

HLW & FD

EIS PROJECT AR/PF

Control # DC-43



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

Dear Mr. Wichmann

- 43-1 IX.D(1) [The Department of Energy doesn't exactly have a good track record of keeping deadlines. They do have a good track record of studying issues to death. They then often fail to make decisions implementing the conclusions of those studies. It appears that the INEEL's approach to implementing the HLW-related provisions of the Batt Agreement will be no different. This will continue to undermine public trust in the Lab, and in us as individual employees of the DOE contractor. The INEEL's single greatest accomplishment as the "Lead Lab" on waste issues is to have convinced the public that nuclear technology is too difficult to be a viable energy option.]
- 43-2 XI(7) [The Department of Energy doesn't exactly have a good track record of keeping deadlines. They do have a good track record of studying issues to death. They then often fail to make decisions implementing the conclusions of those studies. It appears that the INEEL's approach to implementing the HLW-related provisions of the Batt Agreement will be no different. This will continue to undermine public trust in the Lab, and in us as individual employees of the DOE contractor. The INEEL's single greatest accomplishment as the "Lead Lab" on waste issues is to have convinced the public that nuclear technology is too difficult to be a viable energy option.]
- 43-3 III.C(2) [In reality, there are no especially difficult technology issues associated with HLW. In fact, the solutions to our "problems" were designed decades ago. Solutions such as sugar addition to sodium-bearing HLW prior to calcining was demonstrated here on a pilot scale in 1965. Solutions to calcine offgas emission of NOx and Hg were also identified and ignored. Calcine conversion into monolithic concrete (FUETAP) was developed at Oak Ridge in the 1970's. A similar process was used in the UK, where these difficult problems were solved long ago. The existing solutions are effective, and only dangerous in the imagination.]
- 43-4 III.C(2) [In reality, there are no especially difficult technology issues associated with HLW. In fact, the solutions to our "problems" were designed decades ago. Solutions such as sugar addition to sodium-bearing HLW prior to calcining was demonstrated here on a pilot scale in 1965. Solutions to calcine offgas emission of NOx and Hg were also identified and ignored. Calcine conversion into monolithic concrete (FUETAP) was developed at Oak Ridge in the 1970's. A similar process was used in the UK, where these difficult problems were solved long ago. The existing solutions are effective, and only dangerous in the imagination.]
- 43-5 III.D.4(8) [In reality, there are no especially difficult technology issues associated with HLW. In fact, the solutions to our "problems" were designed decades ago. Solutions such as sugar addition to sodium-bearing HLW prior to calcining was demonstrated here on a pilot scale in 1965. Solutions to calcine offgas emission of NOx and Hg were also identified and ignored. Calcine conversion into monolithic concrete (FUETAP) was developed at Oak Ridge in the 1970's. A similar process was used in the UK, where these difficult problems were solved long ago. The existing solutions are effective, and only dangerous in the imagination.]
- 43-6 III.D.1(3) [In reality, there are no especially difficult technology issues associated with HLW. In fact, the solutions to our "problems" were designed decades ago. Solutions such as sugar addition to sodium-bearing HLW prior to calcining was demonstrated here on a pilot scale in 1965. Solutions to calcine offgas emission of NOx and Hg were also identified and ignored. Calcine conversion into monolithic concrete (FUETAP) was developed at Oak Ridge in the 1970's. A similar process was used in the UK, where these difficult problems were solved long ago. The existing solutions are effective, and only dangerous in the imagination.]
- 43-7 IX.D(1) [The continued pretense that these issues are too complex to be dealt with in an expeditious and economical manner will only continue to erode public confidence in the Lab, and ultimately result in the loss of our mission.]
- 43-8 III.C(1) [The remaining liquid should be immediately calcined, and the calcine should be rendered ready for disposal via a FUETAP-like process, and shipped for disposal. If we got serious about actually solving this problem it could be done prior to the Batt Agreement deadlines. Our continued employment may depend on it. Thank you for the opportunity to comment.]
- 43-9 VII.D(2) [The remaining liquid should be immediately calcined, and the calcine should be rendered ready for disposal via a FUETAP-like process, and shipped for disposal. If we got serious about actually solving this problem it could be done prior to the Batt Agreement deadlines. Our continued employment may depend on it. Thank you for the opportunity to comment.]

Sincerely yours,

Bruce J. Mincher, Ph.D.

