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From: Joe Whetstone <pj3whetstone@hargray.com>
To: <nrcprep@nrc.gov>
Date: Sun, Jul 30, 2006 12:52 PM
Subject: Response from "Comment on NRC Documents"

NFR 30967

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(4)

Below is the result of your feedback form. It was submitted by

Joe Whetstone (pj3whetstone@hargray.com) on Sunday, July 30, 2006 at 12:52:15

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Document_Title: Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations (NUREG-1854) - Draft Report For Interim Use and Comment

Comments: I am writing to you in opposition of the Department of Energy closure plan for tanks 18 and 19 at the Savannah River Site in Aiken County South Carolina. My reasons are enumerated below:

The quoted information, pertaining to reasons 1 through 3, is from the National Academy of Science Interim Report: Tank Wastes Planned for On-Site Disposal at Three Department of Energy Sites: The Savannah River Site - Interim Report as prepared by the Committee on the Management of Certain Radioactive Waste Streams Stored in Tanks at Three Department of Energy Sites, National Research Council

1) Grouting of tanks is irreversible. – page 6 of NAS Interim Report:

"Filling a tank with grout is, from a practical point of view, an irreversible action, although it is conceivable to open a tank and excavate the grout if absolutely necessary. Moreover, postponing closure of some tanks for several years would appear to have essentially no effect on near- or long-term risk. The current approach of coupling cleanup and closure schedules forecloses options that may become available in the near future (e.g., using alternative technologies to reduce the radioactive heel [source] and/or using other types of immobilizing material to fill the tank)."

2) Waste to be left in tanks 18 and 19 estimated to be 10 times that left in tanks 17 and 20 when they closed – page 40 of NAS Interim Report:

"There are specific advantages in delaying closure of the most challenging tanks. DOE needs time to gather operational experience for tanks with cooling coils and other major obstructions. DOE obtained good results in retrieving waste from Tanks 17 and 20, leaving behind very little residual waste. Tanks 18 and 19, which have undergone waste removal, are estimated to have an order of magnitude more radioactivity than Tanks 17 and 20, but the greater challenges lie ahead."

3) Unsupported claims by DOE - page 3 of NAS interim report:

"DOE has argued that it is impractical to dismantle and remove the tanks after the waste has been retrieved because of the exposures incurred by workers from radioactive residues and because of the overall prohibitive costs of exhuming such large structures. The committee has not seen analyses to support this claim."

The quoted information pertaining to reason 4 is from 58698 of the Federal Register / Vol. 70, No. 194 / Friday, October 7, 2005 / Notices

4) Despite the ability granted by section 3116 to refer to high level waste as something other than high level waste (HLW), too much HLW is to be left and covered in grout. Please note that combined, these tanks still contain almost 20,000 gallons of waste.

"Both tanks have a nominal operating capacity of 1.3 Mgal. Waste removal operations for Tank 18 were initiated in 1985 and completed in 2003. Tank 18 now holds approximately 4.3 thousand gallons (Kgal) of residual material. Waste removal operations for Tank 19 were initiated in 1981 and completed in 2001, and it now holds approximately 15.1 Kgal of residual material."

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5) Arjun Makhijani, Michele Boyd, and Brice Smith of the Institute for Energy and Environmental Research have devoted a great deal of time and energy examining the DOE HLW tank closure plans and writing articles pertaining to these plans. On October 20, 2005 when asked once again for his opinion on the DOE plan to close tanks 18 and 19, Arjun Makhijani responded via e-mail "Joe IEER is on record as opposing DOE closure plans for tanks. These tanks should not be grouted. Arjun"

In conclusion, the Department of Energy should postpone the closure of tanks 18 and 19 until better techniques for the removal of the remaining high level waste can be developed and implemented.

Sincerely,

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