

**Greater-Than-Class C Low-Level Radioactive Waste EIS Scoping Comments
Oral Comments Provided at the Public Scoping Meetings**

#	Name/ Address	Affiliation When Given	Comment Date	Comment
171	Rep John Heaton New Mexico	<p>Representative, District 55</p> <p>Chairman for the Radioactive and Hazardous Materials Committee for the State of New Mexico</p> <p>Chair the High- Level Waste Committee for the National Conference of State Legislators</p>	8/13/2007	<p>A printed copy of the statement below was also submitted.</p> <p>First of all, let me thank you for allowing me to go first. I need to get on the road. Holmes, we're going to have to make an honorary citizen out of you. You're here more frequently than I am. So, Christine, that was a wonderful presentation. Thank you.</p> <p>Let me begin by introducing myself. I'm John Heaton, and I am the State Representative representing District 55. WIPP is in my district. I also serve as the chairman for the Radioactive and Hazardous Materials Committee for the State of New Mexico. And I also chair the Hazardous -- or the High- Level Waste Committee for the National -- for the Conference -- or the National Conference of State Legislators, which includes legislators around the country.</p> <p>We have been struggling desperately in both of these committees as to what and how to deal with high level waste and greater-than-class C waste. It has been a struggle for all of us.</p> <p>First of all, the definition of the waste is not what it's composed of. The definition of the waste is more likely to be where it originates than what it's really -- what's really in it. And so we've been struggling with it.</p> <p>The budget for Yucca Mountain continues to be an enormous problem and it appears that it will continue to be. Graham Rudman -- stop -- Yucca Mountain has a budget number of \$750 million a year that's coming in. That's the maximum amount that can be spent under Graham Rudman provisions. And as a consequence, the construction of that facility, when you get to 2011, if you look at the budget, jumps up to \$2.1 billion annually for three or four years. So it is a very difficult site. They're looking at 2017 as the earliest possible date. It's really impossible. We're probably looking at 2025 or 2030, something that distant in the future to even have a chance of getting that open, aside from the fact that the people there in Nevada don't seem to want it as you all are very well aware.</p> <p>As you've just heard, the Nuclear Regulatory Commission regulates low-level waste disposal, makes a distinction between waste that are less radioactive than classes 1 -- or A through C, and those wastes that are more radioactive than class C.</p> <p>Greater-than-class C waste must be permanently disposed of in a geologic repository, while waste less than class C, as you've just heard, may be disposed of in suitably engineered shallow subsurface disposal facilities. Thus, disposal of greater-than-class C waste in WIPP inherently meets the NRC requirements.</p> <p>Congress asked DOE, as you just heard, to recommend a path forward and develop an EIS and a public scoping process. DOE should consider NRC regulations for permanent disposal in a geologic repository for greater than-class C radioactive waste.</p> <p>The only alternatives offered by DOE in its EIS notice of intent to meet this requirement are WIPP and the Yucca Mountain project. The other disposal alternatives, shallow bore holes, confinement and others, do not meet the intent behind the NRC regulations.</p> <p>It is important to note that the greater-than class C limits are divided into two radioactive waste types, fission products and transuranic elements. The GTCC limits for transuranic waste are identically the same as the transuranic waste limits for WIPP authorized by the Land Withdrawal Act, that is 100 nanocuries per gram.</p> <p>This means the GTCC transuranic waste would be disposed of in WIPP anyway, if it weren't for the requirement of the Defense pedigree</p>

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				<p>for WIPP waste. It matches all the criteria if it weren't for that single restriction now.</p> <p>In the case of GTCC fission product waste, these materials emit virtually the same radioactivity as remote handled waste that WIPP is currently safely emplacing.</p> <p>In summary, the new waste streams proposed for disposal in WIPP, the GTCC -- in the GTCC EIS are essentially the same waste types as waste is emplacing today. The volume of the added material is insignificant with respect to WIPP's legislated capacity.</p> <p>DOE should find that permanent disposal in WIPP of the GTCC waste is the most protective and cost efficient of all the alternatives studied. It should then recommend to Congress that the Land Withdrawal Act be amended to allow disposal of commercial transuranic waste.</p> <p>WIPP has operated safely for more than eight years and has clearly demonstrated its ability to transport and dispose of GTCC-like waste. In my district, it's clear that the pit project, when we had hearings related to it, we had a tremendous turn out, tremendous support for that project. When we had GNEP hearings it was the same. We had tremendous support for that project as well, and now the enrichment program that's in place in Eunice, we have also had tremendous support for that project.</p> <p>Ladies and gentlemen, I think that the citizens in my district overwhelmingly would support this incremental expansion of WIPP and WIPP service to the nation. Thank you very much.</p>
172	Jim Conca	Director, NM State University Carlsbad Environmental Monitoring Research Center	8/13/2007	<p>Thank you. My name is Jim Conca, I'm director of the New Mexico State University Carlsbad Environmental Monitoring Research Center here in Carlsbad.</p> <p>We've been monitoring WIPP operations from before they began accepting waste, and after they accepted waste to the present, and we look at air, water, soil and people within a 100 mile radius of the site. And after 10 years we have no found no radiological impact of WIPP operations in any of those media, and we don't anticipate any impact if greater-than-class C waste were to be disposed at WIPP.</p>
173	Jeaf Neal	Carlsbad resident	8/13/2007	<p>I'm a resident of Carlsbad. I was born and raised here, I'm a native. Went to school at New Mexico State University. I've been involved with the WIPP project off and on for over 20 years. Back then the mayor had hair, and I was working with the -- nobody laughed at that; I thought it was funny. I was working with Carlsbad Chamber of Commerce at that time, and I was at the ground breaking for the WIPP project where the gold coaters and the ambassadors were there, throwing the first shovel of dirt for the WIPP project. I've been involved with Advance Sciences, Incorporated, the WIPP technical assistant contractor, and with stakeholders interactions. We held public meetings and we were involved with speaker bureaus. I was with Portage Environmental, the Carlsbad Technical assistant contractor. We were with business development then and the regulatory compliance. I was with the Carlsbad Department of Development with the promotion of the PIP [phonetic] project in GNEP.</p> <p>And now I'm with a company called Source One Management. We are with the WIPP record archives. We store the WIPP records from across the nation and bring them here to Carlsbad. I was involved with the WIPP draft and final environmental impact statement, and I can honestly say that there is probably no other place on earth that's been evaluated more than southeastern New Mexico. We know our geology, we know what's underground, we know that it is suitable for this type of site for low-level radioactive waste. With the stability of a two-million-year salt dome, this is the key that makes WIPP successful.</p> <p>Carlsbad and WIPP understands the solution to problems. We stepped up to the plate for our nation, for the Department of Energy, to solve the problem of defense related waste with the nation's first licensed nuclear wasterepository in the world, right here in Carlsbad. And we can solve the issue that confronts us now with the non-defense generated low-level waste. We can handle that here at WIPP.</p>

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				<p>Expand the mission of WIPP. Nuclear energy is here to stay. It's a big -- change is coming; they are building many, many more nuclear power plants. Southeastern New Mexico is in the heart of the nuclear renaissance that is taking place in our nation. LES, the national enrichment facility, is the birthplace of nuclear fuel, and WIPP is the final resting place.</p> <p>The concept of cradle to grave is a reality. Not only does WIPP have the ideal geology environment for this site, being 2,000 feet below ground, WIPP has the proven record of safety, a proven record of transportation, a secure environment where terrorists can't get to it.</p> <p>It has the community support, city, county, state government supports it, we have a Congressional delegation in Congressman Pearce, Senator Domenici and Bingaman.</p> <p>Our scientific community is above all with Sandia and Los Alamos National Labs, Jim Conca and the Environmental Monitoring Research Center, the Center of Excellence, and the strength and stability of the operation and maintenance contractor, Washington TRU Solution. We have the tools necessary to make this mission work.</p> <p>In closing I ask you to expand the mission of WIPP. All the other proposed sites are now shipping their defense related waste to WIPP, why not help other government agencies and ship their non-defense generated waste to Carlsbad. We have the land and we have many -- other land around the WIPP site. We understand the technology of nuclear industry. We can solve this future problem associated with power plants. We have the solution here in Carlsbad. We have the geology, we have the site, we have the safety record, the transportation record, community support, the knowledge and experience. The solution is here in Carlsbad and WIPP. I urge you to go forward with this environmental impact statement. Thank you.</p>
174	Roger Nelson	Private Citizen	8/13/2007	<p>I'm employed by the Department of Energy, but I'm speaking and providing these comments here tonight as a private citizen of Carlsbad.</p> <p>GTCC waste is indistinguishable from TRU waste in the way it is managed, handled, and the way it should be disposed of permanently in a geologic repository. Those that say the WIPP was never designed for GTCC waste are incorrect. I submit that many of them are also being deceptive in that -- to their listeners. WIPP was designed for TRU waste, and high-level waste disposal. TRU and high-level waste. TRU waste is identical, as GTCC waste for the transuranic elements in the waste, and high-level waste is much, much greater in its radioactivity than the GTCC waste. Therefore, WIPP is clearly more than adequate to safely and permanently dispose of GTCC waste.</p> <p>WIPP was opened on the logic that permanent disposal was better than managing by guarding and safely securing storage systems vulnerable to the forces of nature and time. And the GTCC waste is out there in that same category as the TRU waste was decades ago, vulnerable to storage.</p> <p>The NEPA process within the -- the NEPA process that DOE has been forced to process this decision, or make its recommendations to Congress, is flawed. NEPA opens the door to a tiny zealous minority that intentionally deceives the public in order to hurt everything associated with the nuclear industry. The NEPA process is also way too lengthy. Maybe we should speed it up and get on with what should be a clear conclusion. Any delay just allows the anti nuclear zealots more opportunity for deception.</p> <p>In summary, WIPP has the capacity, the GTCC radioactive waste has the same activity as the TRU waste, all other alternatives require new construction and resolution of new anti-nuclear protests at those sites. WIPP is the low cost, low impact, and low political risk choice. Make the recommendation to Congress and make it quickly. Do not agonize over this choice. Thank you.</p>

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175	Jerri McTaggart	Private Citizen	8/13/2007	<p>My name is Jerri McTaggart. I work for Los Alamos, however, I will be speaking as a personal citizen. I also am a business owner in town of Simply Enchanted Events and Rentals, so this important to me both in my permanent job and then my part-time job. Thank you for the opportunity to speak tonight.</p> <p>I have worked in the nuclear industry for 25 years. Over the past six years I've worked to identify TRU waste that was defense related so that it could come to WIPP after characterization.</p> <p>Each waste stream requires the establishment of a defense link in order to be eligible for disposal at WIPP. The Land Withdrawal Act requires that all waste disposed of at WIPP have a defense link. On several occasions commercial sites have called and have identified waste just like what we send to WIPP that needs to be disposed of.</p> <p>We spend great lengths of time trying to identify whether it has a defense link at all. It takes a great deal of time and effort and manpower. I'm excited tonight to find out that GTCC might be coming to WIPP, because that would eliminate some of the time and effort we have to spend for waste that's identical, if not very close to identical.</p> <p>Several sites did work for DOE and created waste that was GTCC, or greater than 100 nanocuries per gram. In the commercial world this waste would be greater-than-class C. The only difference is that greater-than-class C does not have a defense link, therefore the waste cannot come to WIPP.</p> <p>WIPP is the best place to bring GTCC waste because the WIPP organization is already set up to receive the defense related TRU waste. WIPP is equipped to handle the waste that is GTCC. Since WIPP is set up for defense TRU waste, it only makes sense to use a facility that is already established and willing to accept the waste.</p>
176	Frank McKinnon Roswell, NM	None Given	8/13/2007	<p>My name is Frank McKinnon, and I live in Roswell. Southeastern New Mexico is my home. I spent the last five years dealing with a chemical company that poisoned a summer camp that I inherited, and I learned a whole bunch about how government works in dealing with greed and with big corporations who care very little about the people they affect.</p> <p>I spend the past four months studying GNEP, that has proposed a site up in Chaves County. And on -- and in the process of serving a petition for emergency order of protection or injunction, they'd involved some of the folks in the Department of Energy nuclear office, and three corporations.</p> <p>My thoughts on increasing the ability to bring new kinds of waste to WIPP is a mistake, because cleaning up what's already here, once it's all been said and done, in what I hope is the very near future when handcuffs get put on a few corrupt officials that approved it, then I think it will be able to clean it up and take away the threat that it poses on everyone here in southeastern New Mexico.</p> <p>I don't mean to offend anyone here, and I would like though for the record to show the great community interest in this. If you would, and you don't have to, but could I see a show of hands of anyone who is involved in the nuclear industry, or the Department of Energy? I guess everyone's taken the 5th Amendment. I'll try it again. If you are with the DOE, or involved with WIPP, or any other part of the nuclear industry raise your hand. We're looking for honesty here. Okay. So we're close to half. And those are the people honest enough to raise their hand. I can assure you that the people that would benefit from us having nuclear waste at WIPP, of any kind, care very little about any of you, particularly those live here.</p> <p>Now it is unfortunate that real nice people that I've met, that I've talked to tonight, are working for such a sinister situation, and I hope that</p>

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				<p>they are able to stay above the potential for becoming unethical and misrepresenting the truth. I have seen, oftentimes, dealing with GNEP, where the truth has been misrepresented.</p> <p>I have only had a little time to deal with WIPP. I grew up in Roswell where, while I was in high school, grown ups were talking about how dangerous WIPP was going to be, and how having nuclear waste driving through town, or even around the town, would be a horrible thing. And then I went off to school for about 12 years and got back home just in time to watch the first truck load come through town. Not happy. Not happy one bit .</p> <p>And it's very important that everyone here that has the common sense to care about grandchildren live, and making it possible for them to swim out there in the river there and go boating 20-30 years from now, that you make some noise .</p> <p>I'm going to leave you with this, I have a website and I am in the process of putting together as much organization as I can of people who actually care about southeastern New Mexico. On my website, the hardest part to spell is McKinnon, M-C-K-I-N-N-O-N. And if you're interested in going to the website, the entire website is frankmckinnon.com with no capital letters and no space in between. I'll leave you with that.</p>
177	Frank McKinnon Roswell, NM	None Given	8/13/2007	<p>On November 4 and 5, 1999, I attended a National Academy of Sciences workshop on high-level waste and what to do with it in the United States. This workshop was held in Irvine, California. I went there on my own money and on my own time. One of the keynote addresses during that workshop was given by Dr. Frank Parker. He's professor emeritus of civil engineering, and an international expert on radioactive waste management. He is a professor emeritus at Vanderbilt University, and I tend to give great credence to any statements by professors who are emeritus because that means they're essentially disinterested, they don't have an ax to grind anymore. Anyway, he said the following on what we can do with high-level waste in the United States. He said, Either we can put it into Yucca Mountain, or into WIPP. There was no rebuttal from anyone of the over 200 attendees, and they were high level attendees, pardon the pun, except for me, of course.</p> <p>If this eminent expert who was, by the way, also a member of the NAS panel that looked over WIPP's shoulder over many years, if he thinks that WIPP is good enough for high-level waste, it's certainly good enough for greater-than-class C waste. I agree, putting greater-than-class C waste into WIPP, or actually into an inactive potash mine, is neither brain surgery nor rocket science because WIPP is robust. As a previous speaker mentioned, it was actually I designed for high-level waste, for defense high-level waste, which was later stricken from the mission, but it was designed for that.</p> <p>It takes currently remote handled waste, which is very similar in characteristics to a lot of greater than-class C waste. We also have a worst case engineered analog nearby, the Gnome site, where in 1961 an underground nuclear explosion was set off which did not harm the environment, and one could argue very easily that if an underground nuclear detonation did not harm the environment, then putting either TRU waste or greater than-class C waste underground, why should anyone worry about that?</p> <p>So I agree, and -- I agree that WIPP would be perfect for greater-than-class C waste. But my agreement is a little bit conditional, and before I go into those conditions, let me tell you what makes me feel justified to say something about such a condition.</p> <p>My professional qualifications include experience in potash mining, in oil and gas, and in WIPP. And I've also taught -- and actually I saw my first operating underground waste repository in 1973, that was before even Sandia was even dreaming of WIPP. Okay. And that was actually a place in Germany where they were putting away waste underground into salt I and potash mines. This is chemically toxic waste that has infinite half life, so one could argue it's worse than radioactive waste.</p>

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				<p>I have been personally engaged for WIPP by working there. I've invested my own personal and time and treasure into it, and to me WIPP and deep geologic isolation are not merely a professional concern, but they are deeply personal.</p> <p>So let's get back to the somewhat conditional approval. For that, to explain that, let's go back to the 1999 workshop that I mentioned at the beginning. One of the sessions of that workshop was entitled, What factors have helped or hindered national programs. That session was actually sort of lackluster. The only people who really brought anything substantial to the table were the Scandinavians. They had done some really good outreach work and they were very successful in putting underground repositories into practice. And I think let's put that question, or that title of their workshop into a little sharper focus.</p> <p>Let's look at the WIPP experience. WIPP has been operating now for over eight years. That's quite a while. I think what we could learn from WIPP is – should be based on these questions, what would we do again the same as we have done it at WIPP, what would we avoid. There are things that we would do over again if we started from scratch, there are things we would not do again. And then sort of related, what would we change or improve.</p> <p>And I think before we put greater-than-class C waste in here, we should think hard about these questions and find some answers to these questions, because otherwise we're going to go down the same trail as WIPP, and WIPP took too long, WIPP is too regulated, and WIPP is too expensive.</p> <p>WIPP took too long. I find myself in splendid agreement there with Congressman Joe Skeen, when the first waste rolled through the gate, he said, God almighty, why did it take so long. Some of us remember. World War II took six years to fight, and Churchill wrote a history of it in six volumes. Let's look at all the stuff that has been published about WIPP. It's ridiculous.</p> <p>WIPP is too regulated. The risk from the hazardous constituents at WIPP is, according to EEG reports, published reports that have been repeatedly cited in all kinds of literature, is -- the risk from the hazardous constituents is one ten thousandths of that of the radiological constituents. Nevertheless, the cost of complying with being regulated by the state, by the NMED, and the length of getting those permits is much longer and higher than dealing with the regulatory constituents. This is ridiculous as well.</p> <p>So in the past we have considered these aspects of WIPP, too long, too expensive, and too regulated as somewhat justifiable because of its pilot status. But they're becoming less defensible as we accumulate opportunities to learn from that experience, to apply the lessons learned, to follow on projects -- on follow-on projects, and expansions.</p> <p>The Current-Argus had an editorial on Saturday saying the WIPP mission could evolve, no, WIPP must evolve. And I think If we want to put greater-than-class C waste in here, we should apply the lessons that we have learned and make WIPP cheaper, get it out from under silly, superfluous regulations, especially the NMED regulation that doesn't add any value whatsoever.</p> <p>The NMED -- the current -- or the recent mandate by the NMED on the errant drum retrieval increases the risk. Yes, we'll do it as safely as we can, but there is no doubt that it's a triumph of compliance over safety. This is silly. We should not follow that example with greater-than-class C waste.</p> <p>And if we do not follow that, and if we learn from our experience, apply those positive lessons, as well as avoid the negative ones, then we have the ingredients of actually making Carlsbad the waste isolation capital of the world, for which it is eminently suitable.</p>
178	Tim Burns	Carlsbad resident	8/13/2007	<p>I'd like to thank you for the opportunity to participate in this public process, and to register my support for the deep geologic disposal option, as well as the WIPP and -- or WIPP vicinity options that are being considered in the EIS. My name is Tim Burns. I've been a</p>

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				<p>local resident of Carlsbad for over seven years. My family lives in Carlsbad. I intentionally moved in here because I felt like the environment is safe. I have a Ph.D. in chemistry, and I have worked in the radioactive waste management field for over 20 years.</p> <p>In considering the proposed scope of the EIS, I have a few comments. Number one, the EIS should give increased weight to open proven repositories. WIPP has a proven track record to show that TRU waste can be safely disposed. WIPP has the infrastructure, the procedures, the trained personnel, extensive site characterization, well developed methodology for conducting performance assessment in the salt environment, and so it has the key ingredients already established. There are very little doubt about the success of disposing of greater-than-class C and greater-than-class C-like waste in the WIPP environment.</p> <p>Number two, permanent disposal by intubing in salt is better than shallow or intermediate depth options. And my observation there is that it would inconsistent to dispose of defense transuranic waste in WIPP and use less rigorous means for GTCC-like waste containing TRU isotopes in a less robust manner.</p> <p>And finally, the community acceptance of a disposal facility's mission can make or break the ability to successfully carry out that mission. And Carlsbad and the southeastern New Mexico vicinity have shown that they will embrace a nuclear mission when it has proven that it can be done safely, and we have those ingredients in place at WIPP. Thank you .</p>
179	Cliff Stroud	Carlsbad resident	8/13/2007	<p>Good evening. My name is Cliff Stroud. I am a native New Mexican, and a resident of Carlsbad. I also have children and grandchildren who are residents of Carlsbad. And I'd like to thank Christine for her salient introductory remarks and the DOE for holding these hearings.</p> <p>I've been a student of WIPP for approximately 30 years. In the beginning I was ignorant of WIPP. I thought that it was better to leave dangerous chemicals and other hazardous materials, as well as radioactive materials on the surface as opposed to placing them in a permanent geological repository for all time. Fortunately I no longer suffer from that ignorance. I'm going to speed this up a little bit, and hopefully in Christine's manner, so that I can get this in the record. I don't think that in a matter this important that brevity is necessarily desirable.</p> <p>So I'd like to say that WIPP is the first, the world's first licensed and successfully operating deep geological repository for the disposal of radioactive waste. Today societal agreement is broad and it's to operate with, in a limited capacity, to only a specific category of waste, and that is transuranic, or TRU, created as a result of defense-related activities.</p> <p>However, as you've heard, and may hear again, WIPP was originally conceived for the safe permanent disposal of many other radioactive materials, including high-level waste from processing irradiated fuel from nuclear reactors. During the early days of testing, WIPP was demonstrated to isolate these more highly radioactive materials just as effectively as the defense TRU waste that it's currently licensed to dispose.</p> <p>WIPP has demonstrated that safe, permanent disposal can be achieved, even shipping from sites across the country. The projected contact handled, or CH TRU waste that will be emplaced in WIPP totals approximately 150,000 cubic meters. This should be compared to the maximum limit imposed by the WIPP Land Withdrawal Act, or the LWA, of about 168,000 cubic meters.</p> <p>With a projected disposal inventory so close to the legislative capacity limit, consideration should be given to increasing WIPP disposal capacity. As America, and especially New Mexico, realize just how safe and effective waste disposal in WIPP can be, it is time to ask what other way should be safely and permanently isolated in WIPP.</p> <p>Not all radioactive or hazardous materials required such robust disposal to protect present and future human health and the environment. Long-lived and highly radioactive waste clearly need geological isolation.</p>

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				<p>DOE, many other federal agencies, and even commercial entities have responsibility to manage and properly disposition GTCC waste. However, there are no disposal options currently available for this material, and it's considered to be an orphan. Disposal in WIPP should be considered as a safe, cost effective solution.</p> <p>I'd like to remind the folks here tonight in the record, DOE sites of Hanford, Los Alamos, Oakridge, and Savannah River, at those sites, radioactive materials that would otherwise be considered defense-related TRU waste were emplaced prior to the 1970s by the Atomic Energy Agency, DOE's predecessor, in near-surface disposal units, typically referred to as pre-1970 buried waste.</p> <p>Recent Congressional interest and an associated inspector or IG audit of the efficacy of this proposal are ongoing. It may be that the court's, federal court's decision that "all" means "all" can be extrapolated to other DOE sites with pre-1970 buried waste. And this was Idaho where the court stated that.</p> <p>There are also other waste streams that appropriately should be emplaced in WIPP. National security gains would be realized by opening WIPP for disposal of the impurent [phonetic] and unattractive fissile material still under safeguards in domestic and foreign inventories.</p> <p>Current projections of the TRU legacy, TRU waste, as I've stated, yet to emplaced in WIPP will just about fill the repository. That capacity was based on the simplistic inventory from about 1980. Almost 30 years later much more is known about the inventory of the waste destined for WIPP.</p> <p>The current Land Withdraw limit of 168 cubic meters represents only a small fraction of the repository footprint. The boundary could accommodate much more waste and this would be at the same horizon.</p> <p>Finally, the limit placed on remote handled TRU waste is arbitrary. There is no scientific basis for limiting the amount of RH waste to less than 250,000 cubic feet.</p> <p>As the nation finally realizes that nuclear power must play an important role in the overall energy in defense of the country, WIPP could provide a key nuclear waste disposal solution. The scientifically defensible disposal capacity in that ancient salt formation underlying the 16 square mile WIPP Land Withdrawal area is enormous.</p> <p>At the dawn of the nuclear age, with a World War raging, there was little thought of what to do with the radioactive materials left over the nuclear processes. However, by the mid-1950s the U.S. government had commissioned the National Academy of Sciences Committee to study and make recommendations on the best way to deal with radioactive waste from both the nuclear weapons program and the generation of electricity from nuclear power plants.</p> <p>While many options were evaluated, the Committee settled on a consensus recommendation in 1957 that disposal in ancient salt deposits was the most permanent and cost effective method to isolate waste from the environment literally forever. Therefore, the Land Withdrawal Act should be amended to eliminate the volume disposal limit to allow disposal of any volume that may be shown by scientific and technical analysis to meet the performance requirements of 8 40 C.F.R. Part 191.</p> <p>Two, eliminate the arbitrary volume limit on RH TRU waste to include any combination of RH and CH TRU waste that meets the performance requirements of 40 C.F.R. Part 191. This could also require reconsideration of the stipulated amendments to the consultation and cooperation agreement between the DOE and the state.</p> <p>Three, specifically authorize disposal of GTCC waste and eliminate the restriction that only waste resulting from defense activities may be</p>

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				<p>emplaced in WIPP.</p> <p>Four, authorize the federal government to actively seek foreign fissile materials that could be a threat to national security and dispose of them in WIPP.</p> <p>And finally, five, allow high-level waste and spent fuel unsuitable for reprocessing to be isolated forever in WIPP.</p> <p>If we wait the amount of time that it has taken to open WIPP to do this, it may be too late for the environment and also national security needs. So I encourage the Department of Energy to move forward rapidly, and the community and the rational folks who would like to permanently isolate geologically radioactive and hazardous materials to continue charging forward. Thank you.</p>
180	Shrayas Jatkar	Albuquerque resident	8/13/2007	<p>I'm not from Carlsbad. I came down from Albuquerque, and like Frank, I've been working on GNEP for a long time. And some of the things that --well, you know, I'll be honest, I don't know too much about WIPP, but what I've learned from looking at all the other nuclear facilities, it seems like some things should really be taken into account that aren't being addressed.</p> <p>One of those I think is cumulative impacts, and what I mean by that is the increasing number of facilities that are coming up in southeastern New Mexico. And by that I mean the uranium enrichment facility, more and more waste coming to WIPP, a possible reprocessing and advanced burner reactor either outside of Roswell, or between Carlsbad and Hobbs. It seems to me that instead of looking at each one of these projects in isolation, we should be understanding the cumulative impacts. And nobody seems to be addressing those. So I would like the DOE to at least start making some remarks and showing some concern for that, or at least addressing the reason why they haven't been doing so.</p> <p>And the other thing, as folks have noted, there may be a lot of popular support here in Carlsbad for an expanded WIPP, I'm not -- I know for a fact that that is not true in other parts of southeastern New Mexico and other parts of New Mexico and the United States. And a lot of this waste has to travel on highways and rail cars I'm sure too from other parts of the country.</p> <p>And therefore I ask you to start considering what their opinions may be especially since some folks in the Roswell area, who's not too far away, you know, have some serious concerns. And so before people go ahead and think that there's just a whole lot of overwhelming support, I think it should go on the record that there are communities that feel that they are impacted, that they're being impacted and they'll be seriously jeopardized being by increasing the amount of WIPP -- the amount of waste coming to WIPP or other facilities in this region. And I think I'll just end there.</p>
181	Bob Forrest	Mayor	8/13/2007	<p>And I want to thank all the audience from here. You know, we've had great turn outs for the PIP project, and for GNEP, and, you know, I'm glad that we have the people at WIPP here tonight because if anybody has to be concerned about the safety, it certainly has to be the employees out there.</p> <p>And, you know, I've been with WIPP for 30 years, and I can remember when they first came to town and it was the Atomic Energy Commission, and they made a deal with Walter Jerrells -- and Lewis Whitlock was part of the deal -- that they would come in for five years and do a study in Carlsbad, and if there was a chance that we didn't want this project, that they would leave and do something else. But when we started back in the late '70s and early '80s, probably 35 percent of the people approved of this project. A lot of us didn't understand transuranic waste, and we went through the education process, and I kind of disagree with one gentleman that we rush it too quick, but we live in a fish bowl. Everybody's watching Carlsbad, everybody's watching this project.</p> <p>And at one time when WIPP was trying to get open, I think we had over 26 oversight groups that we have to address, and how would you like to run your business like that. But it's made WIPP safer. Bill Richardson's made WIPP safer, Don Hancock's made WIPP safer. And,</p>

