



U.S. DEPARTMENT OF
ENERGY



NYSERDA

January 14, 2016

West Valley Citizen Task Force
c/o The Logue Group
PO Box 270270
West Hartford, CT 06127

SUBJECT: Incorporating Climate Change into West Valley Demonstration Project Decisionmaking

To the West Valley Citizen Task Force:

The U.S. Department of Energy (DOE) and the New York State Energy Research and Development Authority (NYSERDA) thank you for your continued interest in the Phase 2 decisionmaking process for the West Valley Demonstration Project (WVDP) and the Western New York Nuclear Service Center (WNYNSC).

In Reference 1, the West Valley Citizen Task Force (CTF) expressed its concern that the DOE and NYSERDA have not sufficiently incorporated climate change planning in the agencies' Phase 2 decisionmaking process. The CTF's concern is that this lack of attention to climate change impacts will skew agency assessments of the risk associated with leaving wastes in place at the WVDP and WNYNSC.

As discussed during previous CTF and Quarterly Public meetings, the DOE and NYSERDA are committed to evaluating and incorporating the effects of future climate change in the Phase 2 decisionmaking planning process. The Phase 1 Studies Erosion Working Group (EWG), as part of the work detailed in its *Phase 1 Erosion Study Plan*, will compile and analyze available climate and hydrologic data, and identify statistically relevant input parameter data ranges (including hydrologic parameters such as storm depth, duration and frequency parameters) for use in its landscape evolution and gully erosion modeling. This EWG task will involve a review of recent scientific literature, regional climate and hydrologic databases, and newly collected site-characterization data to identify any new constraints on the key erosion model input parameters identified by the EWG. The modeling team will compile and evaluate the updated data and define appropriate parameter ranges for use in the models. DOE and NYSERDA will provide your letter that details your technical recommendations to the EWG for their consideration with respect to this work.

The agencies will also require the Probabilistic Performance Assessment (PPA) contractor to consider and incorporate the effects of potential future climate change during the development of its long-term PPA that will support the development of the Supplemental Environmental Impact Statement (SEIS) for Phase 2 decisionmaking for the WVDP and WNYNSC. The agencies will also require the contractor tasked with preparing the SEIS to consider and incorporate the effects of future climate change in its analysis of the decommissioning alternatives evaluated in the SEIS. During a public scoping process, DOE and

NYSERDA plan to highlight important environmental issues that will be evaluated in the SEIS, including the potential environmental impacts due to erosion and climate change.

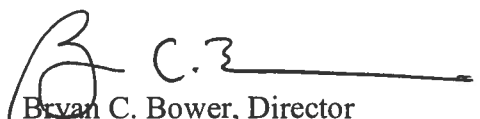
The CTF also recommended that the agencies prepare a climate vulnerability assessment and climate resiliency plan directed toward waste removal for the West Valley site as part of the Phase 1 Study process. DOE and NYSERDA will evaluate climate change issues that pertain to vulnerability and resiliency through the Phase 2 decisionmaking process for the WVDP and the WNYNSC. This will include work performed within the Phase 1 Studies, Probabilistic Performance Assessment or the Supplemental Environmental Impact Statement.

The CTF also requested that all assessments prepared by the agencies to support Phase 2 decisionmaking be transparent and explained to the public in advance of the draft SEIS. As discussed during previous CTF and Quarterly Public meetings, the DOE and NYSERDA are committed to a transparent process during the Phase 2 decisionmaking process, including a public scoping process for the SEIS. Even though there is no requirement for the agencies to expand the public participation beyond that which is required by SEQRA and NEPA, the agencies have committed to routinely update the public on the progress of the Phase 1 Studies, the long-term PPA, and the SEIS at public meetings, and will augment these updates with technical discussions that will include the respective contractors.

The agencies have no comment concerning the CTF's observation that local governments may decide to assess the vulnerability of the WVDP and WNYNSC to severe weather events associated with climate change.

Again, thank you for your continued interest in the in the Phase 2 decisionmaking process for the West Valley Demonstration Project (WVDP) and the Western New York Nuclear Service Center (WNYNSC).

Sincerely,



Bryan C. Bower, Director
U.S. Department of Energy
West Valley Demonstration Project



Paul J. Bembia, Director
West Valley Site Management Program
New York State Energy Research & Development
Authority

BB/PJB/amd

Reference:

1) Letter (366052), The West Valley Citizen Task Force to B. C. Bower, "Incorporating Climate Change into West Valley Demonstration Project Decisionmaking" dated July 27, 2015.

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