

U.S. DEPARTMENT OF ENERGY
MINERALS MANAGEMENT SERVICE
OFFICE OF ENVIRONMENTAL EVALUATION

AND

ARGONNE NATIONAL LABORATORIES

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PUBLIC SCOPING MEETING

ON

GREATER-THAN-CLASS C LOW-LEVEL RADIOACTIVE WASTE
ENVIRONMENTAL IMPACT STATEMENT

TUESDAY

SEPTEMBER 4, 2007

6:47 P.M.

ATOMIC TESTING MUSEUM
AUDITORIUM
755 E. FLAMINGO ROAD
LAS VEGAS, NEVADA 89119

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CONTENTSPublic Comment Moderator:

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P-R-O-C-E-E-D-I-N-G-S

(6:47 p.m.)

MR. BROWN: If folks will take their seats, we'll get started with this evening's program.

(Pause.)

We're scheduled officially to start at 7:00, but I think a lot of folks got here early and had an opportunity to view the posters, talk to people, and so on. So I think we'll -- especially in view of the excessive heat outside and so on, we'll get started.

Good evening. Welcome to this public scoping meeting on the proposed Environmental Impact Statement for the disposal of greater-than-class C low-level radioactive waste. The development of an environmental impact statement by DOE's Office of Disposal Operations is required by the National Environmental Policy Act.

My name is Holmes Brown. I will serve as the facilitator for this evening's event. My role is to ensure that the meeting runs on schedule, and that everybody has an opportunity to speak. I'm not an employee of the Department of Energy, nor an advocate for any party or position.

At the registration table, you should've

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1 received a participant's packet in the green folder.
2 If you didn't receive one, please raise your hand, and
3 staff can provide you one. It contains important
4 information on the following presentation and is a
5 convenient place to take notes during the briefing.
6 There are three purposes for tonight's meeting:
7 first, to provide information on the content of the
8 Proposed Environmental Impact Statement, EIS, and on
9 the National Environmental Policy Act, NEPA, that
10 governs the process; second, to answer your questions
11 on the proposed EIS and NEPA; and third, to receive
12 and record your formal comments on the scope of the
13 proposed EIS. The agenda for tonight's meeting
14 reflects these purposes.

15 We will begin with a presentation by Ms.
16 Christine Gelles regarding the proposed Environmental
17 Impact Statement for the disposal of greater-than-
18 class C waste. Ms. Gelles is the Director of the
19 Office of Disposal Operations, which is the DOE office
20 charged with preparing the EIS. To answer your
21 questions, project staff will be available at the
22 display posters. They can discuss the proposed EIS
23 and NEPA, the contents of the printed materials on
24 display, and the contents of the DOE presentation.

25 Following Ms. Gelles's presentation, we

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1 will recess so the public may pursue further questions
2 with available project staff.

3 Once we reconvene, the court reporter will
4 be available to receive your comments and suggestions
5 regarding the scope of the proposed EIS. All your
6 comments will be transcribed and made part of the
7 permanent record.

8 We'll begin with a presentation by Ms.
9 Christine Gelles. She will discuss the background of
10 the project and the purpose and basic elements of the
11 proposed EIS.

12 MS. GELLES: I apologize in advance. I'm
13 fighting a pretty mean cold here, so I may have to
14 take frequent water breaks. I hope you don't mind.

15 All right. Well, good evening. Welcome
16 to the public scoping meeting for the greater-than-
17 class C low-level waste Environmental Impact
18 Statement. I'll refer to the document throughout the
19 presentation as the GTCC EIS. I am Christine Gelles.
20 I'm the Director of the Office of Disposal Operations,
21 which is within the Office of Environmental Management
22 at the Department of Energy Headquarters in D.C.

23 The Department has been charged by
24 Congress to develop a disposal capability for greater-
25 than-class C, referred to as GTCC, low-level waste,

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1 and to take actions related to the preparation of an
2 environmental impact statement. I am pleased to be
3 here. This is the eighth of our nine scheduled public
4 scoping meetings, and I'm delighted to see as many of
5 you here this evening. Surely there are a lot of
6 distractions here in this city, so thank you for
7 making the time and coming out.

8 This meeting is this community's
9 opportunity to provide us comments, concerns, issues
10 and suggestions regarding the proposed scope of the
11 GTCC EIS. Your involvement and input is very
12 important to us. We will be taking careful note of
13 what you say here tonight, and any comments received
14 through the scoping process will be carefully
15 considered as we move into the next phase of the NEPA
16 process and the development of the Environmental
17 Impact Statement for the disposal of greater-than-
18 class C low-level waste.

19 The National Environmental Policy Act,
20 referred to as NEPA, requires that an environmental
21 impact statement be prepared for any major federal
22 action that could impact the quality of the
23 environment. The Department has determined that the
24 development of a greater-than-class C disposal
25 capability constitutes a major federal action, and

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1 therefore is appropriately analyzed in an
2 environmental impact statement.

3 We are in the very beginning stages of
4 this NEPA process, with the primary focus at this time
5 being on the identification of the scope of the GTCC
6 EIS, including proposed disposal locations and
7 methods. The comments we receive here tonight and
8 throughout the comment scoping or the public comment
9 period, which ends on September 21st, will be
10 carefully considered as we develop the draft
11 environmental impact statement. That draft document
12 will then be provided for comment, and any comments
13 received on the draft document will be carefully
14 considered as we work towards a final environmental
15 impact statement.