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				<p>gosh, I can remember sitting in those restaurants up at Santa Fe in the early -- late '80s and the early '90s, everybody in Santa Fe had a card in their window, Another Business Against WIPP. And I can remember sitting down with some of the anti's in Santa Fe and having coffee and almost looking up the hill and seeing Los Alamos and seeing those drum of waste sitting there on asphalt pads and saying, You know, why not Carlsbad, why not 2100 feet underground?</p> <p>And I can remember Don Hancock saying, You know, that is all right, and that's probably the best thing to do with it. But if WIPP ever gets opened and WIPP becomes successful, it's just going to enlarge. And that certainly is what has happened.</p> <p>But I can't tell you how much I enjoy working on this project knowing how safe it is, and the progress we've made. And I was at Rocky Flats, 15 years ago, and I saw what it was. And you go up there today and it makes you proud to know that we've been able to clean that facility up, we cleaned up five or six other sites.</p> <p>But I the sky's the limit with what we can do, but we have to have these hearings, we have to have this public input, and we welcome the gentlemen from Albuquerque and Roswell, and that waste doesn't come through Roswell anymore, it goes around Roswell because we gave them a bypass to help get that waste.</p> <p>But we want to work with everybody, and when you talk about global warming, and you talk about the problems facing the world, someone's got to step up to the plate. And when we were doing WIPP we didn't have any competition. We were the only town, the only place that even would talk about this.</p> <p>Today we go through the PIP project, there were seven cities that stepped up to the plate. There's 11 sites that are looking to GNEP site, and all this I give credit to the WIPP project and the success that we've had here, and LES and all the people that have come to the area.</p> <p>What a great success story it is, and I think it'll grow even more. But probably one thing that we don't get credit for, or we don't take the time to give credit for, is I can remember being in Sweeney Hall in the late '80s and the early '90s, and the people threw rocks at our bus.</p> <p>And transportation the big issue. We're going to lay down in front of those trucks. And I told my wife when I came home, I says, You know, we may never get that thing open. Transportation is going to be the big issue.</p> <p>We sat down with Bob Neal, EEG, they redesigned the TRU pack from a square box back to the cylinder. We built those containers here in Carlsbad with city labor and people working here. We went up to Albuquerque, to Sandia, and watched it test. And today it's a license. What a great success story, the transportation is. It runs through these cities today and hardly anyone says a word. It's the only 18-wheeler that's going 55 miles an hour, and two drivers, seven million miles of accident free. But it just shows what can be done when we work together and we have these problems and they're out there facing this great country, and I'm just glad that Carlsbad can be a part of this.</p> <p>I just got back from a convention in Seattle, and I'm sitting up there with the people from Japan, Korea, and Great Britain, and France, and Europe and everywhere, and no one has a facility opened and licensed. And it makes you proud to say, Hey, we're the only facility in the world that's got a facility that's licensed.</p> <p>And I think when the DOE and everybody analyzes what we're talking about with the greater-than-class C waste, that we'll win this hands down and we'll move forward to the next step and everything. But when you take the WIPP site and you take the salt beds out there, and it's the size of a ping pong table, and you set a cup of coffee on the top of that ping pong table, that's the footprint that we're using presently today.</p> <p>And why doesn't it make sense to expand WIPP, do other things, when you've got -- DOE's got the greatest success story of all their facilities right here in Carlsbad. But it didn't happen overnight. It took a lot of work, and it took a team of the community, the contractor,</p>

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				<p>and DOE, and that's what it's going to take to continue.</p> <p>And I feel very comfortable. I have grandchildren here, I have my own children here, and I wouldn't do anything to harm the environment of this city, but having these salt beds here that are 250 million years old make it a great opportunity. And we stepped up to the plate and we don't have DOE to blame for this project, we don't have the Washington TRU Solutions to blame for this project. It was the citizens of Carlsbad that decided we want this project. And looking back, and a lot of things you would 16 change in 30 years, you couldn't have written a better script than what we did with WIPP and the success we've had. And it was the best thing that every happened to Carlsbad.</p> <p>And I just want to thank all of you again for coming out and your support, and thank DOE, I know DOE catches hell from time to time, but it's been a great ride. And I think when DOE built this facility, they came in here with the idea that they needed a success story, and they were going to make this thing work.</p> <p>And I've often said as mayor, if they give me a blank check and let me go out to that site and change anything I could to make a safer facility, there's nothing left. I mean, they have done everything, they've lived up to their end of the bargain, and I think that's one reason, or one of the biggest reasons for our success. And our future is unlimited, as long as we keep dotting our Is and keep crossing our Ts, and it certainly doesn't hurt to have two national labs here. But when you talk about capita -- per capita income of Artesian, Roswell, Hobbs, El Paso, all of southern New Mexico, Carlsbad is second to Los Alamos.</p> <p>We have more Ph.D.s per capita than any other city, other than Los Alamos, and it has changed the face of the city. And people like good paying jobs, they're good safe jobs, and I think that's the reason we're seeing LES, WCS, there's a facility -- and our friends from Andrews, Texas.</p> <p>And we were talking earlier, and I can remember 25 years ago that people from the Midland-Odessa area were as bad as the people from Santa Fe. But it's a learning process, they've seen what's happened here at WIPP, Hobbs people. During our campaign for the mayors race I got criticized because we lost the LES facility. That's how tough the competition is today. But we've never had an elected official in Carlsbad in the last 25 years that opposed WIPP get elected to office.</p> <p>WIPP get elected to office. But I think it's something we can all be proud of, and I think we've done a great service for this great country. But we couldn't have done it without everybody working together, and I think that's where our future is, to continue to work, keep an open mind, make it safe, and have no secrets out there, and our future's going to be tremendous.</p>
182	Russ Patterson	Private citizen	8/13/2007	<p>My name is Russ Patterson. I work for the Department of Energy, but I'm here speaking as a private citizen. I feel like maybe Dean Martin following Jerry Lewis, or somebody, when I follow the mayor. I'm also going to probably pair a little bit of what Representative Heaton said, and I'm not even running for office. So I don't know why -- I do know you're going to hear some of the same things. As a private citizen and a taxpayer, I believe WIPP is the most cost effective, safe place to put this waste. It's not a large impact -- Okay. As I was saying, I believe that WIPP is one of the safest and most cost effective places to put the GTCC waste. As we've heard, it's very similar to transuranic waste, and having been involved in both this project and the Yucca Mountain project, as I've worked at DOE, I have to say that I believe this a much safer place for all nuclear waste that is in the United States.</p> <p>And basically I support the idea of doing the EIS and the putting of GTCC waste at the WIPP facility. And that's all I have to say .</p>
183	James Bearzi	Chief of the Environment Department's	8/14/2007	<p>My name is James Bearzi. I'm chief of the Environment Department's Hazardous Waste Bureau with the State of New Mexico. My bureau regulates Los Alamos and the WIPP facility under the Federal Resource Conservation Recovery Act, and so both the Department of Energy and co-operators of these facilities have sought permits from us and we've issued them. So the State of New Mexico feels like it</p>

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		Hazardous Waste Bureau with the State of New Mexico		<p>has a very strong stake in what's being discussed today.</p> <p>I want to organize my comments in three forms. I want to make a brief statement about the WIPP facility, and then I want to talk a little bit secondly about Los Alamos in general and some of the concerns that we have about this project with Los Alamos, and then thirdly I'd actually like to do what you've asked us to do, which is to make some recommendations for some factors that the Department of Energy should consider as they go through the NEPA process.</p> <p>Last night there was a meeting down at WIPP, and the Governor's office has made some statements about how they view this, and I kind of want to reiterate those. The state didn't get its comments on the record, but we're here to do that now.</p> <p>Governor Richardson and the State of New Mexico has been steadfast in its commitment to making sure that WIPP remains focused on its core mission and is operated in a manner that protects New Mexicans. We've opposed attempts in the past to broaden the types of waste accepted by WIPP, thinking particularly of tank wastes.</p> <p>And we're opposed to this proposal for WIPP. The DOE has made promises to the State of New Mexico and its citizens that WIPP will solely remain focused on defense related transuranic waste, and we expect the Department of Energy to, frankly, keep that promise in this and in subsequent administrations. We weren't able to do that last night, but we wanted to get that on the record here.</p> <p>Generally speaking, we think that the idea of disposing of these types of materials at Los Alamos, whether in near surface or in intermediate depth bore holes, is a horrible idea. In fact, you can think of it at a place like Los Alamos as clean up in reverse.</p> <p>Los Alamos National Laboratory is operating on a consent order to clean up the entire site, fence to fence, that they've negotiation with the state painstakingly. The Department of Energy has consented to the provisions of the consent order, as has the operators.</p> <p>And a large part of this consent order involves moving waste, transuranic and other defense related waste, from Area G and other areas off the hill and to places like WIPP. And they're, in fact, after the Cerro Grande fire in 2000, there was a large push to get some of what's known as the higher wattage transuranic waste out of Area G and down to WIPP. And this was a project known as Quick to WIPP.</p> <p>We get the to WIPP part, but the quick part hasn't really come to fruition. But we're expecting that it is going to happen someday. So just on a common sense level, it's counterintuitive to think that we're going to spend all of this energy and money to get these wastes off of the hill down to WIPP, and spend a lot of money and a lot of effort to do that, while at the same taking other wastes that are also high activity wastes, and put them back up on the hill.</p> <p>And if you look at the activities that we're talking about with greater-than-class C versus the quick to WIPP, they're comparable. So we're actually not really doing anything except wasting a tremendous amount of taxpayer money and putting a lot of people at risk by moving this stuff around.</p> <p>We think that getting the waste off the hill to WIPP is a good idea. We think that replacing it with other waste is a bad idea, and is counterproductive.</p> <p>It was mentioned in the presentation that the consideration of the sites included physical conditions of the sites as well as ongoing disposal operations. As far as the physical conditions of the sites, Los Alamos National Laboratory, and the hydrogeology particularly, is very poorly understood, and poorly characterized. In fact, the state would be very supportive of these intermediate depth bore holes, for characterization purposes. We don't think they should put waste in them. But, frankly, Los Alamos doesn't understand what's happening in the intermediate zone, much less what's happening in the vadose zone 1,000 feet below.</p>

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				<p>The performance assessment at Area G relies on this very thick vadose zone on the order of 1,000 feet, but we already have contamination in the regional aquifer from waste operations -- disposal operations, we're not sure. It could be from liquid discharges in the canyons. I think the relevant point is that we don't know where it's coming from. So the site is poorly characterized, and one of the reasons that it's poorly characterized is that Los Alamos National Laboratory frankly has struggled with its environmental mission over the years, and continues to struggle to this day.</p> <p>We think that the ongoing disposal operations may be good from the Department of Energy's standpoint, but from the State of New Mexico's standpoint, we have many ongoing -- we have many former disposal operations that may have caused contamination to the aquifer.</p> <p>We know that at the current disposal site that they're using at Area G, there have been releases from the disposal areas to the subsurface. We don't know how big they are, we don't know if they've affected ground water or not. That's one of the points of the consent order is to figure that out. So there are a lot of unknowns with Los Alamos. We think that it would be exceedingly expensive to plug those data gaps for purposes of greater-than -- disposing of greater-than-class C waste.</p> <p>But enough ranting about Los Alamos. We're here to give the Department of Energy some advice about what they -- some factors to consider through the NEPA process. One is for every site that you're considering, the Department of Energy needs to do an evaluation of the volume of activity and activity of waste at existing sites.</p> <p>And a mass calculation of non-radioactive components at sites. For example, solvents and chemical contamination, to put more colloquially, how pollution is already at the sites, both in the form of releases from waste as well as waste volumes that we already about. This is mandatory.</p> <p>Only after that evaluation has been done can the Department of Energy make an honest public evaluation of we're going to dispose of this permanently in a pristine site, or, we're going to basically declare one of these sites a kill zone and we're going to put this stuff in forever .</p> <p>Secondly, characterization of the geology, and particularly the hydrogeology at all of the sites has be detailed, and it has to be comprehensive, and it has to be complete. And then, the data gaps have to be identified, and these data gaps can be evaluated fairly easily by looking at the existing reports and what we know.</p> <p>And then you have to decide how much does the Department of Energy want to invest in evaluating the subsurface geology at a site where the site managers, frankly, haven't done a very good job. That might now be a very good use of taxpayer money.</p> <p>Next, the Department of Energy should consider, through this NEPA process, the relative volumes of mixed versus non-mixed waste. And that's important, for example, to the State of New Mexico, because we regulate mixed waste. We regulate it at Los Alamos National Laboratory, from a record standpoint, and we regulate the disposal of mixed waste at the Waste Isolation Pilot Plant.</p> <p>So not just understanding the volumes, relative volumes of mixed and non-mixed waste, but the regulatory requirements, there needs to be a very rigorous evaluation of that.</p> <p>Finally, the Department of Energy needs to consider, in a comprehensive way, the record of environmental clean up and what DOE calls stewardship at each of the sites, and not entrust this very important responsibility of the final, Final with a capital F, forever disposition of greater-than-class C waste to sites that have a poor record of environmental clean up. And we would recommend that those sites with poor</p>

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				<p>records should be downgraded as you evaluate the relative factors.</p> <p>The state appreciates the opportunity to come up here and make some comments on the record. We hope the Department of Energy considers our comments because we've put a considerable amount of thought in them. Thank you.</p>
184	John Tauze	Los Alamos resident	8/14/2007	<p>I'm here as a resident of Los Alamos. I also am an environmental engineer up here, and do a lot of work with radioactive waste. I am well versed in low-level waste performance assessment, as well as transuranic and other sorts of DOE waste. I have a lot of experience in it.</p> <p>Now I'm not an advocate for any particular site, and I'm not going to argue in favor or against any particular site, or technology. What I'm an advocate for is making sure that decisions like this are based on science, and based on sound risk assessment. And that -- if those -- if the analyses that inform these decisions are based on science, then that will direct you, I believe, to the, you know, the best sort of site.</p> <p>If you're most interested in keeping risks as low as reasonably achievable, ALARA is the mantra of radioactive management. Then you do a risk assessment to determine what is the best place to put it to keep risks low.</p> <p>And although it's not reasonable for me to expect, it would be nice if politics were kept out of the decision. I don't think that's possible, especially now with Congress getting involved in it. It is ultimately there are politic aspects to it</p> <p>But I'm an advocate for making science based decisions. And I think that the risks, as they're assessed, should be done with a very long time frame in mind. DOE manages its own low-level waste with a 1,000 year time frame. It used to be 10,000 years. They've reduced it to one.</p> <p>And the NRC typically uses a 10,000 year time frame, but recently they got in trouble with that because the National Academies of Sciences suggests that one make estimates out to peak dose, which could be as long as a million years out, or something like that..</p> <p>It's not reasonable for a model to expect to actually be able to predict that sort of dose, but it's still useful in separating one site from another. It's long term behavior, see which one would produce a lower risk than another.</p> <p>Another very important aspect in risk assessment, in my view, is the question of institutional control. Often assumptions are made that a site will be under institutional control, meaning that potential future receptors will be kept off, residents will never be allowed to live on it, and no one would be allowed to drill through it.</p> <p>I think institutional controls may be reasonable to expect to be in place over 100 years, or maybe a few hundred years at the outside. But there's really no technical basis as to why they should be effective for longer than that. Certainly not for 1,000 years.</p> <p>And it's -- another aspect that's very important, as James Bearzi pointed out, is to include the risks from other sources that are already there. And DOE has already recognized the need for this, with a little help from the Defense Nuclear Facility Safety Board, and their recommendation of '94 too that suggested DOE evaluate other wastes in the area and the total risk involved from not only, in this case the greater-than class C waste put in, but other things that are in the area.</p> <p>And that's called a composite analysis under DOE Order 435.1, which is the radioactive waste management order for DOE. So DOE already recognizes the need for that, and I would encourage them to continue to do so.</p>

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				<p>And in general, an excellent bit of guidance for making these sorts of decisions, basing them on risk assessment and on science, it comes from the National Academies in a publication that I think they did in 2005, or some date near that, called Risks in Decisions, which I would highly recommend as required reading for anyone involved in this field.</p> <p>And the idea is, in a way it doesn't matter what the classification of the waste is, or where it came from, or how long it's been there. The important decisions to be made are based on what sort of risk it poses to people in the future, and as is typically ignored in these things, to the environment in the future, and ecological risk assessment could be a part of this as well.</p> <p>So anyway, that's -- what I would like to have this all focused on, I know that politics may overtake the thing in the long run, but, you know, if one can interject the science, then it's clear where the science leaves off and the politics take over. And let the politicians die on their swords.</p> <p>And let's keep the technical aspects of this honest and forthright and based in science. And then hopefully that lead to the right decision with enough persuasive argument.</p>
185	Scott Kovac	With Nuclear Watch New Mexico	8/14/2007	<p>My name is Scott Kovac with Nuclear Watch New Mexico. We have another idea, another alternative that we'd like DOE to consider, please. We'd like DOE to consider hardened on site storage. Hardened on -- greater-than-class C radioactive waste must be safely stored as close to the site of generation as possible. Waste must be safeguarded in hardened on site storage, or HOSS, facilities.</p> <p>Impacts of building HOSS facilities must be analyzed in order to ensure that these wastes are not subject to risks posed by wildfire or -- natural or manmade disasters. HOSS facilities must not be regarded as permanent waste solutions and thus should not be constructed deep underground. The waste must be retrievable and real time radiation and heat monitoring at the HOSS facility must be implemented for early detection of radiation releases.</p> <p>An overall objective of HOSS should be that the amount of releases projected, even in severe attacks, should be low enough that the storage system would be an unattractive terrorist target.</p> <p>Also considering HOSS, DOE should dedicate funding to local and state governments for independent monitoring of the HOSS facilities. The effected public must has the right to fully participate.</p> <p>Periodic review of HOSS facilities should be required. An annual report reviewing the safety of each HOSS facility should be prepared with meaningful public participation from stakeholders, regulators and utility managers at each site. The report must be made publicly available and may include recommendation for actions to be taken.</p> <p>On other notes, we think that DOE should analyze possible greater-than-class C waste treatment alternatives, such as vitrification and compaction. Pretreatment of class C -- greater-than-class C waste could possibly lessen the disposal volumes.</p> <p>We also request that DOE analyze the transportation impacts. DOE should specify each site that has greater-than-class C, and the transportation impacts of shipping waste from site -- from each site to the alternative disposal locations, specify how many shipments would occur by truck, train or barge, specify how many shipping containers would be needed, their cost, and whether they already exist or whether new containers would have to be developed.</p>

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				<p>Do not bury greater-than-class C waste, or sealed sources, at Los Alamos National Laboratory. LANL has collected 15,000 sealed sources from across the country that are currently being stored above-ground at the lab's radioactive waste dump, Area G. The final disposition of Area G, in operation since 1957, but now facing closure, has yet to be determined. Hopefully, the existing buried hazardous waste and radioactive waste will be excavated. Please analyze the location at LANL for a HOSS facility.</p> <p>Do not bring greater-than-class C waste to the Waste Isolation Pilot Plant. This will require a change in existing law of WIPP can accept. This would require changing the Land Withdrawal Act, and opens up the site to commercial waste, which should -- which is and should remain prohibited. WIPP cannot even accommodate all of the waste that DOE has planned for it, let alone new waste.</p>
186	Joni Arends	With Concerned Citizens for Nuclear Safety	8/14/2007	<p>My name is Joni Arends, and I'm with Concerned Citizens for Nuclear Safety. And I thank everybody for coming out tonight. My comments are not necessarily very well prepared, but I'm going to make the statements anyway. First, to talk about the hearing last night, we're very concerned about the fact -- about the number of DOE employees who made comments last night. While they have a First Amendment right to make those comments, we're concerned about the fact that -- how they'll be considered in terms of bias towards the WIPP site. We're concerned specifically about statements made by Cliff Stroud and by Roger Nelson. We're concerned as -- you know, this state -- DOE has made promises, as James spoke, about the which mission of WIPP being for defense waste, and we're concerned about this proposal for commercial waste being sent to WIPP, this greater-than-class C waste. So we're very concerned about those statements. And we've brought these issues up in previous EISes where the proposal is to expand the mission of WIPP.</p> <p>So CCNS supports the alternative that addresses the hardened on site storage, the HOSS facility. And we believe that those -- that should be considered by the Department of Energy.</p> <p>Another aspect is the storage of the sealed sources currently at Los Alamos National Laboratory. We went on a tour of Area G today, and we raise concerns about whether -- currently the sealed sources are stored in the fabric tents. And we asked a question about when the last time the fire retardant was applied to those tents. And given the amount of rain this year, there's a higher potential for fall fires. And we understood that the fire retardant hasn't been put, and basically many of these tents are 12 years old, and according to the manufacturer's information, that needs to happen, that the fire retardant needs to be put on that. So DOE needs to consider the existing storage of the greater-than-class C waste and how that's being -- are they in the most protective facilities currently, because it may be a long period of time before a decision is actually made on the greater-than-class C waste. So we would like to see this waste put in the most protective facility.</p> <p>And we have a long history with, you know, whether it's the quick to WIPP, or it's the greater-than class C waste, the sealed sources up here, because after the dome fire in 1996 we asked for hardened on site storage for the 40,000 drums of waste sitting in the tents right now at Area G. And we were told, you know, that waste will be off the hill by then. And that was in -- that fire was in 1996.</p> <p>Following the Cerro Grande fire we were told, Oh, no, don't worry, don't worry because by the time we went through the construction permit process to build a harden on site storage facility, we'll have all of that waste down at WIPP. Well, in 2007, seven years after the fire, that waste is still sitting in those tents.</p> <p>So DOE needs to look at the current storage of those -- of this waste right now, and to make improvements, and order DOE at LANL to do better.</p> <p>Then I'd like to talk about why Los Alamos is not the site for the greater-than-class C, for any of the disposal options. And I'll refer the DOE to the National Academies of Science report, which I will put into our comments, the plans and practices for ground water protection at Los Alamos National Laboratory, which was released on June 8.</p>

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				<p>On the first couple of pages they made five recommendations, and one to support what James said was the mass balance, that we need to know what came up the hill and what's going down the hill through surface and ground water pathways. We don't have that information right now.</p> <p>Another important point that the NES made was that DOE does not know the inventory of the Mesa Top disposal sites, and we need to know that. And this all goes to the cumulative effects argument, and why bring more waste to WIPP -- or to LANL when we're already being impacted. And the fact that a qualified detection of plutonium 238 has been found in the Buckman Well Number 1, which is the -- ..There's been a qualified detection of plutonium 238 in the Buckman Well Number 1, which is part of 13 wells that the City of Santa Fe uses for its drinking water supply. Forty percent of the water comes from there. And a qualified detection means that the plutonium 238 is there, it's a question of whether DOE used the most sensitive methods to detect it.</p> <p>Another issues with regard to any decision making to be done for Area G is the fact that the performance assessment composite analysis, risk assessment, whatever you want to call it, hasn't been available, hasn't been updated since 1997. A lot of decisions, as James said, that they -- that PA realize on a 1,000 foot thick vadose zone has not been available to the public.</p> <p>The fact that the DOE released a draft LANL SWEIS last year, in August, the fact that the PA was referred to in the draft LANL SWEIS, but the fact that it isn't available to the public is of great concern for the public, because we believe that we need to be able to see that.</p> <p>And, in fact, we've asked for a revision or a supplement to the draft LANL SWEIS based on the fact that we don't have the PA, and we keep asking for the PA, and we understand that it keeps going through revisions. So the fact that we don't have a current PA, performance assessment, for Area G raises a lot of questions for us. And DOE needs to see the PA before they make any decisions. It needs to be included in this scope, so.</p> <p>The other fact with regard to Area G is that there is no ground water monitoring network as required by DOE orders for Area G, and DOE needs to look into that. And as an aside, DOE needs to order LANL to put together the ground water monitoring network because it was required under DOE orders by December 31, 2005. And the fact that LANL hasn't done it is of great concern for the citizens in the community surrounding this site.</p> <p>With regard to WIPP, we're concerned about reopening the Land Withdrawal bill for increasing the volume and the types of waste for WIPP. And, again, as James said, you know, DOE made a promise that it would only be for the defense waste.</p> <p>We're also concerned about the recent GAO report that said that WIPP cannot hold any more waste. So it would be opening the Land Withdrawal bill, not only for the types of waste, but also the volume of waste.</p> <p>Okay. Let's see if there's anything else here. But -- okay. And, again, we support the HOSS and we refer to you the Institute for Energy and Environmental Research, the IEER, website and their work on the proposal or harden on site storage. And DOE really needs to move in that direction.</p> <p>You know, whether it's the commercial fuel or the defense waste, it needs -- we need to talk about hardened on site storage in a real way, and this is really an opportunity to do that, and DOE's consideration is greatly appreciated on</p>
187	Trish Williams- Mello	With the Los Alamos Study Group	8/14/2007	I'm Trish Williams- Mello. I'm with the Los Alamos Study Group. We have dealt with issues surrounding Area G for many, many years. We have a history of gathering supporters against the dumping at Area G. We have over 4,000 letters that were given to Governor Johnson and Governor Richardson combined that ask for closure of Area G.

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				<p>Some of these petitions included information from the Attorney General's office, from NMED, and these stated that this dump has many, many problems, as James Bearzi had stated earlier, and others have as well. Over 27 organizations signed on to the letter that went to DOE and to the Governor and to NMED asking for the closure of Area G, and the discontinuation of any dumping that would occur there.</p> <p>Any comments that I would make on the GTCC being stored up at Los Alamos would be pointless because this really should never be considered at Los Alamos. Los Alamos is not the place for this. It's preposterous to think of bringing that type of waste up the hill and adding it to the already nearly full Area G, or to the expansion areas up on that mesa.</p> <p>So it's really fruitless to spend our time here even commenting on GTCC. If there were an option that anyone would choose, it would be, in my opinion, the on site hardened storage that the others have spoken for. Why are we considering transporting this waste, and why is not the DOE considering this options that have been on the table for quite some time?</p> <p>I have information here that I would like to turn into the record that the study group has generated considering the long history of disposal at Area G, and the fact that this is an illegal, unpermitted and very slipshod storage facility for nuclear waste.</p> <p>I believe that the move now needs to be clean up, as was spoken about. There has been successful clean up at other sites in the country, and that's what we need to focus on instead of adding to this as, again, James Bearzi mentioned.</p> <p>I appreciate that comment from James because it speaks right to the point of what we've been discussing for many, many years, this place needs to clean up and not build up. Thank you.</p>
188	Astrid Webster	None Given	8/14/2007	<p>Good evening. Thank you for this opportunity to speak. And I'm not really going to talk to you all. I'm going to talk to the person who reads, or the people who read this in preparation for a report to Congress, because I think this is where this information really needs to go.</p> <p>I think Los Alamos talks about being based on science, but I think, more than anything, using James Bearzi's words, he thinks of this endeavor as clean up in reverse. I think of what happens here in Los Alamos as learning from history in reverse.</p> <p>Just a real failure to understand the consequences of what happens here, beginning with a nice green glass that was brought home for adornment from the Trinity site nine months before I was born. It was used for play for children and for bookends and bookcases until they figured out how really radioactive it is.</p> <p>And truly I think we are in our infancy in learning about this. And to consider expanding the waste disposal here at Los Alamos versus cleaning it up and closing it down, which is what really should be happening. I think building plutonium pits up here, I think doing radioactive research up here is foolhardy to the utmost extent.</p> <p>I mean, if you drove up here with your eyes open, it was a winding road that you could drive off very easily. This past winter, speaking of science and doing things well here, there was a -- there was something that was put on the road to supposedly make it safe from the snow that had fallen, and at the temperatures that were occurring, this material became more slick, rather than less slick. And a woman, who was a business owner up here in Los Alamos died on that road.</p> <p>This year, based on science, folks. This is one of the nation's top labs here and she's dead. And somebody told them, this is material not to use, that it's -- (interrupted by another person)</p> <p>I happened to be at Amos Falls [phonetic] one weekend morning and noticed a plume of smoke and reported it to the forest ranger. And he said, Oh, not to worry, we've noticed it, and it's nothing to worry about. That turned out to be the Cerro Grande fire. And if you travel around Los Alamos very much, you know how close it got.</p>

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				<p>I mean, really, if you have your eyes open and you want to learn anything, you look around and the drop off from any point in Los Alamos to off the mesa, down the hill, into the run-off and everything else, is not very far. A lot of people can kick a soccer ball that far.</p> <p>I think to consider this for either buried or unburied waste disposal is to ignore that the seismic information about Los Alamos is not quite as complete as people thought it was. This is not as safe as people thought it was.</p> <p>And to talk about protecting the environment and humanity 100 years, or 1,000 years into the future barely skims the surface, barely touches it. These are things that should not be happening. If you learn from history, creating this stuff shouldn't be happening.</p> <p>The first one of these hearings I went to three or four years ago, a Los Alamos employee said, We must not make any more nuclear weapons up here, we don't have any place to bury the waste now, we don't have any place to put this stuff. These activities should stop. And this was a very courageous person, because he was employed by LANL. I don't know what happened to him. I'd be real curious to know.</p> <p>But I think it's time we really added things up. If these are scientific laboratories, use your math and add up what's happening here.</p> <p>And for the Congress that's going to consider this a year or two down the road, shipping this waste around like a shell game is ridiculous. Especially if you bring it up the road to Los Alamos, for pete's sake. It shouldn't be here.</p> <p>And I hear the words loud and clear that WIPP has already too full of defense waste. Adding commercial waste to it is ridiculous. I think if we want to be well based in science, we need to explore alternatives to any of the nuclear industry, because as far as I'm concerned, it is an enormous waste of tax money.</p> <p>It creates dirt that never goes away. I mean, the aluminum can we throw out on the -- from a Coke, does never go away either. All we do by burying it is put it out of sight out of mind. And if we are scientists and we are humans, and have an interest in the future, we have to change course very seriously. Thank you.</p>
189	Mike Dempsey	White Rock resident	8/14/2007	<p>Hi, I'm Mike Dempsey. I'm sorry I interrupted that lady. I already sent my prepared comments via e-mail to D.C. I work for the lab, proud of it. I came here to lobby to have the dump in Los Alamos County because we're part of the problem -- and maybe we're causing the problem. We're part of the situation, we should be part of the solution.</p> <p>I live in White Rock. I can see the domes of the Area 50G WIPP storage area from my street. If I stand in the middle of the street I can see the domes. I stayed through the Cerro Grande fire, did not leave. My family evacuated to Carlsbad -- I used to work at WIPP also. I wasn't afraid. I know the material's contained, I help package it. I wasn't concerned that it would be released in a fire, you know, a forest fire.</p> <p>Like I said, I came to lobby for here, and actually I'm flabbergasted -- and then when I heard the presentation, I'm flabbergasted that the state objects to stashing it at WIPP. I worked at WIPP for two years, I was an underground miner for 10, I was a truck driver for four, and then I was a radiological control technician at Los Alamos and at WIPP for 14. That's the guy that tells you whether the radiation level's safe. And now I do non-destructive assay, and also second line of defense.</p> <p>I've worked on the second off site source recovery trip from Los Alamos. If you saw how the sources are stored out in the world, you'd be donating money to have the waste moved here. We go to the first site to open up, the guy's got it in his backyard down in a pipe thing, and he cracks the cap, 100 daddy long legs pour out of the pipe and they're living on 5 rem an hour neutrons down in his front yard.</p> <p>So if you saw how the waste was stored in the real world, how the orphan sources are stored, and all those sources, they got you the oil that</p>

