FISSILE MATERIALS PEIS COMMENTS

- There does not seem to be any discussion about costing of alternatives. Does cost of each alternative play a role in choosing preferred alternative? When choosing a preferred alternative, it would be fiscally irresponsible without cost evaluation. 1/08.00.00

- As Pantex dismantlement decreases, the number of buildings used for this purpose will decrease. Plans for each alternative on page S-12 specify modifying and/or building new facilities. Did these plans take into effect, that existing structures would become available for use, thus avoiding large new construction costs and minimizing impact on the environment. 2/02.00.04

- On page S-18, under the No Action Alternative, (Page S-19 Upgrade Alternative, Consolidation Alternative (both options), page S-20 Expand-Use Alternative, Collocation Alternative, S-28 Disposition Alternative Pit Disassembly/Conversion Facility, S-30 Ceramic Immobilization Facility, S-31 Vitrification Alternative, S-33 MOX Fuel Fabrication Facility, S-35 Evolutionary LWRs Alternative) the summary states "Adverse impacts to water resources at Pantex would result from the continued local drawdown of the Ogallala Aquifer, but Pantex's contribution to this drawdown is expected to continue to decrease due to a decrease in other DOE activities at Pantex.
  - There does not appear to be an evaluation of decrease versus increase in the above statement and consideration of using reclaimed wastewater.
  - On page 3-159 of Volume I, it states that "an agreement between Pantex and the city of Amarillo is currently being negotiated to develop reclaimed wastewater ... The use of reclaimed wastewater could curtail the annual decline rate of the Ogallala Aquifer." There does not appear to be any evaluation or consideration given to reclaiming wastewater and reusing that water with respect to "adverse impact: Evaluation of recycling treatment water (Amarillo & Pantex agreement) 3/09.04.04
  - Page S-64 Summary Comparison states that Pantex would use the least amount of water among candidate sites and 57% of water used would be discharged back to the playas and consequently the aquifer. No adverse impact is mentioned.
  - In other parts of the summary, water usage is mentioned as a percentage and thus skews the perception of impact. Since Pantex uses less water from the surrounding area than any of the other candidate sites, any increase in water usage would come out as a higher percentage given an equal increase at all sites. Even this is not true since other sites would use more water than Pantex for these options.
  - In the detailed description of Volume II, pages 4-190 through 4-192, water usage for the alternatives has a negligible impact on the aquifer as stated by "water requirements are small relative to the total water in aquifer storage", "total projected amount to be pumped in Carson County by an insignificant amount (0.0001-percent)", and ""there should be minimal

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08 00 00 Comment Number 1

The technical, cost, and schedule analyses of the various alternatives are presented in a separate document to support DOE's ROD. This document was made available to the public for review beginning in late July 1996.

02 00 04 Comment Number 2

As the mission for Pantex changes, DOE will continue to evaluate the possible re-use of existing facilities versus the need for new facilities. Existing facilities will be utilized, where possible, to avoid the cost and related impacts of building new facilities.

09 04 04 Comment Number 3

The actual quantities required for each alternative and the associated percent increases are provided in Chapter 4 of the PEIS and also in the table entitled "Potential Changes to Water Resources at Pantex Plant No Action (2005) and Storage Alternatives." Although Pantex is contributing to the depletion of the Ogallala Aquifer, as stated in Chapter 4, additional groundwater drawdowns attributed to the various long-term storage alternatives are expected to be slight, with minimal impacts to regional groundwater levels. The Summary was revised to emphasize that Pantex's water use from the Ogallala Aquifer is expected to decrease significantly by the year 2005, and that additional withdrawals attributed to the long-term storage alternatives should have only a minor impact on groundwater resources.

The possible use of reclaimed wastewater is not examined in detail in the PEIS because some data (such as cost-benefit analysis) have not been determined for implementing the pipeline specifically for any of the alternatives proposed in this PEIS. In general, several of the disposition alternatives are the only ones which require enough water to consider a project of the scale of constructing an approximately 32.2 km (20 mi) long pipeline to supply water to Pantex. Future tiered NEPA documents would be conducted, as required, to analyze the feasibility of providing Amarillo's treated wastewater to Pantex.

