

To: Citizen Task Force
From: Melinda Holland, Clean Sites
Subject: Summary of September 16, 1998, Task Force Meeting
Date: October 5, 1998

Next Meeting:

The next Citizen Task Force (CTF) meeting is scheduled for:

Date: Tuesday, November 17, 1998
Time: 7:00 p.m. - 9:30 p.m.
Location: Ashford Office Complex
9030 Route 219, West Valley, NY

A draft agenda for the November 17, 1998, meeting will be circulated prior to that meeting. If you have questions or comments regarding the upcoming meeting or about this summary, please contact Melinda Holland at (864) 457-4202 or Tom Attridge at (716) 942-2453.

CTF Attendees:

Attending were: Ray Vaughan, John Pfeffer, Barbara Mazurowski, Nevella McNeil, Larry Smith, Pete Scherer, Eric Wohlers, Paul Piciulo, Warren Schmidt, Rich Tobe, Bill King, and Bridget Wilson. Not attending were: Blake Reeves, Tim Siepel, Lana Redeye, Murray Regan, Pete Cooney, and Joe Patti.

Regulatory Agency Attendees via Videoconference

Jack Parrot, Tim Johnson, and John Greeves; NRC

September 16, 1998, Meeting Summary:

Tom Attridge and Melinda Holland opened the meeting by reviewing administrative issues and the agenda.

North Plateau Groundwater Plume Update

Craig Repp, WVNS, summarized recent site efforts to reduce surface water infiltration into the North Plateau groundwater plume. Several trailers were removed from "trailer city," which is located in front of the Main Plant building. The area was graded, capped with clay and topsoil, and seeded. Storm water controls were also installed to capture water runoff from the north parking lot. Both projects, combined, divert over 2 million gallons of surface water per year from the area around the Main Plant building, which is where the plume originates. In response to CTF member

questions, Mr. Repp explained that he consulted with WVNS Environmental Affairs regarding potential permit requirements. Elizabeth Lowes, DOE, indicated that the Environmental Affairs review suggested that the infiltration controls project did not trigger a modification to the pending stormwater discharge permit application. [Ms. Lowes later confirmed this and notified the CTF member at the West Valley Interface Participants (WVIP) meeting held on September 22, 1998.] WVNS also agreed to provide information on the volume of rain the new diversion system can handle for the continuous open catch basin along the north parking lot. [The design calculations indicate this system can manage approximately 4000 gallons per minute.]

Progress Towards Scheduling a Task Force Meeting with DOE and NYSERDA Senior Management

On July 31, 1998, Congressman Houghton wrote to James Owendoff, Acting Assistant Secretary for Environmental Management at DOE, requesting participation in a meeting with the CTF. Mr. Owendoff responded in a letter dated September 10, 1998, that he was not available at this time but he would try to schedule a visit to West Valley later this year. The CTF agreed to have Rich Tobe write a letter, on behalf of the CTF, to the newly appointed Secretary of Energy, Bill Richardson, to request a meeting (see attached copy).

In discussions about a future high-level meeting, a CTF member mentioned that the CTF should continue to pursue the issue of DOE's responsibility for more waste in the SDA than was originally believed. He suggested that this issue be raised to Mr. Owendoff or other high-level DOE officials when they meet with the CTF. Another CTF member stated that he felt NYSERDA President Bill Valentino addressed this issue very well in his July 24, 1998, letter. A NYSERDA representative added that NYSERDA is still assessing who generated the wastes in the SDA and the regulatory and legal options available to the state. Another CTF member stated that DOE should be urged to budget more money and time for future work at West Valley to deal with these wastes.

In response to a question, a DOE representative stated that Mr. Owendoff is the *acting* Assistant Secretary, so he may not be the one attending a meeting with the CTF. She stated that DOE would provide the CTF with feedback on the CTF recommendations before the draft Preferred Alternative is done, but that an exact time is not yet set. She also mentioned that West Valley is a "closure site" and thus receives higher priority in the Ohio Field Office's budget. The Ohio Field Office recognizes that a closure date will not be known until the Record of Decision (ROD) is issued. The new Ohio Field Office closure plan lists the possible date for the West Valley site as ranging from 2006 - 2015.

Progress of WVDP Low-Level Waste Management Program

Rick Provencher, DOE/West Valley Deputy Director, gave a presentation on Low-Level Waste Management at West Valley.¹ Mr. Provencher described the various activities DOE is currently using to reduce the amount of low-level waste (LLW) stored on site in an effort to prevent the need for construction of additional temporary LLW storage facilities before the ROD is in place. He

¹For a copy of the materials distributed at this meeting, call Sonja Allen, WVNS, at (716) 942-2152

also described DOE efforts to develop alternate criteria for the restricted release of soils on site.

A CTF member questioned the wisdom of pushing for a ROD by the year 2000 and suggested that time was needed to investigate new technologies, and finding ways to address the CTF's recommendations. Mr. Provencher acknowledged that they have an aggressive schedule for the ROD, but felt it is achievable.

In response to another question, Mr. Provencher responded that DOE will be paying \$13.50 per cubic foot of LLW (low activity Class A LLW) for disposal at the Envirocare facility in Utah. He also responded that DOE is investigating ways to reduce the volume of contaminated soil, which must be stored, by investigating mechanical sorting technologies and less conservative screening criteria. A pilot study of a mechanical sorter achieved a 50 percent reduction in the volume of soil which must be stored. There was concern before this demonstration that the sorter would not work well on clay and rocky soils, however a shredder was used to break up clumps of soil and rocks were separated so only small particles went through the sorter. When contaminated soil above a prescribed level passed through the sorter it was detected, separated, and put in storage. However, off-site disposal at the Envirocare facility may be cheaper than using this sorter technology to reduce on-site volumes.

