high-level waste has been treated. We emphasized in our recent statement on tank wastes that the Hanford tanks are one of the most urgent environmental threats to the country. We have three types of tanks: those that have leaked, those that will leak, and those that will leak again. The single-shell tanks are already beyond their design life and the double-shell tanks will reach that point before the vitrification process is completed. Vitrification of these wastes must proceed expeditiously and be completed before a major accident occurs with the aging tanks.
- 52-3 11.E(8) 52-6 11.E(9) We have indicated in several pieces of advice that if any wastes come to Hanford for treatment or disposition "the sending site should cover all costs." The Hanford budget is not adequate to cover even the costs of our own cleanup efforts in

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2000C-064
Page 1
March 6, 2000

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Idaho HLW & FD EIS

accordance with our Tri-Party Agreement and regulatory requirements. The impact of offsite wastes on the inadequate budget of Hanford and the environmental impacts of any diversion of Hanford cleanup funds must be factored into decisions on offsite wastes and should be thoroughly analyzed in this EIS. The Hanford cleanup dollars should not be used to subsidize the receipt, treatment, and/or storage of offsite wastes.

52-4
VII.A(6) [We would appreciate being consulted as this process continues forward, particularly when a preferred alternative or other decisions are being considered which might impact Hanford.]

Very truly yours,

Meryllyn B. Reeves, Chair
Hanford Advisory Board

- cc: Keith Klein, Manager, DOE-RL
- Dick French, Manager, DOE-ORP
- Tom Fitzsimmons, Director, Washington Department of Ecology
- Chuck Clarke, Regional Administrator, U.S. Environmental Protection Agency
- Wade Ballard, Acting Designated Federal Official
- The Oregon and Washington Congressional Delegations
- Michael Gearheard, U.S. Environmental Protection Agency
- Dan Silver, Washington Department of Ecology

HLW & FD EIS PROJECT AR/PF
Control # DC-53

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UNITED STATES DEPARTMENT OF ENERGY
IDAHO OPERATIONS OFFICE

PUBLIC HEARING

DRAFT ENVIRONMENTAL IMPACT STATEMENT

IDAHO HIGH-LEVEL WASTE AND FACILITIES DISPOSITION

February 24, 2000

6:00 p.m.

Doubletree Inn

Pasco, Washington

BRIDGES & ASSOCIATES
Certified Shorthand Reporters
P. O. Box 223
Pendleton, OR 97801
(541) 276-9491 - (800) 358-2345

1 formal hearing and a recorded proceeding with a full
2 transcript being prepared.

3 And finally I would like to take the
4 opportunity to personally thank you all for attending
5 and for your cooperation in observing the procedures I
6 have just outlined.

7 Our first scheduled commenter is John
8 Swanson. Mr. Swanson? If you are not in the room
9 when I call your name, I will go back and recall
10 names. Harold Heacock.

11 MR. HEACOCK: Thank you. I am Harold
12 Heacock of Kennewick, Washington, and I am presenting
13 a statement tonight for the Tri-Cities Industrial
14 Development Council. [The possible utilization of the
15 Hanford waste vitrification plant for the processing
16 high-level fuel processing wastes at Hanford could
17 have a significant impact on the Hanford cleanup
18 program.] 53-1 11.E(5)

19 [Based on currently available preliminary
20 information the use of the Hanford vitrification plant
21 for processing and vitrification of the Idaho
22 high-level wastes would provide significant cost
23 savings to the Department of Energy over other
24 realistic alternatives.] 53-2 11.E(4)

25 [The environmental impacts of this

1 alternative appear to be equivalent to or less than
2 those of other alternatives.] 53-3 11.E(4)

3 [However, this alternative has not been
4 studied in sufficient depth to support a firm position
5 for or against it at this time. 53-4 VII.A(2)

6 If the use of the Hanford vitrification
7 plant for the processing of high-level wastes is to be
8 considered further, a more detailed environmental
9 impact analysis of this alternative must be prepared
10 and reviewed by the public, including the state of
11 Washington agencies having an interest in the subject.]

12 [In the preparations of this analysis, there
13 are several considerations which must be included.

14 The Hanford waste vitrification plant must
15 be adequately funded, completed, and in full operation
16 before any consideration can be given to the
17 processing of off-site wastes.] 53-5 11.E(2)

18 [Processing of Idaho wastes cannot delay or
19 interfere with the planned or accelerated process of
20 Hanford wastes.] 53-7 11.E(5)

21 [Consideration must be given to the impact
22 that additions to the plant will have on local
23 governmental services, police, fire, roads, schools
24 and so on.] 53-8 VII.1(2)