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impacts to regional groundwater levels from this additional withdrawal. The total water withdrawal ... would be less than what is currently being withdrawn from the Ogallala Aquifer by Pantex." This does not create an "adverse impact". 3/09.04.04 cont.

- On page S-18, under the Upgrade Alternative, (S-19 Consolidation Alternative, S-20 Collocation Alternative, S-28 Disposition Alternative Pu Conversion Facility, S-31 Vitrification Alternative) the summary states "The Upgrade Alternative would have potential adverse impacts to air quality at Hanford (both options), INEL, Pantex, and SRS, since air pollutants concentrations would increase during construction and operations. Yet in the very next sentence, the summary states "Cultural and paleontological resources could be affected wherever there is ground disturbance due to construction ... except at ... and at Pantex, because no new ground disturbance would be involved.
  - what part of operations would adversely impact air quality at Pantex.
  - On Page S-72, which is approximately the same for all other alternatives, the summary states "During construction, site is expected to comply with ambient air standards and guidelines. During operation ... site is expected to comply with ambient air standards and guidelines." There is no adverse impact stated during Appendix A summary comparisons. The above is stated for all sites. Why are only specific sites mentioned above singled out for "adverse impact" If Pantex, as a candidate site, is expected to comply with all ambient air standards and guidelines then where is the "adverse impact" in that? 4/09.03.04
  - In volume II, the words "adverse impact" are never mentioned in regards to air quality. Volume II, pages 4-184 and 4-185, does mention "Increased PM10 and TSP concentrations may occur during the peak construction period, particularly during dry and wind conditions." Has an evaluation taken place to compare this small area of construction with the thousands of acres that are plowed annually in this area during dry and windy periods. The increase in PM10 and TSP directly attributable to Pantex would be negligible -- not an "adverse impact".

- On page S-19, under the Consolidation Alternative, the summary states "The potential for adverse impacts to land resources exists at ... Pantex, under the construction of a new facility north of Zone 11 and modification of existing facilities in Zone 12 South option, due to nonconformance with existing land-use plans, policies, or controls.
  - The Appendix A of the summary does not even mention this "adverse impact". The side-by-side comparison with the other sites is approximately equal. Why was Pantex singled out for "adverse impact"? 5/09.01.04
  - In Volume II, page 4-176, it states that "However, the master plan (*Pantex Site Development Plan*) designates Zone 11 for applied technology (PX DOE 1995g:8,11). Therefore, there would be potential adverse effects to land use." It is not anticipated that the Applied Technology Division will expand to use the land in question. This is not an adverse impact and is a

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09 03 04 Comment Number 4

The impacts to the air quality at Pantex due to operational activities are identified in the various sections of the PEIS dealing with air quality. As an example, Section 4.2.4.3 identifies the emission sources associated with operations to include boilers for space heating, diesel generators and testing of emergency diesel generators, exhaust and road dust from delivery and employee vehicles, and toxic/hazardous pollutant emissions from facility processes.

The Summary of the Draft PEIS, which presents information from Chapter 4 on environmental consequences, was revised to remove all subjective or qualitative comparisons among sites such as "adverse impacts."

09 01 04 Comment Number 5

Land-use planning is a dynamic process in which plans must be refined to reflect new information or needs. Although a potential action would be inconsistent with the current site development plan, Pantex could revise the plan in accordance with the proposal. The Proposed Action would be in compliance if the change is approved. The Final PEIS was revised to reflect this condition.

Zone 11, a potential location for the Consolidation Alternative at Pantex, was deleted in the Final PEIS.

very strict interpretation of a document written to describe existing land use. Changes can be made easily to the *Pantex Site Development Plan* to describe future land use that was not thought about at initial writing.