43-10
VIII.1(1)



HLW & FD

EIS PROJECT AR/PF

Control # DC-44

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

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

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

- 44-1 IX.D(3) [Without trust, we cannot move on. An oversight committee should consist of at least three citizens from each down wind and down stream community, plus competent scientists whose wages and reputation do not depend on the government or the nuclear industry. All activities and decisions should be as open as possible. Not only will this engender trust, it will also increase the hope of useful input.]
- 44-2 X(9) [We chose the activities which made the waste and we have a duty to clean it up as well as we possibly can. We should spend whatever money and effort it takes to do that, and not leave the burden to our grandchildren and great grandchildren.]
- 44-3 IV.C(1) [Unavoidable contaminated residue should be stored in well-defined, isolated, impervious spots. We should assume short term risk, if necessary for long term safety.]
- 44-4 VIII.A(6) [Unavoidable contaminated residue should be stored in well-defined, isolated, impervious spots. We should assume short term risk, if necessary for long term safety.]
- 43-5 VIII.C(4) [It's important not to contaminate the aquifer because such contamination is insidious and hard to clean up. It could hurt people without their realizing it for hundreds of years. Maybe more.]
- 43-6 XI(7) [Until we have the technology to make the by-products of nuclear energy safe, we had better cease activities that produce radioactive waste, and find some other source of power and weaponry. It's ridiculous to foul our own nest in the name of progress.]

Anne Newcomb
Anne Newcomb
ph: 307-734-0970
ph/fax: 307-733-3315

D-109

DOE/EIS-0287

- New Information -

Idaho HLW & FD EIS

HLW & FD EIS PROJECT - ~~AR~~PF
Control # DC-45

1 BEFORE THE DEPARTMENT OF ENERGY
2 OF THE UNITED STATES OF AMERICA
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6

7 PUBLIC HEARING

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

11
12 HEARING OFFICER: PETER RICHARDSON, ESQ.
13
14

15
16 DATE: February 15, 2000
17 TIME: 6:00 p.m.
18 PLACE: College of Southern Idaho
19 CITY: Twin Falls, Idaho
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1 call your name, please come forward to the microphone
2 at podium to my left, please preface your comments by
3 stating and spelling your name, and providing your
4 mailing address if you wish to receive a copy of the
5 final Environmental Impact Statement. If you are
6 representing an organization, state the name of that
7 organization and the capacity in which you represent
8 them. If the court reporter is having trouble
9 following you or hearing, he may ask for your help to
10 slow down or speak up or directly into the microphone
11 in order to make a complete record of your comments.

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

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

19 My first commentor is Steve Hopkins.

20 MR. HOPKINS: My name is Steve Hopkins,
21 S-t-e-v-e, H-o-p-k-i-n-s. I'm with the Snake River
22 Alliance of Idaho. My mailing address is P.O. Box
23 1731, Boise, Idaho 83701.

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

1 detailed written comments at a later time.
2 The Snake River Alliance has been
3 watchdogging activities at the Idaho National
4 Engineering Laboratory for 20 years now. So I think
5 we can provide a very fresh and honest perspective as
6 to how to approach the treatment of high-level waste
7 at facilities disposition.

8 For starters, [I] would like to thank the
9 Department of Energy and the State of Idaho for
10 putting on the hearing and allowing the public to
11 testify. [I] am concerned about the timing of the
12 release of the document. Originally, the document was
13 supposed to be released back in August of '99 or even
14 April of '99, and it's been delayed many times. And
15 timing by which it came out coincided a lot with the
16 RICRA process on the advancement waste treatment
17 facility, and there was not adequate time allowed for
18 review of the document before the public hearings.
19 The public hearings should have been adjusted to
20 reflect the release of the Environmental Impact
21 Statement.]

22 [One thing that appears over and over again
23 as it concerns treatment of spent fuel through
24 reprocessing historically at INEEL is it's never fully
25 admitted that INEEL in bomb production activities

45-1
IX.C(4)

45-2
IX.C(2)

45-3
XI(7)

D-111

DOE/EIS-0287

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

7 In looking at the document thus far, [I see
8 that there is much more science fiction and politics
9 in this document than science itself. Looking
10 especially at the separations technologies in the
11 document, it seems to me that the Department of Energy
12 and the State might as well look at turning waste into
13 wine because there is as much of a technical basis for
14 doing so as there is, say, for something like
15 transuranic separations.] [One of the things in terms
16 of the handout concerning areas of uncertainty and
17 controversy is the technical maturity of alternative
18 treatment processes. Alternatives have varying
19 maturity levels. And it must be addressed in the
20 final Environmental Impact Statement. Either options
21 that have no technical basis need to be dropped for
22 consideration in the final EIS or there has to be
23 supporting technical documents to give some assurance
24 to the public that the technology could actually work
25 because, as things stand, the separations technology

