



Kemble and Mildred Stout  
10419 N. Mayberry Dr. #9  
Spokane, WA 99218-1508  
(509) 464-4186

March 15, 2000

Mr. Tom Wichman, Document Manager  
DOE Operations Office  
850 Energy Dr., MS-1108  
Idaho Falls, ID 83401-1563

Dear Mr. Wichman,

47-1  
111.C.(2)

I protest starting the New Waste Calciner Facility at INEEL. This facility has a history of environmental contamination and worker exposure.

The Defense Nuclear Facility Safety Board has repeatedly challenged its readiness to restart operations.

Sincerely,

*Mildred Stout*

D-117

DOE/EIS-0287



HLW & FD EIS PROJECT AR/PA  
Control # DC-48  
United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
600 NE Multnomah Street, Suite 356  
Portland, Oregon 97232-2036



IN REPLY REFER TO:

March 14, 2000

ER 00/0062

Mr. T.L. Wichmann  
U.S. Department of Energy  
Idaho Operations Office  
ATTN: Idaho HLW & FD EIS  
850 Energy Drive, MS 1108  
Idaho Falls, Id. 83401-1563

Dear Mr. Wichmann:

The Department of the Interior reviewed the Draft Environmental Impact Statement for the Idaho High-Level Waste and Facilities Disposition, Idaho National Engineering and Environmental Laboratory (INEEL), Butte, Jefferson, Bingham and Bonneville Counties, Idaho. The Department does not have any comments to offer.

We appreciated the opportunity to comment.

Sincerely,

*Preston A. Sleeper*

Preston A. Sleeper  
Regional Environmental Officer

- New Information -

Idaho HLW & FD EIS

HLW & FD EIS PROJECT - (AR)PF  
Control # DC-49

HLW EIS Web Comments

From: HLWFDEIS Web Site  
Sent: Tuesday, March 21, 2000 4:00 AM  
To: web@jason.com  
Cc: web\_archive@jason.com  
Subject: HLW EIS Web Comment



Name: Lynn Sims  
Affiliation:  
Address1: 3959 NE 42  
Address2:  
City, State Zip: Portland, OR 97213  
Telephone: 5032876329  
Date Entered: (is '2000-03-21 04:00:22')  
Comment:  
Idaho High-level Waste and Facilities Disposition DEIS

Thank you for the opportunity to comment.

49-1 I attended the public meeting in Portland, OR and compliment the participants upon both the quality of presentation and informative materials and displays. Unfortunately that meeting was not well-attended-not due to lack of interest, but because of very poor publicity and communications.

49-2 Decisions regarding the "disposal" of high-level and related wastes should be made from this time forward when decisions are being made to generate these terrible wastes in the first place. We must use more common sense, with a responsible vision for the future. A lack of these elements will result in more serious complications, such as those that lead to this dilemma, and others all over the DOE complex.

49-3 Waste treatment alternatives should lean towards leaving liquid and calcinated waste as is, as long as their containment structures are deemed safe and reliable. Liquid wastes should be diminished in volume and converted if overwhelming technical problems are not forthcoming. At any point, the results of careful monitoring could prompt alternative waste treatments in order to protect the environment and groundwater.

49-4 Since there is no vitrification facility at Hanford at this time and since there is no licensed HLW Repository, it seems premature to make a record of decision which definitely include these options. It must also be remembered that many Hanford structures are already corroded and leaking and in serious emergency status. Until these problems are satisfactorily addressed, Hanford cannot accept more burden.

49-7 Facility closures should be determined upon the risks to the environment and their ability to contain wastes and radiation. All facilities should be maintained as needed and depending upon the risk of failure be closed on a case by case basis.

49-8 After commenting for nearly a decade now upon many equally complicated and frightening environmental impact statements, I would surely hope that someone would, from this point forward, make it a crime to create any more chemical and radioactive waste which is not directly involved in a clean up effort.

49-9 It also should not have to be mentioned, but unfortunately it must be said that more monies should be allocated to monitoring, maintenance, containment, clean up and research technology rather than going for wasteful projects such as stockpile stewardship, weapons research and star wars defense. We've already targeted our own homeland by mismanagement and wrong priorities. It is time to face up to our predicament and do what we can to avoid impending and future disaster.