25 [Any off-site wastes which will be processed

1 or vitrified in the plant must be returned to the
 2 center or to a national repository. Interim or
 3 permanent disposal of the waste at Hanford is not
 4 acceptable. 53-9 II.E(4)
 5 [Full funding for all transportation,
 6 processing, and storage costs must be provided as an
 7 added increment to the Hanford environmental
 8 management project program funding. 53-10 II.E(3)
 9 [Consideration must be given to the local
 10 environmental impacts resulting from the 53-11 VIII.H(3)
 11 transportation and processing of the Idaho wastes.]
 12 53-12 VIII.H (3) [Off-site transportation corridor safety,
 13 environmental impacts, and traffic issues must be
 14 thoroughly reviewed in cooperation with local and
 15 tribal governments.] [Provision must be made to
 16 alleviate any additional costs which may be incurred
 17 by local or state government agencies.] 53-13 II.E(3)
 18 We believe these issues are a reasonable
 19 requirement and provide a bottom line basis for
 20 evaluation of the importation of high-level waste to
 21 Hanford for processing and vitrification.
 22 53-14 VII.A (2) [In view of the potential significant
 23 savings from the Hanford alternative that would accrue
 24 to the Department as compared to other feasible
 25 alternatives, this alternative should be given more

1 comprehensive evaluation than is currently available.]
 2 Thank you for the opportunity to present
 3 our views on this subject.
 4 MR. RICHARDSON: Thank you for your
 5 commenting, Mr. Heacock.
 6 Is Mr. Swanson in the room? I would ask if
 7 there is anyone in the room, Mr. Heacock and Mr.
 8 Swanson were our only registered commenters, if there
 9 is anyone in the room that would like to comment
 10 formally on the record this evening, let me know by
 11 raising your hand, or just standing up and walking up
 12 to the podium, and we will get your comments on the
 13 record.
 14 In the meantime I will take care of a
 15 housekeeping matter. I am going to mark as Exhibit
 16 Number 1 of this evening's proceeding a multi-page
 17 document entitled Idaho high-level waste and
 18 facilities disposition Draft Environmental Impact
 19 Statement, Tom's Talking Points-- Pasco, that would be
 20 Exhibit Number 1.
 21 I will mark as Exhibit Number 2 a two-page
 22 document on TRIDEC, Tri-City Industrial Development
 23 Council letterhead entitled statement prepared for
 24 Department of Energy public hearing on Draft EIS
 25 regarding Idaho High-level Waste and Facilities

1 Disposition, Pasco, Washington, February 24, 2000.
 2 That will be Exhibit Number 2 of this evening's
 3 proceeding.
 4 I will note that no one has indicated that
 5 they have not had an opportunity to comment who wanted
 6 to. Mr. Swanson is not in the room. At this point I
 7 will stand at ease, subject to call of the chair, in
 8 the event Mr. Swanson returns, or another individual
 9 of the public would like to come up and make a
 10 comment. So we will be off the record, subject to
 11 call of the chair. It is 11 minutes before the hour.
 12 (Recess taken).
 13 MR. RICHARDSON: Okay. We will be
 14 back on the record. It is now 8:15. I understand Mr.
 15 John Swanson who pre-registered decided not to comment
 16 and left the hearing.
 17 I will remind you that you have until April
 18 19 in which to submit written comments. That's the
 19 postmark date. And there are a variety of ways that
 20 you can submit comments to the Department of Energy on
 21 this Environmental Impact Statement. I will ask if
 22 there is anyone in the hall who would like to comment
 23 and who has not had the opportunity to do so. If so,
 24 would you raise your hand.
 25 I will note for the record, no one has so



Control # DC-54

Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory



00-CAB-031

April 3, 2000

Beverly Cook
 U.S. Department of Energy
 Idaho Field Office
 850 Energy Drive, MS 1146
 Idaho Falls, ID 83401



Dear Ms. Cook:

Note: The Site-Specific Advisory Board for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

The INEEL Citizens Advisory Board (CAB) recently completed its review of the Idaho High-Level Waste and Facilities Disposition Draft Environmental Impact Statement (EIS) and preparing our recommendation on that document. We have submitted our comments, in consensus Recommendation #73, to those responsible for preparing the environmental documentation.

We are concerned, however, that the document preparers may determine that one of our most important comments falls outside the scope of acceptable comments for a document written in compliance with the National Environmental Policy Act (NEPA). That recommendation states that that DOE should develop a mechanism for informing the decision-maker and the public regarding the compliance issues arising under each alternative considered in the EIS if implemented under a flat budget to support comparison with impacts under a fully funded budget. We cannot believe the decision-maker will ignore this information during the decision process, regardless of the requirements under NEPA. The public similarly requires such information to support informed review of this EIS. Precluding provision of this information to the public jeopardizes the adequacy of public participation conducted to support this EIS. In our recommendation, we identify three approaches that would achieve our objective.

Should DOE determine that none of the three approaches is acceptable in compliance with NEPA, we request that DOE revise its cost analysis to include the recommended information and release that revised cost analysis for public review before issuing a record of decision for the HLW program at the INEEL.

We await your response to this request.

Sincerely,



Stanley Hobson, Interim Chair
 INEEL CAB

cc: Thomas L. Wichmann, DOE-ID
 Carolyn Huntoon, DOE-HQ
 Carol Borstrom, DOE-HQ
 Martha Crosland, DOE-HQ

D-127

DOE/EIS-0287

- New Information -

Idaho HLW & FD EIS