45-4
III.D.3(i)

45-5
III.D.3(i)

- New Information -

Idaho HLW & FD EIS

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

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

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

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

45-6
III.A(5)

45-7
III.D.3(2)

45-8
III.E(1)

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

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

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

25 [True separations should be entirely dropped

45-9
III.D(1)

45-10
III.D(1)

45-11
III.D(1)

45-12
III.D.3(1)

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

45-13
11.E(2)

3 [Another option that should be dropped at
4 this point is minimal processing because it assumes
5 that the waste could go to Hanford. This is extremely
6 unrealistic. For one, Hanford is not planning on
7 separation for its waste, so Hanford would have to
8 build additional facilities in addition to the WIPP
9 plant in order to do separations of our small quantity
10 of high-level waste compared to their waste.]

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

45-15
111.b.3(i)
+
45-16
111.D.1(8)

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

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

5 MR. RICHARDSON: Thank you for your
6 comments.

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

12 Todd Martin.

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

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

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

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

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

D-113

DOE/EIS-0287

- New Information -

Idaho HLW & FD EIS

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

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

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

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

4502-1
III.D.3(i)

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

4502-2
III.E(i)

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

1 receive this waste.]

2 [On the option of sending waste to Hanford.

3 I personally am welcoming that waste with open arms.

4 It is unlikely, however, from a political standpoint

5 that before Hanford waste is truly vitrified and

6 finished any Idaho waste will be vitrified at

7 Hanford. Right now the planning basis, if everything

8 falls into place perfectly, Hanford will be done in

9 2047, after which we can receive INEEL waste. It's

10 not a particularly realistic option at this point.]

11 [Looking at the document itself, I think the

12 scope is too limited and needs to be altered. The

13 final decisionmaker, and this is the document on which

14 I'm making the decision, it doesn't do the job because

15 I have too many questions. One, which option will

16 work; two, which option can I pay for? Both of those

17 characteristics are scoped out of this EIS. It's

18 inappropriate to scope those out because the

19 decisionmaker will not be able to make a reasonable

20 decision without those two pieces of information.]

21 [Picking up on Steve's waste into wine

22 option, we could add an alternative to the document

23 that did essentially result in turning the waste into

24 wine. It would be extremely difficult from a

25 technical standpoint, but that's not considered in the

4502-3
III.E(5)

4502-5
VII.A(4)

4502-6
VII.A(4)

1 EIS. It would be obviously extremely expensive, but

2 neither is that considered. But it would be very good

3 on the cultural end of things, from the socioeconomic

4 aspects, from the transportation aspects, it would

5 fare very well in this EIS. It's an extreme and

6 ridiculous example, but it demonstrates the

7 uselessness of evaluating these alternatives without

8 cost and technical viability. Those should be added.]

9 Three times in the last decade, Hanford

10 asked for everything in its high-level waste program.

11 We went to Congress with an all or nothing proposal.

12 Treat this stuff in a generation at Hanford. Minimize

13 lifecycle costs by minimizing high-level waste volume

14 to Yucca Mountain. Three times we got nothing. [What

15 I am here to urge INEEL to not do is go with the all

16 or nothing bargain. Don't go for TRUOX advanced

17 separations], [don't rely on Yucca Mountain.] [Do store

18 the calcine safely] and [do aggressively try to treat

19 the liquids. Get them into a solid form as soon as

20 you can.]

21 I appreciate the opportunity to comment.

22 MR. RICHARDSON: Thank you for your

23 thoughtful comment.

24 Mr. Martin was the last individual that I

25 have who has preregistered to comment. Is there

4502-7
III.D.3(1)

4502-8
III.E(1)

4502-9
III.E(1)

4502-10
III.A(1)

D-115

DOE/EIS-0287

- New Information -

Idaho HLW & FD EIS

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

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

8 (A RECESS WAS HAD.)

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

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

16 I note that no one has so indicated.

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

HLW & FD

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



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

Mark M. Glese
E-mail: mark@juno.com

MAR 14 2000



Mr. T. Wickman
Document Mgr
DOE Operations Of
Idaho Falls ID 83401
Dear Sir:

46-1
III.C(3)

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

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

Thank you.

Sincerely,