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May 9, 2001

Mr. Andrew Grainger, NEPA Compliance Officer
U.S. Department of Energy
Savannah River Operations Office
Building 742-A, Room 183
Aiken, S.C. 29802

Subject: Comments on the March 2001 Savannah River Site Salt Processing Alternatives
Draft Supplemental Environmental Impact Statement (DOE/EIS-0082-S2D)

Dear Mr. Grainger:

At the request of the Savannah River Site (SRS) Citizens Advisory Board (CAB) Waste Management Committee, the Salt Team Focus Group (FG) has been asked to review and comment on the March 2001 Salt Processing Alternatives Draft Supplemental Environmental Impact Statement (SEIS). The FG was formed three years ago to evaluate the process used by SRS to select salt processing alternatives and to examine in detail the four alternatives.

During this three-year period, DOE has set numerous milestones associated with salt processing activities and many times, these dates have not been met. Furthermore, DOE's past performance on similar projects is not encouraging.

As DOE states in the SEIS, current operational constraints are already required to enhance storage capacity in the HLW tanks to maintain tank space until 2010. If a salt processing facility is not operational by 2010, then more drastic measures must be implemented, such as the closure of DWPF or the controversial position of building new HLW tanks. The ability of DOE to meet the current schedule to have a salt processing facility operational by 2010, still remains the primary concern of the FG.

In reference to the SEIS, we offer the following comments for your review and consideration:

1. Based upon a review of the data in Table 2-8, the long-term impacts associated with the four action alternatives are very similar. There is no significant difference between any process alternative being considered. Therefore, the Salt Team FG believes DOE should move forward with a decision on a preferred alternative and base the decision on the following criteria (listed in order of preference): (1) most expeditious implementation schedule, (2) technological merit, (3) operational surety, and (4) cost.

2. It is clear to the Salt Team FG that the environmental and safety impacts associated with the No Action alternative is greater than any action alternative. However, the general public may not be able to discern this from reading the SEIS because in many tables an equal comparison of the No Action alternative against the four action alternatives is not made. The No Action alternative should be listed in all comparison tables and a discussion included in the text.

3. The SEIS underestimates the consequences of the No Action alternative. In Section 2.3 (page 2-4), the No Action alternative is stated to include the storage of the salt component in the HLW tanks with DWPF vitrifying the sludge. Based upon this description, the HLW tanks will contain approximately 160 million curies. This is the activity level that should be modeled for long-term impacts when the tanks fail. The SEIS incorrectly assumes the removal of most of the waste and inappropriately relies on the consequences described in the tank closure scenario (Tank Closure Draft EIS).

4. Calculated impacts are required for the No Action alternative to fully demonstrate to the public the need to select, fully fund, and make operational one of the salt processing alternatives before 2010. The modeling estimates should show the "catastrophic" results as predicted by DOE, but not supported by any calculations. In addition, one aspect not discussed nor explored is the potential for the No Action alternative to release contamination by the filling and overflowing of the failed tanks from rainfall events. The SEIS only assumes that rainfall will fill the tanks and infiltrate to the groundwater, which significantly understates the potential health and environmental impacts. The Salt Team FG recommends that the very likely potential for the failed tanks to release contaminated media to surface run-off be addressed.

5. The SEIS provides contradictory descriptions of the No Action alternative. DOE can not suspend operation of DWPF, as stated in several places of the SEIS, and still remove sludge from the HLW tanks. However, as described in the EIS, the No Action alternative requires the removal of the sludge component (see page 2-4). Furthermore, the FG believes the "intruder analysis" needs further explanation and specially needs to address the No Action alternative as discussed above (see item #4).

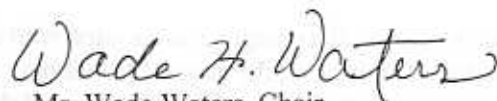
6. The SEIS needs to provide primary references for all regulatory standards and dose conversions as denoted in data tables. Also, consistency is needed. In some tables, the regulatory limit for the same parameter is referenced to be from DOE Derived Concentration Guides and other times as an EPA proposed primary drinking water standard (for example Uranium-238 in Table 3-1 and Table 3-6).

7. It appears to the FG that there may be a bias against Direct Disposal in Grout alternative in the SEIS. The SEIS has several statements that allude to the issue of cesium removal not being technically and economically practical (per DOE Guidance 435.1). The FG believes these statements should be removed from the SEIS and the Direct Disposal in Grout alternative evaluated on its own merits without bias on an equal basis with the other alternatives.

As discussed above, the salt processing activity schedule is very important to the Salt Team FG. One way to gain valuable time is for DOE to provide a response to our comments in 30 or 45 days, instead of waiting to include a response in the final SEIS. This expeditious response schedule will provide the FG a head start on understanding the DOE approach to salt processing and circumvent timely dialogue if we wait until the final SEIS is published. Therefore, we request a response to our comments in 45 days or less.

Thank you for the opportunity to offer our comments.

Sincerely,



Mr. Wade Waters, Chair
Waste Management Committee
308 Pinewood Drive
Pooler, GA 31322