



Sample Scoping Comments for DOE's GTCC Environmental Impact Statement

Greater-Than-Class-C (GTCC) wastes are the most radioactive form of Low-Level Waste (LLW) and are dangerous for hundreds of years. DOE will be choosing one or more locations to bury GTCC radioactive wastes using one or more disposal methods. These radioactive wastes must be handled in a manner that is safe and secure for future generations. Environmental Impact Statements are required by NEPA for all major proposed federal actions. This is your chance to comment on the Department of Energy's latest proposal to handle GTCC radioactive wastes. Suggested sample comments follow.

- **Analyze hardened on-site storage (HOSS):** GTCC radioactive wastes must be safely stored as close to the site of generation as possible. Wastes must be safeguarded in hardened, on-site storage (HOSS) facilities. The impacts of building HOSS facilities must be analyzed in order to ensure that these wastes are not subject to risk posed by wildfire or other natural or man-made disasters. HOSS facilities must not be regarded as a permanent waste solution, and thus should not be constructed deep underground. The waste must be retrievable, and real-time radiation and heat monitoring at the HOSS facility must be implemented for early detection of radiation releases. The overall objective of HOSS should be that the amount of releases projected in even severe attacks should be low enough that the storage system would be unattractive as a terrorist target. Design criteria must include resistance to severe attacks, such as a direct hit by high explosive or an aircraft loaded with fuel and/or explosives.
- **DOE should dedicate funding to local and state governments for independent monitoring:** Funding for monitoring the HOSS facilities at each site must be provided to affected local and state governments. The affected public must have the right to fully participate.
- **Periodic review of HOSS facilities should be required:** An annual report reviewing the safety condition of each HOSS facility should be prepared with meaningful participation from public stakeholders, regulators, and utility managers at each site. The report must be made publicly available and may include recommendations for actions to be taken.
- **DOE should clearly specify exactly what is GTCC:** It should specifically state what is and what is not included in the term "Greater Than Class C." For instance, are all Radioisotopic Thermal Generators (plutonium-238 batteries for spacecrafts) considered GTCC? Is storage tank sludge from plutonium reprocessing such as at the Hanford Nuclear Reservation considered GTCC? Are smoke detectors containing radioactive alpha emitters considered GTCC? Please explain why the above are or are not considered GTCC.
- **DOE should analyze possible GTCC waste treatment alternatives, such as vitrification** (encasing them in glass). Pre-treatment of GTCC wastes could possibly lessen disposal volumes.

- **Analyze transportation impacts:** DOE should specify each site that has GTCC and the transportation impacts of shipping waste from each site to each of the alternative disposal locations. Specify how many shipments would occur by truck, train, or barge. Specify how many shipping containers would be needed, their cost, whether they already exist or whether new containers would have to be developed.

- **Do not bury sealed sources at the Los Alamos Laboratory.** LANL has collected around 15,000 sealed sources from across the country that are currently being stored above ground at the Lab's radioactive waste dump, Area G. The final disposition of Area G, in operation since 1957 but now facing closure, has yet to been determined. Hopefully the existing buried hazardous and radioactive wastes there will be excavated. Analyze a location at LANL for a HOSS facility.

- **Do not bring GTCC to the Waste Isolation Pilot Plant (WIPP).** This will require a change in existing law over what WIPP can accept. This would require changing the Land Withdrawal Act and opens the site up to commercial waste, which is and should remain prohibited. WIPP cannot even accommodate all the wastes that DOE has planned for it, let alone new waste.

- **DOE should make clear the regulatory framework and how it may differ from site to site.** DOE will be responsible for locating GTCC radioactive waste disposal/storage facilities and managing their construction and operation. However, it's not clear if the Nuclear Regulatory Commission (NRC) will have to license these GTCC facilities.

- **Disposal of GTCC radioactive wastes should be the starting point for public discussions of nuclear reactor decommissioning and proposed future reactors, not an afterthought.** Much of the future GTCC wastes will be the reactor parts themselves that won't enter into the waste streams until the 2060's. Reactor decommissioning is a tough problem. Do we wait 100 years for the radioactivity to decay away? That leaves an abandoned, contaminated site where no one will take responsibility. Should they be entombed? More broadly, are more nuclear power plants worth the expense and intractable waste problems that the taxpayer is expected to pay to solve? It is imperative that DOE analyze these issues because they have direct impact on the future generation of GTCC radioactive wastes.

Support for safe, monitored storage of radioactive wastes is a matter of security and environmental protection. As such, it should not be interpreted as support for more nuclear weapons, nuclear power or the generation of more nuclear wastes.

As required by law, DOE will be holding public meetings at the following locations and times:

- *Carlsbad, New Mexico:* Pecos River Village Conference Center, Carousel House, 711 Muscatel Avenue, Carlsbad, New Mexico, Monday, August 13, 2007, 6 p.m.-9 p.m.
- *Los Alamos, New Mexico:* Hilltop House Best Western, La Vista Room, 400 Trinity Drive, Los Alamos, New Mexico, Tuesday, August 14, 2007, 6 p.m.-9 p.m.

The deadline for public comment is September 21, 2007.

Comments should be sent to: James L. Joyce, Document Manager, Office of Regulatory Compliance (EM-10), U.S. Department of Energy, 1000 Independence Avenue, SW., Washington, DC 20585-0119 Telephone: (301) 903-2151. Fax: 301-903-4303. E-mail: gtcceis@anl.gov.

More information can be found and written comments can be submitted on the scope of DOE's GTCC radioactive waste proposal through the Web site at <http://www.gtcceis.anl.gov>. (8/3/07)