

Draft for Discussion

Over the last several meetings, and in individual phone calls over the last week, CTF members have made suggestions concerning the overall response to the DEIS. This draft is an attempt to capture that in writing with the clear understanding that it is not a consensus agreement. Rather it is a compilation of the comments of members. The hope is that this will serve to highlight the issues and act as a focusing mechanism for discussion about a consensus statement in broad terms with the nuance to be worked out through final comments in coming months.

Articulation of CTF overarching goals and core response to the DEIS. Key Points:

- I. The CTF appreciates the progress to date and the work of the Core Team agencies in arriving at a Preferred Alternative, something that was missing from the 1996 DEIS. The Core Team agencies are to be commended for overcoming significant differences and for working together to arrive at a Preferred Alternative.
- II. The CTF appreciates that DOE and NYSERDA are planning to accomplish clean-up work at the site that the CTF deems essential including such as the removal of the source area of the plume and a significant number of the contaminated facilities.
- III. The proposed Preferred Alternative Phase 1 work meets the Policies and Priorities articulated in the CTF 1998 Final Report. The CTF strongly encourages that this work be completed without further delay and in a manner that enhances future decisions regarding clean up of the site. The CTF desires that performance measurements for this work be clearly articulated and adhered to.
- IV. The CTF stands by the Policies and Priorities articulated in its 1998 Final Report. Including, among others:
 - a. The protection of the environment and long-term human health and safety are paramount.
 - b. Given the CTF's knowledge of the geologic, hydrologic and climate conditions, the site does not appear to be suitable

for permanent storage or disposal of long-lived radionuclides and reliance on institutional controls over a prolonged period is not feasible.

- c. Decisions and studies should be performed during Phase 1 that assess and support the eventual goal of a full cleanup of the site.
- V. The CTF understands that not all critical information, characterizations, studies and technologies may exist at this time to make a conclusive decision. The CTF also understands that no long-term storage solution exists for orphan and TRU wastes at this time.
- VI. The Phased Decision-Making approach contained in the Preferred Alternative postpones the ultimate decision as to the level of clean up and disposition of the wastes at the site. The CTF believes:
- a. Such a decision should be made as soon as practicable but no later than _____.
 - b. The opportunity for public review and comment contained in this DEIS is sufficient for the Phase 1 decisions. Any future decisions that will result in the full clean up and closure of the WVDP and the cessation of DOE involvement or in the possible long-term storage or disposal of wastes at the site should be subject to additional NEPA/SEQRA public review and comment or a similarly robust public process.
 - c. If an ongoing assessment period occurs, there will be many interim decisions and site work which will have far reaching impacts on human health and the environment, these decisions and the planning for the work should be subject to regular ongoing consultation with the public.
- VII. Regulatory reviews, permitting and licensing should contain commitments by the appropriate agencies to seek and incorporate the views of the community in making decisions regarding the future of the site.

Over next several meetings develop language on the underlying rationale and detailed comments on:

- I. Phase 1 performance measures
- II. Erosion/geologic conditions
- III. Concerns on long-term stewardship feasibility because of reliance on institutional controls
- IV. Potential impact on Great lakes water supply

Encourage the agencies to perform some assessments, pilot projects and other initiatives as soon as practical (catalogue of items suggested to date):

- Dry the burial ground trenches
- Pilot exhumations of burial ground
- Examine options for above ground retrievable storage while disposal technologies and locations are assessed
- Examine feasibility of potential uses for portions of the site that could provide economic benefit to the community, e.g., timber harvests