Thank you to everyone who is working so hard on these tremendous issues

HLW & FD EIS PROJECT - (AR)PF  
Control # DC-50

Original

United States Department of Energy

IN RE: U.S. Department of Energy )  
 )  
 )

BEFORE  
Peter Richardson  
Hearing Examiner

February 17, 2000, 6 p.m.

Doubletree Riverside  
2900 Chinden Boulevard  
Boise, Idaho

Reported by  
Marta M. Rice  
CSR No. T-205



208-345-3704 • 1-800-424-2354  
Fax 208-345-3713  
605 WEST FORT STREET

P.O. BOX 1625 • BOISE, ID 83701  
Home Page: <http://www.tuckercourtreporters.com>  
E-Mail: [tucker@tuckercourtreporters.com](mailto:tucker@tuckercourtreporters.com)

Before Peter Richardson  
Hearing February 17, 2000

In Re: U.S. Department of Energy  
United States Department of Energy

Page 37

Page 39

(1) Individuals who wish to make oral  
(2) comments tonight in this room will be given three  
(3) minutes each, and those representing organizations  
(4) will be given five minutes. If you are  
(5) representing an organization, please let the staff  
(6) know at the registration table when you sign up.  
(7) And I will appreciate your efforts to  
(8) conclude your remarks within the allotted time  
(9) frame. We have a staff person sitting here in the  
(10) front row who has a yellow card. And he will raise  
(11) that card when you have one minute left in your  
(12) comments to get your attention to do so, and then  
(13) you have one minute left.  
(14) Now, as the presiding officer for this  
(15) evening's hearing, I will reserve the right to ask  
(16) speakers to conclude their remarks in order to stay  
(17) on schedule. I hope you will understand that if I  
(18) do have to ask you to conclude your remarks, it  
(19) will be because it is my job to make sure that all  
(20) people who are interested in making oral comments  
(21) have an equal and fair opportunity to do so.  
(22) If I do stop you before you have  
(23) concluded your remarks, I hope you will submit the  
(24) rest of your comments in writing through the  
(25) internet or by telefax.

(1) the court reporter is having trouble hearing you or  
(2) keeping up with you, she may interrupt to ask you  
(3) to either slow down or speak up.  
(4) Now I will begin the formal comment  
(5) portion of the hearing, and I want to stress that  
(6) this is a formal hearing and a recorded proceeding  
(7) with a full transcript being prepared. And  
(8) finally, I would like to take the opportunity to  
(9) thank you for your cooperation in observing the  
(10) procedures I've outlined. Our first scheduled  
(11) commentator is Steve Hopkins, and Mr. Hopkins will be  
(12) followed by Todd Martin. Mr. Hopkins.  
(13) MR. HOPKINS: My name is Steve Hopkins,  
(14) H-o-p-k-i-n-s. And I'm representing the  
(15) Snake River Alliance of Idaho. The Snake River  
(16) Alliance has served as a citizen watchdog of  
(17) activities at the Idaho National Engineering and  
(18) Environmental Laboratory for 20 years.  
(19) It should be noted first that we do  
(20) support treatment of this waste and do believe  
(21) that, contrary to the plant on the incinerator,  
(22) that this waste does need to be treated and  
(23) stabilized and isolated from the environment.  
(24) I would mainly like to talk about the  
(25) various alternatives that are delineated in the

Page 38

Page 40

(1) A few points on decorum. Please avoid  
(2) side-bar conversations in this room that might  
(3) interfere with the proceedings or distract  
(4) attention from the designated person who is  
(5) providing comments. Smoking is not allowed in the  
(6) hearing room. And in order to avoid disruptions at  
(7) this meeting, if you have handout materials that  
(8) you would like to make available, there is space on  
(9) the registration tables for you to do so.  
(10) Finally, I would like to explain a  
(11) little bit about the role of the court reporter at  
(12) this meeting. Her job is to transcribe verbatim  
(13) the formal comment portion of this evening's  
(14) hearing. In order to help her create as accurate a  
(15) record as possible, when I call your name, please  
(16) come up to the podium and speak directly into the  
(17) microphone, and preface your remarks with your name  
(18) and the spelling of your name. And if you would  
(19) like to receive a copy of the final Environmental  
(20) Impact Statement, please provide your mailing  
(21) address.  
(22) If you are also representing an  
(23) organization, preface your remarks with the name of  
(24) the organization you're representing and the  
(25) capacity in which you are its representative. If

