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Amarillo Economic Development Corporation

April 6, 1996

U.S. Department of Energy
Office of Fissile Materials
P.O. Box 23786
Washington, DC 20026-3786

By facsimile to: 1-800/820-5156

RE: Comments and questions regarding the Storage and Disposition of Surplus Fissile Materials (S&D) Programmatic Environmental Impact Statement (PEIS)

Dear Sir or Madam:

Thank you for the chance to comment on this document that is of great importance to the Pantex Plant, and consequently to the economic vitality of the Texas panhandle.

I also appreciate DOE's commitment to operating in an environmentally sound fashion. The continuation of environmentally sound operating and management principles at Pantex supersedes and is paramount to all further comments about continuing or new missions at Pantex.

Pantex is ideally situated to continue the storage of surplus fissile materials. It makes sense logically and financially to store surplus fissile materials removed from weapons at the DOE's only assembly/disassembly site, Pantex. Further, Pantex has safely stored plutonium weapons components on-site on an interim basis since the facility began nuclear weapons operations in the early 1950s. Because it makes sense to store surplus fissile materials at Pantex, then the DOE should also consider Pantex as the preferred site for environmentally sound disposition options. 1/08.03.01

After having studied the Draft S&DPEIS documents, I offer the following comments(•) and questions(o) to the DOE for inclusion in the comment summary document:

- In the Summary (p.S-46), it is stated that, "When the other DOE programs previously identified in this section are considered, the rank order of DOE sites in terms of their descending potential for cumulative impacts changes to SRS, INEL, Pantex, NTS, Hanford and ORR." A similar statement appears on p. S-47. 2/09.00.08
  - o What does this statement mean? It is obscure and demands an explanation that is concise, clear, to the point, and supported by evidence.
- In the Summary, under the environmental impacts for the No Action and Long-Term Storage alternatives "adverse impacts" on Pantex water resources are 3/09.00.04

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08 03 01 Comment Number 1

The Department of Energy acknowledges the comment in support of Pantex. Decisions related to future missions at Pantex will be based upon environmental analyses, technical and economic studies, national policy considerations, and public input.

09 00 08 Comment Number 2

The Department of Energy did not intend to give the perception that the sites were ranked. The language in the cumulative impacts section of the Summary has been revised to better reflect the impact analysis in the Final PEIS. In addition, reference to "adverse" impacts has been deleted. Revisions made to the Final PEIS are reflected in the Summary.

09 00 04 Comment Number 3

Based on comments received, Section 4.2.4.4, *Water Resources*, was revised, as well as the Summary. There was no intention to "bury" impacts or to portray Pantex, the Pantex region, or the Texas Panhandle region in a negative fashion. Each DOE site was analyzed and studied in the same manner and presented in the PEIS accurately per these analyses and studies. Revisions made to the PEIS text are included in the Summary of the Final PEIS.

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shown for all alternatives except the Phaseout alternative (pp.S-18 through S-21).

In Section "4.2.4.4 Water Resources," however, the following statement is made, "In regard to all of the above alternatives and related actions, the alternatives are not expected to have an adverse impact on water resources at Pantex." (p.4-192)

- o If no adverse impacts are expected on the water resources in regard to "all alternatives and related actions," why do statements regarding "adverse impacts" to water resources at Pantex appear in the important Summary document? 3/09.00.04 cont.
- o Why is the "no adverse impacts on water resources" statement "buried" in the second of three volumes instead of showing up in the Summary document under environmental impacts?

- In the Summary it is stated (p. S-21) that "Potential adverse impacts to waste management would occur at Pantex, ORR (all three options), and SRS, because the construction of sanitary, utility, and process wastewater treatment systems to treat nonhazardous liquid wastes may by required." 4/09.11.08
  - o How can the construction of facilities and systems to treat waste have the potential to adversely impact the management of waste? Is this a significant environmental impact as intended by §1502.1 of the NEPA regulations?

- The Summary discusses three plutonium disposition categories (deep borehole, immobilization and reactor) consisting of nine alternatives, and ultimate high-level waste disposition.
  - o If the immobilization alternatives and reactor alternatives (except CANDU) result in the same ultimate disposition, viz., a high-level waste (HLW) repository, what is the cost/benefit of the reactor alternatives? 5/07.02.00
  - o Doesn't "HLW repository" mean the DOE's High-Level Nuclear Waste Repository at Yucca Mt., Nevada? 6/12.00.00
  - o What would constitute ultimate disposition in the case of the CANDU reactor alternative? Would the Canadians be allowed to send the resultant high-level nuclear waste back to the U.S.? 7/12.00.00

- Volume I, Summary, Attachment A, Summary table indicates that for every alternative the impact at Pantex would be the same or less than the impact at other sites under consideration. 8/08.00.00

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09 11 08 Comment Number 4

The conceptual design for the consolidated and collocated storage facilities and the disposition facilities have, as part of their design, waste management facilities that would treat and package all waste generated in accordance with the *Resource Conservation and Recovery Act* (RCRA), and other applicable Federal and State statutes and DOE Orders. The impacts of having to construct the waste management facilities are captured in other resource areas such as land use and air quality. The text referring to "potential adverse impacts" to waste management has been deleted. The commentor is correct that the construction of waste management facilities will not adversely impact the management of waste.

