Comment Form

United States Department of Energy

NAME: (Optional)
ADDRESS:
TELEPHONE: ( )

COMMENT (and background information):

Section 1502.1 of 40 CFR Parts 1500-1508, the regulations implementing the National Environmental Policy Act states:

"The primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues ... Statements shall be concise, clear and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses." (Emphasis added)

QUESTION:

In light of these very clear and concise instructions based in law, how does DOE rationalize that Pantex is identified as having:

"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... could be susceptible to adverse cumulative impacts." (p. S-46)? (Emphasis added)

1/09.00.04

M-090

09 00 04 **Comment Number 1**

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 Draft PEIS accurately per these analyses and studies. All revisions made to the PEIS text are included in the Summary of the Final PEIS.

NO NAME SUBMITTED
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DRAFT S&DPEIS

COMMENT (and background information):

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.

2/09.00.04

QUESTION:

What does this statement mean? It is obscure and demands an explanation that is concise, clear, to the point, and supported by evidence.

M-090

09 00 04 **Comment Number 2**

The Department of Energy did not intend to give the perception that the sites were ranked. The language in the Summary has been revised to better reflect the impact analysis in Section 4.7. The Final PEIS provides the necessary information to describe the impacts for the resources analyzed. It is up to the decisionmaker to determine which impacts are discriminators among sites.

DRAFT S&DPEIS

COMMENT (and background information):

In the Summary it is stated (p. S-20) 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 be required."

QUESTION: 3/09.11.08

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?

M-090

09 11 08 Comment Number 3

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 into forms that would enable long-term storage and/or disposal in accordance with 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.

NO NAME SUBMITTED
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DRAFT S&DPEIS

COMMENT (and background information):

The oft-repeated phrase appears in the Summary:

> "Potential adverse intersite transportation impacts related to all DOE sites could occur because of the increased risk of traffic accident fatalities."

QUESTION:

Is there no risk to human health associated with intersite transportation of radioactive material? Has a dose risk assessment been made?

4/10.00.00

M-090

10 00 00 **Comment Number 4**

The human health risks of material transportations associated with the proposed Pu storage and disposition alternatives are evaluated and presented in Section 4.4 of this PEIS. The more detailed description of the methodology and supporting data for the analysis is presented in the Appendix G. Transportation of radioactive materials between sites includes health risks for both normal operations and accident conditions to the public and workers.

DRAFT S&DPEIS

COMMENT (and background information):

The Summary discusses three plutonium disposition categories (deep borehole, immobilization and reactor) consisting of nine alternatives, and ultimate high-level waste disposition.

QUESTIONS:

a. 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

b. Doesn't *a HLW repository* mean the DOE's High-Level Nuclear Waste Repository at Yucca Mt., Nevada? | 6/12.01.00

c. 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.? | 7/06.05.08

M-090

07 02 00 **Comment Number 5**

Cost data, along with technical and schedule data, were provided in a Technical Summary Report for disposition in late July 1996.

12 01 00 **Comment Number 6**

The PEIS does not assume the use of Yucca Mountain as a HLW repository for disposal of MOX spent nuclear fuel and/or immobilized materials. However, since Congress directed Yucca Mountain to be the only site considered for evaluation (site characterization) for the disposition of spent nuclear fuel and HLW, data developed to date at this site has been used to evaluate the potential for disposing of Pu wastes.

06 05 08 **Comment Number 7**

No. The spent fuel would be retained within the Canadian spent fuel program.

NO NAME SUBMITTED
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DRAFT S&DPEIS

COMMENT:

In the Summary, under "Phaseout" (page S-21), it is stated that:

> "For all DOE sites, with the exception of Pantex, phaseout would have a potential for adverse impacts to cultural resources if any of the structures eligible for National Register of Historic Places (NRHP) listing would not be maintained," and "None of the affected structures in Zone 12 at Pantex are considered eligible for NRHP listing."

This is *not* an accurate statement! Several of the structures in Zone 12 are potentially eligible for NRHP listing under the Cold War context. Pantex Plant is working with the State Historical Preservation Office (SHPO) and the Advisory Council on Historic Preservation regarding the subject of "Cold War" structure NRHP listings. 8/09.07.04

It is anticipated that several of the Zone 12 structures will be listed. The draft S&DPEIS text should be corrected.

M-090

09 07 04 Comment Number 8

The Summary was corrected to be consistent with Section 3.5.7 which says that Zone 12 does include a number of structures potentially eligible for the NRHP.

DRAFT S&DPEIS

COMMENT (and background information):

In Volume III (pp. M-131 through M-155), the chemicals used are as follows:

Hanford reports 3 chemicals, none with slope factors
NTS reports NO chemicals
INEL reports 28 chemicals, 12 with slope factors
Pantex reports 25 chemicals, 6 with slope factors
ORR reports 10 chemicals, none with slope factors
SRS reports 15 chemicals, 5 with slope factors
Rocky Flats reports 10 chemicals, 3 with slope factors.

These reported chemical usages present an erroneous comparison, as all sites under consideration will use similar chemicals. For example, benzene is a combustion product of both diesel fuel and gasoline, and would be common to all sites.

9/09.10.08

QUESTION:

Was the manner by which the information was requested not specific enough to insure accurate reporting or are the records at some sites incomplete? Please correct.

M-090

09 10 08 Comment Number 9

The data calls sent to each site contained the same information and requests. Under the No Action Alternative, the emissions data is from existing site facilities. Since each site has different existing facilities and operations, the chemicals emitted from these facilities are expected to be different. The cancer risk slope factors depend solely on the nature of the chemicals. For proposed new actions, the emissions data would be very similar among the sites. For detailed information on the emission data on each site, please refer to the respective data reports cited in the PEIS.