16 As I will discuss later in the
17 presentation, and repeat probably more times than you
18 want to hear, before the Department can make a
19 decision on the disposal of greater-than-class C low-
20 level waste, we must first report to Congress on the
21 alternative and alternatives evaluated, and await
22 their action before implementing a record of decision.
23 So you can see we are just at the very start of the
24 process, and we have several years of analysis, work
25 and consultation with Congress before us before we can

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1 implement ultimately the disposal solution for
2 commercial greater-than-class C low-level waste.

3 Before I get started with the slide
4 presentation, which goes into some detail about the
5 proposed scope and the waste inventories, I thought it
6 would be helpful if we provided just an introductory
7 description of greater-than-class C low-level waste.
8 Greater-than-class C low-level waste is generated from
9 commercial activities, such as the production of
10 electricity from nuclear reactors, or it's generated
11 when radioactive sealed sources become disused and
12 require safe handling and ultimately disposal.

13 The volume of greater-than-class C low-
14 level waste is quite small compared to the other three
15 classes of commercial low-level waste, which are
16 established by the Nuclear Regulatory Commission.
17 Those other classes are class A, B and C. But
18 greater-than-class C has a higher concentration of
19 radioactivity, and therefore requires special disposal
20 considerations under the Nuclear Regulatory Commission
21 regulations. There is a copy of this presentation in
22 the green folder that you received, and it will also
23 be posted on our GTCC EIS website. That web address
24 is listed on the next-to-last slide in the
25 presentation.

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1 (Pause to adjust slide projector.)

2 All right. The Notice of Intent, the NOI,
3 was published on July 23rd, 2007 in the Federal
4 Register, and a correction was printed on July 31st to
5 correct a printing error that occurred in the
6 inventory table, which is a pretty important part of
7 the Notice of Intent. A copy of both documents, the
8 original Notice of Intent and the corrected page, are
9 in the folder.

10 The publication of the Notice of Intent
11 served several purposes for the Department. It
12 announced the Department's intent to prepare an
13 environmental impact statement for the disposal of
14 commercial greater-than-class C low-level waste. It
15 also announced our decision to also include DOE
16 greater-than-class C-like waste in this evaluation
17 as well. Publication of the NOI initiated the EIS
18 process. It requested the public's comments on the
19 proposed scope and announced these public scoping
20 meetings. It provided initial preliminary information
21 on the greater-than-class C low-level waste and DOE
22 greater-than-class C-like waste inventories, which,
23 together, the currently stored and projected
24 generation total 5,600 cubic meters. There's some
25 very specific assumptions that went into that waste

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1 inventory estimate. We'll talk through those in the
2 slides to come.

3 The NOI also identified the purpose and
4 need for action.

5 (Pause to adjust slide projector.)

6 Thank you for your patience.

7 The Notice of Intent identified the
8 Department's proposed action. And again, we will go
9 into these scope elements in some detail. It
10 identifies the proposed disposal alternatives,
11 including the methods and possible locations for the
12 disposal facilities. It also responded to the
13 comments we received on the advanced Notice of Intent,
14 which had been published in May of 2005.

15 Finally, the Notice of Intent identified
16 that the Environmental Protection Agency will serve as
17 a cooperating agency with the Department of Energy for
18 this EIS, and the Nuclear Regulatory Commission will
19 serve as a commenting agency. And I'm pleased that we
20 have folks from the EPA with us here tonight. Thank
21 you guys for coming out.

22 So the purpose and need for action -- the
23 reason we need to provide a disposal capability for
24 greater-than-class C low-level waste is that NRC and
25 agreement state licensees have generated and will

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1 continue to generate greater-than-class C low-level
2 waste for which today there is no disposal capability.
3 DOE also has a statutory responsibility for developing
4 this disposal capability. Finally, we own and
5 generate certain low-level waste and transuranic waste
6 streams that have characteristics very similar to
7 commercial greater-than-class C low-level waste, but
8 which today may not have a disposal pathway. We refer
9 to those wastes as DOE greater-than-class C-like
10 wastes.

11 There are three primary legislative
12 drivers for development of this EIS. The first and
13 most basic is the Low-Level Radioactive Waste Policy
14 Act Amendments of 1985. It is this statute that gave
15 the federal government, specifically the Department of
16 Energy, the responsibility for developing the greater-
17 than-class C low-level waste disposal capability. And
18 of course the National Environmental Policy Act of '69
19 is the statute that requires federal agencies to
20 consider the environmental impact of their proposed
21 actions and alternatives to those actions, and
22 establishes the framework for public input in the
23 evaluation.

24 More recently, the Energy Policy Act of
25 2005 included two specific report requirements

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1 directly related to this EIS. The first was that the
2 Department provide a report to Congress summarizing
3 the cost and schedule estimate for developing this
4 EIS. And we did provide that report in July of 2006.

5 Second -- and this is the point I
6 mentioned in my opening comments -- it requires that
7 the Department submit a report to Congress on the
8 disposal alternatives considered, including the other
9 types of information -- it's a pretty comprehensive
10 report requirement -- and that we await Congress's
11 action before we implement a record of decision. What
12 this means is we will be unable to take action as a
13 result of this EIS without Congress's involvement and
14 support.

15 Both the 1987 report to Congress that was
16 required by the Low-Level Waste Policy Act Amendments
17 and the 2006 -- July 2006 report on the cost and
18 schedule are available on our greater-than-class C EIS
19 webpage.

20 So let's talk in more detail about what
21 greater-than-class C low-level waste is. We have to
22 begin with understanding what low-level radioactive
23 waste is. Unfortunately, the statutory and regulatory
24 definition of low-level waste is rather complicated
25 because it defines low-level waste by what it is not.