(1) Environmental Impact Statement, because I feel,  
(2) reading this document, that there is a great deal  
(3) more science fiction and politics than sound  
(4) science in the document.  
(5) For instance, in looking at the various  
(6) separations alternatives, these alternatives are  
(7) unsound. They've never been demonstrated to work  
(8) on an industrial scale. And I believe they would  
(9) not even be attempted at this point if it weren't  
(10) for the fact that largely this issue is about the  
(11) moving of waste to a new place, and trying to  
(12) engineer around Yucca Mountain in Nevada as an  
(13) attempt to get down to the waste isolation plant in  
(14) New Mexico.  
(15) I have to point out here that if  
(16) treatment fails, then environmental protection has  
(17) failed. And we have too much to risk here if  
(18) treatment should fail, because this is dangerous  
(19) material. It does pose a risk to the aquifer. We  
(20) have contamination passed in the aquifer as a  
(21) result of past nuclear weapons activities, and we  
(22) do need to stabilize this waste.  
(23) I'm looking at the areas of uncertainty  
(24) and controversy that were pointed out earlier in  
(25) the presentation. And I have to say that it's just

In Re: U.S. Department of Energy  
United States Department of Energy

Before Peter Richardson  
Hearing February 17, 2000

Page 41

Page 43

(1) phenomenal that these issues are not looked at in  
(2) the Environmental Impact Statement. For one, it is  
(3) possible for DOE to select a hybrid of  
(4) alternatives.  
(5) Something that's not actually separate  
(6) in the EIS for the public to evaluate is that in  
(7) the final EIS, we could have a preferred  
(8) alternative that really was even in the Draft  
(9) Environmental Impact Statement. And that doesn't  
(10) allow the public to adequately review the selected  
(11) alternative.  
(12) How can we, if we can't even see it.  
(13) And that's the problem is that we couldn't live  
(14) with an alternative that's not even specified in  
(15) the Environmental Impact Statement.  
(16) The fact that the costs are analyzed  
(17) separately. There is a separate document that is  
(18) not part of the NEPA process. That presents a  
(19) tremendous problem, because costs are the main  
(20) factors when it comes to deciding what is done.  
(21) Although, I'm hearing from various DOE  
(22) officials that it seems unlikely that there will be  
(23) two vitrification plants that will be built in such  
(24) a close proximity to one another.  
(25) However, if you look closely at the cost

Page 42

Page 44

(1) analysis, which unfortunately is not in the  
(2) document and is viewed separately, you'll see that  
(3) the bifurcation treatment is actually among the  
(4) more — among the cheapest of the various treatment  
(5) technologies. It's far cheaper than the  
(6) separations technologies — especially full  
(7) separation.  
(8) It then becomes more expensive whether  
(9) you add in these extremely speculative costs of  
(10) disposing the wastes in Yucca Mountain. And I have  
(11) to point out here that Yucca Mountain itself  
(12) represents a tremendous uncertainty. It's likely  
(13) that it should open. It's not going to open on  
(14) time.  
(15) Also, looking at a statement in the  
(16) draft EIS that points out a study done by the  
(17) National Academy of Sciences under the  
(18) National Resource Council, or Research Council, and  
(19) it is stated that the study, which is important to  
(20) the DOE in terms of deciding what to choose in the  
(21) way of treatment, it's pointing out that it does  
(22) not conflict with the Draft Environmental Impact  
(23) Statement. But in looking closely at the NIC  
(24) report, this is not the case.  
(25) At this point, separations technologies

(1) are uncertain. They're not tried. They present  
(2) tremendous technical uncertainties and the EIS  
(3) basically said this. The report, on pages 41 and  
(4) 42, it states is much less likely that the  
(5) objective, which is in this case separations, can  
(6) be matched for integrated operations and realistic  
(7) pike conditions without encountering undesirable  
(8) and complex problems, presenting costs and  
(9) generation of excessive amounts of secondary  
(10) wastes.  
(11) I might also point out that the EIS  
(12) rarely uses adjectives. And in this case, there  
(13) are a great number of them. It do encourage the  
(14) Department of Energy to draw from consideration the  
(15) separations alternatives in the final EIS.  
(16) The only way they can potentially be  
(17) allowed in a final EIS is if there were some  
(18) supporting documentation of these technologies  
(19) actually working. At the present time, there is no  
(20) demonstration of such. So at this point, they  
(21) should be dropped from the consideration. Thank  
(22) you.  
(23) MR. RICHARDSON: Thank you for your comments.  
(24) Todd Martin. Mr. Martin will be followed by  
(25) Joe Stratton.

