Enclosure: Letter, Rudy to Loadholt,
SRS CAB Recommendation Number 51
- Environmental Management Integration
HLW, dated DEC 3 0 1997.

Responses to Citizens Advisory Board (CAB) Recommendation Number 51

Regarding your recommendation, with provisos, that vitrified high-level waste from West Valley come to the Savannah River Site (SRS) for storage prior to shipment to the geologic repository, the Department of Energy - Savannah River Operations Office (DOE-SR) accepts the recommendation and provides the following responses.

- *Shipments can be done safely, shipments are licensed and shipping casks constructed.*

  Although planning is in the early stages, DOE-SR is committed, in cooperation with West Valley and the U.S. Department of Energy - Headquarters, to ensuring that shipments are conducted safely and in Nuclear Regulatory Commission (NRC) licensed containers.

- *The shipping and receiving facility is constructed prior to starting shipment, the second glass canister storage building is under construction prior to shipment, and incremental operating funds are provided to SRS for handling the West Valley High Level Waste.*

  A shipping and receiving facility will be constructed prior to starting shipment. Final design and construction of the Glass Waste Storage Building (GWSB) #2 must begin in Fiscal Year (FY) 00 to support receipt of the additional 300 canisters estimated to be received from West Valley beginning in FY01. Incremental operating funds for handling West Valley canisters at SR are expected to be part of preparations to receive and store the canisters.

- *DOE commits to starting shipment of SRS High Level Waste canisters to the geologic repository by 2015...*

  It is DOE-SR's intent to begin shipment of canisters to a final repository by 2015 and complete shipments by 2026. The latest revision (Rev.8) of the High-Level Waste System Plan calls for shipment of 500 canisters to the federal repository in 2015. Although a final decision regarding a federal repository at Yucca Mountain, Nevada has not been made, substantial technical progress has been made toward characterizing the site. The Department is committed to establishing a federal geologic repository to permanently dispose of high-level waste.

We recognize and understand the concerns issued in the CAB minority report and the following responses are offered.

- *That SRS is going to start accepting waste from all over and concentrating high level waste at one site is a very big issue.*

  Although we do not envision high-level waste coming to SRS "from all over", we understand that the decision to bring West Valley vitrified waste to SR is very important and it will be thoroughly evaluated with open participation among stakeholders and customers.

- *The cost estimates associated with the three alternatives presented and the lack of cost analysis data are concerns.*

  Based on our discussions with DOE Headquarters personnel evaluating complex integration options, detailed cost analyses of the West Valley options that will validate currently projected cost savings are expected in early 1998. These analyses will be shared with the CAB upon completion.

- *That this recommendation appears to force a DOE decision regarding a final repository, and that acceptance of this recommendation will in fact not move DOE any closer to this decision.*

  As noted in the response to the CAB's recommendation to commit starting shipments by 2015; although a final decision for a federal repository has not been made, the Department is committed to establishing a permanent geologic repository for high-level waste.

- *That this recommendation will establish a precedent that Savannah River stakeholders will allow the acceptance of waste and it is not known if another site may just as easily accept the West Valley canisters. Fulfilling a commitment to the stakeholders of New York should not be a priority of the SRS CAB...*

  The Department is considering this integration initiative with the purpose of accelerating cleanup of the Nation's legacy of defense nuclear wastes and secondary waste products while assuring safety of the public and workers and with consideration given to financial responsibility.

- *That although the recommendation is presented as a means of ensuring transportation licensing, this is not the only means of acquiring the needed licensing and technology and shipping requirements will likely change over the next 30 years.*

  DOE-SR believes that addressing transportation licensing early, and with supporting funds from West Valley, is a prudent option.

In summary, DOE-SR recognizes the close tie between the provisos of the CAB recommendation and the concerns of the minority report. We are committed as a site to accomplish clean-up of the Nation's legacy defense nuclear wastes in a technically sound, financially responsible and safe manner.