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				<p>you use to drive your car here in, here in your car. That's where -- what those sources are used for. You saw how they're stored there, you'd be clamoring for them to be stored properly.</p> <p>I have no fear of any materials stored at Los Alamos. After I heard the presentation, and having worked at WIPP for two years, I truly believe they should be stored there. It probably would be better there. I would like -- I'm not afraid to take the material here, but it would probably be better if they be stored at the WIPP.</p> <p>The salt's been there for 245 million years. The evidence that if there's no water is that it's still salt there, for 245 million years. So it'll be there another 100 million years probably.</p> <p>The comments that there is no more room at the WIPP are complete garbage. They could cut 10 new levels. I was an underground miner for 10 years. They could cut 10 new levels at the WIPP. It's 2,000 foot thick, it's placed 1,000 foot down, and there's 10 square miles. You could cut many more drifts and tunnels and stash all the nation's nuclear waste at the WIPP.</p> <p>Another concern about storing it here at Los Alamos is that when I heard the term a strong, tight container -- well, that wasn't the term used, but extreme barrier, whatever it was, well, that's going to cost a lot of bucks to stash it in a bore hole where it can't be reached in 1,000 years. That's going to cost a lot of money. The WIPP's my number one choice now, I have to say, having worked there.</p> <p>The HOSS process, or storing it onsite in the -- at the locations, it -- that addresses nothing. Nothing at all. It's the same situation. You want that stuff out of the world, and it does need -- pardon me -- it needs to be on federal land. It doesn't need to be on any private land, on any commercial storage area, unless that commercial storage area is on federal land.</p> <p>And then it's going to have to revert to the feds anyway, because it's going to have to be monitored for a long time. Absolutely. So it needs to be on federal land. That's one of the DOE sites, including the WIPP.</p> <p>Oh, yes, here's one plan I wanted to make. So you're going to store medical waste there. My grandmother was treated with radioactive material to cure her cancer. She lived an additional five years. My son, was treated with radioactive material to diagnose a condition he had when he was eight weeks old. Knock on wood. And you say, oh, I'll never have that done to me. Yeah, yeah, yeah.</p> <p>You're going to need it -- everyone in this room knows someone that's been treated with radioactive medicine. You're going to need it, or one of your friend's are going to need it someday, and you'll be damned glad that you had it and that there was a place to dump it, to get rid of the leftovers when it's done.</p> <p>So right now, I don't know what happened to my grandma's radium needles. My son's technetium 99 metastable got dumped down the sink at Presbyterian Hospital and went into the Rio Grande. That's what happens today with it also. It goes into a storage tank and goes through several half lives and then is dumped into the Rio Grande. But that's where it goes today. So you'll be glad that they have a place to put this stuff when your time comes.</p> <p>You can collect all kinds of studies for anything about, Oh, the lab didn't do this, the lab didn't that, the DOE didn't do this. It doesn't mean a damn thing. You've got to address the problems sooner or later. And you can study it to the nth degree, and, oh, there's a chance of this and a chance of that. Well, by the time -- it's too late. By the time you're finished doing all that, it's still accumulated more, you need to get rid of it, you need to open a place, you need to take a step forward.</p> <p>Nuclear energy in this country is on the way up. Thank God. And that's good for the environment, absolutely good for the environment because it doesn't generate greenhouse gases like the coal that we're using right now does, or the car that you drove up here in does. Anybody here drive an electric car up here, up the hill? Didn't think so. Neither did I. That's about all I've got to say. Please find a place.</p>

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				<p>WIPP's the best, it really is.</p> <p>You probably need to change the scope. It's going to be a killer to do Jim, help them out, man. Don't put Richardson on the wrong track. Just put it in the WIPP. Cut a bunch of new levels, dump it down in there; it'll be there for another 245 million years. Thank you very much.</p>
190	Sylvia Vergara	Individual	8/14/2007	<p>My name is Sylvia Vergara, and I don't belong to any particular group. I'm actually here representing myself. And I'm not going to speak scientifically because I'm not a scientist. I do want to speak simply from my heart, as a human being. And want to say one thing that I think is very important.</p> <p>There's something called psychic numbing. And I remember seeing in Al Gore's movie about global warming. This little frog in a glass and the -- of water, and the water was very gradually heating up. And because it was gradually heating up, the frog would not jump out of the water. And I was so happy in the movie when I saw this little hand go into that little container and pull that frog out before it died. And to me that is what psychic numbing is. And I think psychic numbing happens to not only odd populations, but it happens to scientists, it happens to -- it can happen to anybody. And that is, when you're surrounded by an environment that is the same and the colleagues that are the same, and you're working continuously on dangerous materials, you can lose a sense of the sense of danger of what it is, and you can lose the sense of what it is.</p> <p>And so in that sense I feel that what we need really is we need to have the other example of what would help to awaken people from this psychic numbing. And how they awaken from this is if you have a frog that hasn't been in the hot water, and it's suddenly exposed to some hot water, it suddenly jumps out. There's a natural reaction.</p> <p>And there's a way in which I think that our decisions shouldn't necessarily be scientific. I think what we need to have is a moral decision. And what does that mean? It doesn't necessarily have to mean churches, or a religion, per se. But would it mean that if we have this waste, are we worth enough to spend all the money in this nation, everybody's money, to blast it off and get it off the planet entirely?</p> <p>Do we have enough self-worth to consider the possibility? And I invite you, scientists, I invite all of you, to simply leave your jobs, to live something just because you want to smell the flowers 10,000 years from now, simply because you want to drink pure water from the Rio Grande, simply because you want to imagine that that could be a possibility.</p> <p>We can't categorize human beings into politics, into science. And I think that we have to look at our arrogance. Should we be the ones to make the decision for all those unborn people, this planet, thousands of years ahead? Do you have the scientific knowledge? Do you really? You do have the moral sense of what could possibly be beautiful.</p> <p>I can't speak of Los Alamos. Los Alamos means the cotton woods. I can imagine beautiful cotton woods. and when I think of the area now, this beautiful area, I don't think of a town, but I think of these beautiful Jemez Mountains, some of the most beautiful mountains that we're graced with in this entire area. What a gift. What grace. And these mountains have only to render us its beauty when we look at them. I have this wonderful opportunity to see them when I drive by Alcalde. It's so beautiful to look into those mountains. They are so beautiful. And they have been here for thousands of years. And I really hope that many thousands of years from now, that people will still be able to admire their beauty.</p> <p>And the other thing that I wanted to say is I want to wish you love. I love you. And I want and I hope that we can feel that and that we can love enough to where we can make these decisions from a place that's deeper than science, deeper than politics. From the deepest place where we're human beings, where we can say, this is what we were meant to do. That's why we were born. And that's all I have to say.</p>

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191	Marian Naranjo	Honor our Pueblo ExistenceHOPE	8/14/07	<p>My names is Marian Naranjo. I am from the Pueblo of Santa Clara. I'm the founder and executive director of the newly formed organization that is called Honor our Pueblo Existence, HOPE.</p> <p>I am happy and honored to be able to talk from my heart also this evening. And what's on my mind is what this place means to our people, the Pueblo people. This whole Jemez Mountains is the ancestral homes of our past. All of the teachings that have been passed down to us that we continue in our cultural beliefs happened in this place. It's very hurtful when we realistically look at what has transpired in our ancestral homelands in the last 65 plus years.</p> <p>Today I was privileged to go on the Area G tour, and it has not been my first time going to the area. As a young girl, one of our teachings is that whenever we have the opportunity to visit our ancestral homes, which we consider as sacred sites, we're to offer our cornmeal offerings.</p> <p>And so I've done that throughout my life whenever I have the opportunity, and especially at that particular area, which is a known sacred site, a desecrated sacred site. Well, on this particular tour I thought I was being gracious and respected -- respectable to Los Alamos National Laboratory by asking permission to do my cornmeal offering, and I was denied.</p> <p>So it was a very big learning experience for me today because I learned that this teaching has nothing to do with the lab, it has nothing to do with the agreements with the Pueblo leadership and the lab, but it has everything to do with what I have been taught, and I don't need to ask permission to do this.</p> <p>It's very hurtful to come here and witness what is happening in our sacred places, probing and dumping and, you know, our -- we don't have anywhere else to go. You know, others can come here and fly back east and whatever whenever they choose, you know, but our people have been here for a millennium and we're -- this is it, you know, we don't have no place else to go.</p> <p>So the environmental justice issues are very important, you know, to the -- actually the past and our future. And with saying that, I agree with a lot of what our chief in the New Mexico Environment Department had to say, and it's a very bad idea to bring more of this radiation things, you know, to this area.</p> <p>We're already seeing the health in babies that we've never seen before, you know, leukemia, and all of these things. Maybe the other culture has dealt with this, you know, but we're just starting to see this.</p> <p>And I know that this knowledge, you know, has -- it started here and it needs to go full circle, and it has, it's around the world now, and so it is up to us, you know, what are you going to do now? And I believe that we need to take all those good things that -- to promote life and keep those things because we can deal with that.</p> <p>But all those things that are done that are detrimental to life, you know, hurting others purposely and -- or for defense, or whatever it is, we need to stop doing that and put it back, bury it and call it sacred. Thank you.</p>
192	Ralph Hutchison	Coordinator of the Oak Ridge Environmental Peace Alliance	8/22/2007	<p>My name is Ralph Hutchison. I'm the coordinator of the Oak Ridge Environmental Peace Alliance. I'll try to be brief. I appreciate your being here -- thank you, NEPA -- to listen to the public. And I realize that you don't want to listen to the public very long.</p> <p>With all the enthusiastic talk about the resurgence of nuclear power it's useful to remind ourselves, as tonight's hearing does, that we have not yet answered the very first question posed by nuclear energy: What shall we do with all these wastes?</p> <p>Tonight's hearing also indicates the absurdity of the current classification scheme we employ in the United States. Because we're here to talk about a catch-all category called Greater-Than-Class C low-level waste. And according to the Notice of Intent, a bunch of apparently orphaned radiation waste that DOE would like to dump in whatever bin they can create for this Greater-Than-Class C low-level waste.</p> <p>This title tells us nothing about the risks posed by the material that it collects. Greater-Than-Class C low-level waste is waste that is too hot in terms of concentrations of radionuclides to be called Class C low-level waste. Some of this material is highly radioactive. Some of it is unusually radioactive -- regular materials that have been made radioactive by absorbing neutrons in nuclear facilities. And some is</p>

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				<p>"miscellaneous" in the documents. That's a nice phrase that relieves us of actually having to create a list that would indicate what the materials are or what risk they might pose.</p> <p>The DOE tag-along wastes here are transuranics, most of them, that despite having decades to figure this out, DOE has "no other currently identified path of disposal." Those of us here in Oak Ridge who live in the shadow of the TSCA Incinerator understand something about throwing our arms open to the undefined and the unlimited. The reality is that DOE's back door category of GTCC-like waste make up more than 50 percent of the volume of all the waste being considered here and 22 percent of the radioactivity.</p> <p>Which leads me to my first comment. Despite the denial earlier in the presentation, DOE should not be allowed to assert the right to include it's own GTCC-like material in this EIS without a comprehensive and exhaustive listing of every scrap that DOE intends to dispose of under its scheme. The wastes DOE can dump wherever it ends up dumping its GTCC low-level wastes, if it does end up dumping it somewhere, should be narrowly defined. And once the EIS is finalized, the door to additional DOE wastes should be closed.</p> <p>Second comment. The amount of radioactivity in some of these materials is stunning. More than 110 million curies in the activated metals alone -- this when we measure our risks from radioactivity in millionths of curies, not millions. The risks inherent in these materials argue strongly against any plan to transport the materials or to allow them to be subjected to release to the environment, which would be an automatic catastrophe.</p> <p>Third comment. DOE does not seem to be contemplating a plan of action which would in fact preclude transportation of these highly hazardous materials on highways or by rail. This despite the obvious: transportation exposes these materials to unnecessary potential accidents or intentional attacks. Some of these materials it appears, and I think this was alluded to earlier, would be the stuff that dirty bombers would dream about.</p> <p>Fourth comment. There is in DOE's Notice of Intent a failure of imagination. Not among the list of considerations is Hardened On Site Storage, a proposal put forward years ago by members of the public sector. Hardened On Site Storage provides for safe and secure storage without unnecessary transportation and its accompanying risks. The EIS should consider Hardened On Site Storage not just as a reasonable alternative, but eventually as the preferred alternative.</p> <p>A generic, real-world site should be analyzed -- pick one -- Watts Barr, since power plants are responsible for the lion's share of radioactivity in this category. And the potential for Hardened On Site Storage should be fully explored.</p> <p>In Oak Ridge, the Oak Ridge Environmental Peace Alliance has always advocated taking responsibility for our own waste. We think other people should too. We have never supported schemes to import other people's waste here. Oak Ridge's waste streams contribute less than five percent to DOE's Greater-Than- Class C-like category. A Hardened On Site Storage facility for Oak Ridge would likely be small and not terribly expensive. It is ludicrous for DOE to contemplate shipping all the other waste, 95 percent of the total volume and more than 95 percent of the radioactivity, to Oak Ridge.</p> <p>Hardened On Site Storage is storage, not disposal. It provides for the possibility of progress in our technology development, in our understanding. If in the future we develop safer methods of treating or disposing of wastes, material in Hardened On Site Storage will be available for retrieval, treatment, and disposal. For now though, Hardened On Site Storage provides a level of safety and security that we do not presently enjoy at many of the sites where this material currently resides.</p> <p>Hardened On Site Storage also allows for real-time monitoring of materials in storage. It is more protective of the environment than any of DOE's current disposal practices for its nasty wastes, a list that includes everything from deep geologic burial to incineration.</p> <p>For these reasons the Oak Ridge Environmental Peace Alliance would like to insist that DOE must give full consideration to Hardened On</p>

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				<p>Site Storage in the GTCC low-level waste EIS.</p> <p>I have one other comment. I'm not sure if there -- I didn't listen carefully -- I'm sorry -- Ms. Gelles to your introduction. If there's a NEPA Officer here, probably is or someone who works on that some.</p> <p>There's a calendar of documents, hearings, decisions on the DOE NEPA website. And this process eventually will show up if it's not already on there somewhere. Every month things slip on that calendar. In fact, every month most of the items on the calendar slip, if not every single one. There's lots of reasons for the slippage. I know, I understand that. Still whatever purpose this calendar is supposed to serve in terms of informing the public, it is rendered entirely, thoroughly, completely meaningless as March becomes April and then June and then July and then September.</p> <p>So for the folks here who are working for NEPA or for those of you who can influence them, take that calendar down. Only put up dates when they mean something unless it's your intention to mislead the public.</p>
193	Barbara Walton	Oak Ridge resident	8/22/2007	<p>Good evening. I'm Barbara Walton. I'm a resident of Oak Ridge. I am a retired Federal employee. I worked with NASA Goodard Space Flight Center. I'm a chemical engineer by background. I'm a member of the Citizens' Advisory Panel, a local oversight committee. And I'm sure we're going to be writing a written letter to you before the deadline. But I'm giving my comments tonight.</p> <p>And I've spoken with Court Reporters before and I made the bad mistake at the GENAP program of using MOX, which is mixed oxide fuel, and it came out in the transcript as "mock" fuel. So I printed some of the comments I'm making tonight, others I'm not. So just so that the acronyms -- and I felt free to use any abbreviations you used in your NOI. But sometimes when you are speaking, it's very difficult for a Court Reporter to take that into account and that really came out bad in the GENAP.</p> <p>So I will begin. First of all, the title of this EIS has got to be changed because the volume of the DOE GTCC-like material, which would be more appropriately TRU. And actually the amount of TRU detail of the slide -- and I was very glad Christine did that -- is equivalent to the total of all of the Greater-Than-Class C waste. So to have something that's a greater volume and not have it in the title. Because it wasn't in the title, it was also not in your Notice that was in the paper for the public meeting. People see low-level waste and we're used to dealing with low-level waste at Oak Ridge and people don't get too excited by it because most of it's pretty benign. But this is not benign stuff. I'd like to see the word TRU, non-DOE TRU or something like that. But the classification system is a problem. I agree with the previous speaker on that.</p> <p>Now so I would like the title to be more inclusive. The purpose and need for action of this EIS should be clearly stated and justification given for including the DOE GTCC-like waste. And I said should be considered TRU except for constraints in its definition. But Christine did a better job of stating that.</p> <p>The GTCC low-level waste was included in the final Yucca Mountain EIS. And I have a document number which I will hand a copy to the... As part of the Inventory Module 2, it was in as 2,000 cubic meters. So it really isn't clear to me why so many alternatives and locations are being considered now.</p> <p>I mean the low-level waste -- the smaller part of this waste has already been analyzed in the Yucca Mountain documents and it was not selected in their proposed solution. They did not take all of Inventory 2. It is very appropriate to consider WIPP. And it is very appropriate to consider Yucca Mountain. Those are two of your alternatives that I really like.</p> <p>We may find some others that -- I'm going to wait and see the draft EIS before I make judgments about some of that. A more detailed description and definition of the DOE GTCC -like waste should be included. And we got part of that tonight from Christine. But I did this before I came here, of course.</p>

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				<p>But in the document it should be a more detailed and definitely why it's really TRU but not able to be handled by WIPP. That should all be taken care of in the document.</p> <p>Now WIPP is limited in the amount of remote handle TRU, which this would be because of its high activity it can take. DOE should consider ways to expand that in cooperation with the state of New Mexico.</p> <p>We have quite a few technical problems in disposing of waste and decommissioning facilities that are no longer used. But the biggest -- there's technical problems and difficulties, but we have political obstacles in a lot of these. And so I think the political solutions and legislation solutions should also be in the document. And some of the alternatives should be of that nature because Yucca and WIPP are the proper ways of disposing of this kind of material.</p> <p>Now both the WIPP and the Yucca Mountain documents use curies with powers of 10 to quantify activity. This DOE EIS should also do that. It is misleading to use millions of curies as in the Notice of Intent Table I which makes the numbers look small so the people don't know what they're really talking about, you know. Don't get alarmed and don't come to meetings like this.</p> <p>I'm not saying that's intentional, but in this day of politics and backstabbing and back and forth in politics, you know, you need to be extra careful. So I would suggest that you do that.</p> <p>Now I would say that Oak Ridge and other wet environments are not suitable for disposal of this high activity waste. Another point is locations with a lot karst are not suitable for intermediate depth borehole disposal of such wastes or other kinds of wastes.</p> <p>In addition, intermediate depth needs to be defined and there's a little definition that's greater than 30 meters, but there isn't even -- there should be at least a conceptional schematic in the draft EIS.</p> <p>We can't get much in a Notice of Intent. But there's no -- but even if you have to put the details in an Appendix, as long as it's there, and I want a paper copy of everything. Because I have trouble -- I don't have a high speed length because I have to pay for it myself. So I don't go to websites very often which is why I appreciated getting the corrected version of the table from you.</p> <p>So in closing, please modify. Shorten your very long list of potential locations because Oak Ridge is not suitable and I'm sure there's others that are not suitable. And do add alternatives for pursuing definition and regulatory and political solutions. Thank you.</p>
194	Susan Gawarecki	Executive Director of the Oak Ridge Reservation Local Oversight Committee	8/22/2007	<p>Good evening. I appreciate the opportunity to comment on the scope of the proposed Environmental Impact Statement. Wish more of the public would show up. My name is Susan Gawarecki, G-a-w-a-r-e-c-k-i. And I am Executive Director of the Oak Ridge Reservation Local Oversight Committee.</p> <p>This is an organization that is funded by a grant from the State of Tennessee that represents the concerns of local governments, the seven surrounding and downstream counties to the Reservation and the City of Oak Ridge. And we also have a Citizens Advisory Panel. Barbara just spoke as a member of that. My organization does intend to comment, to provide specific comments that are discussed and voted on. And what I'm going to say is my own opinion at this point.</p> <p>My personal preference for the disposal of Greater-Than-Class C low-level waste would be for geologic disposal because of its highly radioactive characteristics. I don't think it's realistic to give any consideration to near surface or intermediate depth borehole disposal</p>

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				<p>options particularly in wet climates. And that would be a way that DOE could simplify it analyses by eliminating those.</p> <p>I've toured WIPP and I think that's a wonderful facility for this type of waste. And it would be entirely reasonable for DOE to pursue disposal there or at Yucca Mountain.</p> <p>I think that DOE should also ensure that mixed GTCC low-level waste is included at whatever facility is chosen or whatever site is chosen. And the EIS should evaluate the acquisition of a required permit to this end. This is because DOE and commercial generators should have pathways for all radioactive waste, current and future generated.</p> <p>It's unreasonable for this country not to have a comprehensive disposal capability of the waste that's generated so that it goes to a safe and secure repository, preferably a deep geological one.</p> <p>And the waste that goes to this repository should not be limited to existing and projected waste streams. It should also allow future unanticipated radioactive waste streams of the GTCC low-level waste variety. I will note that our radioactive materials transportation system is the safest in the transportation industry. I think this has been demonstrated by the WIPP shipping campaign and their ability to handle even the remote handled TRU waste which is largely equivalent to much of this GTCC waste. It's a good example of the U.S.' ability to ship these very dangerous wastes.</p> <p>I think you may want to add to the EIS the possibility of recycling some of the sources. There should be a continuing demand in the medical industry and other industries that use these sources. And it would seem to be a waste of the resource to dispose of them and allow new ones to be created when the radionuclides could possibly be retrieved from the existing ones.</p> <p>And that's all I have to say at this time. Again thank you for the opportunity to speak.</p>
195	Ellen Smith	Member of the City of Oak Ridge City Council	8/22/2007	<p>My name is Ellen Smith, spelled the way it sounds. I wear multiple hats. But I'll just speak from one tonight. I'm a member of the City of Oak Ridge City Council.</p> <p>The City Council voted at Monday night's meeting earlier this week to submit comments on the scope of this EIS. They will be submitted as written comments. But I'd like to provide a few points from those comments tonight for your preliminary information on the nature of that communication.</p> <p>And I'm reading from the approved document. The DOE's Oak Ridge Facility, notably Oak Ridge National Laboratory, have an inventory of GTCC-like wastes, including some transuranic-like wastes not currently eligible for disposal at the Waste Isolation Pilot Plant. Oak Ridge would benefit if DOE identifies a disposal plant for these GTCC-like wastes that would remove them from Oak Ridge.</p> <p>The Oak Ridge Reservation, however, would be a poor choice of these wastes due to environmental and socio-economic factors such as high rainfall conditions, short hydrologic pathways from disposal sites to the affectable environment and high human population density relative to other DOE sites under consideration.</p> <p>The Oak Ridge Reservation located in the City of Oak Ridge already hosts the Toxic Substances Control Act incinerator facility, which is used for incineration of radioactive mixed wastes from DOE sites in other states.</p> <p>Thus, Oak Ridge is already making a unique and valuable contribution to the equitable resolution of DOE's national legacy waste management challenges. Further, the Oak Ridge Reservation, located in the City of Oak Ridge, already already hosts additional waste disposal facilities for legacy materials generated from National Defense Missions of the Department of Energy. Such disposal should remain limited to remediation activities on the Oak Ridge Reservation and where other options are not viable for these wastes.</p>

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				The City of Oak Ridge endorses and encourages DOE in its efforts to find a permanent home for Greater-Than- Class-C low-level radioactive wastes. The City of Oak Ridge recommends and requests that the Oak Ridge Reservation be removed from consideration as a disposal site for such materials. Thank you.
196	Joe Whetstone	Resident of Buford County, SC	8/23/2007	<p>My name is Joe Whetstone, and I live in Buford County, South Carolina. And I would just like to say that we have enough tritium from this facility reaching the Savannah River already, and we certainly should not risk adding any additional nuclear waste to this facility, since I think our first order of business should be to clean up the mess that has already been created here.</p> <p>When it comes to what to do with the bulk of this material, I think hardened on-site storage should be seriously considered. And then with what was referred to as the sealed sources, the WIPP facility seems to be the most logical spot for this material, too.</p> <p>Again, I emphasize we have received over 500 picocuries per liter on a regular basis here in Buford County in our drinking water. And as you know, the state of California has implemented their public health goal of 400 picocuries per liter based on EPA Report Number 13. So I don't think 500 curies is anything to snicker at. So thank you for your time.</p>
197	Bobbie Paul	Works with WAND (Women's Action for New Directions)	8/23/2007	<p>Bobbie Paul Thanks. And I also work with a women's group called WAND, Women's Action for New Directions. Thank you for the presentation. I'm not sure I understand a lot of it. So some of my comments will be in the form of questions that I think probably should be addressed.</p> <p>Specifically for locations like Savannah River Site and Plant Vogtle, I would like to know how will the disposal techniques ensure that the groundwater is protected from contamination. What standards would you employ to define contamination? And what remediation – I mean, like to what applicable standards would occur if those standards are met? So how would you do that?</p> <p>I'm still not sure exactly how much GTCC and GTCC-like waste there is currently or exactly where it exists. And is there any of this kind of waste that was not listed in the notice of intent? And could you provide the total amount of the GTCC and the GTCC-like or DOE – I guess, could the GTCC-like be considered DOE?</p> <p>MS. GELLES: Yes.</p> <p>MS. PAUL: Right? Okay. -- by the state and by the site so we know a little bit more? Particularly --I understand that a lot of this waste is all over. And that -- I appreciate all the comments tonight and having the little conversations.</p> <p>18 But it seems like, you know, it's all over, in medical facilities and in research places, but NRC must know, because they license this stuff, where it is, but --especially the GTCC-like. Probably DOE knows where this is. So we'd like to know that radioactivity and volume.</p> <p>I am also interested in what we call HOSS, Hardened On-Site Storage. And I don't know why -- I was thinking as much as -- I live in Georgia and am very concerned about possible expansion of Plant Vogtle right across the river.</p> <p>What about the possibility of a detailed analysis of hardened on-site storage being done? Like here you look at a conceptual facility and a real power plant site. And although -- maybe Vogtle is it. But I know that that is considered -- the disposal you say is like permanent storage. I personally don't think anything is permanent, but -- and that this would be temporary --the HOSS would be temporary until a better solution could be found.</p> <p>But I think that money, which -- all of this is going to cost enormous amounts of money -- should go into a real serious study to give us some more information. And as I understand, people around the country have also said HOSS, or Hardened On-Site.</p>

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				<p>So what are the options available for hardened on-site, above-ground, monitored retrievable storage of GTCC and GTCC-like waste? And at those sites where on-site storage is not possible, probably because they have site-specific safety concerns, what are the conceptual options available for nearby and centralized above-ground, monitored retrievable storage of this waste, both kinds?</p> <p>And along those lines, let's compare the advantages and the disadvantages and the cost estimates of above-ground storage versus underground storage? Okay? And if Yucca Mountain's never licensed to receive spent nuclear fuel and high-level radioactive waste, what are the conceivable impacts upon this waste disposal plan if that never comes? I mean I know you're looking at that as one of the options, but if it never comes in, what happens?</p> <p>I'm trying to shorten all this. I have so many questions. Okay. So what -- I know we have a gentleman who is working on transportation. So what are the transportation routes for your Two through Five -- not the No alternative, but your Two through Five alternatives from the notice of intent?</p> <p>What are the costs projected for the transportation of all this waste, both kinds, to the proposed disposal sites? What are the estimated -- I'm sure you'll do this -- number of accidents, radioactive releases and public health and economic impacts from the areas along the transportation routes?</p> <p>And what shipping containers will be used to transport this from production sites to the proposed disposal sites? Do these containers already exist, or would this be another new design, and, if so, how many would we need to have? Would they have to be designed and licensed? What are the costs of the containers? Have they been tested in practice, or computer modeling? What is that?</p> <p>Okay. With all this newly generated waste that we're going to have, why do the projections for the waste only go to 2062? Especially here in the southeast, we have all these new proposals for new nuclear reactors. And if DOE is promoting the potential for new reactors plus nuclear weapons and if they're projected to be built, why is the disposal of all the waste that's going to result from that not being considered in this analysis?</p> <p>11 How will the DOE analyze the waste from future programs? How much waste is actually expected beyond that date if 50 or the number of new reactors that DOE estimates will be built and operated for the length of those licenses? So all of that should detail volumes, radioactivity, composition, and all of that. And how will we receive them, and how will they be stored?</p> <p>Oh. I had another question. What about the waste items that are -- maybe there's an easy answer to this -- currently sitting in the cooling ponds, fuel assemblies and related material, not spent fuel, that may cool down to GTCC levels of activity? What is the disposal path that may become this kind of waste, either through decay or activities that kind of blend together?</p> <p>And since this waste doesn't seem to be that -- hardened is not a good word. GTCC and GTCC-like waste have kind of loose definitions to me. So are there plans to include other kinds of radioactive waste under this classification, either through concentration or dilution, so that it would be eligible for GTCC disposal? And what are those things? What would that be? And will they be treated this way?</p> <p>MR. BROWN: Okay. You're a bit beyond the five-minute mark. But if --</p> <p>MS. PAUL: So I think that's a really good place. As you can see, I have a lot of questions. And I guess the overall thing that I would say is that the most amazing thing is that we have an enormous waste problem in this country on all levels. I mean military, industrial and the commercial reactor. And the fact that we're continuing to propose these new reactors and these new missions without a proper disposal plan for the end byproducts just boggles my mind. Thanks.</p>