(1) MR. MARTIN: My name is Todd Martin. It is  
(2) spelled just like the tennis player. Two d's,  
(3) M-a-r-t-i-n. I'm here at the pleasure of the  
(4) Snake River Alliance. They asked me to come down  
(5) and take a look at the document in light of  
(6) experiences at the Hanford Nuclear Reservation  
(7) where I focus my activism. I'm not going to  
(8) pretend I know everything about INEEL, because I  
(9) don't.  
(10) But I do know what has happened to  
(11) Hanford and what has went wrong. And I hope that  
(12) this site is not going to make the same mistakes as  
(13) us. And I want to review some of those.  
(14) In 1989 Hanford decided to pursue a  
(15) separations alternative similar to many that are  
(16) outlined in this document. Hanford chose Truex,  
(17) the same technology outlined in this document, to  
(18) separate tank waste and put the low-activity waste  
(19) in a cementitious ground form, the high-activity  
(20) waste in glass, very similar to multiple  
(21) separations alternatives in this document.  
(22) The facilities that were to do that were  
(23) supposed to start operating exactly two months ago.  
(24) If you go out to the Hanford Nuclear Reservation,  
(25) you will see blank, empty fields where those

D-119

DOE/EIS-0287

- New Information -


Idaho HLW & FD EIS

<p>Before Peter Richardson Hearing February 17, 2000</p> <p style="text-align: right;">Page 45</p> <p>[1] facilities were supposed to be built. What [2] happened? [3] Truex didn't work and wouldn't work. It [4] was too risky, and it was too expensive. It wasn't [5] science; it was science fiction. Grout was found [6] to be not protective of human health in the [7] environment. The DOE weapons context is littered [8] with examples where grout is not a robust enough [9] waste form to take the significant amount of [10] radionuclides these sites try to force into it. [11] So after five years and \$1.2 billion, [12] Hanford finally threw in the towel, threw grout out [13] and decided we will glassify, vitrify all of our [14] wastes, including the low-activity waste, and we [15] won't do Truex. We will do a simple pre-treatment [16] process. [17] The lessons learned from this process [18] can be applied at INEEL. First of all, don't do [19] Truex. Don't do advanced separations. Hanford was [20] 60 percent of the nation's high-level waste. [21] Defense waste couldn't make it pay nor make it [22] work. INEEL has only 3 percent. [23] It's highly unlikely that even if it [24] worked that it would pay off. Plus, the document [25] Steve cited, the NRC document, says it's a long</p> <p style="text-align: right;">Page 46</p> <p>[1] shot that it would ever work. [2] <b>Second lesson:</b> Don't rely on Yucca [3] Mountain. The speculated repository was speculated [4] costs. [5] In 1994 a broad group of Hanford [6] stakeholders, known as the Tank Waste Task Force, [7] sent a recommendation to DOE that said, "We feel [8] that the tank waste at Hanford is going to stay at [9] Hanford for the foreseeable future. We don't [10] really think Yucca Mountain will exist." [11] Therefore, Yucca Mountain assumptions [12] about cost shouldn't drive the decisions we make [13] here. Get it out of the tanks and in a safe and [14] stable form here at Hanford. Don't let [15] Yucca Mountain back us into a corner. It costs a [16] lot of money and takes a lot of risks. [17] <b>Third lesson:</b> Don't make unrealistic [18] assumptions about budget. If you look at the cost [19] document, you see that three — all of these [20] alternatives — three, four, sometimes ten times as [21] much money as currently today goes into the [22] high-level waste program would be required. It's [23] highly unlikely that that money is going to appear. [24] If I were the decision maker, I'd have [25] two questions that I'd need this document to</p>	<p style="text-align: center;">In Re: U.S. Department of Energy United States Department of Energy</p> <p style="text-align: right;">Page 47</p> <p>[1] answer. First, what will work? Second, what can I [2] afford? Unfortunately, as has been pointed out, [3] technical viability and cost are both scoped [4] outside of this document. [5] As a result, we could enter an [6] alternative into a document that says, let's just [7] turn the waste into wine. It would be extremely [8] technically difficult to do so, but that's not [9] considered by the EIS. [10] It would be extremely expensive to [11] figure out how to turn all this waste into wine, [12] but neither is that considered by the EIS. The [13] characteristics that are considered by the EIS, [14] cultural values, transportation values, [15] socioeconomic impacts in the local community. [16] Turning waste into wine would fare very [17] well in all of those categories. It could easily [18] become the preferred alternative. It's an [19] extremely ridiculous example that demonstrates the [20] uselessness of considering these alternatives [21] without looking at cost or technical viability. [22] Hanford has the overwhelming burden of [23] high-level waste. Three times in the last decade [24] Hanford has went to congress with an all-or-nothing [25] proposal. We have said Hanford's going to treat</p> <p style="text-align: right;">Page 48</p> <p>[1] all its tank waste in a generation. Hanford is [2] going to minimize life-cycle cost by forcing it all [3] into Yucca Mountain. We want it all. [4] Three times in the last decade congress [5] has said, fine, you get nothing. What I'm here to [6] say for INEEL is that you should not go to congress [7] with an all-or-nothing proposal. Rather, you [8] should ask for something, because that's probably [9] what you can get. [10] And what I think that something is, is [11] to aggressively retrieve, treat, and safely store [12] the remaining liquids. Hanford has bent over [13] backwards to figure out how to calcine our liquid [14] tank waste, because calcine is a relatively safe [15] and stable waste form. [16] Now, I look at this EIS and there are [17] multiple alternatives that want to take a step [18] backwards. Take that relatively safe waste form [19] redissolve it into a dangerous liquid waste, all [20] for the purpose of running it through a process [21] that is unlikely to work and that the site probably [22] can't afford. That seems like foolishness to me. [23] Any option that includes the dissolution [24] of the calcine for the purpose of running it [25] through a separations process, such as Truex,</p>
---	---

