Letter/Attachment for GTCC EIS Scoping Comment #96

Public Safety Resources Agency
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On behalf of PSRA, and myself, I wish to add the following statements into the record at this stage of the scoping process for GTCC wastes, specifically as they relate to a siting at the Hanford Reservation.

I am including my written comments that I presented during the public meeting at Troutdale, Oregon on August 27, 2007, to ensure that they also are included in the record.

Hanford has been grossly contaminated for the past sixty-three years of plutonium production and "mitigation" efforts that have been conducted by USDoE and its predecessor agencies.

Although plutonium production ended in the late 1980s, gross contamination still exists and the Department (and its contractors) has demonstrated that they still cannot manage the wastes that already exist at Hanford.

Despite examinations of accidents and a litany of "lessons learned" statements begging forgiveness after an accident, the Department and its contractors ***still*** cannot clean up their existing messes, and quite often experience accidents that could have been avoided if they had heeded the recommendations of panels that investigated ***earlier*** accidents. Hanford has been fined, but the taxpayers are really the ones who pay for institutional incompetence.

Today's article in *The Oregonian* ("Hanford leak a study in neglect") cited several findings from the Department's investigation [Ref: http://www.hss.energy.gov/csa/csp/aip/HanfordTankFarm.html], but they all simply underscore the fact that, at Hanford, the Department's core competency is negligence.

Other persons and organizations will comment about the fallacy of trying to place wastes in a repository that conflicts with Hanford's groundwater, but I will comment that of several waste siting proposals that I have studied, dating back to the BWIP scheme of 1984, all of them encountered variables that precluded any reasonable confidence in the geohydrology of the proposed repositories.

The Department still cannot characterize the repository site at Hanford, therefore a (deep) Geologic Repository should not be built.

An Enhanced Near-Surface disposal facility really is another name for burying wastes in a trench facility. We understand the reasons for storing reactor compartments from nuclear submarines at Hanford, but this class of waste poses an entirely unacceptable level of risk to the environment, field personnel and residents of the Northwest.

The Intermediate Depth Borehole has many of the same issues as BWIP encountered when trying to penetrate the several aquifers that exist below the Hanford Reservation. Although the Intermediate Depth Borehole repository will not penetrate as many aquifers, it will still require special engineering to counter the known fracturing characteristics of Hanford's strata.

Similarly, the Borehole will need to isolate the wastes from groundwater infiltration, a process that has never been successful at Hanford. During our review of the BWIP proposal in the 1980s, PSRA was told by a geologist that when the repository was sealed, it would create a "head pressure" of 2,310 p.s.i, which would likely adversely effect the stability of the structure.

For these reasons, PSRA opposes all three of the proposed disposal methods as they are not compatible with Hanford's characteristics.

PSRA also is concerned about the potential for accidents and/or terrorist incidents while shipping wastes from the source sites to Hanford. Although we believe that public exposures can be reduced by appropriate containerization of the waste packages, the fact remains that transportation accidents ***will*** happen, and in many cases, they could exceed the maximum credible incident.

PSRA asks that the Department honestly examine these issues and factor in human behaviors when making the assessments. Human behaviors at Hanford routinely produce unexpected and unwanted accidents, even though those behaviors had already been noted and had been assumed to have been corrected. We not only have to consider these conditions at Hanford, but also at each point of interaction from the source site, through the transportation process and back to Hanford. Given our experience over the past several decades, this alone should exclude Hanford from consideration as a repository site.

The Department has a responsibility to honestly evaluate this aspect of the proposal. In 1997, PSRA submitted five comments that were addressed, but the Department selectively ignored our concerns about Safeguards, Security and MUF issues. [Ref: S&D Weapons-Usable Fissile Materials Final PEIS; 3-787, Point #2 (F-50).]

In a post-911 environment, it is understandable that specific responses should not be presented in a public document, but the public should be confident that the Department is at least aware of those concerns. At this point, PSRA does not have confidence in the Department's ability to honestly evaluate the ramifications of the scoping issues; therefore, we recommend that the Department's work be audited by an independent outside organization, possibly a panel composed of members of the FAS (Federation of American Scientists).

