



November 8, 1996

Mr. Thomas Grumbly  
Under Secretary of Energy  
U.S. Department of Energy  
Washington, D.C. 20585

Subject: Public Participation In Arms Control and Non-Proliferation Assessment For PEIS  
on Disposition of Fissile Materials

Dear Mr. Grumbly:

I am writing to you on behalf of the Hanford Advisory Board (HAB) regarding the recent public process for the Assessment on Arms Control and Non-proliferation for the Programmatic Environmental Impact Statement (PEIS) on Disposition of Fissile Materials. As noted in public comment during a series of public meetings held in the Pacific Northwest regarding this PEIS, the non-proliferation aspects of fissile materials disposition are a critical aspect of this decision. The original draft was so deficient in this area that the Department determined that the Assessment was necessary.

Concerns about the public involvement process for this critical component of the PEIS have been raised previously by the HAB. The Department was advised by Northwest stakeholders that the timeline was unreasonable to provide for adequate informed public comment. It is unreasonable to expect the public to digest such a technical document (150 pp.) and to prepare meaningful comment on such an important issue without additional local educational efforts.

Additionally, the current schedule regarding disposition of fissile materials ignores a national initiative to improve public participation in USDOE decisions on nuclear materials disposition known as the National Equity Dialogue, a process which has been heartily endorsed by the HAB. Both the Plutonium Roundtable and the Hanford Advisory Board have repeatedly urged DOE to abandon the current piecemeal approach to nuclear material storage and disposition. The National Equity Dialogue offers an alternative: to address the pros and cons of the entire nationwide disposition problem in an effective, open, representative, rational and equitable fashion. Premature, rushed decisions on fissile materials undermine this national dialogue process.

As a Board, we strongly object to the timetable of the public participation process for this Assessment. Because of the importance of the non-proliferation aspect of the Fissile Materials PEIS we recommend that the Department support additional public involvement on fissile materials disposition. This process should combine information from the Assessment regarding non-proliferation questions, including the security aspects of each disposition option, with the information from the original PEIS and allow for a more reasonable public comment period.

This current, rushed series of hearings, and late availability of materials on nonproliferation, serve as another example of the piecemeal approach that makes a mockery of public participation and frustrates rational decision making. It represents a return to the "decide, announce, defend" strategies of the past

which proved so prohibitively expensive to the Department, both in financial capital and public trust.

Thank you for your consideration in this matter. We await your timely response and look forward to participating in meaningful public consideration of the issues addressed by the Assessment.

Sincerely,

Merilyn Reeves, Chair  
Hanford Advisory Board

cc: John Wagoner, DOE-RL  
Alice Murphy, DOE-RL  
Jill Lytle, DOE-RL  
Ken Luongo, DOE-HQ  
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*HAB Consensus Advice #56*

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*Adopted: November 8, 1996*