<p style="text-align: center;">In Re: U.S. Department of Energy United States Department of Energy</p> <p style="text-align: right;">Page 49</p> <p>[1] should be abandoned. The focus should remain on [2] safely retrieving, solidifying, and storing the [3] remaining liquid waste. Thank you for the [4] opportunity to comment. [5] MR. RICHARDSON: Thank you for your comments. [6] I believe Mr. Stratton is not going to be [7] commenting. Steven Milhous Barr. [8] MR. BARR: I'll pass, thank you. [9] MR. RICHARDSON: Thank you, Mr. Barr. [10] Reverend MsMere. Okay Reverend. [11] REVEREND MSMERE: Hello. My name is [12] Reverend MsMere. That's M-s-M-e-r-e. [13] MR. RICHARDSON: Reverend, could you get a [14] little closer to the microphone? [15] REVEREND MSMERE: Sure. I'm the Pastor of [16] Mere Peace Church in Boise, Idaho. And my ministry [17] is presenting, writing a spiritual peace poetry of [18] prose for the children — to the children. I'm [19] also a member of the Snake River Alliance. [20] And I speak in behalf of the children. [21] Mere peace for the children. What can we do? What [22] can we do about what we have done? What is our [23] solution for the children? What can we do about [24] our common mess? We're all involved through [25] grandparents, parents, ourselves, our children, and</p> <p style="text-align: right;">Page 50</p> <p>[1] theirs. In God love. We need to clean up our [2] mess. [3] This problem needs a miracle. And the [4] way to produce this miracle is to continue to work [5] together — each breath continuing our best efforts [6] for the children. We are inseparably joined in our [7] common mess. [8] And what can we do? As Ann said, list [9] in list out, perpetually, move away, quit thinking [10] about a solution for the children. As this [11] gentleman said, consider a crap shoot. No, I think [12] not. [13] We all know we need to make less waste, [14] less mess. Less mess is part of a solution for the [15] children. Yet, now we must focus on love on the [16] existing mess and what is best for our children. [17] Putting the mess into the air is to [18] pollute us even more. And the babies, how will [19] they be contaminated? Will they be mutated? How [20] will their cancers be cured? What else, pollute [21] the waters, pollute our earth, pollute the [22] heavens. What else can we do? [23] This is a mess we have together. What [24] can we do together for the children? What can we [25] do together? Pray together. What can we do?</p>	<p style="text-align: center;">Before Peter Richardson Hearing February 17, 2000</p> <p style="text-align: right;">Page 51</p> <p>[1] Love. Love together. How can we help ourselves? [2] With the help of God. Love. How can we help [3] together for the children? [4] In love, let's do something together. [5] With the love of God, for the love of the children. [6] Together, love is our answer now. And as Tom says, [7] "Let's finish the job," somehow using love. Thank [8] you, Jesus. Mere peace, love. Thanks. [9] MR. RICHARDSON: Thank you for your comment. [10] Fritz Bjornsen indicated to me that he was going to [11] decline to comment. At least orally this evening. [12] Pamela Allister. [13] MS. ALLISTER: I need some clarifications, [14] please. I represent the Snake River Alliance; [15] however, I'm making personal comments. Am I a [16] three-minute one, or a five-minute one? [17] MR. RICHARDSON: The rules are, if you are [18] representing an organization, you have five [19] minutes. If you are speaking on your own behalf, [20] you have three minutes. [21] MS. ALLISTER: All right. Thank you. My [22] name is Pamela Allister. A-l-l-i-s-t-e-r. I live [23] in Boise, Idaho. What I like about this draft EIS [24] is that it's not a simple yes and no EIS. It's a [25] multiple orient equation — a complex</p> <p style="text-align: right;">Page 52</p> <p>[1] decision-making process. It's really a lot of fun [2] in a lot of ways. [3] And on the other hand, it is so entirely [4] complex. I was looking at this display back here, [5] and I could just feel myself going into a food [6] coma, or gridlock, brain dead, or something, [7] because there is just so much there. [8] So in that case, it's what the citizen [9] needs to do, whether they're an activist or someone [10] who is an observant citizen, is they need to start [11] with some guiding principles for how they are going [12] to wade through this process. [13] And that is exactly what the [14] Snake River Alliance has recently done at one of [15] its board meetings, is establish some operating [16] contextual principles. And rather than speak to [17] the specific draft EIS, although I may quickly [18] refer to it, given that now I have to talk real [19] fast. [20] I'd like to run through those guiding [21] contextual principles that we use when we are [22] looking at something like this. One of them is [23] that we have and will always continue to fight for [24] the guiding principle of an open process with full [25] public participation and public involvement.</p>
--	---