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1 It is not high-level waste. It is not spent nuclear
2 fuel. It is not byproduct material. Any other waste
3 stream that contains radioactivity and is generated
4 commercially is likely falling into the category of
5 low-level waste.

6 It comes in many forms. It includes
7 clothing, equipment and tools, disused household
8 items, soil, water treatment residues, possibly
9 building debris generated when radioactive facilities
10 are decommissioned. It basically comes from
11 throughout the United States, from any NRC or
12 agreement state licensee that performs activities with
13 radiation.

14 The NRC classifies low-level waste into
15 four classes, class A, B and C, based on the
16 concentrations of specific short-lived and long-lived
17 radionuclides. And again, greater-than-class C has
18 the highest radionuclide concentration. Class A, B
19 and C low-level waste can safely be disposed of today
20 in existing commercial disposal facilities.

21 The NRC regulations require that greater-
22 than-class C low-level waste be disposed of in a
23 geologic repository licensed by the NRC, unless
24 alternative methods of disposal are proposed to the
25 NRC and approved by them. It is this caveat that

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1 leads us to analyze alternate disposal configurations,
2 other methods other than geologic disposal in this
3 EIS.

4 So what is greater-than-class C low-level
5 waste? It is commercially generated low-level waste
6 that exceeds the concentration limits established for
7 class C low-level waste. It's generated, again, by
8 NRC and agreement state licensees. It can generally
9 be grouped into three waste types, and we'll go into
10 each of these three in some detail.

11 The first, activated metal, primarily
12 generated in nuclear reactors during facility
13 decommissioning, consists of the components of the
14 reactors themselves, such as thermal shields, that
15 have become radioactive through neutron absorption
16 that occurred during operations. The photo here at
17 the right shows a radiation survey being conducted on
18 an activated metal component during the
19 decommissioning of a small research reactor.

20 I remind you that there are 104 operating
21 commercial reactors today. There are 18 that have
22 already been decommissioned. Some of those 18 do
23 today store greater-than-class C low-level waste there
24 at their decommissioned facility, you know, right
25 beside the spent nuclear fuel that is also awaiting

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1 geologic disposal at the planned repository at Yucca
2 Mountain.

3 Sealed sources is the second waste type
4 within the commercial stream. Typically, these are
5 small, highly radioactive materials that are
6 encapsulated in some sort of metal container which
7 provides the shielding. They're used for sterilizing
8 medical products for medical treatment and a number of
9 other industrial purposes. They're found widely in
10 the United States. When we were preparing for the
11 release of the Notice of Intent, we received a number
12 of media requests asking us -- and I received a
13 question just this evening -- you know, where does
14 greater-than-class C low-level waste come from? It
15 comes from everywhere in the U.S. where these sorts of
16 medical treatments are conducted and where industry is
17 active. Any NRC or agreement state licensee likely
18 has the potential generate greater-than-class C waste.

19 It's important to note that not all sealed
20 sources are greater-than-class C. Many are class A,
21 B or C, and can safely be disposed of in existing
22 near-surface disposal facilities.

23 Jamie, I'm sorry, I'm going to sort of
24 speak a little bit more about sealed sources.

25 We do believe that the proliferation risk

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1 that sealed sources, once disused, if not safely
2 stored, that it could pose -- the fact that they could
3 be -- fall into malevolent folks' hands and actually
4 be used to fabricate a dirty bomb may be one of the
5 reasons why Congress included these report
6 requirements in the Energy Policy Act. It really gave
7 us the momentum to move forward in the development of
8 this environmental impact statement. The Energy
9 Policy Act of 2005 also called for the establishment
10 of an inter-agency task force. I think there were 11
11 or 12 federal agencies involved in this. We were one
12 of those agencies working on the disposal part of this
13 report, and to provide a report to Congress and the
14 White House specifically on the safety and security of
15 disused sealed sources. So it's a very real concern
16 for us, and it probably is the real reason why we're
17 moving forward with this EIS today, why Congress is so
18 focused on us moving forward with the EIS today.

19 Finally, the third waste type is this
20 "other" category. It really is a catch-all. It
21 includes any commercial greater-than-class C low-level
22 waste that is not an activated metal or is not a
23 sealed source. It consists of contaminated equipment,
24 debris, trash, the decommissioning and decontamination
25 waste generated from the cleanup of industrial

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1 facilities such as research labs. We do expect that
2 only a few commercial licensees have generated or are
3 projected to generate this "other" greater-than-
4 class C type of waste. Most of the commercial
5 greater-than-class C low-level waste will be in the
6 form of activated metals or sealed sources, which we
7 just talked about.

8 The posters here on the wall and the
9 handout material provide a little bit more detail on
10 the breakdown of each of the commercial low-level
11 wastes -- or greater-than-class C low-level waste
12 types.

13 So what is DOE greater-than-class C-like
14 waste? Well, admittedly, this terminology has caused
15 a fair amount of confusion. If we could think of a
16 better term, we would've come up with it, I promise
17 you. But it really is intended simply to be
18 descriptive. Use of this term does not have the
19 intent or effect of creating a new waste
20 classification for DOE radioactive waste. It does not
21 mean that the NRC classifications or regulations apply
22 to waste generated by DOE. It simply is DOE low-level
23 waste and transuranic waste that have characteristics
24 similar to the commercial greater-than-class C waste,
25 but which today we do not believe have an identified

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1 path to disposal. It is owned by DOE or generated by
2 DOE activities, even if those activities occur at a
3 commercial facility.