- In Volume II, page 4-176/177, it states for all alternatives that "alternative would be consistent with the city of Amarillo's land-use plans, policies, and controls. In Volume I, page 3-147, "Within the State of Texas, land-use planning occurs only at the municipal level. The City of Amarillo comprehensive plan has designated land for future growth." These two references indicate that any construction at Pantex does not create "a potential for adverse impact to land resources ... due to nonconformance with existing land-use plans, policies, or controls."
- In Volume II, page 4-856, it states "Nonetheless, future site development would be anticipated to be in conformance with the future land uses as designated by the Pantex Site Development Plan. As such, the various additive, aggregative land-use actions that would accumulate incrementally, although consuming land, would not change land use, or violate land-use plans, policies, or controls for the user. Proposed development would also be compatible with the industrial use visual character of the developed areas of Pantex." This is in direct opposition to the above "adverse impact" statement.
- VERIFY what policies actually exist for Pantex and is there any nonconformance issues. CONFIRM impression of what is stated in PEIS and the *Pantex Site Development Plan*.

5/09.01.04 cont.

- On page S-19, under the Consolidation Alternative (S-20 Collocation Alternative, S-22 Disposition Alternative Pit Disassembly/Conversion Facility, S-31 Vitrification Alternative, S-33 MOX Fuel Fabrication Facility, S-35 Evolutionary LWRs Alternative), the summary states "At all of the DOE sites under consideration, cultural and paleontological resources have the potential to be affected wherever there is ground disturbance due to construction activities.
  - The side by side comparison in Appendix A states "Prehistoric and historic resources occur within the acreage that would be disturbed during construction." (Who chose these sites, adequately surveyed, use of other buildings, etc)
  - For Pantex, Appendix A also states "It is unlikely that paleontological resources occur within the acreage disturbed during construction." Thus not all DOE sites are the same in this area.

6/09.07.04

- On page S-19, under the Consolidation Alternative (page S-20 Collocation Alternative, S-28 Disposition Alternative Pit Disassembly/Conversion Facility, S-30 Ceramic Immobilization Facility, S-31 Vitrification Alternative, S-35 Evolutionary LWRs Alternative), the summary states "Waste management at Pantex (both options) and SRS has the potential for adverse impacts where implementation of this alternative may require construction of sanitary, utility, and process wastewater treatment systems to treat nonhazardous liquid wastes.

7/09.11.04

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09 07 04 Comment Number 6

Paleontological resources are different from cultural (prehistoric, historic, and Native American) resources. At Pantex, paleontological resources are unlikely to be affected within areas of disturbance, while cultural resources (for example, historic resources) may be affected. The affected environment for these resources is discussed in more detail in Section 3.5.7 of the PEIS.

09 11 04 Comment Number 7

Based on comments received, the Summary of the Draft PEIS was revised to clarify the comparison of impacts and to delete reference to "adverse" impacts. All revisions made appear in the Summary of the Final PEIS.

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- The summary is inconsistent from paragraph to paragraph on pages S-19 and S-20. The second paragraph as stated above mentions adverse impact at Pantex, but does not mention adverse impact for Pantex in last paragraph on S-19 or S-20 second paragraph, or last paragraph for Collocation Alternative page S-20 — 7/09.11.04 cont.
- The treatment of liquid nonhazardous wastes is the area of concern that may require construction of sanitary, utility, and process wastewater systems. Construction of additional facilities is not necessary due to the decrease of other activities (e.g. dismantlement) at Pantex and the existing facilities can accommodate this increase of liquid nonhazardous wastes. This is not an adverse impact. — 8/09.11.04

- On page S-19, under the Consolidation Alternative(Page S-20 Collocation Alternative, S-28 Disposition Alternative Pit Disassembly/Conversion Facility, S-30 Ceramic Immobilization Facility, S-31 Vitrification Alternative, S-35 Evolutionary LWRs Alternative), the summary states "Potential adverse intersite transportation impacts related to all DOE sites could occur because of the increased risk of traffic accident fatalities. — 9/10.02.00
  - It could be concluded that the addition of one vehicle trip to Pantex causes an increased risk of traffic accident fatalities. However in Volume II, in all of the alternatives, page 4-203 through 4-206, all alternatives state for traffic conditions "There would be no significant traffic impact to the local road network". If there is no significant traffic impact, then why does the summary state otherwise?