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198	Lee Poe	Citizen of Aiken, SC	8/23/2007	<p>My name is Lee Poe, and I'm a citizen of Aiken, South Carolina. I have a comment that I think is different than most, because I think that risk ought to be considered in this EIS, not consequence. You know, your output ought to be risk, and it ought to be in a form that is understood and acceptable from the public participation.</p> <p>You know, I think there needs to be some significant effort spent on showing that the 500 picocuries per liter that Joe mentioned a minute ago is in fact a dangerous thing. It doesn't apply to this particular EIS, but, whatever the consequence of the actions that you analyze on these storage modes, they ought to be expressed in terms of risk, not consequence.</p> <p>And I mentioned earlier the institutional disruptive acts. I think you need to consider very strongly what that means, because anybody -- that could be any kind of an analysis. And I think that I guess the one thing that kind of sits behind all of my comments is -- I think we ought to try to conserve our federal funds as much as possible and not spend money, to drive our risk lower than it really needs to be. Thank you.</p> <p>(Spoke again on pg 48): You didn't mention it, but I would presume that for the alternatives that you talk about for disposal, if one part of this alternative looks good for that kind of waste, it will be used. And if not, that's -- my comment is you ought to make the ability to make this thing function so that you could use surface storage for some kind and then geologic disposal for another kind of waste. Thank you.</p>
199	Ernie Chaput	With the Economic Development Partnership in Aiken, SC	8/23/2007	<p>I'm Ernie Chaput with the Economic Development Partnership in Aiken, South Carolina. And we're pleased to provide comments on DOE's plans for the disposal options for greater-than-Class C waste. We congratulate DOE and the congress for addressing this issue, because it does need to be dealt with, and sooner better than later.</p> <p>As many of you know, EDP has supported new DOE and commercial activities in our region, nuclear activities, which can be performed in a safe and environmentally acceptable manner and which are consistent with the capabilities and infrastructures that exist in our region.</p> <p>With that as a backdrop, we have two comments for your consideration. One, we believe there are DOE sites other than Savannah River which are better suited for disposal of these wastes. Savannah River should be considered only if other sites are proven to be unsatisfactory. You know, it's on a technical basis, as well as the capabilities. We really believe the capabilities for this type of an activity exists in different locations.</p> <p>Secondly, we believe that some greater-than-Class C wastes may be suitable for disposal at the Barnwell low-level waste radioactive waste facility. And we suggest that the EIS evaluation include those items as may be appropriate. Thank you for the opportunity to present these comments.</p>
200	Peter Evans	Resident of Aiken, SC	8/23/2007	<p>Peter Evans: I'm just speaking as a resident of Aiken, South Carolina. And I just have a lot of concerns and qualms and questions about what is happening here.</p> <p>It really worries me to see any expansion here in this area of such hazardous, hazardous, scary material in such a major metropolitan area. This area is growing by leaps and bounds. We've got people from all over the country and the world who are wanting to move here. And I don't understand why this is happening in this area.</p> <p>We've been fortunate that there hasn't been a major disaster here. We had a train that derailed in Graniteville, and there was so much destruction done by cars filled with chlorine. And people were horrified. They said, We don't want trains coming through here with such dangerous substances.</p> <p>We had some mills here that were severely affected. Actually, ultimately through the time of the cleanup and so on, we went out of business. People were killed. And that is not nearly as dangerous as all of these materials.</p>

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				<p>We are near a major river. Many, many people are dependent upon the water for drinking. We are -- supposedly there's an earthquake fault line that runs near or through the SRS. And with some of these facilities for storage, that alone is a little worrisome.</p> <p>And then we have the problem of, what I've been hearing on the news, leakage into the aquifer at the Hanford, Washington, plant. And obviously, there must not be sufficient rules yet for stopping such leakage. And I'm just wondering why the emphasis isn't on getting everything that is there out, as they did in Colorado. I think it's Rocky Flats. And instead, what's happening is that we -- just more is being brought in.</p> <p>And I know how important it is to have good jobs here. And yet, if there's a disaster, this plant would have to be shut down, which could mean a huge loss of employment. And at this point, also, a question -- and in Barnwell, there was -- apparently there has been leakage from a nuclear waste disposal site and it's showing up now in people's drinking water wells.</p> <p>And then if there should be something very serious that would happen here, some terrible disaster, who would pay for this? Is it this Washington group? I don't know if anybody can answer me on that. Or is it DOE? But if it's a company, how many billions of dollars of insurance do they have to cover this, or is the DOE prepared -- and the government -- to pay the cost of, you know, what could happen to not only things physically, but loss of employment, loss of value of land, and so on?</p> <p>There is such an incredible brain trust here with people at the SRS that it just seems like it would be logical that the emphasis now would be on hydrogen development. Get the stuff out of here completely, as they've done in Rocky Flats, and let's start doing something positive that would give worldwide acclaim to Aiken and to the Washington group and to the SRS facility.</p> <p>I noticed the very nice gentleman who has been saying that all the Aiken residents are pro-expansion at the SRS. I think this is incorrect, and I think that it's way too early for anything additional to happen here, anything more at this plant at this site, unless it's hydrogen related. Then go for it. Thank you.</p>
201	Dr. Rose Hayes	Resident of Aiken	8/23/2007	<p>DR. ROSE HAYES: I am now a resident of Aiken, and I have first of all a comment to make regarding bias toward nuclear energy. Alternative energy sources would be a possible way to remove us from [electronic interference], but I'm wondering if we can find a way to neutralize the danger that the waste products it produces pose to our community and others.</p> <p>Therefore, I feel that rather than focusing on storing and disposing the waste, that the focus should be on neutralizing it, finding processes that, while we produce these byproducts of nuclear energy, are also capable of neutralizing the hazards they present to public health. And I think that is as critical an issue we face today in terms of security.</p> <p>Secondly, I just recently returned from [electronic interference]. They have terrible pollution problems there, and one of the worst, of course, is the water; it's very polluted, and the drinking water and the river [electronic interference]. I mean, they're drilling wells to get to clean water that go down 300 meters. That's the government standard right now to try and find clean water.</p> <p>Well, if we're drilling boreholes at only 30 feet, I don't think that that's a very large safety margin. And I wonder how do you find out how deep you have to go before this stuff is okay, before new public safety hazards are present once we bore holes into the earth and drop it down?</p> <p>I was speaking to one of the scientists here at our break. We found that in terms of the current existing and projected nuclear waste that is harmful to humans in any contact form, there is approximately 6,500 bathtubs full now and into the year 2062. And that's a lot of holes to be drilling in the earth to be dropping bathtubs full of poison into.</p> <p>We don't seem to have any current program that has been tested to know that it's a safe way to store or dispose of this material. And we</p>

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				<p>have no alternative but to try and find a way to neutralize it, and we shouldn't be producing any more until we can neutralize it. And we shouldn't be focusing all of our energies on how to store it. That's not solving the problem; that's just shelving it.</p> <p>We need to find out how to process it and neutralize it. That's the responsibility of our government in the contracts they give to others to take care of risks.</p> <p>And finally, I think that there should be an extensive risk assessment, until we can drill the hole, on how this stuff can be kept until we find out how to neutralize it. And I think that the results of this risk assessment should be clearly shared with the public in terms that the public can understand, and that it should contain information on such risks as transporting it.</p> <p>How will it get transported? What are the risks involved in putting it on railroad trains or on trucks or by other means of conveyance? And if there is some sort of accident or malfunction -- a malfunction at the site or in the course of transporting it -- what is the exact risk to the public? How many die? How sick do you get? How many people can be affected by how much of the stuff?</p> <p>These are things that need to be considered in the environmental impact statement and shared with everyone here in Aiken. And also, I think that if you're going to put it in anybody's backyard -- and I'm particularly concerned about Aiken -- then you should do a survey to find out if people actually want it here.</p> <p>There have been people here who -- an organization who call themselves concerned citizens, who went to Washington and said that everybody here is for it. That wasn't true; it isn't true now. And I think that the only way to find out just what the population of the area really wants about this issue is to actually survey them. Thank you.</p>
202	Joe Ortaldo	Resident of Aiken; member of the citizens advisory board for the Savannah River Site	8/23/2007	<p>Well, my name's Joe Ortaldo, and I'm a resident of Aiken; I'm also a member of the citizens advisory board for the Savannah River Site. I'd like to thank all of the representatives from headquarters that came down and gave this presentation, and I'd also like to thank the people who made their comments.</p> <p>Many of the questions that -- were asked. I think, you'll find as this process progresses, a lot of those issues are going to be addressed in just the way these EISs are prepared. I would encourage everybody to get on the hoof as they head outside there to receive a copy of the draft EIS.</p> <p>And I would like to request that the Department of Energy come back to the Aiken area at the appropriate time and hold a similar public meeting such as this so that we can get more comments from the people and we'll have a document with information in it that people can comment on and make appropriate comments.</p> <p>Again, thank you for coming. And I would request that a future meeting be scheduled at the appropriate time when the draft EIS is completed. Thank you.</p>
203	Rick Geddes	From North Augusta	8/23/2007	<p>My name is Rick Geddes. And in contrast to all of these Aikenites you've been hearing from, I'm from right here in North Augusta. So I'd like to take this opportunity and I feel obligated to tell you all that there seems to be a disconnect between your program and another DOE action of which I'm aware.</p> <p>In the next fiscal year, DOE has requested \$420 million for the Global Nuclear Energy Partnership, a program which intends to close the fuel cycle by establishing large-scale commercial fuel reprocessing. It is likely that large-scale reprocessing will generate large quantities of GTCC waste. In fact, there are studies out there that show the quantities might be greater than your 5,000 or so annually from large-scale reprocessing.</p>

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				So I think, particularly when you look out to 2060 and DOE is trying to establish many reprocessing plants, you may need to be looking at much larger quantities of GTCC waste. Thank you.
204	Mary Gautreau reading text from senator Ron Wyden	Senator Ron Wyden	8/27/2007	<p>My name's Mary Gautreau. I'm from Senator Ron Wyden's office. Christine, I want to welcome you to Portland. Thank you for yours. The senator, of course, could not be here, but asked that I would read a statement, and will give you this one.</p> <p>The Hanford Nuclear Reservation is already one of the most polluted places on the planet. It currently stores more high-level nuclear waste than any other site in the United States, and it is not safely managing all of the nuclear waste that it already has on-site today. And now the Department of Energy proposes to use Hanford as a national nuclear waste dump.</p> <p>The bottom line is the Energy Department should not be adding more waste to Hanford when it isn't safely handling the waste that it already has on-site. The Energy Department -- (applause) -- and its contractor have a long history of mismanagement and failures to protect public health and safety at Hanford over the past 20 years. A report by the contractor responsible for the Hanford Tank Farms, which stores 53 million gallons of highly radioactive and toxic waste, indicates that removal of all of these wastes just from the aging and leaking single-shell tanks would not be completed until the year 2032. Hanford is decades away from dealing with the waste that it already has on-site.</p> <p>Just last month, Hanford had a spill of high-level nuclear waste while retrieving it from the single-shell tanks that endangered workers at the site. I have requested that the Defense Nuclear Facility Safety Board, an independent DOE safety oversight agency, investigate this spill, as well as the entire single-shell retrieval program. Given the long history of mismanagement of waste cleanup at Hanford, the Energy Department's proposal to bring more waste to Hanford is essentially a proposal to turn Hanford and the Northwest into a national sacrifice zone.</p> <p>The waste under discussion today is the most radioactive in the low-level category. As many of you know, I have long been concerned about DOE's history of unkept promises to clean up Hanford. It's time to address the current problems, and not add additional risk and dangers by adding huge volumes of additional nuclear waste to Hanford.</p> <p>What is amazing to me is DOE has now been trying to clean up the nuclear waste environmental contamination half as long as the site was actually in operation, more than 20 years, with no end in sight. Instead, we're miles away from meeting those cleanup goals.</p> <p>In March of this year, U.S. EPA issued a fine of more than a million dollars for the failure of DOE's contractor to properly manage the existing low-level waste disposal facility. How can this Department be seriously considering sending more of the same waste to Hanford?</p> <p>In March of 2006, I requested the Inspector General conduct an investigation into the safety of the waste vitrification plant after a former employee of Bechtel raised concerns about the former employee's use of unproven and flawed control systems. In response to my request, the Inspector General issued a report that said -- and I quote, "The control system does not meet the stringent procedures, plans, specifications for work practices associated with nuclear quality standards."</p> <p>My point here is a simple one: DOE has not fulfilled the obligation to clean up Hanford. It is not clear when it will. But now DOE is proposing to bring more waste to Hanford. Hanford should have less nuclear waste, not more, and it should be cleaned up, not dumped upon.</p> <p>So today I'm putting myself on record as being fiercely opposed to DOE's plans to dump more waste at Hanford. I will do everything within my power to keep it from happening. Thank you. Senator Ron Wyden.</p>

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205	Ken Niles	Assistant Director for the Oregon Dept of Energy	8/27/2007	<p>I'm Ken Niles. I'm the Assistant Director for the Oregon Department of Energy. I'm providing comments on behalf of the State of Oregon.</p> <p>I want to first of all thank the U.S. Department of Energy for conducting a scoping meeting in Western Oregon. Oregon and Oregonians have a long-standing interest in Hanford. We appreciate this opportunity to provide our comments directly to you. And thank all of you for coming out one more time.</p> <p>My agency will provide what I expect will be fairly lengthy written comments to the Department prior to your deadline that will outline the analysis that we expect to see in the environmental impact statement.</p> <p>Since Hanford cleanup began in 1989, the federal government has so far spent more than \$25 billion taxpayer dollars to try and clean up the extensive entry that occurred at Hanford during more than 40 years of plutonium production. There is not sufficient time for me to thoroughly explain the many cleanup challenges that still remain at Hanford now 18 years into cleanup. The recent spill of high-level waste at the S-Tank Farm is just the latest example of many examples over the years that demonstrate that DOE still is unable to manage the waste that they currently have at the Hanford site.</p> <p>The State of Oregon opposes the idea of bringing greater-than-class C waste to Hanford for disposal. Hanford's groundwater and soil are already widely contaminated, and a great deal of money and effort is being expended to try and clean up these contaminants. Adding more waste to the subsurface, especially waste that is highly radioactive and very long-lived, is contradictory to the cleanup effort that has come at such a premium price and that we all support.</p> <p>I acknowledge that our position is seen by some as just another NIMBY. But there's a difference between saying "not in my back yard" and what we're saying, which is "no more in my back yard" -- (applause) -- especially given that our back yard is so horribly polluted already and poses a very real long-term threat to the Columbia River.</p> <p>In preliminary comments we submitted two years ago, the Oregon Department of Energy commended DOE for beginning the process of determining a disposal path for greater-than-class C waste. Some of this waste does exist. More will be generated. There does need to be a disposal path identified.</p> <p>However, we also strongly encouraged DOE to not consider near-surface disposal and to exclude from consideration any site still undergoing active cleanup. Both of these recommendations were ignored. The assumption, as Christine has mentioned, for many years has been that greater-than-class C waste would be disposed of in geologic disposal. We see no reason to change that. Thank you.</p>
206	Natalie Trayer	Field Operator for Heart of America Northwest	8/27/2007	<p>My name is Natalie Trayer, and I'm the Field Organizer for Heart of America Northwest. My first question is this: There were hundreds of folks who came out to the solid waste EIS meetings who weren't notified about this meeting. Everyone who was commented and was at those meetings should've received notice of this one.</p> <p>Secondly, it's apparent to me that the U.S. Department of Energy doesn't believe the old adage that less is more. As if we didn't have enough nuclear waste to take care of already, DOE, which runs the Hanford Nuclear Reservation and the nation's nuclear weapons complex, wants to check a different kind of extremely radioactive waste at Hanford for burial. They refer to this waste as greater-than-class C, as you've heard, and are proposing to dump this toxic waste in shallow landfills and relatively shallow boreholes above groundwater that's flowing directly next to the Columbia River.</p> <p>There are a myriad of reasons why bringing more radioactive waste to Hanford is a bad idea. But first and foremost, we obviously can't take care of what we already have. DOE is incapable of safely managing the waste that currently exists at the site. In case you didn't hear, and has been mentioned in comments before me, nearly 50 to 100 gallons of toxic waste erupted from a water line on July 27th. The cause of this leak is attributed mainly to an engineering blunder and lack of oversight.</p>

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				<p>On top of that, over one million gallons of radioactive waste has already leaked from tanks at Hanford, and that contamination, this will be spreading toward the Columbia River.</p> <p>A vast amount of money and effort is being exhausted to try and clean up this site. To put it simply, adding more waste is incongruous with cleanup. For the safety of our communities, our families and future generations, we ask you to join us in saying no to this preposterous proposal to the import of more waste at Hanford. Thank you.</p>
207	Greg de Bruler	Representing Columbia River Keeper	8/27/2007	<p>My name's Greg de Bruler, and I'm representing Columbia River Keeper. I've been doing this for -- well, for them for 18 years, and working on behalf of the river for a little over 20 years now.</p> <p>Hey, Hanford, the river, hey, our favorite place here. Everybody remembers Hanford. If you don't remember Hanford, it's all about the river. The river flows this way. It comes all the way around, goes down there, goes out to the sea. Remember in 1962 it was the most radioactive river in the free world. This is where they're proposing to dump this stuff. Travel time from here is seven years. Well, depending on who you talk to, it could be here from 10 years to 100 years. Travel time this way, if the waste goes this way, it's 15 miles, it could be, eh, not this stuff, but 20 years to 500 years, depending on who you talk to.</p> <p>Bottom line, what you put in the ground makes a big difference. Columbia River -- there's the N-reactor. Just think of all the waste sites. Nine nuclear reactors, waste everywhere, most contaminated site in North America. Look what happens when you dump the stuff in the ground. This is what they've dumped in the ground to date. Check those things out. You know, some of you might know what it is, some of you might not know what it is. Bottom line, it's hazardous, toxic waste that's eventually going to hit the aquifer, that's eventually going to flow into the Columbia River -- not here in my lifetime, but what about the future?</p> <p>They say this is safe disposal. They use the word "safe." That's not what we're here for. And the whole idea, this whole preposterous idea, is that it's disposal. What happened to the first part, which is remove, treat, and then dispose? "Treat" left. That went away. The "treat" is they're going to dump it in your back yard, and the "treat" is they're going to continue dumping it in your back yard. So they not only create more waste here that's going to migrate, but it's going to flow into the Columbia River sometime, not in our future, but in somebody else's future. That is -- it's just absolutely ludicrous. I told Jerry this is like being standing here in 1980-something that somebody proposed this.</p> <p>They say deep geologic storage, that's what they've always planned for this. Now the reason why they don't want to do that is because that the science at Yucca Mountain was so bad, they realized that didn't work. And now they want to do surface storage. Why? Because they don't have to drill big holes.</p> <p>So this is really a disposal EIS. It's not a remove, treat and dispose, like you're required under the law by the EIS. That's what you're going to have, and you're going to have more of that all over the Hanford site. They're supposed to release it as being clean. Supposedly they're supposed to release it and give it back to the Native Americans and back to the public to use. It's never going to happen. Twenty years the Department of Energy -- 18 years -- has been cleaning up the mess. We have a delay in the vit. plant until 2019. Does anybody in this room in their right mind trust the Department of Energy's ever going to start the vit. plant?</p> <p>MULTIPLE SIMULTANEOUS SPEAKERS FROM THE AUDIENCE: No.</p> <p>MR. DE BRULER: So if you don't believe that the vit. plant's going to be started in 2019, we have 18 years of them telling us what they're going to do, but they haven't gotten to what they were supposed to be doing. And now they're coming here and they want to do surface disposal? Whoa. Wait. No. Stop. That's why we're at a truck stop, actually, so all the truckers could come in here and talk about hauling hazardous materials and what it does to them and their lives.</p>

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				<p>According to the nation -- or the BEIR-7 panel, National Academy of Science, they went out and did an analysis of all the health stuff in the world. They wanted to find out, okay, everybody says low doses, no big deal. High does, low does, what is all this stuff? Bottom line, they went around the world, checked up all the studies, and they came up with one answer. There is no safe level of radiation, period.</p> <p>Now, none of the EISs that have ever done and that will ever be done by the Department of Energy will accept that fact. They'll tell you in even their current baseline risk assessment for the Hanford breach that there is an acceptable dose. There is no acceptable dose. And they only look at cancer. They don't look at the diseases that are caused that don't have anything to do with cancer.</p> <p>So we have a trust responsibility, the federal government does. The federal government has a trust responsibility that says they must protect the most maximally exposed individuals. This EIS better do that, because I'll tell you what, the other EISs don't. They somewhat kind of get to it, but they don't.</p> <p>Native Americans have a God-given right here, like we all do, but they've got a little special provision that says if they don't do it right and clean up Hanford, they're going to come back and file suits against you, and they will -- we, the taxpayers, will be paying for billions and billions of dollars of lost resources in damage. A hundred and eighty square miles of groundwater at Hanford has to be cleaned up. Take 90 -- not near in my lifetime.</p> <p>The EPA has nine criteria. The nine criteria basically state, remove, treat and dispose. And when you finally get down to the bottom part is if you can't do with remove and treat, then you might find some waiver to do something different. Well, their idea right now is to, if you listen to 'em closely, is to short-track the process. This is a focused move, a disposal EIS, that wants you to take a journey down the road to where we don't have to put it deep in the ground, but what we're going to do is we're going to put it on the surface -- mhh -- ten feet under the ground.</p> <p>What does it really mean? Hanford has what they call post- -- or pre-70 TRU waste, transuranic waste. It's so hot that you wouldn't want to pick it up. You wouldn't want to handle it. The Department of Energy has been lucky in Savannah River and Oak Ridge where they've been able to leave this stuff in the ground. Anybody been to Savannah River or Oak Ridge? They have coffins that they put above ground, because when the groundwater gets too wet, it flows up and it moves the coffins out of the ground. Oh, well, wait a second here. We've got Oak Ridge and Savannah River as a proposed site. And they want to do near-surface disposal? Am I missing something here? Because I know that the process that they're steering us on is their disposal.</p> <p>We have to change the process. We have to say to them, no, you can't do this. And by the way, you aren't going to stop 'em, because they're going to do the EIS. This is the minimum assessment modules determined by the CRCIA Team, Columbia River Comprehensive Impact Assessment Team, which I was the chair at the last time when we finally closed out. The Department of Energy came back and said, when we do an assessment of impact, we will use these, all of these things, in every one of our analyses for every EIS ever done. That commit was done in 1997 and 1998. It's 2007, folks, and they haven't done it.</p> <p>So I'm telling these people that you need to read CRCIA, the requirements documents. It's 120 pages long. Read through it, and if you cross all your T's and dot all your I's, then I might be happy somewhat with your EIS. I don't think you'll do it.</p> <p>Look at this. Disposal sites -- a big river, a big river, lots of rain, lots of rain, lots of rain. Stuff floats to the surface. They have a wayside at Oak Ridge -- anyway, I've got a whole bunch of reports. You can read that stuff if you want. I analyzed all those sites.</p> <p>Idaho, that's a good one. Let's dump it over in Idaho so it flows back into the Columbia River anyways. Oh, but let's dump it at Hanford, because it's going to hit the river anyways. Okay, Yucca Mountain, they're kind of dry, so maybe we can put it over there.</p> <p>But the big thing is this: That's what they're going to do. They're going to put this stuff on the road. Somebody told me there were terrorists</p>

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				<p>in the United States. That's what somebody told me. Somebody told me that terrorists could attack and create dirty bombs. This is the perfect dirty bomb. It's a perfect dirty bomb. And they want to ship this stuff all over the United States. Why don't they treat it? Why don't they do separation? Why don't they figure out compaction? What about the new technologies that basically can stabilize some of this stuff so it's not radioactive? There are technologies out there. But believe you me, this EIS won't consider those.</p> <p>This is what it's about: Protect the Columbia River. Protect the future. Stop U.S. DOE dead in their tracks. We have to stop the process.</p> <p>And my suggestion tonight is this: It's time for the people of the United States and the Northwest to seriously consider a new process. The Department of Energy in the last 18 years has consistently shown us time and time and time and time again that it has failed to manage the cleanup of the Hanford site, beyond recognition. There is so much documentation that anybody in Congress who would be listening to this should say, Oh, my God, we've spent \$25 billion, and we've gotten nowhere. There's nobody in their right mind that would put up with it anymore.</p> <p>It's time to create a cleanup commission and move forward with a change for Hanford and the site. And I want the analysis not only done for Hanford as far as the CRCIA requirements. I want it done for every site in the nation, because as far as I'm concerned, this isn't a battle just about Hanford. This is a battle for the protection of our water resources in this whole country. And you can't do it at Savannah River because you might have their hands tied in Savannah River because it's a "yes" society down there. And you might have 'em tied in Oak Ridge because they're fully into this production mode. But the bottom line, the people that aren't being paid are getting contaminated and dying because of their exposure at Hanford, at Rocky Flats, at Oak Ridge, at Savannah River, and it's time that we change the process.</p> <p>So thank you for this opportunity to speak, and I hope you enjoyed my slide show.</p>
208	Bill Mead	Director of Public Safety and Resources Agency	8/27/2007	<p>My name is Bill Mead, and I'm the Director of Public Safety and Resources Agency in Portland, Oregon. I'm retired from federal law enforcement, and my first nuclear training class was in 1977.</p> <p>I am against bringing new waste to Hanford, regardless of their source or composition. Hanford is already grossly contaminated, and must be cleaned up before additional waste is imported.</p> <p>In 1984, for each pound of plutonium-239 that was produced at Hanford, we paid \$276,000. We also generated \$4,138,000 gallons of high-level liquid radioactive and chemical waste for each of the 2200 pounds of plutonium that we produced that year. That added 9 billion gallons of high-level liquid waste that we needed to safely contain for 225 generations.</p> <p>In the late 1980s, the Department finally admitted that it had released 195 billion gallons of similar waste into Hanford soils during the previous 40 years of operations. That waste was just one of several dozen waste streams at Hanford.</p> <p>In 1987, I was called to testify before a congressional subcommittee. Now, even though the topic was about converting WPPSS-1 reactor to a production reactor, the discussion rapidly expanded to include waste issues at Hanford. During that hearing, Hanford's manager bragged about the amount of waste that had been reclaimed in 1986.</p> <p>During my testimony, I reported that even though the Department had worked on that project for an entire year, the total for that year was less than had been produced during a single day of plutonium production, and that we were creating that waste for more than 42 years at that time. Again, this was only for a single waste stream of the dozens at Hanford.</p> <p>Now, according to the Department's own published data, in 1984, Hanford produced a total of 1,376,000 curies of radiation. Of this, 1,000 curies were of TRUs were buried on-site, and another 10,000 pounds were dumped there. I'm not sure why they referred to that as "dumped." Again, this is only one of the 40 years of Hanford's history. The current proposal is for 140 million curies.</p>

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				<p>TRUs are extremely long-lived radio-nuclides and must be isolated essentially for eternity. Some of the wastes in the Department's proposal would include additional TRUs.</p> <p>In 1998, I toured the Department's Mound site in Ohio, which had ended its weapons production function and was being cleaned up. At that time, the two managers I interviewed about their cleanup experience were concerned that a total of 2.3 curies of radiation that still existed in the grease pits of their elevators might delay returning the site to the city. Even so, before that tour, I had to view a video and pass a radiologic health test. And then I had to participate in a follow-up survey several months later. I've toured Hanford several times over the past couple decades, and I've never been monitored during that time.</p> <p>A single particle of plutonium is only 4/10ths of one micron in diameter. As a comparison, a normal backpacking filter filters down to one micron. So in other words, you could get two of these things side-by-side going through a filter.</p> <p>Dr. John Gofman states that the inhalation of that amount will inevitably cause cancer, and the risk to smokers increased by a ratio of 20-to-1. We just saw a picture up here of a plutonium particle in the lung tissue. That was what that little star was.</p> <p>Typical reactor grade plutonium-239 oxide is eight to ten times more toxic than normal plutonium-239. Plutonium is so lethal in its exposure that in Japan the acceptable amount is 460,000 times smaller than for uranium-238.</p> <p>MR. BROWN: You're at five minutes now.</p> <p>MR. MEAD: I'm on my last page.</p> <p>The type of plutonium at Hanford is sometimes referred to as "dry plutonium" because it travels for longer distances than does normal plutonium. We ended production there 20 years ago, but it's still grossly contaminated. As an example, nearly 40 years after Hanford's plutonium nuked Nagasaki, the soil one kilometer away from where the bomb exploded showed 5500 picocuries per square meter. None of us would want to live in that type of contamination. But at Hanford, the same time, the soil readings one mile from Purex's discharge stack showed 6600 picocuries. Hanford's soil was 20 percent more contaminated at distances 1.6 times farther away than Nagasaki.</p> <p>Okay. To summarize, the Department's history of not being honest with the public, regardless of their statements, the Department will have already focused on a preferred option. It will run multiple projects simultaneously to achieve their desired goals.</p> <p>In 1987, it wanted to modify an abandoned reactor, even though its own peer review committee strongly recommended against that project due to safety concerns. The Department's continued attempts to restart the FFTF reactor are legendary, even though the Department knew the reactor was not needed, was not cost-effective, and would be hazardous.</p> <p>The Department has been trying to remediate some wastes that were created at Hanford in the 1940s and 1950s. But it has never completed a cleanup project on time or within the projected budget. In fact, even after working on these issues for decades, the Department still cannot manage the wastes that already exist on-site.</p> <p>The Department is responsible for the actions of its contractors, and in this regard, it has been criminally negligent. They recently had yet another spill out there because the workers used the wrong type of hose to drain a waste tank. The hose failed, but the workers did not notice it for several hours, and then delayed in making the required notifications of the accident.</p> <p>It is time for the Department to prove it is competent and able to clean up what is already at Hanford. I object to Hanford's inclusion as a potential site for wastes that were not created at Hanford, and I ask the Department to strike Hanford from the list of candidates for this repository. Thank you.</p>