4 The waste forms are similar to those three
5 waste types in the commercial stream -- activated
6 metals, sealed sources, and other -- but the
7 distribution of our projected generation differs
8 widely from the commercial generation. Most of the
9 DOE greater-than-class C-like waste, both what exists
10 today and will be generated in the future, potentially
11 generated in the future, is transuranic waste that
12 today does not qualify for disposal at the Waste
13 Isolation Pilot Plant because it is not clear that it
14 came from defense-related activities. And we'll talk
15 about that in a little bit more detail.

16 There's a comparison of the waste
17 inventories. Again, to remind you, the estimated
18 stored and projected volume of the greater-than-class
19 C low-level waste, both the commercial and the DOE
20 greater-than-class C-like, is approximately 5,600
21 cubic meters. In volume terms, this is a very small
22 volume compared to what the Department of Energy
23 manages on a yearly basis. We have sent more defense
24 transuranic waste to the Waste Isolation Pilot Plant
25 in New Mexico this year alone. We're well over 7,500

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1 cubic meters this year alone.

2 What is real challenging about this waste
3 is it has the potential to contain as many as 140
4 million curies of radioactivity, and that's nothing to
5 blink at. That's a lot of curies. And if you look at
6 the distribution, although the DOE volume makes up
7 more than half in volume terms of the total estimate,
8 and the total activity for the DOE waste is only 31
9 million curies; whereas, the 2600 cubic meters of
10 commercially generated waste comprise 110 million
11 curies of activity.

12 Most of the activated metal that's within
13 the inventory of the commercial greater-than-class C
14 low-level waste is expected to be generated between
15 2035 and 2062. So not all of this waste would be
16 generated at the same time. There's an inventory
17 report that supports these inventory estimates that is
18 also available on the greater-than-class C project
19 webpage, and it provides the methodology and some
20 generation estimates, some generation rate estimates
21 as well. I invite you to go take a look at that.

22 We established these estimates through
23 data calls and interviews and other sources of
24 information, including the historical report from 1987
25 and available databases that exist with the NRC, as

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1 well as DOE, related to sealed sources. Another
2 interesting point; the total volume of this greater-
3 than-class C, both the commercial and DOE, is less
4 than one-tenth of one percent of the total estimated
5 volume of commercial A, B and C waste that will be
6 generated during the same period. Our inventory
7 estimates go through 2062, as I mentioned. Again, the
8 inventory report, which provides really all the
9 background on this, is available electronically.

10 So what is our proposed action? Our
11 proposed action is to construct and operate a new
12 facility or facilities, or use an existing facility,
13 for the disposal of commercial greater-than-class C
14 low-level waste and DOE greater-than-class C-like
15 waste. We do invite your comments on this proposed
16 action. It does stem from this legislative
17 requirement that the DOE develop a disposal capability
18 for GTCC low-level waste.

19 The proposed disposal alternatives that we
20 identified in the Notice of Intent and that are
21 delineated on the poster boards and in the material in
22 your folder are also great fodder for your comments.
23 If you have other ideas, we welcome those tonight.
24 They range from no action, which is a very real
25 alternative in this environmental impact statement, no

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1 action where current and future greater-than-class C
2 low-level waste and DOE greater-than-class C-like low-
3 level waste will continue to be stored at designated
4 locations consistent with current practice and
5 regulations.

6 And then there are three disposal methods
7 we intend to analyze: disposal in a geologic
8 repository at the Waste Isolation Pilot Plant,
9 disposal in the geologic repository planned at Yucca
10 Mountain, and then disposal in a new enhanced near-
11 surface burial facility at one of the proposed
12 locations, which we'll go through in just a few
13 moments, or disposal at a new intermediate-depth
14 borehole facility at those same proposed locations.

15 We do recognize that some of these
16 alternatives have existing legislative or regulatory
17 constraints that would impede their implementation
18 immediately. However, the fact that there are such
19 constraints, that alone is not a reason for us to
20 eliminate them from consideration in the environmental
21 impact statement. Our NEPA guidance requires that we
22 evaluate a range of reasonable alternatives, and the
23 development of the draft environmental impact
24 statement will include a very careful discussion of
25 what existing regulatory and legislative constraints

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1 do affect each of the alternatives, and some proposed
2 solutions to those constraints if it's appropriate.

3 As I previously mentioned, and will say
4 probably two more times, we must await Congress's
5 action before we implement any preferred alternative
6 or alternatives as a result of this environmental
7 impact statement.

8 I also mentioned that we have received
9 comments at the previous public scoping meetings on
10 other alternatives that should be evaluated, as well,
11 in addition to that list of five.

12 There are three disposal methods that we
13 include -- or that we intend to include in this EIS.
14 Again, if you have other approaches, we do welcome
15 your comments tonight or through the duration of the
16 public scoping period. We'll go over each of these in
17 a little bit of detail.

18 Deep geologic repository is, again, the
19 default disposal method assumed by the NRC
20 regulations. It is the placement of waste in mine
21 cavities deep beneath the earth's surface. I'm sure
22 this is a disposal approach that this community's very
23 familiar with. It is what we use at the Waste
24 Isolation Pilot Plant for disposal of defense
25 transuranic waste. It is what is planned for disposal

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1 of spent nuclear fuel and high-level waste at Yucca
2 Mountain. This photo here is a picture of contact
3 handle defense transuranic waste emplaced in the mine
4 cavity at the Waste Isolation Pilot Plant.

