CITY OF RICHLAND, OFFICE OF THE MAYOR, RICHLAND, WA, MAYOR LARRY HALER
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Comments of Richland Mayor Larry Haler
April 11, 1996 Public Meeting on Storage and Disposition of Weapons-Usable Fissile Materials
Draft Programmatic Environmental Impact Statement

Good evening. I am Larry Haler, Mayor of Richland. I also serve as Chairman of the "Hanford Communities," an intergovernmental organization that represents the interests of cities and counties most directly affected by Hanford. As you are concluding a long day of meetings, let me extend a somewhat belated welcome to the Tri-Cities!

I have a prepared statement I would like to read and leave with you. We will be submitting written comments within the month.

The Programmatic Environmental Impact Statement, or PEIS, on Storage and Disposition of Weapons-Usable Fissile Materials is of great interest to the City of Richland and the other local governments in this area. Hanford, directly to our north, is identified as one of six DOE candidate sites for long-term storage of weapons-usable plutonium. Two of the disposition alternatives noted in the PEIS are particularly well suited to Hanford.

We would be proud to have Hanford help reduce the global nuclear weapons threat. However, we do have some misgivings. Nearly half of all Hanford workers live in Richland. I am concerned about their health and safety, as well as their economic well-being. Public safety associated with transport of radioactive materials through our communities is a factor we must consider. We must also safeguard the quality of our natural environment. 1/10.00.00

Beyond these tangible issues, we are anxious that our community not be perceived by others in the Pacific Northwest as a dumping ground for radioactive wastes. As DOE is reducing employment opportunities at Hanford, we must recruit new enterprises into this area to remain viable. Positive community image is critically important to our economic diversification efforts. 2/09.08.01

Our formal written responses to this PEIS will be carefully developed. We have appointed a technical advisory committee to explore the health and safety, transportation, and socioeconomic impacts of a new plutonium mission for Hanford. The committee began its analysis this week, and we hope to have our elected governing boards review their work and recommendations by the end of the month.

WA-016

10 00 00 — Comment Number 1

Transportation safety is assured since Federal regulations require the use of packagings that cannot release dangerous quantities of radioactive material under the most severe accident conditions. During more than 40 years of DOE shipment activity, there has never been an accidental release of radioactive material that has caused injury or death. The maximum potential health risk from transporting materials associated with the Proposed Alternatives are evaluated and presented in Section 4.4 and Appendix G of the PEIS.

09 08 01 — Comment Number 2

The socioeconomic analysis estimates impacts to employment, income, housing, and community services. These impacts are estimated using standard methodology and can be quantified and compared across sites. The disposal of radioactive wastes from other DOE sites is not within the scope of this PEIS. This PEIS analyzes the expected waste disposal for Proposed Actions at Hanford, and compared the amount to the existing environment.

Fabricating plutonium into mixed-oxide, or MOX, fuel and burning it in reactors is one of the disposal options noted in the PEIS. The Washington Public Power Supply System has made a proposal to the Department of Energy to burn a bundle of MOX fuel as a demonstration. Our City Council fully supports the Supply System in this endeavor. We also encourage DOE consider the Supply System's unfinished nuclear power plant on the Hanford Site as a second MOX fuel facility. The Fast Flux Test Facility, or FFTF, provides yet another opportunity for burning of MOX fuel. The FFTF offers additional value in the potential for production of tritium and vital medical isotopes. We also have at Hanford the "Fuel and Materials Examination Facility," or FMEF, the only facility in the country that has been designed and is available to cost-effectively manufacture MOX fuel. 3/08.03.01

As you can see, Hanford offers a complete, safe, and secure industrial complex capable of storing plutonium, manufacturing and burning MOX fuels, vitrifying waste products, and handling spent fuel. The Supply System and private companies have indicated interest in participating in this important endeavor. We have a talented and experienced work force and the industrial infrastructure necessary to perform a plutonium storage and disposal mission. Assuming we achieve necessary public understanding and support and address legitimate concerns through effective mitigative measures, I believe Hanford will prove to be well suited to play a plutonium storage and disposal mission.

In closing, I should mention that the short timeline for commenting on the PEIS has made our review particularly difficult. One problem is that there are very few copies of the PEIS currently available. We have requested additional copies for our committee and hope to receive them soon. I hope you will consider extending the comment period to give the public better opportunity to participate. 4/08.02.00

Thank you again for the opportunity to provide comments this evening. We will be carefully evaluating this opportunity for Hanford to be of service to the nation. You can expect a thoughtful written response to the PEIS from us.

WA-016

08 03 01 Comment Number 3

Liquid metal reactors were not included as alternatives for Pu disposition in the PEIS due to longer time and greater cost required to complete their construction. The FFTF, on the other hand, is an existing reactor and could be used for Pu burning. However, the limited capacity of the FFTF would limit the rate at which Pu could be dispositioned and would require a much longer timeframe for disposition than that which could be achieved with the reactor options addressed in the PEIS.

The Department of Energy is in fact considering the FFTF, pursuant to the ROD for the *Final Programmatic Environmental Impact Statement for Tritium Supply and Recycling* (TSR PEIS). The ROD (December 1995, 60 FR 63878) for the TSR PEIS addressed the FFTF for tritium production as follows:

> A private group has recently suggested that it purchase the FFTF from DOE and that DOE then contract with the private group to make tritium at that facility. In the [Tritium Supply and Recycling Final] PEIS, the use of the FFTF was considered and dismissed as a long-term tritium supply option because the amount of tritium that it could produce would only meet a percentage of the steady state tritium requirements, and it was not reasonable to rely on operating the facility far beyond the end of its design life. However, DOE will evaluate the presentation made by the private group to determine whether the operation of the FFTF might be able to play any role in meeting future tritium requirements. If any changes are warranted to this ROD following that review, or further NEPA documentation is required, DOE will take appropriate action.

The Secretary of Energy has requested a review by the JASONS Panel (eminent academic scholars and scientists) as part of the evaluation of tritium production with the FFTF. Should the outcome of this evaluation lead to a DOE proposal to restart the FFTF for tritium production, additional environmental analyses would be performed, as appropriate. If the FFTF were to be restarted, a substantial portion of the surplus Pu that would be used for MOX fuel could be used to fabricate FFTF driver fuel, thereby achieving the Spent Fuel Standard for Pu disposition through irradiation in the FFTF. Further description of the FFTF has been added to Appendix N of the PEIS.

The Fuels and Materials Examination Facility (FMEF) is considered for use as a long-term storage facility for Pu, and the impacts are included in Section 4.2.1 of the PEIS. For the production of MOX fuel, a generic facility was considered for all six DOE sites. At Hanford, the MOX fuel fabrication facility would be located in the 200-Area adjacent to 200 East. The utilization of the FMEF would be a variant for MOX fuel fabrication at Hanford, which is bounded by the environmental analysis for the MOX fuel fabrication facility located in the 200-Area. Table 2.4–1 of the PEIS provides a brief description for variants which includes "Modification/Completion of existing facilities for MOX fabrication." The storage options for Hanford also include constructing a new facility. Utilization of FMEF for the Upgrade Alternative would not preclude its use to also support Pu disposition activities for either Reactor or Immobilization Alternatives.

08 02 00 Comment Number 4

Additional copies of the PEIS were mailed within 2 days of receipt of the request. The public comment period was extended to a total of 92 days.