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209	Bob Hedlund	None Given	8/27/2007	<p>Yeah, my name is Bob Hedlund. To begin with, I don't think we ought to put anything else up at Hanford until we go ahead and, like Greg says, clean what we have up there already -- clean it up. But, you know, I've been involved in the nuclear industry. I started down at Trojan in the late '60s, early '70s, when we were excavating stuff. I worked for Catalytic Hoffman, (unintelligible) and Becker, you know, all the different companies -- worked with Bechtel and those people. You know, the majority of workers are, you know, hardworking people, just like everybody in this room. They deserve a fair break.</p> <p>But, you know, in 1980, when the mountain blew up, I was down there. I was in the spent fuel area. There was radioactive asbestos all over the place. Also, we had a leak in the basement with radioactive water and some other stuff. I worked in some of the hottest spots of the plant. My pick went off the scale four days in a row there and stuff.</p> <p>When I left Trojan down there, I was sick. I coughed up blood for years. My stomach bled. My hair fell out. All my teeth fell out, and we had to replace every cavity in there. You know, I've had two cancer operations on my left leg. The bones hurt. You know, a year ago or six months ago or something, I quit breathing. I breathed so hard I sucked my whole chest in. My sternum's stickin' out.</p> <p>I don't know if that was from the Trojan down there, the nuclear waste, or I don't know if it was from the five superfund sites I dug through down on Front Avenue that they knew about and didn't tell us about. You know, we lost a couple of kids, four of my friends that were on the job. You know, you bring that crap home on your clothes, and it gets in the atmosphere.</p> <p>You know, it's shock and awe crap over in Baghdad, hell, what did they do? They went in there and bombed it. Right after that, they had a big storm. You know what happened? Five and a half weeks that depleted iridium came over and sat over the United States. It rained down. Every time it rained, it came down on us.</p> <p>You know, we got more diabetes from the Second World War tests. There's maps that show where the wind went and stuff. You know, I told 'em -- I filmed every meetings for the last eight years. I told 'em eight years ago, you know, we needed to quit producing this nuclear junk and start cleaning it up. We're all going to be dead.</p> <p>One in 50 Indian kids up around Hanford are dying of leukemia. Out of the 28 families at the perimeter of Hanford, all 28 of 'em had cancer. The kids are born with no eyes, no brains, you know. Out of 200 calves one year, they destroyed 80 of 'em because they had extra legs or heads and that.</p> <p>You know, in '57, I was working over there in an area where they were dumping the stuff on us on purpose just to test -- that was GE -- to see what effects it had on the people. You know, I was working behind a bailer when I was in grade school, you know, breathing that junk all day long. It's a wonder I made it this long. The only reason I did is because I went with alternative medicine. The regular doctor, all they do is cover it up. You know, you get sick, hell, I paid my own doctor bills. Hanford didn't pay 'em. Trojan didn't pay 'em. You know, the state didn't pay any of my bills.</p> <p>Well, anyway, you get the point. I want the damn thing stopped. We don't need the 70,000 to 100,000 trucks running in the United States carrying this stuff. We've got 38 canisters sitting down there at Trojan we don't know what to do with. A friend of mine decommissioned that down there. Where we ran into the radiated water in the basement where I was working up to my knees, they had to destroy four foot of concrete. It went down through there, you know, alpha, beta and gamma radiation. You don't want to get the junk in your lungs, I'll tell you, you're going to have a hard time breathing. That's all I got to say.</p> <p>Spoke again, pg 119: MR. HEDLUND: For those of you don't know, we have Operation Topoff from October 15th to the 24th. This is a mock nuclear attack or dirty bomb in Portland. We're the only ones who's going to have this. It's a national thing and involves the National Guard, involves all the agencies. It's part of Homeland Security deal. I just hope it's not another false flag 9/11.</p>

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210	Cherie Lambert- Holenstein	None Given	8/27/2007	<p>My name is Cherie Lambert-Holenstein, and I thank all of you for coming, and in respect to you, I will be very brief.</p> <p>On or about the presentation of slide number 16, you read the word "defense." I do not see that word on this slide. The history of Hanford is toxic, and toxic has been the use of euphemisms. The word "defense" should be replaced with "war, invasion, occupation." It has little to do with defense. I would suggest in the future you have better word usage.</p> <p>You use the public tonight by inviting public questions, and you did not plan to record that. That is manipulation of the public, purely and simply, and I suggest that it was used so that you would lessen public testimony.</p> <p>The issue tonight is -- let's see -- what's the -- greater-than-class C level radioactive waste. The acronym is GTCC LLW. Why is the word "radioactive" left out of the acronym?</p> <p>It's greater-than-class C level radioactive waste, and in parentheses it's GTCC LLW. And all throughout here it's GTCC LLW, where "radioactive" is omitted. My message here is very simple. That's eight words. Do not bring more waste to Hanford. And thank you all for coming. Thank you very much again.</p>
211	Dr. Joyce Young	From Portland, OR	8/27/2007	<p>DR. YOUNG: My comments have to take a little bit of a health -- not a disease perspective, but a health perspective. I'm Dr. Joyce Young, a naturopathic physician with a specialty in environ-mental medicine, from Portland, Oregon. I'm in private practice. I came here ten years ago with virtually no knowledge of Hanford and its health effects. I've been totally appalled about the lack of health effects information/epidemiology that has been done on the present radioactive leaking waste. How much is really going into the air? Nobody seems to really talk about it that it's going into the ground, it's going into the water. What's going into the air?</p> <p>The down-winders, quote/unquote, of Hanford are usually considered to be the folks east of Hanford. The reality of the situation, according to the National Weather Service in Portland, is that the Columbia River Gorge drains all the air from eastern Washington and eastern Oregon into the Willamette River Valley, i.e., air moves like water, downstream.</p> <p>This means that the people of Portland, Oregon and Vancouver, Washington are the true down-winders. We're talking millions of people in the Willamette River Valley. There are no air epidemio-logical studies on the present-day leakage on down-winders and health of down-winders, especially in conjunction with the 9500 pesticides registered for use in Oregon, and the roughly ton of mercury -- that's 2,000 pounds -- from the eastern Oregon cement plant, and the several hundred pounds of mercury -- airborne mercury from the coal-fired power plant, and the save nerve gas -- quote/unquote, safe -- nerve gas burning at the Umatilla (ph) Nerve Gas Depot.</p> <p>All of this health surveillance incompetence needs to be taken into account with the grim reaper health statistics of the Oregon and Washington Pacific Northwest -- what I call the paradox. If the Pacific Northwest is such a great place to live, then what are Oregon and Washington compared to all the rest of the country, all the rest of the U.S.?</p> <p>One, Oregon is number two in autism.</p> <p>Number two, Oregon is number two in breast cancer, and Washington is number one.</p> <p>Three, Oregon and Washington are considered to have the highest amount of multiple sclerosis in the U.S.</p> <p>Number four, Oregon and Washington have just joined the stroke belt of the Southeast United States. They're number six and nine in the country in stroke mortality. That's stroke death.</p> <p>Five, Oregon is 24 percent above the national average in malignant melanoma skin cancer, even though Oregon is known for its cloud</p>

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				<p>cover. <u>The Oregonian</u> says, to quote the front page of the paper, "The dark side of the sun," Dr. Oleg Johanssen of the Carolinska (ph) Institute of Sweden says in a 2006 paper entitled "Malignant Melanoma Skin Cancer - it's not the sun!" It's chemicals and radiation, some kind of a combination.</p> <p>How much has this geologically unstable northwest toxic stew at Hanford contributing to these grim Pacific Northwest health statistics? It's anybody's guess, because it's a mixture. All the people of Oregon and Washington need to have some answers before more high-level radioactive waste is added to this toxic soup. Thanks.</p>
212	Keith Harding	From the upper Hood River Valley	8/27/2007	<p>I'm Keith Harding from the upper Hood River Valley, oh, about 50 miles upriver from here, and an hour or so downriver from Hanford. I have two beautiful young adult kids who are in the room here. They've been attending these meetings for the last 18 years in Hood River and Portland.</p> <p>In this day and age, when we are programmed daily by the mass media, working for who knows who, to believe that there's a terrorist behind every "bush" in the country -- (laughter) -- terrorism and transportation of this waste material is one of my concerns, and then stockpiling yet more of this stuff in this gorgeous bioregion here.</p> <p>I started into college very soon after NEPA 1969 was instituted. Coming from an instinctually ecological perspective from birth really, in a Republic family even, New Hampshire, I was very glad that NEPA came into existence. In college, we had great hopes for it. Then working for 20 years in government, I saw the ups and downs of NEPA. And my sense of it now is that it has been extremely corrupted by the political mission that is fed down to the agencies to work with it.</p> <p>It seems to me the environment -- the human environment that we live in is that agency people very quickly get coopted by that political mission and working towards retirement. The public sees a very different final product through NEPA than what goes on back in the agency offices and whatnot. We get sanitized information, a lot of doublespeak and whatnot. In my background of forestry, a clear-cut is now called a regeneration cut. Well, it's a darn lie. Or killing citizens is called collateral damage in a war.</p> <p>So it seems to me one big challenge that we have in these agencies is for them to earn the public trust. Many much more specific speakers before me spoke specifically to Hanford and the whole nuclear realm, to this issue of earning the public trust. The track record with DOE and other agencies is not good.</p> <p>I have talked with retired friends that have worked in the industry, and they tell me that a lot of things that are running up and down the roads all the time really create a much more imminent threat than these things that are intended to transport on the road. The obvious thing is, why add to it, the dangers on the road? Yeah, there's plenty.</p> <p>Let's see. In the end, it will be ecologists, not the bookkeepers of industry, who give the final accounting of humanity on this planet. And I do have a suggestion of a place to check out for storing this material. It's on a ranch in Texas. I heard -- (applause) -- I heard that the owner of that ranch recently bought some 600,000 acres in Paraguay. What the heck is that about?</p> <p>I'll quit so that more can get up here. Thanks a lot.</p>
213	Gerry Pollet	With Heart of America Northwest	8/27/2007	<p>I'm Gerry Pollet with Heart of America Northwest. Folks, thank you very much for coming out here tonight. Together we can stop this insane proposal. We've done it before; we'll do it again. But it takes you coming out to do it, even when the Energy Department doesn't want you to be here, especially when the Energy Department doesn't want you to be here. And they don't.</p> <p>We're going to go through a few numbers and a few letters in alphabet soup. First, let's stop and say Einstein asked people to remember what the definition of insanity is. Right? Insanity, for those of you who don't know the quote from Einstein, insanity is doing the same</p>

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				<p>thing over and over again and expecting a different result. So, what do you call it if you dug a borehole above the groundwater that flows into the Columbia River, and inserted highly radioactive waste into the bottom of the borehole? And if you don't expect the borehole to leak and contaminate the river, then you're insane, because we've done it before, and our problem is that the Energy Department is fighting us tooth and nail trying to evade cleaning it up.</p> <p>We've dug boreholes at Hanford -- not we -- the weapon-makers -- and said, trust us. And we'd be insane if we did.</p> <p>Two hundred people were mailed notice of this hearing tonight by the Energy Department nationwide for all their hearings. Took a little teeth-pulling tonight to get to how large their mailing list was. I think that is more than dismal. It is shameful. Come on, I think we know that thousands of people commented on the Hanford solid waste disposal environmental impact statement. We had hundreds of people attend those hearings in Portland. Oh, in Portland. The Energy Department didn't want to hold the hearing in Portland either tonight, did they?</p> <p>Let's insist that they hold the hearing on the draft EIS in Portland and one in Hood River. (Applause.)</p> <p>Please make sure the applause is noted in the record.</p> <p>MR. BROWN: It's also not deducted from your time.</p> <p>MR. POLLET: Thank you. Three thousand people commented. Every one of those people were commenting on a closely related proposal to bury low-level and mixed waste at Hanford, including some of the same -- very same wastes that the Energy Department is attempting to rename and put in here as greater-than-class C-like. It's highly radioactive plutonium waste. They called it then remote handled transuranic. That was a mouthful. Didn't think that they would come up with a worse name to try to dissuade the public from commenting, but they did, calling it greater-than-class C-like. But it's the same highly radioactive plutonium wastes that they wanted to bring to Hanford. Two court decisions said you can't without studying the full impacts and the impacts of all the other similar wastes that you want to bring to Hanford.</p> <p>Instead what we have is a continued effort to rename and piecemeal. "Ten" -- write down ten -- -- "up to ten potential latent cancer fatalities during routine transport." That bureaucratese for the number of people who will die during routine, accident-free, terrorist-attack-free, trucking of the wastes proposed in the last go-round to Hanford under the solid waste EIS, including some of these wastes.</p> <p>Now write down "50." Fifty is the number of fatal cancers that those same wastes would actually kill when you include children and use the National Academy of Science's latest dose conversion numbers. Yes, believe it or not, your federal government decided in studying the risks of trucking highly radioactive waste to Hanford to leave out our children. Like I said, it's adult latent cancer fatalities they measured. I guess they don't give a damn.</p> <p>You have to ask the individuals who are in charge of the document, what were you thinking when you made that decision, when you decided to write that and leave out the study of children? And did you think you could get away with it?</p> <p>We insist that this document include the risks to children for not only trucking the waste, but for drinking the water and breathing the air in 10 years, 50 years, and 100 and 1,000 years, and include the risks as the National Academy of Sciences, paid for with your tax dollars, including from the Energy Department, ironically, said in the biological effects of ionizing radiation -- I'm saying this just for the record -- report number seven issued in June 2005 -- use the latest National Academy data on what is the effect of a dose on a child and an adult instead of trying to use 20-year-old data to say that you have fewer cancers. Because when we include children and the new data, it's 50 people die of cancer from routine transport of this waste to Hanford.</p>

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				<p>But what happens if at the intersection of I-205 and 84, the Energy Department's truck with mixed radioactive waste, including plutonium, had an accident, a predictable accident with fire, or a terrorist attacked it at that location? The Energy Department didn't study this. So we hired independent nuclear physicists to run the Nuclear Regulatory Commission's own models studying what would happen with a single truckload. So write down "340" -- 340 square miles of Portland would be contaminated, requiring evacuation and unprecedented effort to try to clean it up to make it liveable again -- 340 square miles. It's never been done.</p> <p>Write down "1,400." That's the number of cancer fatalities from that predictable attack and running their own computer model -- 1,400.</p> <p>Now let's think about -- the Energy Department said we've got 5,600 cubic meters of this waste to send to Hanford possibly. Are we really looking at anywhere else? Well, it's illegal to send it to WIPP. And the State of New Mexico's not about to roll over and make it legal. And Congress isn't about to. And Yucca Mountain's never going to open. So we're looking at all of a sudden near-surface disposal, which is insanity. Tried it. Done that. Been there. Done it. They buried greater-than-class C-like waste in the soil at Hanford. It's contaminating the groundwater today.</p> <p>And look at the other sites. Idaho has a legal agreement that the Energy Department is suing to void, but it's sticking. And it says you have to remove all similar wastes from the soil in Idaho. They're not going to ship it there. We have to win a legal battle to get the same thing into the Hanford cleanup agreement. And we have to uphold the mission of 297 passed by Washington voters to try to keep any of this waste that has chemicals in it out.</p> <p>Five thousand six hundred cubic meters is just the tip of the iceberg. In fact, as the State of Nevada wrote several years ago, the Department of Energy has 2.6 million cubic feet of similar wastes in existence today which it is looking for a place to send, calling it "special case waste," "denotes DOE waste having characteristics similar to those of greater-than-class C waste that generally lack firm disposal plans." So they're looking for a place, and they're trying to piecemeal it. And we insist that you put it all into one impact study, including all the wastes already at Hanford and everything else you want to send there in one study, and show us how many people you want to kill, and how much contamination you're going to put into the groundwater and flow into the Columbia River. It's not going to take hundreds of years.</p> <p>How much cesium-137 is going to be in it from your GNEP proposal to truck high-level waste to Hanford for reprocessing? The answer given tonight was either disingenuous or a deliberate attempt to evade the law. The law says all related proposals have to be disclosed to the public and their potential impacts considered in one environmental impact statement. Don't give us, Oh, we don't know which facilities we'll use for GNEP. You've chosen facilities, you're doing an EIS, and you're piecemealing it. You have to put it all into one document, have one round of public hearings, and tell the public at one time, when you want to ship all that high-level waste to Hanford, plus the greater-than-class C-like waste, and all the remote handled transuranic plutonium waste, where's it going to go, and what are the impacts, and how many people die? Thank you.</p>
214	Angela Crowley- Kuch	Executive Director of the Oregon Chapter of Physicians for Social Responsibility	8/27/2007	<p>I'm Angela Crowley-Kuch. I'm the Executive Director of the Oregon Chapter of Physicians for Social Responsibility.</p> <p>One of the problems I see with this environmental impact statement is one of the problems that represents our whole nuclear energy and nuclear weapons industry. We're not looking far enough ahead into the future. Not only are we not looking at the waste that will be generated with GNEP program, which, as we heard earlier, is the majority of the waste coming from the DOE weapons facilities, but we're also only looking out until 2062. That's as far as the projections for this disposal are going. I might not even have grandchildren by that time.</p> <p>Are we really looking far enough into the future when we're talking about radioactive waste that will be around for millions of years? The EIS should incorporate all current plans for new weapons and new power plants, all the new waste that could possibly be classified should</p>

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				<p>be included, all types and all amounts.</p> <p>Secondly, there's one alternative that was not included, and it needs to be included in the EIS. That's called the hardened on-site storage, or HOSS. When you have hardened on-site storage, there's no need for transportation. It stays at the site. We don't want to put anyone at risk from transporting nuclear waste. We don't want to put Oregonians at risk, Washingtonians, people in New Mexico. There's no need for any of us to be at risk from transportation.</p> <p>So in the EIS there needs to be an assessment of HOSS. They need to be resistant to attacks, including explosive and planes, and those are not usually included in the risk assessments. They also need to look at specific sites for these studies, not an arid site, and a human site. All these sites are different. The water tables are different. The rivers are different. We need a specific study for every individual site looking at all possible scenarios, types of waste and amounts of waste.</p> <p>There are a few other things that I'd like to see included. The first is there needs to be funding for the Washington Department of Ecology to monitor this waste independently to see the levels and check if anything is leaking. There also needs to be funding for the Oregon Department of Energy to review and comment on any transportation issues should the HOSS alternative not be chosen.</p> <p>Speaking of transportation, all routes and methods need a projected cost. And in addition to that, we need to have the estimates of the public health costs, which are not always included, in addition to accident projections.</p> <p>Finally, as has been mentioned many times before, we need a specific definition for what this other miscellaneous DOE GTCC-like waste is. It's not appropriate to have an environmental impact statement when we don't know exactly what we're talking about. So I'd ask that all these things be included. And please look far into the future. We'll be dealing with this waste for a long time. And if I have grand-children, I don't want them to be sitting at these meetings like I have for the past four years. Thank you.</p>
215	Ruth Curpiz	None Given	8/27/2007	<p>but I was going to say something else. But I don't know that I had an epiphany, but somehow I'm reminded of shock and awe and going into Iraq. Nothing was ever prepared correctly. The same thing, I think, is happening in regard to the Trojan -- or to the Hanford. I was opposed to Trojan, and then opposed to Hanford.</p> <p>We're being massaged with a lot of statistics that I think -- but -- but I don't believe anything. I think this is a bunch of working over our minds to make us think that something is being done. But I don't think they know what the hell is -- that they're doing. And I think that we just have to stop -- not -- certainly not transport this stuff. But we need to absolutely do a better job of getting the word out to people and planning and maybe changing who's doing when.</p>
216	Catherine Thomasson	President of Physicians for Social Responsibility nationally	8/27/2007	<p>My name is Dr. Catherine Thomasson. I'm the President of Physicians for Social Responsibility nationally.</p> <p>I'm concerned about the whole United States, and of course the whole earth, with these wastes that are going on internationally. I think it's very important, of course, to know exactly what the waste is, listing type and sites by state, by radioactivity amount, and volume, to better assess and plan for the site issues that are variable from site to site, and the transportation risks involved in each.</p> <p>I feel that it's very important to have a very clear and defined listing of the waste streams, and for the DOE activities that create this waste, so we know where the waste is going to be coming from in the future. It's also very important to accurately characterize the new sources of this waste, as was stated before in terms of its future projection.</p> <p>I think it would be fabulous if the EIS included a possibility that there wasn't going to be any more generation of nuclear waste, either in any nuclear power plant or any additional nuclear weapon, and that -- (applause) -- the savings from that would help fund adequate -- to me, storage is identical to disposal -- so adequate containment of this waste.</p>

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				<p>Obviously, as I mentioned with my question, I haven't been able to find -- and I'm sorry that you guys don't know any other country that is doing any better job than we are in terms of storing, which is equal to disposing, of this waste. It's very, very important to realize that the only current option that we have, which is the no-action option, is to store it on-site. Well, every site is not going to be able to store it on-site. So there is going to be some transportation risks involved with that action. But it needs to be in a manner that can be continually monitored, and the monitoring plans obviously need to go out for centuries.</p> <p>We need to have it hardened. We need to have it safe from a variety of attacks that haven't been assessed or even paid for up until this point, and aren't in the budget to be paid for. But obviously some of the sites are going to need to be combined, and my recommendation is for an eval- -- further evaluation and development of the no-action option, because storage and monitoring is essential.</p> <p>If you were to go beyond the storage in hardened facilities on-site in a variety of sites around the country, and go to near-surface level or intermediate level, it would have to be absolutely crystal clear what kind of monitoring is going to be done. There isn't any adequate research done on this. And it's pretty amazing that no research has been done, since this was legislated over 20 years ago, to tell us what kind of waste storage, which is, again, identical to disposal, that we could potentially have.</p> <p>So, obviously, we need to work through this EIS, through any other process we possibly can, to demand new geologic deep storage that is safe from groundwater and safe from geologic activity. Yucca Mountain isn't happening, and we need another site. We need another site because it's legislated. We need another site because that is the best way potentially to dispose, really to store.</p> <p>The last thing I'd like to say is that I think it is worth looking at the other technologies in terms of how to decrease the volume of these high radioactive sources and encourage the places that are creating them that there are alternative technologies developed so that we're not continuing to create this kind of mess.</p> <p>I thank you for your time. I know that there's a lot of scientific information in this room and expertise, and I know that you all are doing your job, and I want to thank you so much for being here. I truly do -- I mean, for us to be knowledgeable about this is very, very difficult. I work on many different issues, obviously. But to hear question-and-answer is really helpful for us, because we don't always know what questions we should be asking. So thank you very much.</p>
217	Paige Knight	Hanford Watch	8/27/07	<p>I'm Paige Knight, the President of Hanford Watch in Portland. We've been around for 14 or 15 years now. And I think I've been doing Hanford almost as long as I've been in my current teaching job, a long time.</p> <p>Therein lies for me one of the most important things, as I really am concerned about the children and future generations. I'm leaving my students and my own children and perhaps grandchildren with a terrible legacy. That's one of the reasons I've worked on this as much as I do.</p> <p>I'm going to address a couple of words first, and then just go through my points. And I'll try not to be too repetitious of things that people have said, although I think it's important that you hear people working on the same themes.</p> <p>We call this waste "orphaned," which I find quite fascinating. Also, at Hanford, we talk about cribs where waste goes. I mean, we have all these baby analogies. You know, it really bothers me. I think it's a real commentary over the many years on how we look at each other, and look at our children, and look at the world. So I look at "orphaned" and say, you know, all waste should stay at its home if at all possible. You know, every orphan should stay at its own home. We don't want orphans. So just a little bit of humor there, but there's also some seriousness in that comment.</p> <p>The other thing that I want to comment on in sort of that vein is, it was mentioned tonight, and it's mentioned in the literature, that the volume of this greater-than-class C radioactive waste is small compared to all the other waste at Hanford. "Small" is relative. We're</p>

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				<p>talking curies, and we're talking about adding to waste to waste to waste, and we have no good solutions, and some terrible problems at a place like Hanford. And we're not the only ones in the complex that are on that wonderful list that has problems.</p> <p>This is just one of DOE's proposals to bring waste to Hanford from all over the complex and country. We're right now waiting for another environmental impact statement to come out that was a redo of the solid waste impact statement that Jerry and others have mentioned that hundreds and hundreds of people showed up to speak out about several years ago. That EIS is looking at bringing waste in from everywhere. It went back to the drawing board because the logic of it and the data in it was so incredibly flawed. We cannot afford to have flawed logic in any of these documents -- and in the thinking. This is all about critical thinking. And I think we have a real chasm or a real black hole in our country of people who are really critically thinking through these issues.</p> <p>Hanford has no treatment yet. Let's think about this. We have no treatment capability right now for the 54 million gallons, plus other waste, all of which will leak into the Columbia River and the groundwater. That also has been mentioned. The Columbia River is our lifeblood. It is the lifeblood of our area. We cannot continue to kill our rivers.</p> <p>We also need -- and I mentioned this in my question earlier -- a comprehensive document that must include the synergistic or cumulative impacts of the waste from all these EISs. That's been mentioned a few times, so I won't belabor that one. But we need to include all current documents, which Jerry says is the law, into this document.</p> <p>The other thing, in this little handout where each site is described, I want to say your description of waste management activities at Hanford -- and now this is a quote from this little article -- "include treatment and disposal of low-level waste on-site and processing of transuranic waste which is being stored at WIPP." We don't have treatment. We don't have this kind of activity going on on-site. It is projected, but again, it's been mentioned, if we're lucky, we're going to have a treatment plant by 2019. And there's a really good chance we won't have it by then. So these projections are -- you know, they're based on pending things, and Yucca Mountain is one of those pending things that's been in process for over 20 years. It is millions, if not billions, of dollars by now in cost overruns, and we are nowhere, because it's not a great geological repository. It happens to be, from my studies, a great earthquake-prone area. I'm not too excited about waste being stored there.</p> <p>So the logic of picking Hanford -- and maybe some of the other sites, too, but my knowledge is about Hanford -- as a disposal site for this greater-than-class C radioactive waste is being predicated upon solutions and processes that are still a dream at Hanford. We haven't met our dream yet, and our dream is cleanup.</p> <p>DOE -- let me see -- Hanford is also currently not being safely managed. That's been mentioned time and time again. There's truth galore on that one, and I think Ron Wyden's representative tonight covered that pretty well.</p> <p>Finally, DOE needs to give a true projection of all the wastes over time, since it looks like there will be a steady stream. Catherine just mentioned this in her thing. I don't see this kind of waste ending unless we start looking at policies where we don't create this kind of waste anymore or we create it minimally.</p> <p>So we've got some real policy-type issues and rethinking to do in this country about this. Other countries are no further ahead in this. Absolutely they're not. So we're in a real tight place here. And if you are really concerned about your children and your grandchildren, you will send some comments in by e-mail, or, you know, the little handout here. The more, the better. They have to address them.</p> <p>I just think it's amazing that all of these people here have turned out tonight. I love that you have come and given your time again. I also really appreciate that the meeting was held here. And I would request that meetings do be held in Portland and Hood River for the draft EIS that comes out on this, because I'm sure one will -- who knows when -- and that many, many more people are contacted, and you get that list through the tank waste closure and management EIS. I mean, there's a huge list there -- 3,000 people -- and those people are</p>

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				<p>interested in this. They know that no solutions have come. They know that there's no -- you know, that there's, I guess I would say, a big tomorrow with no answers.</p> <p>So thank you very much.</p>
218	Karen Harding	From the Hood River area	8/27/2007	<p>My name is Karen Harding. I would appreciate being able to speak from the Hood River area. We had to plan a day, because we don't like to waste gas, just driving in to a meeting. And so our whole day was Portland errands. And we had quite a few discussions in the car, my 21-year-old and my 18-year-old, who have been coming for at least 15, 16 years. Why do we have to do this again? It's like, it doesn't do any good, they don't listen. And it's like, yes, yes.</p> <p>I have over the years released the thought that it does any good. But I guess my answer for now is that if you just come and listen to the combined wisdom of people who are truly grappling from their various disciplines, you have a tribal consciousness and answer, at least a wisdom of thinking, and you can compare it to the agencies who are trying, hopefully, to do the best they can, but are not looking necessarily at the larger picture. And I'm very glad you're here, and thank you for doing that all these years.</p> <p>Thank you for all the people who speak out with the facts and figures. I don't have all those at my command. I do child care, and so, obviously, children are the issue. We need to be considering many generations farther into the future than this EIS appears to be looking at.</p> <p>So I am opposed to making Hanford a national sacrifice zone. I would like all the facts and figures put into this EIS that represent the numbers of deaths that are potential, the amount of money that's potential. It needs to be a much larger scope, because the problem's a much larger scope.</p> <p>I would rather not have it trucked all over the country. If there's a way to solidify it on-site, I would be ecstatic about that. And we need to be putting that money into that.</p> <p>I definitely agree that we need a congressional mandate to have an outside commission be in charge of this. It's not been working, as we are well aware, to have the people who are generating it being paid to clean it up. It doesn't seem to be working. Thank you.</p>
219	Shannon Palermo	From Portland	8/27/2007	<p>My name is Shannon Palermo. I came here with some friends from Portland because my roommate, Lizzy, told me that this was going on, and it really concerned me. We drove here to urge the Department of Energy to take the Hanford location off its list of potential sites for the disposal of radioactive waste. I also want to say thank you so much to all the people that came here today, and also do all of the work, because it's hard work going up against the Department of Energy and all the powers that be. And you don't get paid for it necessarily. I just am really, really thankful for the physicians, for everybody that's come and spoke today.</p> <p>Our concerns are as follows. The delicate habitat of the Columbia River is an important part of many ecosystems. The possibility of Energy sending even more nuclear waste to Hanford will compromise the river. To consider disposing of even more waste in such a sensitive area seems short-sighted, given the proximity of such a lovely river. The river's ability to spread any leak contamination concerns us.</p> <p>Public opinion continues to show that we want to clean up Hanford and not increase the risk for further pollution. In the case of leaked nuclear waste, which, as mentioned, has already happened, and therefore I do not feel confident in putting more into the ground. Radiation would directly affect our community. Communities feel the effects of radiation in many ways, including an increase in birth defects, cancer, infertility, and other tragic medical conditions.</p> <p>Finally, we are sick and tired of not feeling safe to swim and recreate in the Columbia River when it's right there tempting us every summer. Thank you.</p>

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220	Liz Gilbert	None Given	8/27/2007	<p>I'm Liz Gilbert. I'm here because I read an article in <u>The Oregonian</u>. I really haven't been active about this before. I really felt driven to come here tonight and do what I can.</p> <p>We're talking a lot about children. I personally will never have children because my ultimate motherly instinct tells me to not bear a child into an apocalyptic world. I guess what I'm saying is that I don't necessarily believe that we will all survive. You know, it may be five years before we're wiped out completely. But what will live on are animals and plants and soils and rivers that deserve respect and need honoring.</p> <p>I am so sad, and I want to ask you personally to reach deep inside of your human self and ask yourself if it feels right to do this. Because it's wrong. And I know that something needs to be done with it, but please don't put it here next to the Columbia River. This is our home. We'll do whatever we can to protect it, and we will not allow it</p>
221	Chuck Johnson	Board Member of Columbia Riverkeeper	8/27/2007	<p>I'm Chuck Johnson. I'm a Board Member of Columbia Riverkeeper. Just for the record, I actually haven't checked this out with Columbia Riverkeeper yet, but I personally favor the option number one, the no option. Although, actually, I do think that the suggestion by the representative of Physicians for Social Responsibility for hardened on-site storage is probably a more responsible way of dealing with it.</p> <p>I do think, obviously, these wastes need to be protected and kept close to where they were generated to reduce the transportation costs and risks. I don't think that we're served well by a shell game of moving wastes around the country. These wastes -- I asked earlier in the question period about where these wastes were coming from, and specifically whether they were coming from the West Valley Reprocessing Facility that's been shut down for many years. It's highly contaminated. And the answer was that the current projected waste primarily comes from that site. I just question as to whether or not it makes a lot of sense to take waste from one highly contaminated site and move it to another highly contaminated site. I've been to West Valley, and I feel bad for the people who live in that area. They've got a creek going through the West Valley site. There are people who are downstream of that creek who want to have that waste moved. I can be sympathetic to that. There is an Indian tribe, the Seneca Band of Iroquois Nation, that live in that area and have part of their reservation that are downstream of that creek. But I wouldn't want to put my waste in their land, and I don't think they would really want to send their waste to us either.</p> <p>Particularly I think it's -- we really are -- I don't really think we're ever going to psychologically get a grip on what to do with this waste properly, as long as we're still hellbent on generating more of it. I really think that's the key -- (applause) -- because as long as there's this financial imperative to create more waste, and this political imperative to create more waste, then whatever solution is come up with is going to be the most -- the easiest but certainly not the best solution to what to do with it ultimately.</p> <p>So I think we need to have a national consensus. And I think we're actually -- the funny thing is, this administration is crumbling in so many ways right now. This global nuclear energy project is going to flop and fall on its face -- thank God. When it does, maybe we can finally have some sanity in our energy policy and make a decision to end this nuclear craziness. There's some other things that cost a lot less money -- conserve energy, build wind generators -- although they can be fatal, too, as we saw today. That's -- you know, nothing's completely risk-free, but nothing compared to the hazards of long-lived radionuclides.</p> <p>So when we get to that point, then I think we can have a rational discussion about what to do with this stuff, and a scientific decision that isn't based on expediency, and the least cost, quickest option. We will figure out what to do with it at that point. But until then, I favor option one, and I favor option one as my default position on just about any generation of radioactive material. Keep it where it's generated, and put the heat on the people in that place to stop generating it and figure out some other way of doing -- generating energy or doing whatever other activity it is that we think we want to do with radioactive materials. Thank you very much.</p>
222	Tiago Denczuk	From Portland	8/27/2007	<p>Tiago Denczuk: My name is Tiago. I came from Portland. I'm (unintelligible). I -- actually, I just would like to just bring forth some feelings that many people here express, and we agree -- arguments -- I would just like -- are just going to reinforce my personal feelings</p>

