

Feb. 7, 2002

Mary Beth Burandt, Document Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450 – H6-60
Richland, WA 99352

Re: Tank Waste Retrieval and Closure EIS Scoping

Dear Ms. Burandt,

The U.S. Department of Energy has requested scoping comments based on the "Notice of Intent To Prepare an Environmental Impact Statement for Retrieval, Treatment, and Disposal of Tank Waste and Closure of Single-Shell Tanks at the Hanford Site, Richland, WA" (Federal Register / Vol. 68, No. 5, pp1052-1057 / Wednesday, January 8, 2003). This Environmental Impact Statement (EIS) will have far reaching effects on how the tank wastes are treated and disposed, and how to achieve final closure of the waste storage tanks at Hanford. The Hanford Advisory Board (Board) would like to emphasize that all alternatives should be considered carefully, and the preferred alternative chosen on the basis of the analyses in the EIS.

The Board advises that the following items be included in the scope of the EIS:

- * The EIS should analyze short- and long-term impacts to the environment, including groundwater, of not removing technetium-99 from the Low Activity Waste.
- * Include analysis of Immobilized Low Activity Waste (ILAW) disposal and any other waste streams that arise in the retrieval, treatment, and disposal of Tank Waste.
- * The vadose zone is not identified in the current Notice of Intent (NOI) as an important item within the scope of this EIS. It should be. The EIS needs to assess options for remediating the vadose zone.
- * The EIS as proposed in the NOI will not analyze all "reasonable alternatives." Some examples of additional alternatives that should be analyzed (including long-term, full life cycle costs) are:
 - different melter technologies
 - different glass formulations
 - removal of tanks to achieve "clean closure"

- treatment of all retrieved tank waste as High Level Waste (HLW) and disposal at the HLW repository.

* Environmental impacts need to be assessed for the time frame necessary for them to achieve their peak value (e.g., > 100 years, > 1000 years, > 10,000 years).

* This EIS should address retrieval and closure of the Double Shell Tanks.

* Provide a life cycle cost to site closure for each of the alternatives considered. Per prior Board advice (#8), uncertain costs associated with a national repository should be entirely segregated.

* For each alternative, evaluate the environmental impacts, human and environmental risks, and costs. Analyses should be carried out in sufficient depth and detail to provide objective and quantitative comparisons of alternatives. In addition, these analyses should include the full time span over which hazards may persist.

* Impacts on and costs for community services.

The following items require clarification or definition in the EIS:

* Provide a primer for the reader that identifies the various types of waste, their treatment methods, and disposal requirements for each waste classification. This EIS should contain, in language understandable to the public, a listing of the specific decisions supported by this EIS and how this EIS will be used in making those decisions.

* The various Retrieval, Treatment, and Disposal options and closure options need to be presented in a matrix format to allow the "best" combination of actions to be chosen to achieve the optimal balance of technical approach, cost and schedule impact, and risk reduction.

* A clear statement of the relationships between this EIS, the previous Tank Waste Remediation System (TWRS) EIS, and the Hanford Solid Waste (HSW) EIS should be included. (EIS roadmap.)

* Under "Preliminary Identification of EIS Issues," clarify what the statement "Short term uses of the environment vs. long-term productivity" means, and how it translates into the requirements of this EIS.

Sincerely,

Todd Martin, Chair
Hanford Advisory Board

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Roy Schepens, Manager, U.S. Department of Energy, Office of River Protection
Keith Klein, Manager, U.S. Department of Energy, Richland Operations Office
John Iani, U.S. Environmental Protection Agency, Region 10
Tom Fitzsimmons, Washington State Department of Ecology
Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Martha Crosland, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations

U.S. Senators (OR)

Gordon H Smith
Ron Wyden

U.S. Senators (WA)

Maria Cantwell
Patty Murray

U.S. Representatives (OR)

Earl Blumenauer
Peter DeFazio
Darlene Hooley
Greg Walden
David Wu

U.S. Representatives (WA)

Brian Baird
Norm Dicks

Jennifer Dunn
Jay Inslee
Richard Hastings
Rick Larsen
Jim McDermott
George Nethercutt
Adam Smith

State Senators (WA)

Pat Hale
Mike Hewitt

State Representatives (WA)

Jerome Delvin
Shirley Hankins