

## DEIS Chapter 1– CTF Member Individual comments as of 4/20/2009

Page	Paragraph / Section	Status	Comment
1-5	Para 2 Line 2	Edited  Removed “illegal” re splitting EIS.  Confirmed EIS titles.	<p>“DOE also determined that the <i>Waste Management EIS</i> would be a new EIS, and that the <i>Decommissioning and/or Long-Term Stewardship EIS</i> would instead be considered the revised draft of the 1996 <i>Cleanup and Closure Draft EIS</i>.”</p> <p>1) Splitting the original EIS jeopardizes the intent of the original EIS for the entire site and potentially slows work because such a decision is open to legal challenge. 2) The title change from “<i>Cleanup and Closure</i>” to “<i>Decommissioning and/or Long-Term Stewardship</i>” indicates no intention to clean up and close the site.</p> <p>See also: p. 11 SectD00016 (See)Tj1111-te.hip</p>

also:

			<p>License Termination Rule and the West Valley Demonstration Act. These should be clarified.</p> <p>Would decommissioning of the High-Level Waste Tanks in the ground constitute a “disposal” decision?</p>
1-6		<p>√ + Edited to add 5<sup>th</sup> bullet</p>	<ul style="list-style-type: none"> <li>• How can the tanks be decontaminated and decommissioned in the ground?</li> <li>• If the material inside is dried, would it not still be radioactive?</li> <li>• Does the LTR apply to that material?</li> <li>• “Such requirements as NRC will prescribe”... What determines end of NRC involvement in the site?</li> <li>• Will the disposal requirements specified under the West Valley Demonstration Project apply and under what circumstances?</li> </ul>
1-8		<p>√</p>	<p>Can NRC disapprove of the DOE plan at some later point?</p>
1-8		<p>√</p>	<p>As it deals with non-DOE, non-Project and non-SDA waste, can NRC, in resuming its regulatory role, exercise any authority to force parties to take action? i.e. take any action once the West Valley Demonstration Project Act is completed?</p>
1-10	1-5	<p>To be revisited</p>	<p>Decisions... “...to complete WVDP and either close or manage...” Cleanup is not mentioned.</p>