

Messr. Bryan C. Bower

Page 2

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CLG/end

Attachment:

NYSERDA Comments on the Draft Environmental Assessment for the Decontamination, Demolition, and Removal of Various Facilities at the West Valley Demonstration Project (DOE/EA-1552), dated June 16, 2006

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NYSERDA Comments on the
Draft Environmental Assessment for the Decontamination, Demolition, and Removal of Various
Facilities at the West Valley Demonstration Project (DOE/EA-1552),
dated June 16, 2006

1. Decommissioning Assumptions are Needed

As NYSERDA has previously stated, we support DOE's effort to remove facilities that are no longer needed to complete the WVDP Act. The facilities that are needed to support

decommissioning and/or storage and transportation of the HI W canisters) should be retained

3. Radioactive Waste Storage Capacity is Still Needed

Footnote 1 on Page 1 of the EA acknowledges that some of the 42 buildings that are the subject of this EA are currently being used to store low-level waste (11 of the 42 buildings included in this EA are currently used to store low-level waste and/or are permitted to store low-level mixed waste) and further states that when shipments of the waste inventory covered by the WVDP Waste Management EIS Record of Decision (ROD) "... are complete, the buildings will be empty and ready for decontamination (if needed), demolition, and removal from the WVDP site." The footnote seems to imply that there is no future need for low-level radioactive waste storage capacity once the current low-level waste inventory is shipped off-site and/or the WM EIS ROD is fully implemented. In addition, Table 2,

that needs to be replaced. NYSERDA believes that future decommissioning actions will

additional 40 employees. The number of workers estimated to be needed for the various Decommissioning EIS alternatives ranges from 157 to 467 which means that 7 to 15 water

closets would need to be maintained on-site if all these employees were located at the site. OSHA also requires that lavatories with hot and cold running water be made available in all permanent places of employment. Regardless, running water is also needed for eye wash stations and decontamination showering. NYSERDA is aware that the existing sewage treatment plant may be oversized for the size of the current work force and thus may not function as well as it should, but why would the WVDP elect to replace all the existing sanitation facilities with portable units instead of just continuing to use a contracted transport and disposal service to bulk ship the sewage off-site, as is done now? In addition, there is no assessment or discussion of the replacement impacts.

5. Warehouse Capacity is Still Needed

There are three warehouses on the site that have been used by the WVDP (i.e., the Old Warehouse, the Bulk Storage Warehouse and the New Warehouse) and all three are proposed for removal. Table 2, *Facility Functions to be Replaced*, indicates that the warehouse function will be replaced by renting or otherwise using other locally available warehouse capacity. NYSERDA questions the merit of removing all three warehouses and would propose that DOE retain the largest and newest warehouse located on the Project Premises to support future decommissioning activities. In addition, there is no assessment or discussion of replacement impacts (e.g., rental costs, fuel use and employee hours to transport materials to and from an off-site warehouse, etc.).

6. One WTF Training Platform Should Be Retained

NYSERDA believes that one of the two WTF Training Platforms should be retained to facilitate mockups of the installation and removal of equipment from the HLW tanks. Additional equipment, such as the zeolite columns or tank pumps may need to be removed from the tanks. Additional equipment, such as sampling equipment or waste removal equipment may need to be put in the tanks. One of the WTF training platforms should be retained to facilitate proper planning of this important work.

7. "Maintenance-Type" Facilities Will Still Be Needed

NYSERDA believes that one or more "maintenance-type" facilities (e.g., Fab Shop, Maintenance Shop, Test and Storage Building, Vehicle Repair Shop, MSM Repair Shop) should be retained to support future site decommissioning activities. Radiological and non-radiological equipment will still need to be maintained, modified, mocked-up, etc. during decontamination and decommissioning activities that are within the scope of the Decommissioning EIS. NYSERDA urges DOE to retain one or more of the existing "maintenance-type" facilities to fulfill this future need.

8. Page 7, Table 1, Bulk Storage Warehouse - A waste volume estimate for the Bulk Storage Warehouse (BSW) appears to be missing from the table. The only waste volume estimated for the BSW is the volume associated with the concrete slab. Shouldn't an estimated volume of industrial waste be associated with the building?
9. Page 7, Table 1, Equalization Tank - A waste volume estimate for the Equalization Tank

10. Page 7, Table 1, Live Fire Range - Based on the WVDP use of this area and the expected hazardous waste contamination, why hasn't the live fire range been declared and assessed as a SWMU under the RCRA 3008(h) Consent Order?
11. Page 7, Table 1, Old Sewage Treatment Plant - The old sewage treatment plant is known to have received radiologically contaminated liquids from the Process Plant and is currently posted as a radiologically contaminated area. If DOE intends to remove this slab, how does DOE plan to address contaminated soils? What cleanup standard will be applied to determine when enough radiological soil has been removed? A predetermined exhumation depth or volume of soil is not an acceptable way to demonstrate adequate cleanup. NYSERDA does not want clean fill placed over contaminated soil in the area of the sewage treatment plant or any other area of the site. This practice will lead to the generation of additional contaminated soil volumes and may lead to the loss of institutional knowledge of the presence of subsurface contamination. NYSERDA requests that contaminated soil and contaminated surface features be completely characterized and/or remediated so they are not left to be "rediscovered" at some point in the future.
12. Appendix B, *WVDP Facility Map and Facility Name Crosswalk* - The facility name crosswalk table may lead to significant confusion and misunderstanding because it includes all of the site facilities, as opposed to just the EA facilities. In addition, the following acronyms are not defined and references or citations to the relevant documents are not provided: "GOAT," "SAR," "ORPS" and "SUMP." Also, it is unclear if the RCRA column was intended to list only the RCRA HWMUs or the RCRA HWMUs and RCRA SWMUs. Either way, the RCRA column is incomplete.