07 02 00 Comment Number 5

A cost analysis for the alternatives was performed concerning those activities before final disposition in a geologic repository; this cost data, along with technical and schedule data, was provided in the Technical Summary Report for disposition in July and October 1996.

12 00 00 Comment Number 6

Not necessarily. "HLW repository" refers to a high-level waste geologic repository as envisioned under the *Nuclear Waste Policy Act* (NWPA). Although work is being done to characterize the Yucca Mountain site, no final decision regarding the suitability of Yucca Mountain has been made.

12 00 00 Comment Number 7

For the CANDU Reactor Alternative, no spent fuel would be returned to the United States. The material would become part of the Canadian spent fuel program.

08 00 00 Comment Number 8

At the time the Draft PEIS was published, DOE had not identified a Preferred Alternative. There were no preferred sites for any of the storage or disposition

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- What is the basis for news reports indicating that other sites are leading in the consideration for this mission? 8/08.00.00 cont.

- Under Phaseout (p.S-21) of the S&D PEIS, the following statement is made: "All of the regional economic areas surrounding the DOE sites would experience a loss in employment with phaseout. However, compared to total employment in these areas, the loss of jobs would have no or negligible impacts at all the DOE sites." 9/09.08.08
  - For which sites would the impact be negligible?
  - For which sites would the impact be significant?
  - What is the basis for determining the significance of the impacts?
  - How does the DOE plan to use this significance in their selection process?

- In the draft S&D PEIS, under Long-Term Storage Alternatives (p.S-48), it is stated that:

  > Among the DOE sites under consideration, Pantex has the greatest potential to experience adverse cumulative impacts, particularly because of its relatively small, compact area. Water resources and biological resources would be vulnerable, and land resources, air quality, cultural resources, socioeconomics, ...public and occupational health and safety, waste management, intersite transportation, and environmental justice could be susceptible to adverse cumulative impacts." (A parallel statement follows on the same page as regards the Disposition Alternatives. There is no analysis presented to support this statement.) (Emphasis added.)

The draft SWEIS, however, presents conclusions on the cumulative impacts of the Proposed Action and the draft S&D PEIS collocation alternative - the bounding alternative used for the analysis. In some cases conclusions include draft WMPEIS impacts. Quotations are from Section 4.xx.5.1 if the draft SWEIS. Conclusions are:

Plant Facilities and Infrastructure

> "...additional oil...would be required. ...would increase electrical consumption from 90,200 megawatthours per year to a maximum of 179,814 megawatthours per year. ...additional electrical lines would be needed." Draft WMPEIS impacts are included. (p.4-20)

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missions. A Preferred Alternative has been identified in the Final PEIS. The ROD will be based not only on environmental analyses, but also on technical, cost, national policy considerations, and public input.

09 08 08 Comment Number 9

With the exception of RFETS, the phaseout of existing storage facilities at DOE sites would involve, at most, the loss of 200 direct jobs (at Hanford and SRS). At Pantex, the phaseout would only affect five jobs, and at INEL no jobs would be lost. The impacts of these employment losses on the affected regional economies would be minimal. As stated in the PEIS, the regional economies in which the DOE sites are located are too large to be adversely affected by such a small decrease in employment at one site. Although the phaseout of storage facilities at RFETS would involve a greater number of workers, the impact on the regional economy would still be small since the plant is located near a large metropolitan area. The PEIS analyses (including analyses of socioeconomic impacts), as well as technical and cost studies, Nonproliferation Policy considerations, and public input will be considered by the decisionmaker in reaching the ROD.

Land Resources

"...direct effects of land use would be negligible." (p.4-25)

Geology and Soils

"No ...effects on the geologic resources are anticipated. Soil impacts during operation are expected to be minimal." (p.4-54)

Water Resources

Water for "construction and operation would require 295 million gallons per year and 301 [million(?)] gallons per year, respectively. ...increase in wastewater generation ...would be 174,000 million gallons per year. ...no exceedance of...discharge limit. During operations, wastewater would be recycled, causing no impacts." Draft WMPEIS impacts are included. (p.4-85)

Air Quality

During construction, ambient "concentrations of all pollutants...would remain within...standards. During operation, concentrations...are predicted to be in compliance..." (p.4-117)

Acoustics

"Due to the size of the site, noise emissions from construction equipment would not be expected to cause annoyance to the public." (p.4-13)

Biotic Resources

"...would disturb 232 acres of habitat. Construction would adversely affect some animal populations." (p.4-145) [Note: "Cumulative impacts to terrestrial resources or threatened and endangered species would be minimal." (S&DPEIS p.4-860)]

