

## THE WEST VALLEY CITIZEN TASK FORCE

## **For Immediate Release**

The West Valley Citizen Task Force Members named below will deliver the following comment at public meetings on the West Valley Draft Decommissioning and Long Term Stewardship Environmental Impact Statement.

March 31, 2009, Seneca Nation of Indians – Anthony Memmo

April 1, 2009, West Valley, NY – Warren Schmidt

April 2, 2009, Buffalo, NY – Judy Einach

Good evening and thank you for this opportunity to comment on the Revised Draft Environmental Impact Statement. I am \_\_\_\_\_\_ and comment on behalf of the West Valley Citizen Task Force.

The Citizen Task Force was formed in 1997 to "assist in the development of a preferred alternative for the completion of the West Valley Demonstration Project and cleanup, closure and/or long-term management of the facilities at the site." The group has 18 members with representatives from the affected communities. After its formation, the CTF met for 18 months and studied the issues before releasing a report in July 1998. That report details the CTF's expectations with respect to Policies and Priorities and Guidelines for a Preferred Alternative. Our report and considerable information about our work and the site may be found at <a href="https://www.westvalleyctf.org">www.westvalleyctf.org</a>.

For more than a decade since the Report was issued, the CTF has been meeting regularly with DOE and NYSERDA. We have also received numerous presentations from regulatory agencies and advocated with elected officials on behalf of cleanup at the site. We believe that our ongoing active involvement has been essential to a number of the cleanup activities underway or planned at the West Valley Demonstration Project.

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 Draft EIS. The Core Team agencies are to be commended for overcoming significant differences and for working together to arrive at a Preferred Alternative.

The CTF also appreciates that DOE and NYSERDA are planning to accomplish cleanup work at the site that the CTF deems essential, including the removal of the source area of the North Plateau Groundwater Plume and a significant number of the contaminated facilities.

We are actively working on written comments to be submitted later this spring. Based on our review to date of the Draft EIS, we would like DOE, NYSERDA and the public to understand in broad terms what we anticipate will be the essential views expressed in those comments.

First, 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 cleanup of the site. The CTF desires that performance measurements for this work be clearly articulated and adhered to.

Second, the CTF stands by the Policies and Priorities articulated in its 1998 Final Report. Including, among others:

- The protection of human health and safety and of the environment is paramount.
- Our 1998 Report states that the CTF does not believe that the geologic, hydrologic and climate
  conditions of the site are suitable for long term, permanent storage or disposal of long lived
  radionuclides. After 11 years of continued education on the characteristics of the site, we are
  more convinced of this and we feel that the level of risk from exposure is such that reliance on
  institutional controls over a prolonged period, hundreds or thousands of years, is not feasible.

Third, decisions and studies should be performed during Phase 1 that assess and support the eventual goal of a full cleanup of the site and reassess the technologies and volume of waste disposal associated with exhumation which may alter estimates of safety risks and costs.

Finally, *if* the Preferred Alternative and its phased decision making approach is selected we feel that the views of the public should be considered on an ongoing basis. The public should be allowed full opportunity for review and comment on later subsequent proposals that might lead to anything less than unrestricted release of this site. 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 also be subject to regular ongoing public consultation to ensure that viable options are not precluded. Regulatory reviews, permitting and licensing should contain commitments from the appropriate agencies, beyond the minimum legal requirements, to seek and incorporate the views of the community in making decisions regarding the future of the site.

Over the coming months the CTF will be developing more detailed written comments on the Draft EIS. We encourage everyone to take the time to carefully read and comment on this DEIS and submit written comments. Thank you for the opportunity to comment at this time.