<p>Before Peter Richardson Hearing February 17, 2000</p> <p style="text-align: right;">Page 53</p> <p>(1) And I am specifically going to make a (2) comment of somewhat of a distress about this (3) particular hearing. It's very difficult to put (4) something into three minutes that is weighing 15 to (5) 20 pounds when it came into the office. (6) So I would encourage the decision makers (7) to be more flexible on the amount of time that (8) people can have. And I was particularly thinking (9) today about, there are some of us who are not white (10) Anglo-Saxon Protestants and don't operate well in a (11) very tight constraining time schedule that's (12) extremely rigid. (13) And I know that, and I just wanted to (14) commend you for going to the Fort Hall Reservation, (15) and I hope that you are culturally sensitive when (16) you do that, to the pressure the time constraints (17) can make on people who are trying to deal with such (18) a complex issue. So that is principle number one. (19) A second and very important principle (20) for the Snake River Alliance and activists, such as (21) ourselves, is do not create more risks by the (22) process that you are establishing. (23) And this particular EIS illustrates that (24) there are at least four or five different places (25) where we are running the risk of creating more risk</p> <p style="text-align: right;">Page 54</p> <p>(1) with what we already have, that there is unproven (2) technology and unsound scientific methods including (3) the plans for where they may dispose of this waste (4) in the long-term. (5) And many of the options are including (6) transportation, which we feel is a risk. The (7) grinding principle for the Alliance, then, is to (8) store the waste as safely as possible in a (9) monitored situation and try not to move it around (10) too much. (11) Another principle is to stop creating (12) more waste. It looks as if — that we need to (13) create further efforts to be aware that we have (14) this mess, because we used a process that we felt (15) was a good idea at the time: reprocessing. (16) And we have now acquired a huge problem (17) that is probably one of the most expensive cleanup (18) jobs that we have in this state and in our (19) neighboring state. (20) And I hope that we will take into (21) account what an important lesson this has been (22) about the use of technology that seems right at the (23) moment, but may not be right later. I'm running (24) out of time. (25) So the last four are going really</p>	<p style="text-align: center;">In Re: U.S. Department of Energy United States Department of Energy</p> <p style="text-align: right;">Page 55</p> <p>(1) fast — just the basic principles, which are (2) cleanup with scare, prioritize the money spent to (3) the risk. Then we heard a lot about money tonight, (4) whether the income is going to be there and whether (5) or not we have a value to cost. (6) Reduce the highest risk first. This is (7) taking into consideration the entire DOE complex at (8) INEEL. This is high-risk waste that does need to (9) be attended to as soon as possible. (10) And lastly, our guiding, over-acting (11) principle, do everything we can to protect the (12) land, the air, the water, from nuclear (13) contamination, especially and particularly in our (14) case, the Snake River Plains Aquifer, and thus, the (15) human environment and all of these pieces. Thank (16) you. (17) MR. RICHARDSON: Thank you for your comment. (18) I remind you that the Department of Energy and the (19) State of Idaho are providing a variety of methods (20) for you to submit your comments. (21) You may submit them in writing. You may (22) drop them off in the comment box. You may submit (23) them over the Internet. You may submit them by (24) telefax. There is no limit on the amount of (25) written comments you may submit.</p> <p style="text-align: right;">Page 56</p> <p>(1) And written comments receive the same (2) weight in the record as do oral comments made at (3) this and the other public meetings. If you would (4) like to make an oral comment this evening and (5) haven't had an opportunity to do so, I'd ask that (6) you register at the registration table or, (7) otherwise, just indicate to me that you would like (8) to come up and make a comment. (9) Ms. Allister was our last pre-registered (10) commentator this evening, and I'll note that no one (11) so indicated. So what we will do at this point is (12) take a break, subject to call of the chair, and (13) we'll be off the record. (14) (Brief recess.) (15) MR. RICHARDSON: We'll take the Idaho (16) hearing on the United States Department of (17) Energy's, Idaho High-level Waste and Facilities (18) Disposition Draft Environmental Impact Statement. (19) It's now 8:40 p.m. We're back on the (20) record after a short break, having taken comments (21) earlier. I'd ask if there is anyone in the (22) audience this evening who would like to comment on (23) the Draft Environmental Impact Statement, but who (24) has not yet had an opportunity to do so. (25) We will let the record reflect that none</p>
---	---

