



THE WEST VALLEY CITIZEN TASK FORCE

May 6, 2011

Greater-Than-Class C Low-Level Radioactive Waste EIS
Office of Technical and Regulatory Support (EM-43)
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0119

RE: Comments of the West Valley Citizen Task Force on the
Greater-Than-Class C Low-Level Radioactive Waste EIS

The West Valley Citizen Task Force (CTF) urges the Department of Energy (DOE) and the United States Congress to act in a timely manner in the identification of a preferred alternative for the disposal of Greater-Than-Class C (GTCC) Low Level Radioactive Waste and GTCC-like waste. The CTF is encouraged by the approach and time line that the Department of Energy is pursuing in their accumulation and analysis of public comments on this Draft EIS. We find it distressing that, while the West Valley site does have GTCC and GTCC-like waste, (Table S-2, pg. S-19) the closest public hearing will be in Washington, DC. We also question the exclusion of the Seneca Nation as a participating tribal government (S.1.5, pgs. S 6 &7).

There are several factors that we believe are of significant importance when identifying a preferred alternative. The CTF supports the complete deactivation and decommissioning of the West Valley Demonstration Project site. It is our belief that all waste should be removed and the site should be available for public reuse. The removal of GTCC LLRW and GTCC-like waste will be another step in that direction.

The CTF urges the DOE to carefully examine the comments received from the public and stakeholders. We also believe that cost should not be the driving factor in the preferred alternative decision. The CTF urges that an independent cost analysis be conducted before an alternative is chosen. Public safety, average dose, and long term impact should be weighed more heavily than any cost factor. We also suggest that all relevant studies be completed prior to recommending an alternative to the Congress. With the recent devastation in Japan due to seismic activity, we urge that all alternatives and sites be subject to the most rigid of standards.

The DOE has suggested five alternatives for the disposal of GTCC waste (S.2.5). Each of these alternatives was evaluated on eleven separate criteria (S.2.8, pg. S-37). There was also a mention of regional commercial disposal sites, although no specific vendor or site has yet to be identified. Upon examination of the five alternatives, the West Valley CTF strongly supports Alternative 2, WIPP Geologic Repository as the preferred alternative. Our selection of this alternative is based on the data presented in Table S-3, comparisons of potential impacts. Public safety and environmental impact must be primary considerations for any alternative. Table S-3, pg. S-41 supports our belief that the WIPP alternative would offer the lowest worker dose and lowest Latent Cancer Fatality (LCF) risk (Table S-4; pg. S-47). The WIPP site would also have zero long term annual dose and LCF risk (Table S-3; Pg. S-42), although we would urge DOE to conduct studies to accurately determine the impact, if any, to individuals and nearby populations from a waste handling accident at the site.

The WIPP site would be preferred by the CTF due to the very low impacts that disposal would have on habitat and wildlife as well as other ecological resources compared to the other alternatives (Table S-3, pg. S-43). The siting at WIPP is also preferred due to the existing facility and stable environmental footprint need to dispose of additional waste at the site (S.2.5.2; Figure S-8, pgs. S-20, 21).

Transportation to the WIPP repository is an obstacle and a point of concern for the CTF. We would recommend that studies be conducted to lower the projected impacts of shipping waste to the site. The CTF strongly encourages the use of rail transportation as opposed to trucking materials. Fewer trips would be necessary, resulting in the chance for fewer accidents or exposures (Table S-3; pg. S-45).

In summation, the West Valley CTF strongly supports the creation of a disposal site for GTCC and GTCC-like wastes. We urge the DOE and the Congress to move judiciously, but as quickly as possible, in the identification of such a disposal site. The CTF supports the WIPP Geologic Repository as the preferred alternative for such a site based on the points discussed in the preceding paragraphs.

Sincerely,

Deborah Aument South Circle

Christopher C. Gentry

Bob Ryan

Mark K. W. Warden

Deborah S. Lambert

Joe A. A.

Joseph J. A.

Roy A.

Eric W. Wohlens