PSRA does foresee a future role for Hanford in cleaning up the nation's nuclear waste legacy, but we object to siting additional wastes at Hanford until the Reservation has been restored to pre-production contamination levels and the existing surface and groundwater contaminations have been remediated to acceptable levels. At that point, and only at that point, should Hanford be included in proposals to import additional wastes from external sources.

Until then, PSRA objects to the inclusion of Hanford in the GTCC siting process. We request that Hanford be dismissed as a potential site for this repository. However, assuming that Hanford will NOT be dismissed, PSRA requests that the scope of the evaluations be inclusive rather than exclusive; that the Department err of the side of caution instead of "business as usual" when deciding what factors will be examined. This should also include the "human factors" that now exist at Hanford, not what ideally should exist, because Hanford's management and contractors have historically demonstrated that they do not truly learn from the "lessons learned" of their past mistakes.

Also, please notify PSRA of future relevant events, meetings and/or deadlines for this process. Having been involved in the Department's public hearings process for the past twenty years, it was disconcerting to discover that the only notice of the hearing in Troutdale, Oregon was in the newspaper. The Department has a responsibility to be proactive in soliciting public input on these issues.

Sincerely,

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August 27, 2007

My name is Bill Mead, and I am the Director of the Public Safety Resources Agency in Portland, Oregon.

I am against bringing new wastes at Hanford, regardless of their source or composition. Hanford is already grossly contaminated and must be cleaned up before additional waste is imported.

In 1984, for each pound of Plutonium-239 that was produced at Hanford, we paid $276,892.20. We also generated 4,138,322 gallons of high-level liquid radioactive and chemical waste for each of the 2,204 pounds of Plutonium we produced.

That added 9,120,861,688 gallons of high-level liquid waste that we need to safely contain for 225 human generations. In the late 1980s, the Department finally admitted that it had released 195 billion gallons of similar waste directly into Hanford's soils during the previous 40 years of operations. This waste was just one of several dozen waste streams at Hanford.

In 1987, I was called to testify before a Congressional Sub-Committee. Even though the topic was about converting the 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.

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 production, and that we had been creating that waste for more than 42 years! Again, this was only for a single waste stream of the dozens at Hanford.

According to the Department's own published data, in 1984 Hanford produced a total of 1,376,702 Curies of radiation. Of this, 1,067.91 Curies of TRUs were buried on-site, and another 10,684.628 pounds were "dumped" there. Again, this is only for one of the 40-plus years of Hanford's history. The current proposal is for 140 million Curies.

TRUs are extremely long-lived radionuclides and must be isolated essentially for eternity. Some of the wastes in the Department's proposal would include additional TRUs.

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 the 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 had to participate in a follow-up survey months later. I have toured Hanford several times during the past few decades, but have never been monitored in this manner by my escorts.

A single particle of Plutonium is only 4/10ths of one micron in diameter. As a comparison, a normal backpacking water filter only filters down to 1 micron, so two Plutonium particles could past through it side-by-side. Dr. John Gofman, states that the inhalation of that amount will "inevitably" cause cancer, and that the risks to smokers increases by a ratio of 20 to 1.

Typical "Reactor Grade" Plutonium-239 oxide is 8 to 10 times more toxic than "normal" Plutonium-239. Plutonium-239 is so lethal in its exposure that in Japan the acceptable amount is 460,000 times smaller than for Uranium-238. ("Final Report of the International MOX Assessment" 11/1997 for Japan, as based on ICRP's recommendations.)

The type of Plutonium at Hanford is sometimes referred to as "Dry Plutonium" because it travels for longer distances than does "normal" Plutonium. Plutonium production at Hanford ended 20 years ago, but the land is still grossly contaminated.

As an example, nearly forty years after Hanford's Plutonium nuked Nagasaki, the soil 1 KM away from where the bomb exploded showed 5,500 PicoCuries per square meter. None of us would want to live in that contaminated zone, but at the same time, the soil readings 1 mile from PUREX's discharge stack showed 6,600 PicoCuries: Hanford's soil was 20% more contaminated at distances 1.6 times farther away than Nagasaki's.

The Department has a history of not being honest with the public. Regardless of their statements, the Department will have already focused on a preferred option, and will run multiple projects simultaneously to achieve its desired goals.

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.

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 the issues for decades, the Department still cannot manage the wastes that already exist on-site.

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 about the accident.

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 the repository.

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