Page 53 - Page 56 (16) Min-U-Script® Tucker & Associates (208) 345-3704

 <p style="text-align: center;"><b>Oregon</b> John A. Kitzhaber, M.D., Governor</p>	<p style="text-align: right;">EIS PROJECT - (AR) PH- Control # <u>DL-51</u></p> <p style="text-align: right;">Office of Energy 625 Marion St. NE, Suite 1 Salem, OR 97301-3742 Phone: (503) 378-4040 Toll Free: 1-800-221-8035 FAX: (503) 373-7806 www.energy.state.or.us</p>	<p style="text-align: center;">RECEIVED MAR 28 2000</p>
<p>March 23, 2000</p> <p>Mr. Thomas L. Wichman Document Manager, U.S. Department of Energy, Idaho Operations Office 850 Energy Drive, MS 1108 Idaho Falls, Idaho 83401-1563</p>		
<p>Dear Mr. Wichman,</p> <p>Thank you for the opportunity to comment on the Idaho High Level Waste and Facilities Disposition draft Environmental Impact Statement (EIS). These comments are submitted on behalf of the State of Oregon. They should be considered as an addition to written comments provided by Ken Niles of my staff at the Portland public meeting on February 22, 2000.</p> <p>Our previous comments focused primarily on conditions under which Oregon could potentially consider future treatment of Idaho's high-level waste at Hanford. The comments provided here focus more on the technical elements of the draft EIS.</p> <p>We have two overarching concerns with this draft EIS:</p>		
<p>51-1 11.A(3)</p> <p>51-2 11.E(2)</p> <p>51-3 11.E(2)</p> <p>51-4 11.E(2)</p> <p>51-6 11.C(3)</p>	<ul style="list-style-type: none"> <li>• We believe the "mix and match" philosophy of this EIS is inappropriate. Putting together pieces of different alternatives to create a hybrid alternative creates an alternative that has not been analyzed in an integrated fashion in the EIS.</li> <li>• This EIS is too hypothetical to be used as a decision making document. For example, construction on the facilities being considered for Hanford's own use in the Hanford Option will not begin for several years even if they are approved and funded. Final waste dispositions discussed in the EIS rely on facilities still in the research, planning and approval phase. The future existence of these facilities is not certain and is many years away at best. And, these facilities may not be compatible with Idaho waste.</li> </ul> <p>We recommend that Hanford references in this EIS be removed and re-evaluated and the ROD deferred due to the large uncertainties associated with the alternatives being considered.</p> <p>There is another point I would like to make. I am greatly concerned about the manner in which the Portland public meeting was conducted. Although the information provided was fair and understandable, I must object to the rigid format used in conducting the meeting. My staff suggested a less formal format to reflect the small turnout. We were</p>	

D-121

DOE/EIS-0287

- New Information -

Idaho HLW & FD EIS

HLW & FD EIS PROJECT - (AR/PF)-  
Control # DC-57

told this was not possible because the National Environmental Policy Act required that each public meeting be conducted exactly the same. We do not agree with this interpretation of NEPA's requirements.