5 Enhanced near-surface, this involves the
6 placement of waste in engineered trenches, vaults or
7 other similar structures within the upper 30 meters of
8 the earth's crust. This picture is here for
9 illustrative purposes only, just to show what an
10 engineered structure and an enhanced near-surface
11 burial facility might look like. There's a different
12 rendering over here on the poster board. These are
13 just conceptual ideas at this point. The exact design
14 will be developed through the development of the draft
15 EIS. We do invite your comments or any ideas you have
16 on this sort of disposal method. The photo here is a
17 picture of an engineered vault that does exist at a
18 DOE site at Hanford.

19 Finally, intermediate-depth borehole
20 disposal, the placement of waste in an augered
21 borehole deeper than the 30 meters -- the upper 30
22 meters of the earth's crust. This sort of borehole
23 would also involve other engineered barriers, either
24 for the structure of the borehole or after waste is
25 emplaced and it is closed to prevent inadvertent human

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1 intrusion in the future during the institutional
2 control period.

3 This method has been successfully
4 demonstrated in the United States at a DOE facility,
5 as well as in other countries. It is the disposal
6 method that the international community is looking to
7 for disposal of intermediate-level waste, which in
8 IAEA waste classification terms is the waste stream
9 that's comparable to what we call commercial greater-
10 than-class C low-level waste here in the U.S. This
11 photo is of the installation of a borehole at a DOE
12 site. Again, the poster board shows a slightly
13 different rendering of the disposal method. We do
14 invite your comments on these. We will develop a
15 conceptual design for this disposal method through
16 development of the draft EIS.

17 These are the proposed disposal locations
18 we intend to analyze in the EIS. WIPP, the nation's
19 only operating geologic disposal facility, and Yucca
20 Mountain, the only other planned geologic disposal
21 facility within the U.S., are obvious candidates
22 because of, again, the default disposal method assumed
23 in the NRC regulations is deep geologic disposal.

24 The identification of these other sites
25 was made based on some specific criteria we developed

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1 over it seems like 18 months worth of wrangling and
2 discussion. Basically, these sites have a mission
3 compatibility, and the physical characteristics of the
4 site appear to support low-level waste disposal
5 operations. I can say that with confidence because
6 every one of these DOE sites on this list have ongoing
7 low-level waste operations in near-surface burial
8 facilities, some of them with well-engineered
9 structures that support disposal of higher-activity
10 low-level waste generated by DOE's activities.

11 We also intend to analyze commercial --
12 generic commercial locations, one in an arid
13 environment and one in a humid environment. Inclusion
14 of this generic commercial allows us to make a
15 programmatic determination that such a facility may be
16 part of the future solution. We were not able to
17 identify specific commercial sites, however. We did
18 ask industry for -- and if they were interested in
19 being part of this greater-than-class C disposal
20 solution, and we did get some positive feedback.
21 However, none of the respondents were ready with a
22 specific design or a specific siting location such
23 that it could be analyzed with those sort of site
24 specifics in this EIS. So this will give us the
25 programmatic coverage. It's very likely that

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1 additional NEPA analysis would be required in the
2 future to analyze the specific site conditions if
3 commercial facilities are used in the future.

4 We do intend to evaluate each of the GTCC
5 waste types, the activated metals, sealed sources, and
6 "other" category, individually and in combination for
7 each of the disposal alternatives, taking into
8 consideration the waste characteristics that differ by
9 those waste types, the volumes by waste type, and the
10 generation rates, because all greater-than-class C
11 low-level waste is not equal. It really is not a
12 homogenous population.

13 Again, the EIS will describe the statutory
14 and regulatory requirements for each alternative, and
15 whether legislation or regulatory modifications are
16 needed for implementation of an alternative or
17 alternatives being considered. It is conceivable that
18 recommendations could entail combinations of
19 facilities in a phased period over time.

20 This summarizes the GTCC EIS process.
21 Again, it began with the advance Notice of Intent
22 published in May of 2005. The EIS development really
23 kicked off on July 23rd with publication of the formal
24 Notice of Intent. For the two years that transpired
25 between the advance notice and the formal notice, we

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1 were working to refine the inventory estimates and
2 reach the programmatic decision that we would in fact
3 include this DOE greater-than-class C-like waste. We
4 are now more than halfway through the public scoping
5 process. Again, it closes on September 21st.

6 After the scoping process, we will move
7 into the development of the draft EIS. That, again,
8 will be published for comment, and then we'll move
9 into the final EIS development. After the final EIS,
10 is published, we will report to Congress on all the
11 alternatives evaluated and all those other ancillary
12 report requirements they delineated in the Energy
13 Policy Act, and await their action. And it's hard to
14 estimate how much time will be required until they
15 act, or how much time will be required after their
16 action before we would issue a record of decision and
17 then move towards implementation.

18 What's not on this slide, which is the
19 NEPA process and our report to Congress, is all of the
20 other implementation steps. It's highly likely that
21 there will be some licensing activity involving a
22 third party, such as the NRC, after we issue the
23 record of decision, and of course then the siting and
24 construction of the facility itself.

25 The draft 2006 report to Congress that was

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1 required by the Energy Policy Act did estimate a cost
2 and schedule for this EIS. It's really outdated now
3 because it assumed that the Notice of Intent would be
4 published last year. We took a little more time to
5 refine the inventory estimates, and again, reach that
6 decision to include the DOE waste. So after we
7 complete this public scoping period, we will revise
8 those estimates, and I expect that a revised schedule
9 will be available on the Department's NEPA webpage,
10 probably when we do the semiannual update. Marybeth,
11 that's, what, in the January time frame, NEPA web
12 page? Thank you.