Cultural Resources

"Impacts to prehistoric or historic resources are not anticipated." (p.4-153)

Socioeconomic Resources

"Construction and operation of new storage facilities would require 1.524 and 676 workers, respectively." (p.4-171)

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Intrastate Transportation - not addressed in the S&DPEIS

Waste Management

"...impact on...waste management activities by increasing the generation of TRU, LLW, LLMW, HW, and NHW." (p.4-203) [Note: "...the worst alternative in the WMPEIS may increase the need for additional treatment facilities. The consolidation of Pu storage with HEU storage...would increase the need for treatment and disposal facilities." (S&DPEIS p. 4-861)]

Human Health

"Normal operation of the new collocated storage facility...would result in impacts that are within applicable regulatory limits. The risks of adverse health effects to the public would be small." (p.4-239)

Aircraft Accidents

Any alternative "would reduce aircraft accident probability." (p.4-252)

Interstate Transportation of Nuclear and Hazardous Materials

"...the potential fatalities would be .481" from transportation of Pu and HEU from storage sites to Pantex. (p.4-274) [Note: Total potential fatalities range from .293 to 1.080 at the six candidate sites; only ORR has a smaller impact than Pantex. A footnote states that the results are from radiological and nonradio-logical risk for the life of the project. (S&DPEIS p.4-778)]

Environmental Justice

"...If there were any health impacts...these impacts would not appear to disproportionately affect minority or low-income populations." (p.4-285)

The statements make it appear that it is DOE's intention to eliminate Pantex from consideration as a long-term storage site.

Please enumerate which cumulative impacts are potentially adverse and explain why you believe each is greatest at Pantex. In each case, please discuss the basis for the conclusion and whether you think the potential adverse cumulative impact is significant as a discriminator among sites. | 10/09.00.04

- The socioeconomic analyses of the three EISs are not consistant. The SWEIS (p.S-17) assumes 1.65 indirect jobs in the region for every job at Pantex. The | 11/09.08.04

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09 00 04 Comment Number 10

The Department of Energy did not intend to give the perception that the sites were ranked. The cumulative impact analysis in Section 4.7 of the PEIS does not attempt to rank the potential for cumulative impacts at the sites. The language in the Summary has been revised to better reflect the impact analysis in Section 4.7.

09 08 04 Comment Number 11

Projections of the number of indirect jobs generated depend on a number of factors, including the activity performed, the type of data used, and the methodology employed. The Storage and Disposition PEIS evaluates the socioeconomic impacts for the storage and disposition of fissile materials at Pantex, while the Stockpile Stewardship and Management PEIS evaluated the impacts of weapon assembly and disassembly operations. The activities of the two programs are quite different and each requires very different inputs. The availability of inputs within the region determines the size of the multiplier.

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SSMPEIS (p.S-32) assumes 1.16 and the S&DPEIS (p.4-205) assumes 3.51. | 11/09.08.04 cont.

- Please explain these differences.

- The Amarillo Economic Development Commission (AEDC) analysis, based on local knowledge of the area and a regional impact study performed by Dr. Ray Perryman of Southern Methodist University, gives a ratio of 2.67 additional jobs in the region to every one Pantex job (for a total job multiplier of 3.67). | 12/09.08.04

  - Why didn't the DOE consult with the AEDC and/or the City of Amarillo and use the expert analysis that local taxpayers had already paid for?

- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, and President Clinton's February 11, 1994, Memorandum for the Heads of all Departments and Agencies requires an analysis of environmental effects on low-income and minority populations to include human health, social, and economic effects. | 13/09.12.08

  - Why do the draft SWEIS, SSMPEIS, and S&DPEISs analyze only human health effects of the proposed actions and not the social and economic effects, as required?

Thank you for your attention to these comments and questions.

Sincerely,

Bob Juba

Bob Juba
Pantex Retention and Expansion Coordinator

cc: Hon. Mac Thornberry
Hon. Kel Seliger

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09 08 04 Comment Number 12

The number of indirect jobs generated by the Proposed Alternatives was based on the RIMS II model developed by BEA. The multipliers used in the model are available for every economic region in the Nation (each of the DOE sites). This allowed a consistent method to be applied to all sites. Site-specific numbers should be used in site-specific EISs. Section 4.1.8 of the PEIS has been modified to clarify the utilization of the RIMS II model.

09 12 08 Comment Number 13

Socioeconomic impacts are analyzed in detail in all of the environmental statements noted by the commentor. The PEIS analyzes potential socioeconomic impacts for all of the alternatives. For those alternatives that would add a new mission to a particular DOE site, there would be no adverse socioeconomic impacts. In fact, the analyses indicate that the impacts of these alternatives would be small but beneficial to the affected regional economies. There would be no environmental justice issues associated with these alternatives.