- On page S-19, under the Consolidation Alternative (Page S-20/21 Collocation Alternative), the summary states "The Consolidation Alternative would have adverse impacts to the following: ... biological resources at ... Pantex — 10/09.06.04
  - But for construction of a MOX Fuel Fabrication Facility on page S-33, the summary states "At all DOE sites, except for Pantex, there would be the potential for adverse biological resource impacts because habitat disturbance and potential impacts to special status species during construction activities. For construction, there is either adverse impact or no adverse impact -- this example shows large inconsistencies in evaluations and conclusions drawn from basically the same data input.

- On page S-20, under the Consolidation Alternative(S-35 Evolutionary LWRs Alternative), the summary states "..., biological resources would experience adverse impacts under the Consolidation Alternative at all DOE sites. This is due to habitat loss ... . In addition, the potential exists for adverse impacts to either Federal- or State-listed threatened and endangered or special status species at ... Pantex (both options) ... . There is also the potential for adverse impacts to wetlands at Pantex (both options)." — 11/09.06.04
  - Page 3-166 in Volume 1. "No critical habitat for threatened and endangered species as defined in the ESA (50 CFR 17.11; 50 CFR 17.12) exists on Pantex."
  - Page 3-167 in Volume 1. "There is little undisturbed habitat at Pantex that

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09 11 04 Comment Number 8

After discussion with Pantex representatives and review of the Pantex EIS (DOE/EIS-0225D), the impacts of liquid nonhazardous wastes have been reevaluated. The Final PEIS reflects that the existing wastewater treatment systems at Pantex are adequate to handle the increase for the Consolidation and Collocation Storage Alternatives.

10 02 00 Comment Number 9

The statement in the Summary on the potential adverse intersite transportation impacts concerns the human health impacts of moving radioactive material (Pu and uranium) to support the storage and disposition alternatives. This analysis concerns DOE material, is governed by Federal, State, local, and DOE regulations, and determines the number of fatalities due to movement of the material. The analysis is contained in Section 4.4 of the PEIS. The statements in the various socioeconomic sections concern local traffic conditions in regard to construction and operations workers that may be needed for the alternatives. This analysis concerns workers, is governed by traffic laws, and determines the effect of the local transportation network.

09 06 04 Comment Number 10

The proposed sites for the Consolidation Alternatives and the MOX Fuel Fabrication Facility were in different locations at Pantex and contained different habitat types (one being a previously disturbed area). Thus, the potential to disturb biological resources would also differ among these alternatives. The proposed site locations have changed and are reflected in the Final PEIS.

09 06 04 Comment Number 11

The Summary was revised to correctly reflect the analysis provided in Chapter 4. The official designation of critical habitat by the U.S. Fish and Wildlife Service (USFWS) does not determine the presence of, nor the possibility of, impacts to a threatened or endangered species. Regardless of the permanent or temporary nature of a species occurrence at Pantex, the potential impacts to those species attracted to the site are described. The word

would accommodate any of the threatened, endangered, and other special status species, other than the Texas horned lizard. Most of these species are attracted to the playas, which provide water and foraging habitat."

- The above two sentences taken together do not merit "an adverse impact" at Pantex.
- The summary side-by-side comparison states "Construction-related ground disturbance may increase the potential for sediment runoff to wetlands. During construction and operation, discharge of treated wastewater could cause increase open water areas in site playas which could lead to change in plant community composition. Discharges should increase aquatic habitat for amphibians." This is not adverse impact. Most of these playas are dry for most of the year. An increase of water would definitely help wetlands and provide improvement for the "water and foraging habitat." 11/09.06.04 cont.