13 Finally, the public participation. NEPA
14 does provide several opportunities for the public to
15 have input to the development of an environmental
16 impact statement. You can participate tonight by
17 providing oral or written comments on the scope of the
18 EIS and any of the material in the poster boards, on
19 anything I've had to say here tonight. Written
20 comments may also be provided after this meeting
21 through September 21st by mail, via the website, or by
22 fax. You can continue to stay informed by visiting
23 our EIS webpage. And again, there's the website.

24 These are our points of contact. I'm just
25 going to turn this off. These are our points of

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1 contact. I am Christine. Jamie here is the document
2 manager. He is your primary point of contact. We are
3 very serious. We're giving you our phone numbers and
4 e-mail here. We would love to hear from you. George
5 Dixon is another member of our team who's here with us
6 tonight. Joel Kristal, our third GTCC member, was not
7 able to travel with us this evening, but we are
8 supported by folks from Argonne National Lab -- Mary
9 Picel is here with us. And nobody from Sandia this
10 time, right? And we're also supported by Sandia
11 National Laboratories. And again, I have the pleasure
12 of having Eric Cohen from our NEPA Office at
13 Headquarters, and then Bonnie and Dan from the EPA.
14 Thank you, as well, to the Nevada site office folks
15 who came out. We'll be available to answer any
16 questions that you have.

17 Thank you.

18 MR. BROWN: Thank you.

19 At this time, we're going to take a brief
20 recess to allow you to ask any questions of staff that
21 you have remaining. We'll resume in a few minutes and
22 begin taking oral comments. I think during the recess
23 I'll try and switch microphones since all I'm going to
24 be doing from this point out is calling names, while
25 you will be providing comments over there.

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1 So again, if you have any remaining
2 questions, you know who the staff are here. Go ahead
3 and ask them. I'll just take a minute or two to
4 switch this microphone.

5 Thanks.

6 (Recess from 7:21 p.m., until 7:35 p.m.)

7 MR. BROWN: Please step up to this
8 microphone. The batteries failed on the other one, so
9 I'll just use this, and then step over there. But
10 step up to this microphone when your name is called.
11 Introduce yourself, providing an organizational
12 affiliation where appropriate. If you have a written
13 version of your statement, please give it to the court
14 reporter when you've finished with your remarks.
15 Also, please give the court reporter any other
16 documents that you would like to see included in the
17 formal record. They will be labeled and made part of
18 the permanent record.

19 I'll call two names at a time, the first
20 of the speaker, the second of the person to follow.

21 Ms. Gelles will be serving as the hearing
22 officer for the Department of Energy during the formal
23 comment period, but she will not be responding to any
24 questions or comments during this session. So we'll
25 begin with Steve Frishman, who will be our first

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1 speaker.

2 MR. FRISHMAN: I'm Steve Frishman. I'm
3 Technical Policy Coordinator for the Nevada Agency for
4 Nuclear Projects.

5 We will be submitting written comment
6 before the close of the comment period. But today I
7 have just a short statement from Bob Loux, who is the
8 Executive Director of the Agency for Nuclear Projects.
9 He asked me to just read this into the record today,
10 and then you'll get much more extensive comments from
11 us later.

12 Of the five alternatives proposed for
13 evaluation by the Notice of Intent, three include
14 potential sites in Nevada. Alternative three would
15 have a greater-than-class C, greater-than-class C-like
16 waste disposal at the potential high-level nuclear
17 waste repository at Yucca Mountain. Alternative four,
18 potentially at the Nevada Test Site, proposes disposal
19 in a new, enhanced, near-surface facility. And
20 alternative five, also potentially at the Nevada Test
21 Site, proposes disposal at a new intermediate-depth
22 borehole facility.

23 Under current circumstances, none of the
24 proposals for Nevada sites are realistic, nor are they
25 acceptable. In our written comments we'll provide the

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1 specifics for this finding.

2 Regarding Yucca Mountain, DOE has yet to
3 even submit a license application to the Nuclear
4 Regulatory Commission for the proposed repository. If
5 it succeeds as planned in submitting an application in
6 June 2008, by its own most optimistic estimate, it
7 will not be known whether Yucca Mountain is allowed to
8 accept any waste until at least 2017 at the earliest,
9 but probably later, and maybe never.

10 The alternative prejudicially assumes that
11 the Yucca Mountain site will be licensed as a
12 repository, at best an unrealistic assumption, and at
13 worst an assumption intended to bolster the DOE's
14 intense effort to make Yucca Mountain the nation's
15 foremost, and I might add mostly dangerous,
16 radioactive nuclear waste dump. Further consideration
17 of this alternative in the EIS creates a conflict of
18 interest for both the Nuclear Regulatory Commission
19 with the Notice of Intent, which the Notice of Intent
20 says will be a commenting agency for DOE's EIS, and
21 the Environmental Protection Agency, which would be a
22 cooperating agency.

23 The NRC is the agency responsible for
24 whether or not to grant a license to DOE for a Yucca
25 Mountain repository, using regulations that, as of

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1 today, are incomplete. And the EPA is responsible for
2 setting the health and safety standards for Yucca
3 Mountain, also currently incomplete.

4 Alternative three involving Yucca Mountain
5 should be removed from the scope.

6 The proposed use of the Nevada Test Site
7 for alternative four and five is unrealistic because
8 of outstanding legal and statutory issues involving
9 its long-unresolved land withdrawal status. The
10 original 1952 land withdrawal for the Nevada Test Site
11 and all subsequent withdrawals specify its intended
12 use as a weapons testing site. In 1994, the State of
13 Nevada filed a complaint in U.S. District Court here
14 in Las Vegas alleging that the land withdrawals for
15 NTS did not include disposal of off-site-generated
16 low-level radioactive waste as an intended use.

