Savannah River Site
CITIZENS ADVISORY BOARD
A U.S. Department of Energy Site-Specific Advisory Board

July 26, 2005

Mr. Frank Marcinowski, DAS
Logistics & Waste Disposition
DOE EM 10, Forrestal Building
1000 Independence Ave SW
Washington, DC 20585

ATTN: Melissa Nielson, EM-30.1

Subject: DOE Preliminary Draft Low Level Waste and Mixed Low Level Waste National Business Strategy - Phase I

Dear Ms. Nielson:

The Savannah River Site (SRS) Citizens Advisory Board (CAB) appreciates the opportunity to review and provide comments on the Preliminary Draft Low Level Waste and Mixed Low Level Waste National Business Strategy - Phase I document. We understand that DOE continues to face a legacy of wastes needing disposal. While the strategy is still very preliminary, we are favorably impressed and consider it an initial step in making responsible waste disposal decisions and supporting the mission of the Office of Business Operations, which is to manage, integrate and coordinate infrastructure support for the Office of Environmental Management (EM).

In its work products through the years, the SRS CAB has strongly supported decreasing risk, first and foremost, and believes the National Disposition Strategy should incorporate this same stance. We, like many other stakeholders, would like to compare this risk reduction across site programs and the entire complex. As the National Disposition Strategy continues to be developed, DOE must strive to incorporate equity across the complex when making responsible waste disposal decisions.

In addition to the general comments above, we offer the following specific comments for your review and consideration:

- Clearly define the purpose and goal of the document
- Discuss how this strategy differs from the disposition maps generated in the 1990s and how lessons learned from that process have been incorporated
- Ensure that the document meets the requirements of DOE Order 435.1
- Verify and clarify all data presented and ensure all data is comparable (SRS information appears to be inaccurate)

- To facilitate risk reduction decisions, provide estimation of cost for LLW/MLLW waste types across the DOE complex and include regulatory, safety, environmental stewardship and total costs in all disposition decisions

- Develop a schedule that ensures greatest risk reduction first

- Discuss how DOE will audit the safety and financial assurances of commercial disposal facilities after waste stream shipments have been completed and provide this information to the stakeholders and regulators

- Provide the opportunity for external experts with both waste disposal business and technical experience to review and comment on the strategy and provide those comments and proposed resolutions to stakeholders and regulators

Again, thank you for the opportunity to review the document at such an early phase. We support your objectives and look forward to providing additional comments as future revisions are made available. We would appreciate a written response regarding your disposition of these comments.

Sincerely,

Jean L. Sulc
Chairman

cc: Doug Frost