

March 23, 2007

Mr. Bryan Bower, Director
 U.S. Department of Energy
 West Valley Demonstration Project
 10282 Rock Springs Road
 West Valley, NY 14171

Dear Mr. Bower:

SUBJECT: DOE's Assessment of Options to Mitigate the Spread of the North Plateau Groundwater Plume

The New York State Energy Research and Development Authority (NYSERDA) is participating in discussions with representatives from the U.S. Department of Energy (DOE) and its contractors in regard to DOE's present effort to assess near-term options to mitigate the continued spread of the Sr-90 groundwater plume on the North Plateau of the West Valley Demonstration Project (WVDP) Premises. We strongly support DOE taking action in the near term to stop the further spread of the plume, and to eliminate or reduce the concentration of Sr-90 being discharged from the WVDP Premises as surface water. At the same time, we are concerned that DOE's assessment of plume mitigation options may be too narrowly focused on the downgradient portion of the plume. We request that DOE's evaluation of near-term plume mitigation options be broad enough to identify efficient and effective approaches to mitigating the spread and discharge of plume contaminants without unnecessarily limiting the study to a particular area of the plume.

DOE's current study, being conducted by Geomatrix Corporation through a subcontract issued by WVNSCO, will identify potential near-term mitigation actions for the downgradient portion of the plume. The Geomatrix study also focuses on mitigation options that will be effective for a limited time period (~five years). The mitigation of higher concentrations of Sr-90 and longer-lived radionuclides in the upgradient portion of the plume is being assessed by WSMS in a separate study as part of the Decommissioning EIS. The contractors are supposed to consider each other's work as they prepare their separate assessments, but the manner and effectiveness of integrating the separate assessments is not clear.

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NYSERDA is concerned that if near-term mitigation actions are focused only on the downgradient portion of the plume, high concentrations of contaminants will continue to spread across the North Plateau, making the eventual decommissioning of the site more difficult and costly. We are also concerned that DOE will be unnecessarily restricting the implementation of potentially beneficial mitigation actions by characterizing actions on upgradient portions of the plume as "decommissioning" actions.

We encourage DOE to conduct a thorough investigation of plume mitigation approaches that considers all parts of the plume, including the upgradient areas, to identify effective and efficient mitigation options. We recommend that DOE prepare a comprehensive management plan for the entire plume that will be implemented as environmental conditions warrant.

NYSERDA looks forward to continued discussions with DOE on this important activity.

Sincerely,

WEST VALLEY SITE MANAGEMENT PROGRAM



Paul L. Piciulo, Ph.D.
Director

PJB/amd

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