17 In 1997, a settlement agreement was signed
18 in which DOE committed to initiate "consultation with
19 the United States Department of Interior concerning
20 the status of existing land withdrawals for the NTS
21 with regard to low-level waste storage to disposal
22 activities." Nothing productive has yet come from
23 that 12-year-old commitment.

24 In the fiscal year 2005 House Report to
25 the Energy and Water Appropriations Bill, DOE was

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1 directed to "enter into formal consultations with the
2 Department of Interior regarding multiple uses of NTS,
3 and if necessary, revise and update the land
4 withdrawal to reflect these additional uses." In May
5 2007, a DOE official reported to a senate committee
6 that consultation had been underway since 1997 without
7 resolution.

8 The current status of the Nevada Test Site
9 for consideration in this greater-than-class C EIS is
10 that it is not available. It should be removed from
11 the alternatives at least until or unless its land
12 withdrawal status is resolved, consistent with the
13 settlement agreement with the State of Nevada and the
14 directive of the House of Representatives Report.

15 Thank you.

16 MR. BROWN: Our next speaker is Paul
17 Liebendorfer. And he will be followed by Alan
18 Pasternak.

19 MR. LIEBENDORFER: My name is Paul
20 Liebendorfer, and I work with the Nevada Division of
21 Health, the Radiological Section. Comments I'm going
22 to make today will wind up being incorporated in the
23 state comments as a whole. So I'm leaving -- just the
24 issues of concern we presently have and we're still
25 looking at.

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1 We start out by referencing the letter
2 where all the concerns that went in the preliminary
3 2005 scoping comments with life cycle goals,
4 institution of controls, and the cumulative impacts
5 that don't appear to be, at least in the present
6 scoping, adequately talked about being addressed.

7 But in accordance -- more specifically, in
8 accordance with at least what the requirements with
9 NRC will be an NRC-licensed facility and be operated
10 under -- presumption is that that's what it is --
11 required to be operated under an NRC license. The
12 scoping document really didn't talk about the
13 complexity of the regulatory implications that this
14 poses. If you talk about putting it at the WIPP
15 facility, WIPP isn't an NRC-licensed facility. That
16 means you have to -- WIPP or a portion of it would
17 be -- have to be licensed by NRC. Real significant
18 regulatory implications.

19 The same thing applies to whether or not
20 at Yucca Mountain -- implications. But any one of the
21 other DOE sites listed, all are Atomic Energy Act
22 regulated. To put an NRC-licensed facility adjacent
23 to an already existing DOE facility, which is not
24 regulated, the complexity in the regulations of
25 operating those sites becomes very significant.

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1 Operating one under one set of conditions and one
2 under another, it brings some real concerns.

3 It brings some concerns of when the waste
4 going to a facility -- we -- I acknowledge that -- I
5 commend DOE for actually beginning to talk about their
6 greater-than-class C-like waste, because when the
7 5220-2A, their waste management order, turned into
8 435.1, they used to talk about their special case
9 waste, their high-activity waste. Well, that concept
10 disappeared with the issue of the new order because
11 they weren't sure how to deal with it, and it went
12 away. And now their wastes potentially will be
13 included. And when would it be included? A
14 regulatory issue under an NRC-licensed facility.

15 Waste shipped to WIPP and to the Test Site
16 as low-level waste -- the shippers have had problems.
17 Well, if you have a regulatory issue with a commercial
18 shipper sending waste to an NRC-licensed facility,
19 he's subject to great scrutiny from the shipper and
20 from the originating point. If you have DOE-like
21 waste going to a facility, at what point in time does
22 it become regulated? Both WIPP and NTS have had some
23 major generator and shipper flaws. Would you be
24 penalizing the commercial shippers and generators of
25 the NRC-licensed waste, and not being able to penalize

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1 DOE because they still assume control over the Atomic
2 Energy Act? A regulatory issue would have to be very
3 significantly resolved in any alternative proposed.

4 So when does DOE waste lose its
5 regulatory -- it's Atomic Energy Act exclusions? This
6 becomes an issue because DOE collects waste at this
7 point in time that was NRC-licensed at one point in
8 time -- reactor waste, sealed sources. Now it's no
9 longer NRC-regulated waste; it's DOE waste. When does
10 it lose it? When does the Atomic Energy Act
11 exclusions that are applicable to DOE waste go away if
12 it goes to an NRC-licensed facility and has to be
13 managed that way? Regulatory issue.

14 One issue that came back up, you revised
15 Table 1 in the document because there was some
16 confusion. I guess -- not understanding it all, but
17 you can go to Los Alamos NNSA website, and they talk
18 about the quantity of sealed sources they've collected
19 from commercial sector and what the total curie count
20 was and what the specific nuclides are within that.
21 They've been advertising this for a number of months
22 on their website, and expounded on what a good job
23 they were doing in knocking -- that -- they were
24 not -- they were taking these out of the environment
25 for a potential terrorist activity. But the numbers

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1 that Los Alamos says they have in the way of sealed
2 sources are not represented in the Table 1. As a
3 matter of fact, are they DOE waste? If they're DOE
4 waste, they ought to be represented as DOE. If
5 they're commercial waste that they've done it, there
6 is no number for commercial sealed source waste
7 presently in existence. And if they're DOE waste, the
8 quantity represented on the website and what's there
9 is twice what DOE says the total quantity of sealed
10 sources they'll have at the end of the time.