A CTF member asked what happened to the soil designated as "not contaminated," what level of residual radioactivity was considered "not contaminated," and what was the "detection level" of the equipment used by DOE to make this determination? Mr. Provencher responded that, up until now, the GM counter was able to measure down to the detection limit of 45 picocuries per gram (beta and gamma radiation, analysis of the soil revealed no alpha-emitting radionuclides are present); anything below that level was put back on the ground on site. He added that the mechanical sorter used in the pilot study has a set point of 45 picocuries per gram, though the detection limit of the sorter was actually lower than that.

Mr. Provencher mentioned that to reduce the additional storage capacity needed, DOE is also considering a less conservative screening criteria (authorized by DOE Orders) for contaminated soil from new excavations. Existing institutional controls would ensure that there is no increased risk to the public. A CTF member stated that DOE Orders may not be strictly applicable here and that if you excavate, then put contaminated soil back on the ground, that could be considered "disposal." A WVNS representative reminded the group that this would be an interim approach until the ROD is complete. A Task Force member stated that handling wastes two or more times is not a good idea. The Tonawanda site near Buffalo was mentioned as an example where soils were moved three times and each time they became more diluted with clean soil thus reducing the contamination levels of some soil to the point where DOE recommended just leaving it in place. The Task Force member said this provided intense opposition from the community around that site. A Task Force member stated that he did not want West Valley to have the same result as Tonawanda where soils were moved repeatedly increasing the overall volume of contaminated soil. The largest cost estimate in the West Valley DEIS is for soil removal under Alternative I. A WVNS representative stated that a trade-off is involved here between spending budgeted funds for cleanup of highly contaminated wastes versus low-level waste soils which may need to be excavated while doing other site work. He also stated that the existing institutional controls keep

the public safe from all soils on site. A CTF member reminded the group that the Task Force has recommended that cost not be the primary decision factor.

When asked about the limit for potential exposure to people from the soil, Mr. Provencher explained that a pathway analysis for a new on-site restricted release criteria is used which considers the potential exposure to employees and to off-site residents. The analysis uses a maximum exposure limit for an on-site employee of 25 millirem/year and a maximum off-site limit to a resident of 1 millirem/year. He also explained that the actual exposure to workers from all the contaminated soil currently on the ground at the West Valley site is minimal. He explained in response to a question that some containerized soil had been sorted in testing a mechanical sorting system last summer. About half the soil was containerized and the other half which was below the current site criteria for packaging was placed in a spoil pile on site. He stated that these actions are acceptable based on existing DOE Orders. A CTF member recommended that the boxed soil not be put back on the ground where it will contaminate other soil. In response to a Task Force member's question about the level acceptable for free release or unrestricted use, an NRC representative stated that NRC's existing criteria, used at another site, for Cesium-137 is 15 picocuries/gram and for plutonium it is 25 picocuries/gram. However, he added that specific limits for the West Valley site under the Decontamination and Decommissioning Criteria are still under development. Based on NRC's existing criteria, he stated that the detection equipment used by the West Valley site today may not be sensitive enough if its detection limit is 45 picocuries/gram, though it was recognized that this limit was based on a mixture as opposed to individual radionuclides.

Mr. Provencher reminded the CTF that the decision on interim handling of low-level soils will not be made prematurely, DOE will run analyses, do budget projections, analyze trade-offs, and consult with the CTF and regulators.

Environmental Impact Statement Update

Dan Sullivan, DOE, told the CTF that a 10,000-year performance assessment is being done in response to NRC and Task Force concerns about long-term impacts. Science Applications International Corporation (SAIC) is performing landscape evolution modeling and will provide a presentation to the CTF on the methods, analysis, and results as soon as the work is complete. He also stated that the closure engineering reports for WMA 1, Process Building, and WMA 3, HLW Tank and Vitrification Facility, (Alternatives I and IIIB) are being revised. The DEIS did not consider using other DOE sites as disposal options for Alternative I. For Alternative IIIB more efficient ways to rubble the building are being investigated.

DOE and NYSERDA site staff will begin regular meetings next week to start development of the draft Preferred Alternative. A Task Force member asked when NRC's paper will be available to the site, given the fact that the Commission Paper is supposed to be an important consideration in developing the Preferred Alternative. An NRC representative stated that they are still working on the paper. NYSERDA has sent a letter requesting that a draft of the Commission Paper be released for comment, and the Commission is currently considering that request. [A copy of the letter from NYSERDA to NRC is attached.]

Observer Comments

An observer stated that it is great to hear some exact numbers from NRC, even though they are not part of the Decontamination and Decommissioning Criteria for West Valley. She also recommended that the Envirocare site be investigated carefully due to its past history. She stated that a cheap disposal price may not reflect good operating practices. She agreed that West Valley should not take the approach used at the Tonawanda site where contaminated soils were spread around and diluted. She also recommended that people contact their congressmen to push for making cleanup of DOE sites a priority.

Action Items

WVDP to provide Ray Vaughan with an explanation of detection limits for the GM detector and the mechanical sorter.

Next Steps

At the request of the CTF the next meeting was scheduled for November 17, 1998. Ms. Holland reminded the CTF that conference calls or other means of communication can be set up in the interim to discuss issues of importance to CTF members. She requested that CTF members contact her or Tom Attridge with requests for any type of support between now and the November 17, 1998, meeting.