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				<p>about the same issues. I think the argument's represented pretty well, so I'm not going to extend myself on that.</p> <p>Mainly I feel really outraged to have to be here today telling the Department of Energy that this proposal is preposterous, is offensive. There's a group of people here that obviously have been working on caring of communities in many different levels and preserving in spiritual level, ecological, medical. Having to come here to just say, get out here, don't come with more trash to our back yard, is taking all this energy that's being focused on fixing a problem that started decades ago, and have not been fixed.</p> <p>I think that the feeling of DOE not being trustworthy is like no one can trust any project that comes from this agency that already prove itself incompetent and has no evasament (sic/ph) on really cleaning our sides, on really fixing the error that committed in the past, and has a lot of evasaments (sic/ph) in cheap demonstrations like PowerPoint presentations or PR movements. But when it comes to actually planning on coming up with real solutions, there's nothing. And then coming to ask to dump even more trash on a broken trash can that is already leaking and destroying our environment is just so offensive.</p> <p>I say no. We're not stupid. We're not going to just accept that. Yeah, get out of here.</p>
223	Les Davenport	Consultant to Washington Closure Hanford as their Criticality Safety Engineer	8/27/2007	<p>MR. DAVENPORT: I'm a consultant to Washington Closure Hanford as their Criticality Safety Engineer, even though I live in Battleground, Washington, just about 15 miles north of here. I have been the -- I have led the Nuclear Criticality Safety Programs since 1985 at Pacific Northwest National Laboratory, Bechtel Hanford, Incorporated, and Bechtel's successor, the Washington Closure Hanford.</p> <p>My conclusion is that we really shouldn't add the greater-than-class C waste to sites that are currently under going cleanup or where the water table is high. That would eliminate four sites that I can think of, including Savannah River, Oak Ridge, where the water table is high, Hanford, where undergoing cleanup, and hopefully will be nearly through with most of the cleanup except the vitrification project before -- in fact, quite a bit before -- the last of the greater-than-class C waste is generated.</p> <p>However, these wastes have to go somewhere. They don't have a disposal path for many of them at the current time. But my personal preference is the geologic repository. That will remain true throughout the period when they're generated. However, that means that we have problems with our national Congress, because they're the ones that have put limits on WIPP, the Waste Isolation Project -- Pilot Project in New Mexico, and also Yucca Mountain, if it ever gets started. Neither one is large enough to take care of all the wastes that have been generated and are designated for those two sites.</p> <p>We have a national problem. We have a political problem. If you can do anything with your congresspeople, please consider that.</p> <p>Also, it was Congress -- yes, our national Congress -- that shot down the Basalt Waste Isolation Project that was at Hanford, and the basalt disposal at Defsmith (ph), Texas. They wanted to spend all the money on Yucca Mountain so they could hurry up the project. Didn't seem to work, did it?</p> <p>We all accept some risks in our life. When we understand them, that's okay. Some people smoke cigarettes. I don't. Most people drive cars. There are a lot of other things that are risky, including just living. But radiation is one of the unknowns in our life for many people. It's because of this unknown quantity, and not being able to see it, that makes many people very hesitant to accept radiation risks.</p> <p>However, we are in a radioactive environment. It's natural. Potassium-40 is in our bodies and everywhere throughout the earth. You've heard about radiation from radon in your basements. that comes out of the earth. Don't forget life-saving medical radioactivity. It's necessary. There is radiation from nuclear power and isotope production, but that's less than is emitted by our coal-fired electric generating plants.</p> <p>We're also in a chemically filled environment. They don't ever decay. They don't go away. But because radioactive material, which is relatively unknown, decays, we can talk about that and be scared.</p>

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				<p>Kind of in summary of what's going on at Hanford, it is being successfully cleaned up in many ways. And I'm not including the vit. plant and the tank waste. They're going to be a long, long, long-term problem. There are five reactors that have been cocooned. N-Reactor's in process. B-Reactor may become a museum. We'll have to wait until people decide on that one.</p> <p>Only spent nuclear fuel has been moved away from the Columbia River. It's put into dry storage in the central plateau. All liquid waste disposal to the ground was stopped quite a number of years ago, and some low-level waste, contrary to the comments earlier, has been sent to a contractor near Hanford, at Richland, and is put into a more stable form, and then returned for storage at the Central Waste Complex at Hanford until it can be properly disposed.</p> <p>Many solid waste sites have been cleaned up to their ROD requirements. That's a record of decision, which is the final decision by the regulators and the public as to what happens. That includes the hundred-F (ph) sites -- hundred-F reactor of solid burial grounds are pretty much all taken care of down to the requirements.</p> <p>Hundreds of buildings have been removed and debris has been shipped to ERDF. That's the Environmental Restoration Disposal Facility in Two West Area, where it goes into a lined below-ground facility that meets CERCLA requirements. Hundreds of buildings have been removed, and that includes almost the entire north half of the 300 Area. If you've been out there recently, there's hardly a building there, two that I can think of. One's a power plant -- never had any radioactivity in it. Well, the coal, but that's something else again. They're down to the floor slabs, and now they're starting cleanup of the underground waste.</p> <p>The last thing that I want to mention is that transuranic waste is being successfully shipped from Hanford to the Waste Isolation Pilot Project in New Mexico. Success is happening at Hanford. Don't say no</p> <p>Spoke again later in the meeting: MR. DAVENPORT: Again, I'm Les Davenport. I'm a subcontractor to Washington Closure Hanford.</p> <p>Two points that I missed during my presentation. Semi-permanent storage on-site of some waste is not practical. That includes medical waste, the unneeded radioactive sources out in the commercial world and some other places, and reactor internals from permanently closed reactors. Hardening these sites just is not cost-effective. It is too expensive. If you look at the cost of hardening the 104 reactors that we have currently, it's a tremendous expense. Even at Hanford, guarding the plutonium that remains there in the two-thirty-four-five facility is around two million dollars a year, if I remember correctly. That's a lot of money for security that doesn't go into cleanup.</p> <p>Secondly, you have to realize that 20 percent of our electricity in the United States comes from nuclear power. If you're so anxious to close 104 nuclear reactors, what do you plan to provide your electricity?</p> <p>UNIDENTIFIED FEMALE SPEAKER: Solar.</p> <p>MR. DAVENPORT: Good. Solar is excellent. So is wind power. But if you consider the amount that they contribute, the cost of developing such facilities, and getting them in place, that's a lot of money. It is being done. It needs to be done. But there is one other thing about solar and wind power. They are not continuous. When the sun doesn't shine, when the wind doesn't blow, it does not make electricity. You need base load plants.</p>
224	Dona Hippert	On behalf of the Northwest Environmental Defense Center and Oregon	8/27/2007	<p>Dona Hippert: Thanks to the Department of Energy for holding these hearings, and to everybody for coming out and speaking at them. My name is Dona Hippert. That's D-o-n-a, with one "N" for the benefit of whomever is given the lovely task of transcribing these testimonies of ours.</p> <p>I'll likely be submitting detailed written comments on behalf of the Northwest Environmental Defense Center and Oregon Toxics Alliance.</p>

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		Toxics Alliance		<p>We'll give you a copy of these written comments attached to that.</p> <p>These are two groups of which I'm a board member, and both of whom are very concerned about the current situation at Hanford, and with any scenario that will increase and compound the problem that exists there now.</p> <p>But tonight I speak to you on the subject of trust and obligation. I'm astounded that there's even consideration of the idea of bringing more waste of any kind to Hanford Reservation. I shouldn't be by now, but I still am. Considering all the problems and mishaps that have happened at Hanford in the process of cleaning up the waste that's already there, for instance, the waste leak last month, it's simply incomprehensible that the Department of Energy would want to bring in more waste. The most frightening example -- oh, when one looks beyond Hanford, the situation gets even worse. The safety record of the DOE gets even worse. The most frightening example is found in the DOE Inspector General's own report that came out in March of this year describing the inability to locate at least 14 computers that held highly sensitive and classified information. Six other computers were missing, but they weren't sure what the information was that was on those. And the state of DOE record-keeping was so abysmal that the Inspector General's Office had to resort to, in their words, extraordinary means to locate an additional 125 computers.</p> <p>Now, in conjunction with this process, we have the soon-to-be infamous slide 19 where they're showing a Hanford situation as an example of something that's already working, and it's actually something that's not working at Hanford.</p> <p>If parents were to exhibit the same sort of neglect and incompetence that the DOE has exhibited at Hanford and in its other operations, the state would long ago have stepped in and removed their children. And now the DOE is talking about adopting more children, and ones that are difficult to manage at that. And when I wrote these comments, I wasn't aware of the term "orphaned waste," but it seems to fit in and dovetail quite nicely with this.</p> <p>This analogy of incompetent parenting is not as far-fetched as it may seem in that our resources, including our lands, waters and airsheds are a public trust, and we the people are the beneficiaries of that trust. Although DOE may not be the agency in charge of directly managing these resources, DOE is charged with protecting the trust of the public health and safety. As public servants, DOE officials at the very least have the obligation not to act in a manner that damages our resources and violates that public trust.</p> <p>In the case of Hanford, where DOE actions are already contaminating the Columbia River and the groundwater in the Hanford vicinity, the DOE should do nothing that by any chance would compound that contamination. Please do not bring this GTCC waste or any other waste to Hanford. Thank you all very much for your attendance.</p>
225	Lloyd K. Marbet	Representing Don't Waste Oregon	8/27/2007	<p>My name is Lloyd K. Marbet, M-a-r-b-e-t. I am here representing a group called Don't Waste Oregon, which many of you know has been in existence for some time addressing various problems of the nuclear fuel cycle, as well as the Executive Director of the Oregon Conservancy Foundation.</p> <p>I appreciate the opportunity to provide testimony. I must say it's an honor to hear the testimony that's been given thus far by all of you. I too very much appreciate the fact that we seem to retain ourselves as a community of concern, willing to come time and time again to try and provide some wisdom in this process.</p> <p>I also appreciate the fact that you've changed the way in which you're holding these meetings. I talked to you about that at the last meeting, and I very much recognize that you've done that, and I want to give you that recognition.</p> <p>MR. BROWN: Sure. Thanks.</p> <p>MR. MARBET: This is the second public scoping meeting on a proposed EIS involving Hanford. It seems now that they're happening</p>

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				<p>about every six months. I'm worried about what's going to come up in February. It seems to me that if you're going to do this scoping process -- and there seems to be now redundant -- or to some degree a redundant analysis of specific locations, then the efforts definitely should have communication between them, and the results be combined, because I'm very worried that we're not seeing the bigger picture here. There's -- I think a lot of people have spoken to that.</p> <p>I would also like to ask that Congress and the U.S. Department of Energy stop presenting us a fait accompli, which goes, some waste already produced, more waste coming. Chuck spoke to this eloquently, and I can't really say it better. I think we have reached a point in time in which we have to disengage ourselves from this technology and create the world that we've all been striving for. Going in this direction in which we allow ourselves to constantly be presented this "more is coming" justification is wrong and needs to be stopped.</p> <p>If you proceed with this scoping process, then I ask that it include the following:</p> <p>First, an examination of the need for further waste production, exploring all alternatives which obviate that need. I'd like to see that kind of analysis put forward.</p> <p>Secondly, the EIS should provide an analysis of new stabilization technologies. We want to be clear that we're in the present when we're examining what's available out there and how they impact the justification for this proposal.</p> <p>Third, Hanford and other existing USDO locations are being considered because of their past disposal operations. They're being considered a part of this review process. All of these sites should be analyzed based on a comparison of the problems and successes of their respective operations. I think we need to look back and see where we've come from, and that should be a part of that scoping process. Again, evaluating how the success of various disposal operations have been can greatly impact what you're going to find in the future.</p> <p>Furthermore, I'm concerned with the distinction that's being made between disposal methods; more specifically, geologic versus surface disposal. And I might add here, by the way, that I don't think we would have this comparison happening to us if there wasn't this underlying justification that we're going to have more nuclear waste produced, because I think this is the formula for cutting corners in the future. Apparently, these wastes fall under different regulations, government versus commercial waste. Yet, safe surface disposal is being considered without specifically identifying the under-lying justification for using this disposal method at all. It seems to me that we need to know where that's coming from.</p> <p>The EIS should reveal this justification with measurable criteria. And in doing so, it should consider what the impacts are between geologic and surface disposal if there is a breach of containment, which is the obvious thing that you're trying to prevent. The EIS should also examine the impact of terrorist activities between all disposal methods, which I've not heard much, and I think that definitely should be examined.</p> <p>The EIS should examine the impact of the disposal of new waste on existing cleanup operations. There's so many people that have eloquently spoken to this this evening, and obviously I stand with them in pointing out the obvious, which is that we should not put anything more at Hanford until we clean up what we've already done.</p> <p>Finally, transportation of waste between all sites should be examined with the risk involved for each location. I testified at the last scoping public meeting, and I concluded with what I'm going to paraphrase for this meeting in that testimony. We have lost faith in the U.S. Department of Energy's ability to find wisdom in the scoping process. But we have not lost faith in the hearts and minds of those who are no longer willing to put up with the faustian bargain you present us. I again suggest that you carefully consider the idea of siting more nuclear waste installations in the Pacific Northwest. Out here, we are not willing to settle for anything less than full accountability. We are only interested in building a world that is based on peace and justice, sweeping nothing under the rug, cleaning up, and putting a stop to these kinds of proposals. Thank you.</p>

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226	Catherine Chudy	Resident of Washington	8/27/2007	<p>My name is Catherine Chudy, and I live in Washington and I work in Oregon. I'm also the daughter of Stanley Chudy, who worked as a rigging foreman for Union Carbide, a site for the Manhattan Project as it developed the atomic capability that destroyed Hiroshima and Nagasaki. There were 50 acres involved in the Manhattan Project in Tanawanda, New York. It was a secret, bolted, locked place. When the war ended, they unlocked and unbolted that place, and my dad walked those grounds for more than 30 years. He didn't understand the risks. Someone earlier said that if we understand the risks, then we can proceed.</p> <p>Years after he retired, they condemned the building his office was in. That was the infirmary for the Manhattan Project. They carted away tons of contaminated soil -- I don't know where -- and they erected barriers and hoops for those workers if they could prove direct damage in the form of cancer. My dad is a survivor. He has unexplained neuropathy and legs he can barely stand on at 89 years old. But as his daughter, I struggle to understand and know a lot more than he did about such risks.</p> <p>Hanford on this list is a bad idea, beyond assumptions, beyond mission compatibility, and beyond reasonable alternatives. When will they ever learn? When will the Department of Energy recognize that the only compatible mission, the only reasonable alternative, is to clean up, and not enhance, the dreadful toxicity at Hanford. This is Alice through the looking glass, and the Mad Hatter is twisting the language on us once again. There are no imaginable physical alternatives -- no imaginable physical characteristics or mission compatibility that begins to justify Hanford being on this unfortunate list.</p> <p>My friend David Hupp (ph) asked that I convey his comment on the transportation risk implicit in this process. He reminds us that a few years ago children collected hot cars. Well, creating hot trucks is a childish solution to a serious problem. We should be beyond such childish solutions. But I fear that, as always with the Department of Energy, viable answers to serious problems are still blowing in the wind.</p> <p>I am a mental health therapist, and I see insanity every day. I appreciate being one of the voices speaking out tonight against this insanity. Thank you.</p>
227	Louisa Hamachek	With Wild Eugenians for a Safe Columbia River	8/27/2007	<p>I'm Louisa Hamachek of the Wild Eugenians for a Safe Columbia River.</p> <p>We of WESCR say no to the DOE proposal to this current consideration for considering Hanford as a site for the low-level solid nuclear waste to be added to the already existing waste at Hanford. We want no more waste to be brought to Hanford with any level of radioactivity. We want no trucks of radio-active materials passing through our town of Eugene on I-5. We'll track them from Livermore Labs and the San Diego Navy Base and other sites that might use I-5 to make their way to Hanford. And we'll try to prevent them from endangering our Valley of the Willamette.</p> <p>We in Eugene, who are stewards of the upper Willamette Valley, which is a tributary of the Columbia River, do not want to risk spillage and radioactive harm to the inhabitants and their habitats, harm to innocent children, citizens and animals. We trust that our federal government is working to protect us, and we hope for that. We say no to the proposed transport of radioactive waste to Hanford through our area. We of WESCR recognize ourselves as part of the biological category of animals, and as humans are subject to the damaging effects of radiation, cancer and mutations or birth defects, that all animals are. The plant's genetic material is also changed by ionizing radiation. It leads to a diminishment of the health of our entire region, and that's not fair.</p> <p>We of WESCR want the entire Columbia River watershed basin to be free of damaging toxic chemicals and radiation, and insist that the Department of Energy immediately prevent any further leaks of toxics and radioactive liquids into the Columbia.</p> <p>We want to have monthly reports of the levels of radiation in the river from Hanford to be on a website available to everyone, not to have blocked websites from the Department of Energy that have information not available to us, that lists a category of information, and we can't find any information under that category. That's not fair.</p>

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				<p>We want to have the Department of Energy removed from the responsibility of cleaning up Hanford, and to have that responsibility transferred to a triad of the State of Washington, the State of Oregon and the Federal Environmental Protection Agency, and to have the Department of Energy foot the bill, pay for it. You made the mess, and you have to pay for it. But you're not showing any resolve to actually keep us safe. So we as citizens ask for a different federal agency to take over. We want the Department of Energy -- let's see -- to have this transaction -- the transfer of responsibility to be commenced by 2008. By the end of 2008, we want the EPA to be given the task and to work with Washington and Oregon.</p> <p>Furthermore, according to the book <u>The Atomic Farm Girl</u> by Terry Hein (ph), in the fall of 1946, General Electric took over the administration of the Hanford Reservation. They built and ran five new plutonium production reactors, two chemical reprocessing plants, and 81 underground waste storage tanks. These produced the nuclear liquid -- the liquid nuclear waste that we are concerned about right now. The Cold War bomb production and pollution began in 1949 when the Russians tested their own atomic bomb, and the frenzy at Hanford began with a desperateness to produce bombs, which led to dumping of the liquids into the nearby available dirt, which is now going out into the river. And that's not fair. There might've been a desperation, but we presently are having to deal with the mess.</p> <p>We at WESCR hold General Electric responsible for the present remaining nuclear waste leaking into the Columbia River at this time. They profited enough, and we call for an international boycott of all General Electric products until the radioactive and toxic leaks into the Columbia River has been abated and verified by that triad of the States of Washington and Oregon and the federal EPA, as well as the United Nations, because that river does not stop in Portland. It keeps going on out to the ocean, and the salmon -- perhaps some of those wild Alaska salmon, they spawned at the Hanford breach possibly where the radioactive liquids are bubbling right up in the base of the river where they're spawning, and this is an international abuse, and it should be brought to the United Nations, and they should verify, as well, that Hanford has stopped leaking. Thank you.</p>
228	Rachel Pecore	Works for Columbia River keeper	8/27/2007	<p>My name's Rachel Pecore, R-a-c-h-e-l, P-e-c-o-r-e. I work as a water quality scientist for Columbia Riverkeeper.</p> <p>On that back panel there explaining greater than class C waste, I'm going to quote, "Most hazardous of low-level radioactivity waste/dangerous to inadvertent intruders beyond 500 years. Must be disposed in geologic repository unless alternative method proposed by DOE and NRC." The mandate is clear; the study must include how all waste will be protected from inadvertent intruders beyond 500 years, at the least.</p> <p>Please consider all worst-case scenarios, including earthquakes at 9.0, rising sea levels, other climate change predictions, volcanic eruptions, not to mention what's already been -- well, I will mention what's already been mentioned -- hazards to children, health hazards and the risks of transporting these things on our roads.</p> <p>There's a lot I don't understand about Hanford, and appreciate coming to these hearings to learn more. I appreciate everyone who's here. I learn from all of you. Hanford's an extremely complex site. However, I don't understand how radioactive waste could possibly be transported or disposed of or stored before the vitrification plant is finished. Finish the vit. plant, and then come talk to us. Thank you</p>
229	Daniel Swink	Resident of Vancouver, Washington; volunteer for Columbia Riverkeepers	8/27/2007	<p>My name's Daniel Swink. I'm a resident of Vancouver, Washington, and also a volunteer for Columbia Riverkeepers for water quality monitoring of the Columbia River.</p> <p>I think most of my concerns have been well-expressed tonight. But one of the things that's foremost on my mind has already been indicated is that I don't see how the Department of Energy can even consider bringing more waste in when you already have plumes of toxic radioactive waste seeping towards the river, and has already been discoveries of radio-activity that's already reached the river, even though most media does not -- has not brought that forward.</p>

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				<p>This river basin serves an area the size of France. That alone has so many repercussions just from the river standpoint alone, not to mention the airway and the transportations of vehicles and all the other considerations that people have mentioned. So as the one woman that mentioned before me has indicated, this has repercussions that go international because the river does flow into the ocean. We're only just beginning to study the impacts. It's one of our most recent contributing pollution sources into the river. If it wasn't for a lot of volunteers that are out there right now that are trying to gather data on what this all means as the full extent of impact, there wouldn't be hardly anything going down about this.</p> <p>I just want to make it clear that I'm definitely opposed to bringing more waste in until we take responsibility for cleaning up what's already there. It's already been proven that we have a long ways to go, and it's been a slow road getting there. We need to get this waste contained that's already there before we even consider bringing in an ounce more. Thank you.</p>
230	Terry Hammond	None Given	8/27/2007	<p>My name is Terry Hammond. I was born in Portland. So if I have a right to fight for anyplace on earth, I guess this is it. I just want to take the national government as a model for my response anyway, and that is that we will resist your bringing weapons of mass destruction to threaten us, and we will hold your leaders personally responsible. We will use whatever means are necessary to stop you. As been said, all options are on the table.</p>
231	Carol Earnert	With Women's International League for Peace and Freedom	8/27/2007	<p>My name is Carol Earnert. I'm the Women's International League for Peace and Freedom, nationally, internationally and locally. I wasn't planning to speak, and I'll speak very briefly. But I second virtually everything that's been said by those in the audience tonight. I think you're great. I think you're critical thinkers. I think you really care about human beings and our future. I really feel for the young women who were sitting in the front, because a lot of our kids have got the same feeling that this is an apocalyptic time and a very dangerous time.</p> <p>So I just want to say that I think the DOE should consider as an alternative looking at what Henry Kissinger had said, and George Schultz, and Sam Nunn; it's time to start talking about evolution of nuclear weapons. And a lot of other people are saying it's time to look for something besides nuclear power. We've made a mistake in following this, and we've got to recognize it. And we've all got to work together with each other in love and caring and truthfulness, and caring for those who've made the mistake, and those who have been shouting out against it. We've got to turn around.</p> <p>We've got treaties already that we can support. We have other nations begging us to come back to sanity. Let's help our government turn around and start being a little civilized instead of acting like the world's barbarians and butchers.</p>
232	Ron Skinnarland	State of Washington Dept of Ecology	8/28/2007	<p>My name is Ron Skinnarland, S-k-i-n-n-a-r-l-a-n-d, and I gave a copy of our comments to the person at the front door.</p> <p>We want to thank you for a chance to comment on the EIS, and I'll just start with the bottom line. We have copies of our comments here. I've given them to a number of people in the room already but we have some more, if anybody else is interested in looking at them.</p> <p>I think our main concern is Hanford's a big cleanup, it's a long-term cleanup, we have a lot of issues to deal with, issues like off-site wastes that periodically, you know, caused a lot of interest and concern at the site, and I think kind of where we're starting off is this waste is defined as being waste that's a long-term threat. It might a threat to an intruder, would be a threat, you know, to the environment over the long term.</p> <p>It's supposed to go to a repository, unless NRC makes a decision not to put it in a repository. So I think our, you know, underlying question is why are we looking at other alternatives here, and I think you've already heard some of those concerns from--at the meeting in Oregon and you'll be probably hearing some of those tonight too.</p> <p>So basically our general point is the greater-than-Class C waste is a long-term threat to human health, the environment, and given the current status of the Hanford cleanup, and the amount of waste that's going to remain at Hanford, forever, that adding greater-than-Class C</p>

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				<p>waste is not acceptable to the State of Washington.</p> <p>But just some of the underlying concerns we have is we're already working on that Tank Closure and Waste Management EIS at Hanford. We have been working with the Department of Energy on that. There's a lot of expectations about what that EIS is supposed to show.</p> <p>The thing that people are most interested in is what is the total effect of the cleanup we're going to do. Like when we do the cleanup, we can get the waste we can out of the tanks, clean up the soil sites we can, treat the waste, dispose of it, ship off transuranic waste, ship off high-level waste. What's the long-term risk here?</p> <p>And, you know, we still don't have an answer to that question yet. So the EIS, in addition to making decisions on tank closure and making decisions on disposal waste at Hanford, and bringing a small amount of low level and mixed low-level waste, not greater-than-Class C waste at Hanford, we're still waiting for people to see that, and our stakeholders are very concerned it's inadequate, cumulative impact, and adding the greater-than-Class C waste is another factor.</p> <p>There are questions of timing. So the timing for our EIS, I think we're still waiting to hear a little bit more about what the schedule is, but we're hoping next year to have a draft of our Tank Closure and Waste Management EIS, and then, in order to put all these together, whenever the greater-than-Class C waste comes out, we would need to add it in and do supplemental analysis.</p> <p>So I think in addition to just the general value that, you know, this, the alternative of disposing at Hanford in shallow landfill, enhanced or not, or in a borehole, you know, just doesn't make, you know, practical or technical sense to us.</p> <p>There are the problems of, you know, it potentially creates a delay or extension in the process for figuring out where we are, and making cleanup decisions on the Hanford waste we already have, and we're trying to deal with.</p> <p>So that's one concern is, you know, how do you integrate the tank closure EIS with this EIS, so that the public and the decision makers can have a good cumulative impact, that lets you make good choices about what we're going to here at the Hanford cleanup.</p> <p>Then, in addition, there are values like, you know, the state does have an issue of an off-site waste. It was invalidated by a federal court but still on appeal, so, you know, it was voted on by 70* percent of the voters in the state, and represents a, I think pretty basic value about getting on with Hanford cleanup. I think that's one of our concerns here.</p> <p>And just to reiterate that a little bit, you know, we're still in negotiations right now over the overall Hanford cleanup schedule. We haven't concluded those negotiations but we're ten years away from having any tank treatment for the 53 million gallons of waste that's at the Hanford site.</p> <p>And estimates vary. But there's a million gallons of waste, or so, of that high-level waste, has leaked in the past in the environment. There's no, you know, there's no approved plan for getting that waste out. So that represents a long-term threat.</p> <p>Because of the past disposal of liquid wastes and waste that's been put in burial grounds in the tanks, most of it's liquid waste, but there's about 80 square miles of groundwater that's above drinking water standards for a number of radioactive and chemical contaminants at Hanford, and we started working on some of those things but we're years away from finishing those, and the cleanup at Hanford right now, under the best circumstances, you know, based on what the DOE baseline and current congressional funding levels, is going to take 40 years, or more. So I think it just--you know, to consider bringing this waste which, you know, is safer for everybody in a repository, I think just seems like a bad thing to be spending time on.</p> <p>So I guess in an effort to try to be positive ...* I think we think the focus should be on looking at finding a repository for waste like this,</p>