- On page S-20, under the Collocation Alternative (Page S-29, Ceramic Immobilization Facility, S-35 Evolutionary LWRs Alternative), the summary states "Although the level of service on one or more local roads would decline during construction at INEL, Pantex, and ORR (all three options), the associated employment benefits would outweigh any short-term adverse local transportation impacts."
  - In Volume I, page 3-175, it is stated that Traffic conditions on all of these roads (FM 693, 293, 2373) are typically free flowing with low volumes of vehicles capable of traveling at speed limits without interference due to congestion. Building projects in past have had no effect on traffic conditions at the plant and would not be expected to have "adverse local transportation impacts" in the future. The traffic volume would not be that great even with construction crews. 12/10.00.00

- Inconsistency: Even though Pantex is included in sites used for analysis of Immobilization and Deep Borehole and Reactor categories (see second paragraph on page S-13), Page 22 (Page 32 MOX Fuel Fabrication Facility) states "Construction and operation of the pit disassembly facility would have no or negligible impacts to land resources, site infrastructure, air quality, noise, and geology and soils at any of the DOE sites used for analysis purposes."
  - This statement is not consistent with other alternatives and associated evaluations and conclusions. Additionally, the above paragraph is not consistent with following paragraphs in the same sections. 13/09.00.04

- On page S-28, under the Pu Conversion Facility paragraph, the summary states "Whereas the associated employment would have generally positive socioeconomic impacts at all of the DOE sites, the level of service on one or more local roads during the operations period would decline at INEL, Pantex, and ORR, leading to an adverse socioeconomic impact for the Pu conversion facility.
  - In Volume I, page 3-175, it is stated that Traffic conditions on all of these roads (FM 693, 293, 2373) are typically free flowing with low volumes of vehicles capable of traveling at speed limits without interference due to 12/10.00.00 cont.

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"adverse" has been deleted as a descriptor of impacts. There are no anticipated impacts for wetlands at Pantex

The side-by-side summary comparison noted is presented consistently throughout the document. Both increases and decreases in stormwater and wastewater discharges may affect the open water areas in the playas and could lead to changes in both the plant and biotic populations living within and utilizing the playa. Also, increases in stormwater, wastewater, and operational discharges may increase the potential for sediment and affect the open water area and water quality within the playa. The impacts due to water discharge to playas are described as an increase in aquatic habitat and an alteration of wetland habitat; whether the changes to wetlands are positive or negative would be determined in site-specific environmental documentation.

10 00 00 Comment Number 12

The local transportation model used indicates that there would be a decline in the level of service during construction of the collocation facility, ceramic immobilization facility, and evolutionary LWR at Pantex. The model indicates there would not be a decline in the level of service during operation of these facilities. The statements in the Summary concern the level of service decline during construction not operation. A description of the Average Annual Daily Traffic (AADT) is included in Section 4.1.8 of the PEIS. This model uses six levels of service described in Table 4.1.8–1. A drop of one level of service is considered an impact in the PEIS. Although building projects in the past have had no effect on traffic conditions, the AADT model was applied to all sites so that a comparison can be made between them.

09 00 04 Comment Number 13

Based on comments received, the Summary was revised. There was no intention 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 per these analyses and studies. All revisions made to the PEIS text are included in the Summary of the Final PEIS.

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congestion. Building projects in past have had no effect on traffic conditions at the plant and would not be expected to have "adverse local transportation impacts" in the future. The traffic volume would not be that great even with construction crews.

- In Volume II, page 4-203 through 4-206, all alternatives state for traffic conditions "There would be no significant traffic impact to the local road network". This a large inconsistency and does not deserve to be described as an "adverse impact" in the summary. 12/10.00.00 cont.

- On page S-29, under Ceramic Immobilization paragraph (S-31 Vitrification Alternative, S-32 MOX Fuel Fabrication Facility, S-35 Evolutionary LWRs Alternative), the summary states "The potential for adverse impacts would exist for land resources at Pantex, because use of the proposed site would not be in conformance with the *Pantex Site Development Plan*.
  - In Volume II, page 4-176, it states that "However, the master plan (*Pantex Site Development Plan*) designates Zone 11 for applied technology (PX DOE 1995g:8,11). Therefore, there would be potential adverse effects to land use." It is not anticipated that the Applied Technology Division will expand to use the land in question. This is not an adverse impact and is a very strict interpretation of a document written to describe existing land use. Changes can be made easily to the *Pantex Site Development Plan* to describe future land use that was not thought about at initial writing. 5/09.01.04 cont.

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