



David Nulton
Director, NEPA Compliance and Outreach
Office of Fissile Materials Disposition
Department of Energy
PO Box 23786
Washington, DC 20026-3786

Sent by Facsimile to 1-800-820-5156 and by US Mail

May 3, 1996

Dear Mr. Nulton:

Re: Storage and Disposition of Excess Weapons Useable Plutonium and Special Nuclear Materials (SNM) (HAB Advice #46)

The draft Plutonium Programmatic Environmental Impact Statement (PEIS) indirectly considers Hanford as a potential site for certain activities within the scope of the plutonium safe storage and disposition program by the virtue of the site's current capability and plutonium possession. The Hanford Advisory Board is opposed to the piecemeal approach to nuclear material storage and disposition like that taken in the PEIS on plutonium disposition. We have on three previous occasions adopted advice to USDOE urging an integrated public discussion on these issues. (Board Advice #13, 34 and 38) We have a commitment from USDOE leadership to initiate such a process. Therefore, a ROD on the narrow choices presented in this EIS is premature pending the National Equity Dialogue. The Board is opposed to the use of the bore hole option at Hanford. At this time, the Board has not expressed a preference for one of the other disposal options. However, the Board does have a number of values/issues which relate to a plutonium (Pu) and spent nuclear material (SNM) program. Many of these values/issues have been previously provided to you as advice or recommendations for other Hanford programs. These values are:

1. Any plutonium or SNM storage or disposal program must be compatible and integrated with the TPA commitments and milestones and should not affect the rate or funding of cleanup. The program would have the safe disposition of Hanford plutonium as a priority.
2. Any plutonium program assigned to Hanford must be fully funded from new funding sources. This funding should include appropriate site infrastructure and overhead costs. Funding should fully cover the cost of treatment, storage and disposal of any new waste streams.
3. The acceptance of plutonium at Hanford should not delay, defer, or negatively impact Hanford cleanup.
4. Appropriate local and regional public information and involvement programs must be conducted by the agencies to ensure that the public is fully informed of the risks, hazards and impacts of such a program. This would be part of the national dialogue on all nuclear materials (noted above) prior

to assignment of nuclear materials to a specific site.

5. Any permit or plan approval for new Hanford programs/activities must be fully integrated and must comply with all State of Washington public health and safety rules and regulations.
6. Equity impacts must be addressed in the assignment of new nuclear materials (including plutonium) to Hanford.
7. The transportation of plutonium and special nuclear materials to Hanford storage will require careful planning of routes and consideration of weather emergencies to minimize the likelihood of an accident. Emergency preparedness for minimizing the impacts from an accident will require financial support from DOE for state, tribal, and local involvement, including adequate equipment and training. When materials are shipped, timely notification should be provided to transportation agencies.
8. The choice of disposal options re: Pu will be a determinant for sites such as Hanford. Prior to the choice of a disposal option, complete characterization of the material and the impacts of short and long-term disposition technologies must be reviewed by the public and regulatory agencies.
9. Acceptable processing techniques including waste processing must be developed as an integrated part of any new Hanford storage and disposal program. Permanent disposal of waste plutonium at Hanford is not acceptable.
10. A "systems" analysis approach should be utilized to select the most effective method for processing and interim storage. This analysis should adequately address public and worker health and safety and environmental issues.
11. If a plutonium disposition mission is assigned to Hanford, every effort should be made to use existing workforce, facilities, technologies, and other resources.

Finally, we note that this PEIS does not address cumulative impacts of nuclear material movement and disposition as required by NEPA.

The Health, Safety and Waste Management Committee of the HAB looks forward to further discussions and working with you on this issue. The Board looks forward to your written response, as called for in our charter.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

attachments: Board Advice #13, 34 and 38

cc: Thomas Grumbly, DOE
John Wagoner, DOE
Alice Murphy, DOE
Chuck Clarke, EPA
Mary Riveland, Ecology
Cindy Kelly, Designated Federal Official

Linda Lingle, Site Representative
Jim Mecca, DOE (by fax)
The Oregon and Washington Congressional Delegations

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For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov

HAB Consensus Advice #46

Subject: Storage and Disposition of Excess Weapons Useable Plutonium and Special Nuclear Materials (SNM)

Adopted: May 2-3, 1996