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				that are a threat over the long term, and we think that's where this EIS should concentrate. That's basically our comment.
233	Gene Kinsey	individual	8/28/2007	<p>I'm Gene Kinsey. I'm not a polished speaker or anything. I'm just me. But I have opinions, just like everybody else, and in my opinion, the Hanford reservation is a safe place in the world to store, as any place in the world to store nuclear waste. nuclear issues, we might do some things differently than we have in the past, but that's 20/20 hindsight.</p> <p>Also, it's my opinion that some of the concerned people from Oregon, who are extremely negative about Hanford, are filled with fear and superstition instead of real knowledge about nuclear and radioactive issues.</p> <p>I believe that Oregon citizens down the Columbia River from Hanford, if they really understood the truth, would have more to fear from the discharges from the backside of their local squirrels and pigeons and mushrooms growing in their backyards than any microscopic anything that would come from the Hanford reservation and get into the Columbia River.</p> <p>I also would like to, at this time, commend the DOE for the job they're doing, for the problems they go through, the people that they work with, the people that work for them, they're imperfect and so is their equipment. It has a tendency to break down, and mistakes are made. But they are doing what they need to do, and as far as I'm concerned, they're doing the right thing. Thank you.</p>
234	Faye Vlieger	Resident of Kennewick	8/28/2007	<p>MS. VLIEGER: Good evening. I live here in Kennewick, I'm not from Oregon, although I did pass through Oregon while in the military. I do not represent anyone from Oregon. I represent my own opinions as a former Hanford worker.</p> <p>In my opinion, no more waste should be added to a problem that we haven't been able to fix already. The waste at Hanford still has not been characterized. There is no public document that DOE will release to any other agency, or to any of the government-regulated programs that are trying to aid the workers that still don't know what is killing them.</p> <p>The waste that is here is compounded by a number of years of error in the manner in which it has been handled. The DOE track record in making those errors public--well, let's just say the slower the report comes out, the more significance it has.</p> <p>It's inversely proportional to how significant it is as to how quickly DOE will answer the question.</p> <p>Well, I have thought that this is a difficult situation, that we are going to have nuclear power with us for the rest of our lives, and we will have to contend with the issues. Dumping it here is not the answer. DOE has not acted to preserve the public trust, nor to preserve the safety of the workers at the site.</p> <p>If you wanted to work at this site because you thought that bringing this material into the site would increase our economic potential, I welcome you to apply for a job at Hanford, where it's been documented that more than 10 percent of the injuries are never recorded, and those are the most dangerous injuries.</p> <p>If you think that doesn't happen, you're looking at a person whose injury was never reported, and I still haven't been told what I was exposed to.</p> <p>This isn't the Cold War, the time has passed for secrecy, and I don't think bringing more of this highly radioactive waste to the site is going to improve the conditions at Hanford.</p> <p>If Hanford is so safe, and we are doing everything correctly, then why do we have a Class A accident under investigation at this time for tank waste. We're talking waste that was generated 40-plus years ago and we still can't handle that.</p> <p>DOE turns a blind eye to contractors that do work here. So to enable them to have oversight over highly radioactive waste, yet again, when they turn a blind eye to malfeasance, and, unfortunately, errors that happen on the site, is unconscionable.</p> <p>The philosophy that DOE still projects, that as part of their credo for injuries, that unless three or more workers are injured, there will be no formal accident investigation, is old school, old world, and wrong*.</p>

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				<p>So we want to bring more waste here. We want to increase, exponentially, the hazard. It's unconscionable. We're not doing a service for ourselves, our children, our grandchildren, or posterity. The situation at Hanford is already out of control. There is no answer. They cannot control the contractors, they cannot manage a contract, look at the gasification plant and how screwy that's gone. The tank waste is not managed. And injuries continue.</p> <p>Near surface disposal or enhanced near surface disposal for this type of waste is ludicrous. If it's that hazardous, why are we putting it near the groundwater supplies?</p> <p>Hanford does not have a safety record that has enabled us to have a warm fuzzy feeling for them, and I do not believe that they have promoted public trust. This has been apparent in a number recent DOE IG investigations for the public and the workers at the site.</p> <p>I look forward to more of your investigation into this, and I sincerely hope that none of it ends up here. Thank you.</p> <p>MR. BROWN: Thank you.</p> <p>MS. VLIEGER: My name is Faye Vlieger. That's F like Frank, a-y-e. The last name is V like victory, l-i-e-g-e-r.</p>
235	Todd Martin	None Given	8/28/2007	<p>My name's Todd Martin, M-a-r-t-i-n, and I thought I was sighing up to say I was here, not that I was going to offer comments, but if you ask I'll talk.</p> <p>MR. BROWN: All right.</p> <p>MR. MARTIN: I don't think Hanford should be considered in the scope of this EIS for disposal of greater-than-Class C waste, but not because of any argument about the technical fitness of the site, or whether it's a good place to bury radioactive waste.</p> <p>My personal concern is the Hanford communities, and by that I mean all of us in the Northwest, our ability to create and maintain cleanup momentum. And I cannot imagine a scenario in which this EIS could select Hanford and then could have a relationship with the Tank Closure and Waste Management EIS, that is critical to maintaining that--creating and maintaining momentum, that would be productive, and because of that, I don't think that Hanford should be considered within the scope of this EIS. That's it.</p>
236	Gerald Pollet	Representing the "heart of the American northwest"	8/28/2007	<p>Gerry Pollet, representing the heart of the American Northwest. P-o-l-l-e-t. Gerry with a G.</p> <p>The solution is not on the table tonight, unfortunately. The solution is very clearly that the nation needs a deep geologic repository, not only for the 5,600 cubic meters under discussion, but for the tens of thousands, nay, hundreds of thousands of cubic meters of waste from the Energy Department complex, that are similar, closely related, should be in the same EIS, and for which the Energy Department has no plan to remove them from the soil at Hanford and other sites, or to dispose of them anywhere responsibly.</p> <p>Unfortunately, the reasonable alternative that should be on the table is an independent agency to site, with a scientific study, and appropriate deep geologic repository in the most appropriate, stable geologic formations.</p> <p>The Energy Department has failed to do that at Yucca Mountain. They've lost the credibility and trust of the American public, and Congress, in doing it at Yucca Mountain, and an independent agency is a reasonable alternative that should be studied at this point in time. Let's just look at Hanford. 152,800 cubic meters. That's a lot. 5,600 cubic meters. We're told that's just a little bit.</p> <p>152,800 cubic meters is the quantity of transuranic wastes estimated to be in the soil at Hanford, which the Energy Department has no plan</p>

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				<p>to ever retrieve. What is the entire capacity of the width repository? 176,000 cubic meters. We need another repository. We need to remove this waste from Hanford's soil. Greater-than-Class C wastes were disposed in Hanford soil, directly in Hanford soil, in unlined ditches. Let's do away with all this other verbiage, trying to "pretty up" the words. An unlined ditch is an unlined ditch, and greater-than-Class C waste was disposed of in unlined ditches from other DOE sites, not just 50 years ago, 40 years ago, 30 years ago. Not just the mistake 20 years ago. But, oh, in 2003. That's irresponsible.</p> <p>Now it is time, long past due, to commit to retrieving the transuranic wastes, and similar long-lived and highly radioactive wastes from Hanford soil, and the soil at INEL, instead of fighting the State of Idaho's agreement, and trying to overturn that agreement signed by the Energy Department to retrieve transuranic waste from Idaho's soil, all of which should be retrieved, treated and disposed in a deep geologic repository, and all those materials need to be part of one EIS, looking at where we should dispose of it, how we should dispose of it, how it should be treated, and how do we reduce further production responsibly.</p> <p>Since the NEPA officer is here, you're well aware that the precedents are well-established, that the question of reducing waste is within the scope of any EIS relating to the disposing of waste.</p> <p>The most common sense way to reduce your environmental impacts is to reduce generation of waste, and it is required of you to include discussions of how, with specific actions that will be taken by the Energy Department to reduce waste. Much of the waste proposed to be disposed of in this EIS is future generation waste. It can be reduced, and it must be.</p> <p>M is for mixed waste. This notice "flies in the face" of the Energy Department's other NEPA documents, acknowledging that almost all remote-handled transuranic waste, and similar special case wastes, in your parlance, are presumed mixed waste because we don't know and cannot characterize their hazardous waste component. The Energy Department has no capability here, at Hanford, to characterize the chemical component of remote-handled transuranic or greater-than-Class C waste; has not across the nation. Nothing has changed since a federal court ruled that these wastes were mixed wastes, and since the Department itself, in its waste management PEIS acknowledged that they were all necessarily required to be viewed as mixed waste.</p> <p>We'd like to point out that the Federal Facility Compliance Act gives each state the responsibility and the authority to disapprove of DOE's plans for storage, treatment or disposal of mixed wastes, which has been excluded from your discussion.</p> <p>As the State of Washington has laid out tonight, adding to the near surface at Hanford, a great deal of additional impact, when you don't know what the existing impacts are of the wastes that are already in the soil, makes no sense.</p> <p>Those are the best of grounds for the state disapproving such plans. Along with the failure of the Energy Department to have any plan in place to remove, and dispose of the waste that's already in the soil, and threatening our groundwater and our precious Columbia River.</p> <p>Last night, I asked do we know what the definition is of insanity. As Einstein said: Insanity is doing the same thing over and over, over again, and expecting a different result. At Hanford, we have tried borehole disposal, and now the state and the public and the tribes are fighting to get the Energy Department to remove the wastes from those boreholes with remote-handled transuranic waste and greater-than-Class C wastes, which are spreading contamination.</p> <p>If you can't remove that waste, if you can't dispose of that properly, what makes you think that you're going to get a different result when you do it again?</p> <p>It's time to just acknowledge that the Department of Energy should commit to cleaning up Hanford, before it tries to keep disposing of more waste, when it can't do what it's supposed to do already. Thank you.</p>

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237	Bob Smith	None Given	8/28/2007	<p>My name is Bob Smith. That's too common. It's Robert Lee Smith. I'm Bob Smith. I worked out on the ...* Project, the DOE part, for about 35 years, and another five years for commercial *operatives near the Hanford project.</p> <p>And I have great respect for people who have given their opinion, that's anti-Hanford. But being in the field of radiation protection for 40 years, overall, and I've been on a lot of these jobs where you are dealing with waste, and protection of it, I feel that Hanford is really a safe place to bury this waste.</p> <p>Sure, they've made mistakes in the past, we all make mistakes, but we learn from them too. So I really don't think that you need to throw insults at DOE, and the people, the way they've acted in the past, because in the field of atomic energy program, you have to spend a little bit of time while you're doing this to learn more about it. So I have a great respect in their ability to handle this waste, now and in the future. That's all.</p>
238	Willie Preacher	Member of the Shoshone-Bannock tribes	8/30/2007	<p>Hello. My name is Willie Preacher. I'm a member of the Shoshone-Bannock tribes, and they're a tribe that's here that used the INL for aboriginal and treaty right areas.</p> <p>Some of the concerns I think that the tribe has is if we was to receive, or this site was to be designated s a repository for the GTCC, their concern would be, how is it going to be shipped? The safety factors of it being shipped, what type of shipment is it going to be? Is it going to be rail, is it going to be highway, you know, all of those factors that need to be involved.</p> <p>We also would like to see, as this progresses, the program come and address the tribes's issues. I am also a member of CAB and some of those views are also shared by the INL CAB. And I guess one of the main concerns is if it's going to be here, how long is it going to be here?</p> <p>If it's a permanent storage site, what type of other waste may be designated for Idaho. We have a clean site here in Idaho compared to all the rest of the sites that have been identified. And the concern is just we would not to have this as a dumping ground classification for some of these wastes.</p> <p>And like is say, the shipments coming in and out go through the reservation. Now I don't know if these shipments are going to be designated to go through the reservation based on the type of waste that it is, but that is something I think that we would like the program, your program, Christine, to maybe come and address the tribes, some of their issues.</p> <p>I'll go back and I'll discuss some of these issues with the tribe itself, and then from that point on, you will probably see some comments from us, you know, regarding this. So thank you.</p>
239	Steve Frishman reading a statement from Bob Loux	Nevada Agency for Nuclear Projects	9/4/2007	<p>I'm Steve Frishman. I'm Technical Policy Coordinator for the Nevada Agency for Nuclear Projects.</p> <p>We will be submitting written comment before the close of the comment period. But today I have just a short statement from Bob Loux, who is the Executive Director of the Agency for Nuclear Projects. He asked me to just read this into the record today, and then you'll get much more extensive comments from us later.</p> <p>Of the five alternatives proposed for evaluation by the notice of intent, three include potential sites in Nevada. Alternative three would have a greater-than-class C, greater-than-class C-like waste disposal at the potential high-level nuclear waste repository at Yucca Mountain. Alternative four, potentially at the Nevada Test Site, proposes disposal in a new enhanced near-surface facility. And alternative five, also potentially at the Nevada Test Site, proposes disposal at a new intermediate-depth borehole facility.</p> <p>Under current circumstances, none of the proposals for Nevada sites are realistic, nor are they acceptable. In our written comments we'll</p>

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				<p>provide the specifics for this finding.</p> <p>Regarding Yucca Mountain, DOE has yet to even submit a license application to the Nuclear Regulatory Commission for the proposed repository. If it succeeds as planned in submitting an application in June 2008, by its own most optimistic estimate, it will not be known whether Yucca Mountain is allowed to accept any waste until at least 2017 at the earliest, but probably later, and maybe never.</p> <p>The alternative prejudicially assumes that the Yucca Mountain site will be licensed as a repository, at best an unrealistic assumption, and at worst an assumption intended to bolster the DOE's intense effort to make Yucca Mountain the nation's foremost, and I might add mostly dangerous, radioactive nuclear waste dump. Further consideration of this alternative in the EIS creates a conflict of interest for both the Nuclear Regulatory Commission with the notice of intent, which the notice of intent 19 says will be a commenting agency for DOE's EIS, and the Environmental Protection Agency, which would be a cooperating agency.</p> <p>The NRC is the agency responsible for whether or not to grant a license to DOE for a Yucca Mountain repository, using regulations that as of today are incomplete. And the EPA is responsible for setting the health and safety standards for Yucca Mountain, also currently incomplete.</p> <p>Alternative three involving Yucca Mountain should be removed from the scope.</p> <p>The proposed use of the Nevada Test Site for alternative four and five is unrealistic because of outstanding legal and statutory issues involving its long-unresolved land withdrawal status. The original 1952 land withdrawal for the Nevada Test Site and all subsequent withdrawals specify its intended use as a weapons testing site. In 1994, the State of Nevada filed a complaint in U.S. District Court here in Las Vegas alleging that the land withdrawals for NTS did not include disposal of off-site-generated low-level radioactive waste as an intended use.</p> <p>In 1997, a settlement agreement was signed in which DOE committed to initiate "consultation with the United States Department of Interior concerning the status of existing land withdrawals for the NTS with regard to low-level waste storage to disposal activities." Nothing productive has yet come from that 12-year-old commitment.</p> <p>In the fiscal year 2005 House Report to the Energy and Water Appropriations Bill, DOE was directed to "enter into formal consultations with the Department of Interior regarding multiple uses of NTS, and if necessary, revise and update the land withdrawal to reflect these additional uses." In May 2007, a DOE official reported to a senate committee that consultation had been underway since 1997 without resolution.</p> <p>The current status of the Nevada Test Site for consideration in this greater-than-class C EIS is that it is not available. It should be removed from the alternatives at least until or unless its land withdrawal status is resolved consistent with the settlement agreement with the State of Nevada and the directive of the House of Representatives Report. Thank you.</p>
240	Paul Liebendorfer	Works with the Nevada Division of Health; his comments will be incorporated in the state comments	9/4/2007	<p>Name is Paul Liebendorfer, and I work with the Nevada Division of Health, the Radiological Section. Comments I'm going to make today will wind up being incorporated in the state comments as a whole. So I'm (unintelligible) just the issues of concern we presently have and we're still looking at.</p> <p>We start out by referencing the letter where all the concerns that went in the preliminary 2005 scoping comments with life cycle (unintelligible), institution of controls, and the cumulative impacts that don't appear to be at least in the present scoping adequately talked about being addressed.</p>

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				<p>But in accordance -- more specifically, in accordance with at least what the requirements with NRC will be an NRC-licensed facility and be operated under -- presumption is that that's what it is -- required to be operated under an NRC license. The scoping document really didn't talk about the complexity of the regulatory implications that this poses. If you talk about putting it at the WIPP facility, WIPP isn't an NRC-licensed facility. That means you have to -- WIPP or a portion of it would be -- have to be licensed by NRC. Real significant regulatory implications.</p> <p>The same thing applies to whether or not at -- Yucca Mountain implications. But any one of the other DOE sites listed, all are Atomic Energy Act regulated. To put an NRC-licensed facility adjacent to an already existing DOE facility, which is not regulated, the complexity in the regulations of operating those sites becomes very significant. Operating one under one set of conditions and one under another, it brings some real concerns.</p> <p>It brings some concerns of when the waste going to a facility -- we -- I acknowledge that -- commend DOE for actually beginning to talk about their greater-than-class C-like waste, because when the 5220-2A, their waste management order, turned into 435.1, they used to talk about their special case waste, their high-activity waste. Well, that concept disappeared with the issue of the new order because they weren't sure how to deal with it, and it went away. And now their wastes potentially will be included. And when would it be included? -- a regulatory issue under an NRC-licensed facility.</p> <p>Waste shipped to WIPP and to the Test Site as low-level waste, the shippers have had problems. Well, if you have a regulatory issue with a commercial shipper sending waste to an NRC-licensed facility, he's subject to great scrutiny from the shipper and from the originating point. If you have DOE-like waste going to a facility, at what point in time does it become regulated? Both WIPP and NTS have had some major generator and shipper flaws. Would you be penalizing the commercial shippers and generators of the NRC-licensed waste, and not being able to penalize DOE because they still assume control over the Atomic Energy Act? -- a regulatory issue -- would have to be very significantly resolved in any alternative proposed.</p> <p>5 So when does DOE waste lose its regulatory -- it's Atomic Energy Act exclusions? This becomes an issue because DOE collects waste at this point in time that was NRC-licensed at one point in time -- reactor waste, sealed sources. Now it's no longer NRC-regulated waste; it's DOE waste. When does it lose it? When does the Atomic Energy Act exclusions that are applicable to DOE waste go away if it goes to an NRC-licensed facility and has to be managed that way? Regulatory issue.</p> <p>One issue that came back up, you revised Table 1 in the document because there was some confusion. I guess not understanding it all, but you can go to Los Alamos NNSA website, and they talk about the quantity of sealed sources they've collected from commercial sector and what the total curie count was and what the specific nuclides are within that. They've been advertising this for a number of months on their website, and expounded on what a good job they were doing in knocking -- that -- they were not -- they were taking these out of the environment for a potential terrorist activity. But the numbers that Los Alamos says they have in the way of sealed sources are not represented in the Table 1. As a matter of fact, are they DOE waste? If they're DOE waste, they ought to be represented as DOE. If they're commercial waste that they've done it, there is no number for commercial sealed source waste presently in existence. And if they're DOE waste, the quantity represented on the website and what's there is twice what DOE says the total quantity of sealed sources they'll have at the end of the time.</p> <p>It conveys to me that there's not adequate communication between the entities of DOE, and going back on the information-gathering and what is representative of what's out there, and having worked with the Department of Energy here locally, but some nationally, for off and on 20 years, there's a great perception that there's a lot of hocus-pocus goes around with what waste is where and how it is. These two pieces of information that are out there imply there's still manipulation of numbers. And is DOE being forthright with the public, and how can they begin to understand the decisions that are made?</p> <p>That's kind of where I stand on the comments, but those will be elaborated more and come formally within the state comments. Thank you.</p>

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241	Alan Pasternak	Technical Director of the California Radioactive Materials Management Forum	9/4/2007	<p>My name is Alan Pasternak. I'm the Technical Director of an organization which began in 1983, the California Radioactive Materials Management Forum. Our members -- we're an association of organizations that use radioactive materials, primarily in California, others in the other states of the Southwestern Compact Region, which includes North Dakota, South Dakota and Arizona. In fact, I think we even have one or two members who are outside of the region, as well. These organizations include universities, nuclear utilities, electric utilities with nuclear power plants, biotech firms, which is a very large activity in California, as well as some other states, pharmaceutical firms, medical centers, and so on.</p> <p>21 So we are what is sometimes loosely 22 referred to as a generators organization. We prefer 23 to use the phrase "user of radioactive material," 24 because that's in fact what we are, and the waste is 25 generated as a byproduct of that beneficial use.</p> <p>I have two general comments, which we will follow up with in written communications prior to the September 21st deadline. The first is a request for clarification of the use of the word "commercial." It's needed not just within DOE presentations, but I think elsewhere within the industry and others. There's a tendency to refer to DOE waste on the one hand and commercial waste on the other. Commercial, of course, implies that it's an organization that's for profit. There are, as I just enumerated, a number of organizations that use radioactive materials that are more correctly called "institutional" -- medical centers and hospitals, universities and other kinds of research organizations. Also, there are a host of federal and state government agencies which use radioactive materials, generate low-level waste, and whose waste disposition options are the same as those of the nuclear utilities or any other commercial organizations that use radioactive materials.</p> <p>20 So our suggestion is that we divide this universe thusly: DOE waste and non-DOE waste. And that might require some explanation, but at least it will be a clarification for the members of Congress, for the public, as to what the scope of the problem is. As we've often had occasion to say, there are some serious problems -- finding disposal paths for the non-DOE waste. In particular, come July 1, 2008, organizations that use radioactive materials in some 36 states will have no disposal pathway for their class B and class C waste.</p> <p>With the help of the Department of Energy's MIMS group -- Manifest Information Management System -- one can go through the numbers and find, for example, that in the calendar year 2006, the B and C waste sent to Barnwell by organizations that use radioactive materials in these 36 states accounts for about 95 percent of the activity measured in curies, 95 percent of the activity disposed of by non-DOE waste generators at all three commercial disposal facilities -- Clive, Richland and Barnwell. So even though we have the Clive facility taking large volumes of low-level waste, not only from non-DOE users, but the Department of Energy as well, but we have a much larger fraction of the activity currently going to Barnwell from organizations that will not have a disposal pathway under the current course that the nation is on, will not have a disposal pathway after July 1, 2008.</p> <p>So our suggestion here is one that we have made elsewhere and made before, and that is that the scope of the greater-than-class C EIS be expanded to include non-DOE B and C waste as a long-term solution. We realize that there's a long schedule ahead until the final EIS is written, until that's submitted to Congress, until Congress asks and you prepare the ROD, and then the construction of the GTCC facility. So I hold that out as a long-term option. It was originally suggested by the National Health Physics Society. It makes some sense if a facility is safe for and has been designed to handle greater-than-class C waste safely, then it's certainly safe for the B and C wastes. And economically it will improve the economic efficiency of the ultimate GTCC facility.</p> <p>We do have some other suggestions to make in the near term, post-July 1, 2008 time frame, regarding the non-DOE B and C wastes, but that's outside the scope of this EIS on greater-than-class C. But I would add that an example of how the Department of Energy is contributing a national solution to a national radioactive waste problem is the sealed source program mentioned by the previous speaker, the sealed source program that is run out of the Los Alamos National Laboratory. That addresses a specific problem. It's an important</p>

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				<p>problem. These sealed sources are used everywhere, including demonstrations in high schools. In fact, I believe it's accurate to say that this program has collected sources from such a wide disparity of organizations, sealed sources from generating sources, including, in some cases, high schools. I think it's a very valuable program, and it's a good example of how the Department of Energy has contributed a national solution to a national problem. We're simply asking that you expand that vision and performance. Thank you.</p>
242	Judy Treichel	With the Nevada Nuclear Waste Task Force	9/4/2007	<p>Judy Treichel: I'm with the Nevada Nuclear Waste Task Force. We very often provide public comment in all sorts of venues where there's not generally a public voice heard.</p> <p>One of the things that's very difficult for members of the public when they have to consider things like are being proposed here is how to deal with a problem that you can't quantify. You don't know how large this is. On the graphs over on the wall, it talks about amounts of wastes that currently exist, and then we're told that the vast amounts and the primary waste will be created between 2035 and 2062. The public would always like to be part of the decision-making process that determines whether or not you make a lot more waste. That obviously is not the scope here. But we always wind up with this thing in our lap where it says, but this waste exists, what are you going to do? And it's a source of frustration, and it seems to always be there. Perhaps in this case, that waste generation is far enough out that people will get a chance to talk about whether they want more nuclear power and whether they want new generations of weapons, where I suppose this would come.</p> <p>If Yucca Mountain were to be chosen, the license application, we are told, will be submitted for a Yucca Mountain repository in June of '08. I'm not sure when there would be a license application submitted for this project if it was to happen at Yucca Mountain. But I would make comment saying that if Yucca Mountain were to be chosen during the process that you've just entered, it would certainly prejudice a licensing decision that will be in process at that time. It also would muddy a lot of the waters. There is no EPA standard, radiation standard for Yucca Mountain, but it's due and supposedly will be there at some point, and it will be much harder to figure out if a Yucca Mountain repository complies with an EPA standard when this sort of undetermined amount of product would also be included in there.</p> <p>It's already been mentioned that it's a tremendous problem to put a licensed facility adjacent to or combine it with an unlicensed facility. But at Yucca Mountain, which is the only spot up on the board that is, according to DOE, intended at some day to be licensed, that shouldn't make this thing easier, it should make it more complicated, because this presents a terrible conflict of interest and makes everything much more complicated than it even is now, and it's already complicated. Thank you.</p>
243	Richard Arnold	Spokesperson for the Consolidated Group of Tribes and Organizations	9/4/2007	<p>My name is Richard Arnold. I am the spokesperson for the Consolidated Group of Tribes and Organizations, a group that represents 16 tribes with cultural and historic ties to basically the Nevada Test Site and Southern Nevada areas with all the various federal lands that are involved.</p> <p>There's a variety of issues I'd like to just present for consideration. First and foremost, it's nice to see that the identification of the environmental issues that are going to be evaluated that are inclusive of Native American concerns. We believe that that's paramount from our perspective, of course, also with the potential impacts to the historical and cultural artifacts and sites and environmental justice, because we believe that from the tribal perspective, that there are indeed environmental justice issues with things specific to the Nevada Test Site being -- access violations and religious violations of holy lands that are traditional creation places and important for our after-life.</p> <p>One of the things with the Nevada Test Site programs and the tribes and the involvement there, and even inclusive of Yucca Mountain, is that there's been a standard that's been set for consultation and for involvement of tribes to voice their concerns. First and foremost, that needs to continue. Secondly, that needs to be replicated for those other sites that are being -- that are under consideration.</p> <p>As such, locally we've been involved in writing actual text in the EIS. So we would again recommend that that be considered in this analysis. That also -- the Indian involvement needs to, I guess, continue throughout the entire process. So any -- beyond just checking a box and things, it's meaningful involvement and information that's being provided in the analysis of the proposed action.</p>

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				<p>We've also done things because of – when you mention Yucca Mountain, and when you mention -- and there's transportation issues and things that are a part of that, those transportation issues, depending upon how the stuff would be transported, may indeed go across -- or they are going across lands that were at one time tribal lands. And so those need to also be evaluated systematically.</p> <p>We don't believe that it would be appropriate to try to do tiered studies, because there's some information that may be out there that there needs to be in-depth and systematic analysis to make sure that we're not just taking stuff that -- trying to extrapolate information that may or may not be accurate or germane to what the proposed project is.</p> <p>Let's see here. I guess I was a little taken aback, I guess, and maybe it's just me, and just happen to be kind of a local yocal kind of guy, but when I looked on the website for additional information for this project, it seemed to be a bit presumptuous for Nevada. One of the things that I saw in there was that it lists all the different sites around and what they're proposing to do. However, when it came to -- Yucca Mountain had a little bit more detailed information, and Nevada Test Site had even more information. It wasn't -- there wasn't parity of the information that was shared.</p> <p>For example, it talked about how Area Five on the Nevada Test Site, it basically falls within 1375 square miles. It's the largest restricted area in the U.S. It's surrounded by thousands of additional acres of land withdrawn. I mean, it sounds a little bit presumptuous in that, well, gee, what about the other sites? Why aren't we providing that kind of information, too, in order to systematically and objectively evaluate all the sites. So I believe that that kind of gives a little bit of an edge maybe in one respect, and secondly is that it gives the impression of, once again, that it's kind of like this barren wasteland out here, and it's not. It's our home. It's everything to us as Indian people, and then as Nevadans the same way.</p> <p>So those would be, I guess, the comments that I have. Unfortunately, I was hoping that – I thought I had heard before the break that there was going to be some opportunity for some questions prior to the comments, because I did have the question as to, with the proposed date for the draft EIS when that was going to be. I understand you had to go back and look at the schedule, but what is kind of anticipated.</p> <p>And then the second questions that I would've had would've been who was going to be preparing the EIS, who was the contractor? Thank you.</p>
244	Diane D'Arrigo	With Nuclear Information and Resource Service	9/10/2007	<p>I'm Diane D'Arrigo with Nuclear Information and Resource Service. The first point I guess that I would like to ask in this report to Congress is that it be made clear that Greater-Than- Class C since the bulk of it comes from - the bulk of the radioactivity is coming from the nuclear power industry that Congress understand that we are dealing with an additional subsidy to the nuclear power industry especially at a time when the nuclear industry is trying to revive itself, and I think would ask that the DEIS look at, in addition to where the waste comes from, be clear about what's coming from existing and proposed new nuclear power reactors, both the activated metals and the other materials.</p> <p>I know that there's been an effort to do that, but it's not abundantly clear from the way this is laid out, and I think that it's important to be honest with the Congressional decision makers about what it is that they're going to be authorizing.</p> <p>Is there a light here? Okay. In the U.S., so-called low-level waste is a broad category as we talked about of materials that are not high level and not from uranium mining.</p> <p>It was in the quest for so-called low-level radioactive waste dumps and when the public was faced with these new unlined soil trenches that the demand was made that materials that are hazardous longer than the institutional control period of 100 years, that's the NRC's required institutional control period, be moved up out of the low-level category into the high level category.</p>

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				<p>The compromise that came from this was that the Greater-Than-C category was punted up to the Department of Energy while states were continuing to help the nuclear industry find dumps in the states and largely with states being required to provide subsidies to the so-called low-level waste portion of the nuclear power industry.</p> <p>Class A which is the least concentrated still has plutonium in it and other long-lasting radioactive materials including transuranics. Class B has unlimited amounts of tritium and cobalt, high concentrations of other biologically important dangerous nuclides.</p> <p>We do not support the concentration averaging which allows the Greater-Than-C or the C or B waste to be diluted down into a lesser category.</p> <p>Radioactive waste with the concentrations Greater-Than-C, as I said, were punted off to the Department of Energy hoping that it would look like the problem was deferred. The DOE is essentially providing another Federal subsidy for nuclear power by providing for Greater-Than-Class C disposal whether it's at a commercial site, whether it's at a Department of Energy site, and all of the existing sites for both commercial and weapons waste are in various stages of needing clean up and remediation themselves, so to consider putting this whole new category of wastes into existing problematic sites or into clean sites is really unacceptable.</p> <p>It comes down to the bottom line that there needs to be incorporated into the evaluation of what to do with the waste, whether to make more, and we do support that which has been generated be stored in a retrievable manner protected from both intentional and unintentional release, that it be kept in an institutional framework that keeps track of it.</p> <p>Don't pretend that after 100 or x number, 300, 500 years that it's no longer a problem when in fact it is much longer lasting than that.</p> <p>Until there's an adequate proven way to isolate Greater-Than-C from the environment, as long as it remains hazardous, no future Greater-Than-C should be generated. This should be laid out in the report that it be an option, need to look at whether more should be generated.</p> <p>I had a bit of a problem in the materials that were provided in saying that certain amounts of Greater-Than-C already exist or don't exist. The reality is that reactors that all of the Greater-Than-C exist. It just hasn't been put into the pot like the sealed sources haven't been put into the list that DOE has to deal with.</p> <p>The reality is we've already generated a substantial amount, but if we continue, if we make new - if we license new facilities both for weapons and power, we're going to be creating more, and the question of whether or not these materials are generated needs to be incorporated into the Environmental Impact Statement and into the report to Congress. It needs to be laid out that this is part of what we're doing here is facilitating creation of more waste for which we have no really guaranteed answer for isolating.</p> <p>Just make sure I don't repeat myself. What's needed is precaution, a halt to new reactor and power production that generate Greater-Than-Class C waste, storage in an institutional system that perpetuates knowledge from the generation to generation of the waste presence and its hazard, a physical system that prevents intentional and unintentional leakage and spreading in a manner that facilitates recontainerization and isolation from the biosphere, and an economic system that internalizes the costs so that those that generate or generated the wastes are paying for the perpetual management care and isolation.</p> <p>The - a copy of that. The options that are laid out in your advance notice, two of them appear to be ones that are not even legal to consider.</p> <p>Yucca Mountain is not close to being licensed. It's likely that it might not be licensed. If it is licensed, it has a limit on the capacity which isn't even enough for all of the high-level waste, so it doesn't seem sensible to have that as a serious option for where to put these materials.</p>