Only five members of the public and two members of my staff attended the meeting. One highly interested and knowledgeable individual left her sick child with her husband to come to this meeting because of her passion about Hanford issues. She politely asked to give formal public comment after 90 minutes of presentations because she could not stay for the formal public comment period. She was allowed to give her comment during the question and answer period but was told her comments were not on the record. After giving her comments she was told that her comments were good but she should send written comments if she wanted them on the record. This inflexible approach to public involvement and NEPA serves neither the public nor the U.S. Department of Energy.

51-8  
IX.C(5) Oregon Office of Energy staff also suggested a low cost facility which was not used. We are ever vigilant about getting the best possible result for money spent. Please provide the total cost of the Oregon public involvement effort to include meeting room and staff travel costs and per diem. This information will be used in an Oregon report to USDOE on public involvement efforts in Oregon.

More specific technical comments on the draft EIS are attached. Should you have any questions about any of our comments, please contact me at 503-378-5544 or Mr. Douglas S. Huston of my staff at 503-378-4456.

I look forward to seeing how our comments and concerns are addressed.

Sincerely,

Mary Lou Blazek  
Administrator,  
Nuclear Safety Division  
Oregon Office of Energy

HLW & FD EIS PROJECT - (AR/PF)-  
Control # DC-57

Oregon Office of Energy Technical Comments on the Idaho High Level Waste and Facilities Disposition Draft Environmental Impact Statement

- 51-9  
III.D.2.C(5) 1. This EIS does not consider all reasonable alternatives. For example, vitrification plants exist and are operating at West Valley and Savannah River. The EIS should examine the alternative of vitrifying Idaho's waste at these locations.
- 51-10  
IX.A(5) 2. Section 3.1, "Description of Waste Processing Alternatives," lists five alternatives. Table 3-1 on the next page lists nine alternatives/options. This is confusing and should be clarified.
- 51-11  
VII.A(2) 3. As a result of the mix and match philosophy espoused in this EIS, Section 5 should analyze Hanford impacts for the Full Separations Option and Early Vitrification Option.
- 51-12  
VIII.C(2) 4. Appendix C.8, Section C.8.3.2, "Water Resources," page C.8-11, "Surface Water," does not discuss Oregon's extensive use of the Columbia River for irrigation, drinking water, electrical power generation, commerce and tourism. We recommend these uses of the river be included in this section, and that the EIS examine and explain the impacts on these uses from the various alternatives being considered.
- 51-14  
VIII.D(1) 5. The Hanford alternative is described as having a minimal impact on 52 acres of sage shrub-steppe habitat. However, no consultation was done with the Native American tribes in the area, or with the appropriate federal agencies to support this assertion. As a result of fires in the 1980s, much of this habitat was burned. This has drastically reduced the amount of prime sage shrub-steppe habitat. The State of Washington identifies this habitat as of special concern. It is home to about 17 species which are under consideration for listing as rare, threatened or endangered. As Hanford cleanup proceeds, additional land will be required for processing and cleanup facilities. Even more land will be disturbed as a direct result of cleanup. The EIS fails to consider or analyze the cumulative impacts of all of these activities at Hanford. We recommend these impacts be considered in the EIS.
- 51-16  
VIII.C(5) 6. The models used to predict waste migration through the vadose zone and groundwater are overly simplified and fail to consider the broad uncertainties that occur due to preferential pathways and a general lack of understanding of the basic science involved in long term migration of radioactive materials through soil. We recommend that a discussion of these uncertainties be included in this EIS.
- 51-17  
VIII.C(4) 7. Mobilization of plutonium and other actinides by the action of vegetative organic decay products such as humic and fulvic acids does not appear to have been considered, or by colloid formation and transport. We recommend these potential impacts be considered in the EIS.
- 51-18  
III.E(3) 8. This EIS should discuss how the Hanford Option would be funded and the impacts of the various funding options on Hanford and Idaho cleanup.