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				<p>We do support that the waste be considered high level. They should be considered high level radioactive waste because their hazard is longer than any low-level radioactive waste facility is designed to manage, but Yucca Mountain should not be on the table as a waste of taxpayer money to consider it for this and also for the Waste Isolation Pilot Plant, that also has its statutory limitations, and we don't need to have another effort underway, official or unofficial, eking away at the compromise that was made for WIPP that prohibits waste that's not defense generated.</p> <p>I had a couple of other points that I wanted to make. I think as similar reassessment should be done for the continued release of sealed sources or licensing, general licensing, of sealed sources. Several international and Federal agencies, EPA, DOE, are chasing after sealed sources that continue to be licensed without proper track being kept, and there are alternatives for those sealed sources that do not need to be - that make them not necessary, potentially not necessary.</p> <p>So in looking at the EIS and in the report, once again look at what the real purpose is and what alternatives exist for the creation of this material in the first place. That's about it for now.</p> <p>Spoke again: MS. D'ARRIGO: The concept of concentrating Classes A, B, and C into a Greater-Than-Class C form is one that I believe the EIS should consider. The dangers and the potential for the A, B, and C waste being concentrated and then sent the site or sites that the DOE chooses. In other words, since they're not able to find new low-level radioactive waste disposal as has been charged by Congress since 1980, if DOE is going to provide a Greater-Than-C site, is there a potential then or what is the potential and what might be the dangers of that site then providing for the disposal for the hottest part of the low-level radioactive waste A, B, C categories.</p> <p>That's one concept that I would like to see addressed, and I follow up on what Cindy Folkers said with the Otake and Schull would be your reference for mental retardation being a health effect from radiation exposure at a certain time during pregnancy, mental retardation in the child, and the study is Otake and Schull. I don't have the year, but you can give that one that - in our written comments that you'd consider and look that up yourself.</p> <p>MR. BROWN: Thank you. Again, let me ask if there's anyone else who would like to add comments at this time. Okay.</p> <p>MS. D'ARRIGO: The other thing is that the majority of the - at least some portion of the Greater-Than-C looks like it's at West Valley which is the only commercial reprocessing that took place in the U.S., and it was more than half Federal reprocessing, Federal nuclear material, but also commercial. As Kevin pointed out earlier, if GNAP is going to be considered, is going to be proceeded with, and we're going to have one or more reprocessing facilities in this country, that needs to be included in the projections and very specifically.</p>
245	Alfred Meyer	With the Alliance for Nuclear Accountability	9/10/2007	<p>My name is Alfred Meyer, and I'm with the Alliance for Nuclear Accountability. We're an alliance which represents 35 different organizations around the country working on issues of nuclear weapons production and the consequent environmental and health problems that are - that happen from those.</p> <p>I first want to thank the staff of the DOE and the other people working to set up this meeting and to have this kind of meeting where we can all speak and be heard and where our concerns can be considered by the DOE representing many grassroots groups. We feel this is a fundamental part of democracy and an important thing in order to really protect us not only in the near future but for generations to come because the materials we're working with have the potential to cause great harm for many years to come.</p> <p>I'd like to go through a number of issues which we feel are important. Some of this we'll be asking for just additional information and has been given already. I do appreciate the website that you have up and the documents posted there. I thank you for that, but we're hoping that you can add some more detail to the websites.</p>

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				<p>We also want to bring up some concepts we feel have not been dealt with in the options presented to date.</p> <p>So we are interested in knowing what's the history of the disposal of GTCC and GTCC-Like Waste to date and how has it been disposed of up until now. It sounds like from what we heard today it's just on site, but I'd like to sure that that's the full discussion of the topic, and we'd also like to make sure that there's no kind of waste GTCC or GTCC-Like Waste that's not listed in the table in the NOI.</p> <p>We'd like a listing of this waste on a state-by-state basis and also on a radioactivity basis and a volume basis.</p> <p>We're also concerned about environmental protection and standards. We're wondering if the health standards will include pregnant women and their fetuses. This is the concept of using the reference family instead of the reference man. We feel that this is a very important thing to consider.</p> <p>We also wonder about especially places like the Savannah River site. I must say that with the water table that's only 30 feet below the surface of the ground, I wonder how even enhanced new surface disposal could be achieved when that's in the upper 30 meters, so we're worried about the disposal techniques and be sure that you consider how they will protect ground water and in particular what standards will be used to define contamination and what methods of remediation will there be should these standards be exceeded.</p> <p>Also we'd like to know about ongoing monitoring of these disposal sites. It's mentioned that these sites will be closed, but we would like to know what monitoring will go on, for how long, and what can be done if again there is a leakage of radiation.</p> <p>We're also very concerned about the transportation of this waste. We're wondering what the transportation routes would be for Alternatives 2 through 5. We'd like to know what the projected costs for transportation for all GTCC and GTCC-Like Waste to the proposed disposal sites, what are the estimated number of accidents, radioactive releases, and public health and economic impacts that would result from the transportation.</p> <p>Also regarding transportation, we'd like to know what shipping containers would be used to transport these materials. Do these containers currently exist, and if so, how many of them are there? If they don't exist, what new containers or different designs would have to be incorporated and licensed, and what are the costs of such containers, and have such containers been tested in practice or just by computer monitoring?</p> <p>This would lead to another important issue we'd like the DOE to consider and this would be a different alternative, and that would be for on-site storage, storage as close to the site of generation as possible. Conceptually what are the options available for hardened, on-site, above-ground monitored, retrievable storage of GTCC and GTCC-Like wastes?</p> <p>And we'd also like you to develop a plan for hardened on-site storage at a facility that contains GTCC-Like - or GTCC waste at a current nuclear facility such as Plant Vogtle would be one that we'd like to see portrayed again in particular because of its proximity to the water table.</p> <p>For those sites where on-site storage is not feasible due to site-specific safety concerns, what are conceptual options available for nearby and centralized above-ground monitored retrievable storage?</p> <p>And then we'd like to see a comparison of the advantages and disadvantages including cost estimates of above-ground storage versus underground storage, and we'd like the engineering specifics and characteristics of above-ground and below-ground storage containers and/or the engineered barriers that will last long enough to protect the surrounding environment for the length of time the waste is dangerous.</p>

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				<p>What materials are being considered for containers and barriers and for what length of time will the containers maintain their integrity? We're also concerned that if Yucca Mountain is never licensed what are the conceivable impacts on the GTCC and the GTCC-Like Waste disposal plans and options?</p> <p>We'd also like an accurate characterization of the GTCC-Like Waste reveal that we need a little more detail than we've been given out in order to know how these plans really would work. Although the DOE states that they do not have the effect or intent of creating a new classification of radioactive waste by using this term GTCC-Like, until it is disclosed exactly what constitutes GTCC-Like Waste, how can we be sure that it should not be given a new classification?</p> <p>The current definition includes such vague terms as other miscellaneous waste owned by DOE or generated by DOE activities. We'd like a more specific definition and characterization by source, form, volume, and radioactivity.</p> <p>And then lastly I'd like to bring up the concept of newly-generated waste. We ask why the projections for GTCC and GTCC-Like Waste go only to the year 2062 when DOE itself is promoting potential for new reactors for reprocessing, and for new nuclear weapons.</p> <p>If new reactors, if reprocessing, and if new weapons are built, then what are the realistic estimates of the types and amounts of expected new wastes which would then be considered as GTCC and GTCC-Like?</p> <p>How much waste is projected beyond 2062, and in specific, we'd like it if you could make an assumption that let's say 50 new reactors will be built. What then are those implications for the disposal of GTCC waste?</p> <p>And we also want to be sure that there's a complete characterization of this waste. Is there a disposal path of material that may become GTCC or GTCC-Like waste either through decay or blending activity, so we want to make sure that in the figures we're being presented that all the waste items currently in cooling pools that may cool down to GTCC levels of activity are included.</p> <p>Given the loose definitions of GTCC and GTCC-Like Waste, are there plans to include other kinds of radioactive waste under this classification either through concentration or dilution so that we'll be eligible for GTCC disposal? If so, what are they and what materials will or won't be treated? In particular, how does this work in relation to the branch technical position on concentration averaging?</p> <p>Are there prohibitions against such treatments of waste to change its classification? That ends my comments. I appreciate this very much. I will provide a written version of my comments with the option for amendments before the end of the comment period. Thank you very much.</p>
246	Kevin Kamps	On behalf of Don't Waste Michigan	9/10/2007	<p>My name is Kevin Kamps, and I speak on behalf of Don't Waste Michigan, although fully in disclosure I'm also employed at Beyond Nuclear. Don't Waste Michigan is a statewide organization that was founded in the struggle against a so-called low-level radioactive waste dump that was started at the state by seven additional states, and it also monitors nuclear power and radioactive waste issues and radiation and its health impacts across Michigan, and I would like to concur with the excellent points made by my colleagues from NIRS and from Alliance for Nuclear Accountability and just add a few additional for now and submit more extensive written comments.</p> <p>The first point I would like to make is I would request that the public comment deadline be extended especially considering the errors and omissions that were present in the Federal Register notices despite the correction that was issued.</p> <p>Whether it's the fault of the Department of Energy or the Government Printing Office, I think that given the short timeframe that was allowed in the first place, especially given the errors in the Federal Register notices that an additional 60 days for public comment should be granted.</p>

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				<p>I would like to reemphasize a point that was raised earlier about the inclusion beyond 2062 of Greater-Than-Class C wastes that would be generated by new reactors and also by the Global Nuclear Energy Partnership and its various manifestations, whether that be so-called advanced fast burner reactors or eprocessing technologies.</p> <p>Another point that I would like to see included in the Environmental Impact Statement is the impacts of climate change on these proposed sites so that an arid site could become a humid site and a humid site could become a more humid site in the future.</p> <p>Also intrusion scenarios should be addressed especially given the shallow depths that the Department of Energy is proposing for burial of these deadly materials. Groundwater contamination for the full extent of the hazardous persistence of these poisons should be included.</p> <p>Also of significance are issues of civil liberties and security, the threat of terrorist attacks upon these materials that are very similar to high level radioactive waste. There should also be a full cost accounting which goes back to that point made earlier that this is yet another subsidy to the nuclear power industry especially when you look at Figure ES-1 which shows that the vast amount of radioactivity included in GTCC wastes comes the commercial nuclear power side of the equation.</p> <p>As was mentioned as well, transportation impacts in all their manifestations should be included including not only accident scenarios but also so called incident-free transports, the mobile x-ray machine that cannot be turned off phenomenon as these wastes that emitting gamma radiation are transported down our roads and rails and waterways and the impacts on unsuspecting bystanders as well as workers from those exposures.</p> <p>Also in the EIS the radionuclides contained in Greater-Than-Class C and GTCC-Like wastes should be clearly laid out and also the hazardous persistence of each of these radionuclides should be clearly shown to the public.</p> <p>As a final point, I would like to repeat what was said previously about the idea of hardened on site storage, and I would like to point out that this concept has to do with protecting these deadly wastes against accidents, against attacks, and against leakage, but it should be emphasized that some of the locations where GTCC wastes are currently located on lakes and rivers and seacoasts are not good locations for the permanent storage of these materials.</p> <p>As an example, the West Valley site in New York, a former re-processing and dumping ground. Well, eventually after 1,000 years or so a road into Lake Erie, and so hardened on-site storage should not be confused with permanent disposal on-site. This is an interim measure designed to protect these deadly materials against attacks and accidents and leaks until better solutions can be found than the Department of Energy is proposing at this point.</p> <p>I would add that the status quo no action alternative is not acceptable. Hardened on-site storage would add to the status quo, the fortification against attacks, the safeguards against accidents, the monitoring and retrievability against leaks over time, and we look forward to submitting a full version of our written comments, and for now I will leave here Principles for Safeguarding Nuclear Waste at Reactors, also referred to as hardened on-site storage. This was written and has now been signed by over 150 organizations across the country including significantly many who live next to commercial nuclear power plants with their mounting stockpiles of high level radioactive waster, Greater-Than-Class C radioactive waste, and other forms of deadly radioactive material, but it should be pointed out that Greater-Than-Class C Waste is in many regards comparable to high-level radioactive waste, and so these principles apply well to Greater-Than-Class C Waste. Thank you.</p>
247	Cindy Folkers	With Beyond Nuclear	9/10/2007	<p>My name is Cindy Folkers. I'm with Beyond Nuclear, and I would like to extend my appreciation to DOE for having the meetings. I would also like to extend my support for the other public comments that have been made today, and I apologize for the extemporaneous nature of my remarks. I was not going to make any remarks until I read the DOE Environmental Management Fact Sheet called Radiation. It was in the packet today that we received when we walked in the door.</p>

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				<p>I am specifically going to comment on the last paragraph on the last page entitled Primary Health Effects. I'm going to start by reading this statement, "The main health concern associated with chronic exposure to radiation is the induction of various cancers. This is the health effect of concern for the GTCC low-level waste and will be analyzed in detail in the EIS."</p> <p>I beg to differ with that. I can off the top of my head list three studies or groups of studies that show that certain forms of heart disease are also induced by radiation exposure. Matanoski from Johns Hopkins did a study on radiologists that showed increased levels of heart disease. There's also evidence in the Hiroshima Nagasaki studies for heart disease, and the third study was a study done – were studies done by Dr. Bandazhevsky in Belarus as a result of incorporated and externally - and external exposure to the radionuclide Cesium-137, so I would give you those.</p> <p>I'm also going to provide written comments with even more detail and better research and probably more articulate I'm hoping, so heart disease is an issue, and it needs to be considered along with cancer, and I really think that you need to assess for that.</p> <p>The second thing is the statement that you make is additional health effects associated with exposures to radiation may, may, include genetic mutations and teratogenic effect such as mental retardation, but these have not been directly attributable to specific radiation exposures.</p> <p>This is a flashback for me. No, not entirely because I'm not that old, but I know that this is how the cancer debate with radiation started. Maybe it does, maybe it doesn't, maybe it does, and where we are today right now standing here, we know it does.</p> <p>So I am asking you, please, use precaution when you look at these other health effects. It's not just cancer, and the BEIR VII report which DOE helped pay for and asked for along with EPA and a few other Government organizations, and this is going to be a paraphrase, but they basically said that we see evidence of genetic effects in the studies. There is no reason to believe that this will also not be a health effect for human beings, and I will again provide that exact quote in my written comments, but that's what BEIR VII says, so you better look at it. Please look at it because this is how we started with cancer, and I see history beginning to repeat itself, and I'm asking for precaution. If you think it's going to be a health effect, assess for it.</p> <p>Even if you don't feel or you can't find the mechanism, assess for it anyway because there's a historic precedent that we underestimate the health effects of radiation exposure.</p> <p>This also brings me to a second point which is animal exposures, environmental exposure, water, fish, animals, plants, these are all what some would consider lower life forms. Well, folks, we're at the top of the food chain, so if you're going to be assessing for what's happening with human beings at these sites, you better assess what's happening with the environment, and that includes the water and the fish and all of the rest of the animals and the trees too because we all are one big circle.</p> <p>We eat the fish, we grow food in the soil, we drink the water, and so you're going to need to assess the health effects not just for human beings hich is what this paragraph implied when I read the it about genetics because the genetics are seen in animals. The genetic effects are seen there, but also all of the other life forms that are at issue here.</p> <p>I would also like to ask for an assessment of acute health effects, and this is for a very specific reason. There have been a number of cases, I believe one was Juarez, another Goiana, Brazil. I would have to look them up to get the actual facts, and I will do so for my written comments, but we had intrusions and people took sources opened them, passed the contents around to family members. I believe it was Cobalt-60. Correct me if I'm wrong, and those health exposures were acute in nature, so this was something that no one foresaw. These materials were in a regular landfill or a garbage dump of some sort that was publicly assessable, so you might want to assess also. I would request that you assess for acute health effects as well in addition to any accidents that may happen while transporting. Those health effects</p>

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				<p>could also be acute, not just long term.</p> <p>I think that that concludes my comments. I will be adding written comments by the 21st of September which is the deadline, and I thank you for the opportunity.</p>
248	Brian O'Connell	With the National Association of Regulatory Utility Commissioners	9/10/2007	<p>My name is Brian O'Connell. I'm with the National Association of Regulatory Utility Commissioners which is the association of state and public utility commissions that are mostly interested in the high-level waste problem which I know is not the scope of this undertaking, but GTCC is also an issue for the decommissioned and to be decommissioned nuclear power plants, so we're pleased that DOE has got the task of finding a solution or combination of solutions to the problems at hand, and I am also pleased that EM or the Environmental Management Agency or organization within DOE has the lead on implementation because you draw upon a track record of success in project management which is needed for this project.</p> <p>Clearly the Congress has the policy aspects of the program, but when it comes time for implementation, it should be done with an Agency that knows what it's doing.</p> <p>I should also say that I just recently came back from a visit to Finland and Sweden where they have a much smaller nuclear industry, but nonetheless they have the same set of problems for their disposal and management of spent fuel and other forms of nuclear waste that are by-products of the commercial nuclear power production.</p> <p>They have in place low-level waste facilities that are well designed, and there is public confidence in them. They are regulated in both cases of Finland and Sweden. They also have an interim storage facility in operation in Sweden for spent nuclear fuel while they develop their long-term repository.</p> <p>So these things can be done, and it is also interesting to see how in those two countries public outreach has been successful to the point where the municipalities in the location of those facilities have affirmatively approved the projects that shows a confidence in the regulatory agencies as well as some degree of confidence in the development of those facilities. It's quite impressive.</p> <p>The comment was made earlier about subsidy to the nuclear power industry. I don't think anyone contests the validity of the principle that looters pay, so if it is appropriate for the nuclear power industry to be charged for disposal of material that they generated, I don't think that's going to be in question.</p> <p>I don't plan to submit any written comments, but I just thought I would add a few more to the record today.</p>
249	Argun Makhijani	President of the Institute for Energy and Environmental Research	9/10/2007	<p>I'm Argun Makhijani for the record. I'm President of the Institute for Energy and Environmental Research. I'm going to submit written comments later on, but I wanted to make some oral comments here since you are having this here in Washington, D.C.</p> <p>First, a few things, observations on the Notice of Intent. I see from the table that most of these Greater-Than-Class C wastes certainly in radioactivity and to a large extent also in volume are going to be generated in the future.</p> <p>The vast amount of radioactivity is going to be from decommissioned reactors, and since there's license extension going on, most of this radioactivity will not be there as waste for decades.</p> <p>I don't see the rush to prepare a plan to bury the stuff or dispose it off other than to find some way to dispose of what is now there which is mostly "GTCC-Like Waste", the GTCC-Like Waste is a DEO waste. The first time I have seen this new term. It's stated in the Notice of Intent that DOE doesn't intend to create a new waste category, but it seems to me that it is.</p>

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				<p>I'm not necessarily opposed to the creation of this new waste category. I think DOE should just say that this GTCC-Like Waste will be treated like GTCC unequivocally because its radiological characteristics are GTCC-like, so I think this may be a positive step in that DOE is acknowledging that it has some wastes that are not now classified as Greater-Than-Class C Waste but should be treated like that, and I think this is a positive element in the Notice of Intent that - because in the past there's been a lot of ambiguity about what was going to happen to certain kinds of waste because DOE didn't have a waste classification for it, and I am always afraid that some will wind up in a Class A low level waste type of designation which is what</p> <p>My next point is about depleted uranium. I have long held that depleted uranium has similar characteristics to Greater-Than-Class C Waste under the NRC definitions in 10 CFR 61.</p> <p>It isn't defined as Greater-Than-Class C Waste in 10 CFR 61 only because depleted uranium in large amounts from enrichment plants was not considered in the Environmental Impact Statement underlying that rule, but all of its other characteristics are GTCC-like, so that's another reason I'm not unhappy you've created this category. It should just be formalized as Greater-Than-Class C Waste.</p> <p>As some of you may know, there has been a long argument about the classification of depleted uranium from enrichment plants in the course of Nuclear Regulatory Commission proceedings for the licensing of the Louisiana Enrichment Services plant which is now being built in New Mexico, and I have long argued that this should be treated like GTCC even though it doesn't have a formal classification now, and in the course of the proceedings in 2005, the Nuclear Regulatory Commission announced that this was low level waste but that its classification was not settled.</p> <p>Just last week before the Court of Appeals in the appeal of that license and to which Nuclear Information Resource Services a party and public citizen I was one of their experts in the case.</p> <p>The Nuclear Regulatory Commission formally acknowledged that the classification of depleted uranium from enrichment plants within the scheme of low-level waste is not a settled question and that this question has to be settled.</p> <p>I would advise the DOE really to get out ahead of the NRC and include depleted uranium from enrichment plans such as what it stored at Paduca, Portsmouth, and - Paduca, Portsmouth, and Oak Ridge as Greater-Than-Class - GTCC-Like, and to formalize a definition of alpha emitting long-lived more than 100 nanocuries per gram and whatever the other Greater-Than-Class C definition is in 10 CFR 61.55.</p> <p>I think this would be a very good thing. You maybe anticipated that I would only say negative things, but this is not the case. People who follow what I say carefully know that when there is something good to say, I say it, and I do encourage you to push this thinking farther because I don't find any evidence of that in the Notice of Intent.</p> <p>Depleted uranium definitely does not belong in any other category than Greater-Than-Class C Waste, and it should be whether you call it transuranic-like or Greater-Than-Class C-Like, I don't really care, but it's not transuranic obviously but that's only a nomenclature problem.</p> <p>The third difficulty I have is with the inclusion - more unusually I will ask some things to be removed from the scope of this in that proposed Environmental Impact Statement because they really don't belong there.</p> <p>One is disposal of GTCC and GTCC-Like Waste in WIPP. WIPP is designated for defense transuranic waste. There is an enormous amount of defense transuranic buried waste, some of which is not well characterized. In Idaho where there is a very large volume of this, the Department of Energy actually to its credit recovering some of that waste, that waste will have to be treated and disposed of like transuranic waste because it is in fact transuranic waste under the DOE definition, or a large proportion of it will be when it is characterized at least, so we think that more than one ton of plutonium in buried aste in Idaho alone, one metric ton.</p>

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				<p>So I think to preempt - to jump the gun on existing commitments for transuranic waste and add burdens to WIPP would I think be contrary to the intent of the creation of WIPP and to the underlying laws and regulations.</p> <p>I think WIPP should simply be removed from the scope of the EIS. Similarly I think Yucca Mountain should be removed from the scope of EIS. Right now there is extension of licenses going on.</p> <p>The amount of waste that will be generated under the projected bath of existing nuclear reactors is clearly more than what 70 metric thousand - 70,000 metric tons allowed under the present law. It's not even clear whether there would be physically enough room for the spent fuel plus the defense wastes from Hanford, Savannah River site. The volume of defense high-level waste from Hanford and Savannah River site is still unsettled, so I think Yucca Mountain is - even the license application has not been made.</p> <p>DOE got quite a harsh decision last week from a judge in Nevada regarding its conduct on various counts especially in regard to water at Yucca Mountain, but I think - I had read the whole decision, and the indictment is quite broad, and were I a responsible official in DOE, I would be very unhappy. One small thing that can be done is not to add problems to DOE's Yucca Mountain. The waste acceptance criteria are not settled. The licensing criteria are not settled. The waste characterization criteria are not settled. You've got a lot of stuff that you call debris other GTCC LLW and DOE GTCC-Like waste includes contaminated equipment, debris, trash, scrap metal, decontamination, decommissioning waste.</p> <p>A lot of this be (sic) plutonium scrap for instance. It's not clear that this could meet waste acceptance criteria. It's not clear how it would be packaged. It's not clear what kind of tests would be done at Yucca Mountain. I think DOE has enough - at least a much -in my opinion I have been on the record as being opposed to the Yucca Mountain as not a suitable site, and many of you may know that, but I think DOE has enough licensing issues with Yucca Mountain that to add a whole raft of burdens, so as a friendly suggestion, I would advise DOE to exclude Yucca Mountain from -</p> <p>The matter of boreholes I think clearly in a deep disposal does include the borehole option. National Academy talked about in relation to plutonium.</p> <p>The difficulty with boreholes that I think should be explicitly within the scope of this EIS is that you have to have actual data before you can calculate an environmental impact. It would be very depressing if there were only a theoretical environmental impact from boreholes sited in humid and dry areas, something like that.</p> <p>You could do that with shallow land sites as we have done using various computer programs, but I think boreholes are a rather - deep boreholes especially, are rather novel waste disposal method with which there is very little experience, and I think whatever DOE does to calculate the environmental impact of boreholes, it should be explicit within the scope that DOE is actually going to use geologic data and information including whatever disturbance the actual drilling of the borehole and backfilling of the borehole would make in terms of -</p> <p>So so much for the scope of things. I think - you know, I understand the words in the Notice of Intent recognizing that shallow land burial is not normally allowed under 10 CFR 61.55 of Greater-Than-Class C Waste, and that some special engineered structures are being considered, but in light of the fact that the predominant materials that we're considering like Nickel 63 and Naibium 94 which would constitute a large part of the bulk of the radioactivity from reactor internals in Greater-Than-Class C Waste.</p> <p>I don't know the exact fraction, but I imagine it would be significant. They have half lives if I remember in the tens of thousands of years. Somewhere - one of them is in the 70-odd thousand years.</p>

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				<p>So I think that whenever you're talking about thousands or tens of thousands of years, shallow land burial is a priori unacceptable.</p> <p>I do not know any - you know, it's hard to say that you should rule it out of your scope, but when you do examine its impact, I don't know that you can appeal to any engineered burial structures that won't get eaten up by animals or degraded by the weather or affected by the kinds of changes that we are seeing in climate.</p> <p>I mean this is a problem even with deep geologic repositories that are recognized by DOE at Yucca Mountain by Andra in France, A-N-D-R-A, in France at its site in Eastern France that they've done an enormous amount of quite good work on climate change and deep geologic repositories.</p> <p>So I think when we have so much difficulty with deep geologic repositories I, you know, I think that the amount of effort that it would take to do even a modestly good job of characterizing the long-term impacts of shallow land burial, and you are obliged to conduct that to the peak year.</p> <p>That is not explicit in the Notice of Intent, but I think any environmental impact that's not to the peak year would be unacceptable because 10 CFR 61, Part C, goes to the peak year. There's no time limit in the low-level waste regulations under the Nuclear Regulatory Commission as they stand.</p> <p>A lot of people assume that there's a time limit of 1,000 years and calculated for 1,000 years, but that is not a correct reading of the rule and the record in the LES hearings before the licensing board does show that there is no time limit, and an artificial time limit of 1,000 years would be unacceptable.</p> <p>All right, one option that should be in there that is not in there is hardened on-site storage.</p> <p>A little back of the envelope calculation. The protected volume of waste is not very large. It's about 300 55-gallon drums at 70 sites. We've got about on the order of 70 sites that we're talking about 60-odd reactor sites and some Department of Energy sites, and it's not - so it's not a lot of waste that we're talking about. Most of it is in the future. You've got sites at which you have to store spent fuel for security reasons. Many of us have advocated, and I'm sure you've heard today from others that it should be hardened on-site storage.</p> <p>Let me make a construction suggestion about hardened on-site storage. I have seen vitrified canister storage at Savannah River site. I think that kind of storage for canisters can be hardened quite easily. I think DOE did a good job of that storage building and storage method in my opinion, and you can build on that in terms of creating hardened on-site storage, both for spent fuel which I believe you should do anyway given the decades for which spent fuel will have to be stored on site and for other reasons.</p> <p>I don't believe that this is a huge addition to that, and I think hardened storage of highly radioactive material like GTCC waste alongside spent fuel, not in the same packages obviously, should be an option that is thoroughly examined because I think it's a preferable option.</p> <p>I think a follow-on EIS perhaps ten or 20 years from now when the deep geologic repository issues connected with high-level wastes are more clear should be envisioned, and that perhaps should also be, you know, an impact, environmental impact, option of reconsidering this issue doing hardened on-site storage and reconsidering this issue in ten or 15 years would be desirable because I think - there's no rush to do this. You've stored this on site, at DOE sites, most of it is not waste. At non-DOE sites though - let me see if I have anything left.</p> <p>Oh yes, did I talk about concentration averaging? I don't think I did. I don't like concentration averaging. This is dilution, a fancy term for dilution, as a solution to pollution.</p>

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				<p>If you mix wastes of the same type that are all Greater-Than-Class C and the result is still Greater-Than-Class C, it's fine, but really one can mix - one can buy steel on the scrap market I guess and mix it with metal that's GTCC and then saying the whole thing is Class B or Class C, and the problem would go away.</p> <p>I think a preferable option to reduce the scope of the Greater-Than-Class C problem in on-site storage because you have a decay of, to some extent, not of the Nickel-63 and Niobium 94, but of some of the lesser shorter-lived materials, and in a 30 or 40-year period the volume of Greater-Than-Class C Waste should materially go down. I've not checked the numbers recently, but I think that volume projection should definitely be done as part of your on-site storage, hardened on-site storage option. Thanks.</p>