11 It conveys to me that there's not adequate
12 communication between the entities of DOE, and going
13 back on the information-gathering and what is
14 representative of what's out there, and having worked
15 with the Department of Energy here locally, but some
16 nationally, for off and on 20 years, there's a great
17 perception that there's a lot of hocus-pocus goes
18 around with what waste is where and how it is. These
19 two pieces of information that are out there imply
20 there's still manipulation of numbers. And is DOE
21 being forthright with the public, and how can they
22 begin to understand the decisions that are made?

23 That's kind of where I stand on the
24 comments, but those will be elaborated more and come
25 formally within the state comments. Thank you.

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1 MR. BROWN: Thanks very much.

2 Al Pasternak is next. And he will be
3 followed by Judy Treichel.

4 MR. PASTERNAK: Thank you.

5 My name is Alan Pasternak. I'm the
6 Technical Director of an organization which began in
7 1983, the California Radioactive Materials Management
8 Forum. Our members -- we're an association of
9 organizations that use radioactive materials,
10 primarily in California, others in the other states of
11 the Southwestern Compact Region, which includes North
12 Dakota, South Dakota and Arizona. In fact, I think we
13 even have one or two members who are outside of the
14 region, as well. These organizations include
15 universities, nuclear utilities, electric utilities
16 with nuclear power plants, biotech firms, which is a
17 very large activity in California, as well as some
18 other states, pharmaceutical firms, medical centers,
19 and so on.

20 So we are what is sometimes loosely
21 referred to as a generators organization. We prefer
22 to use the phrase "user of radioactive material,"
23 because that's in fact what we are, and the waste is
24 generated as a byproduct of that beneficial use.

25 I have two general comments, which we will

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1 follow up with in written communications prior to the
2 September 21st deadline. The first is a request for
3 clarification of the use of the word "commercial."
4 It's needed not just within DOE presentations, but I
5 think elsewhere within the industry and others.
6 There's a tendency to refer to DOE waste on the one
7 hand and commercial waste on the other. Commercial,
8 of course, implies that it's an organization that's
9 for profit. There are, as I just enumerated, a number
10 of organizations that use radioactive materials that
11 are more correctly called "institutional" -- medical
12 centers and hospitals, universities and other kinds of
13 research organizations. Also, there are a host of
14 federal and state government agencies which use
15 radioactive materials, generate low-level waste, and
16 whose waste disposition options are the same as those
17 of the nuclear utilities or any other commercial
18 organizations that use radioactive materials.

19 So our suggestion is that we divide this
20 universe thusly: DOE waste and non-DOE waste. And
21 that might require some explanation, but at least it
22 will be a clarification for the members of Congress,
23 for the public, as to what the scope of the problem
24 is. As we've often had occasion to say, there are
25 some serious problems -- finding disposal paths for

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1 the non-DOE waste. In particular, come July 1, 2008,
2 organizations that use radioactive materials in some
3 36 states will have no disposal pathway for their
4 class B and class C waste.

5 With the help of the Department of
6 Energy's MIMS group -- Manifest Information Management
7 System -- one can go through the numbers and find, for
8 example, that in the calendar year 2006, the B and C
9 waste sent to Barnwell by organizations that use
10 radioactive materials in these 36 states accounts for
11 about 95 percent of the activity measured in curies,
12 95 percent of the activity disposed of by non-DOE
13 waste generators at all three commercial disposal
14 facilities -- Clive, Richland and Barnwell. So even
15 though we have the Clive facility taking large volumes
16 of low-level waste, not only from non-DOE users, but
17 the Department of Energy as well, but we have a much
18 larger fraction of the activity currently going to
19 Barnwell from organizations that will not have a
20 disposal pathway under the current course that the
21 nation is on, will not have a disposal pathway after
22 July 1, 2008.

23 So our suggestion here is one that we have
24 made elsewhere and made before, and that is that the
25 scope of the greater-than-class C EIS be expanded to

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1 include non-DOE B and C waste as a long-term solution.
2 We realize that there's a long schedule ahead until
3 the final EIS is written, until that's submitted to
4 Congress, until Congress asks and you prepare the ROD,
5 and then the construction of the GTCC facility. So I
6 hold that out as a long-term option. It was
7 originally suggested by the National Health Physics
8 Society. It makes some sense if a facility is safe
9 for and has been designed to handle greater-than-class
10 C waste safely, then it's certainly safe for the B and
11 C wastes. And economically it will improve the
12 economic efficiency of the ultimate GTCC facility.

13 We do have some other suggestions to make
14 in the near term, post-July 1, 2008 time frame,
15 regarding the non-DOE B and C wastes, but that's
16 outside the scope of this EIS on greater-than-class C.
17 But I would add that an example of how the Department
18 of Energy is contributing a national solution to a
19 national radioactive waste problem is the sealed
20 source program mentioned by the previous speaker, the
21 sealed source program that is run out of the Los
22 Alamos National Laboratory. That addresses a specific
23 problem. It's an important problem. These sealed
24 sources are used everywhere, including demonstrations
25 in high schools. In fact, I believe it's accurate to

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1 say that this program has collected sources from such
2 a wide disparity of organizations, sealed sources from
3 generating sources, including, in some cases, high
4 schools. I think it's a very valuable program, and
5 it's a good example of how the Department of Energy
6 has contributed a national solution to a national
7 problem. We're simply asking that you expand that
8 vision and performance.

9 Thank you.

10 MR. BROWN: Thanks very much.

11 Judy Treichel.

12 MS. TREICHEL: I'm with the Nevada Nuclear
13 Waste Task Force. We very often provide public
14 comment in all sorts of venues where there's not
15 generally a public voice heard.

16 One of the things that's very difficult
17 for members of the public when they have to consider
18 things like are being proposed here is how to deal
19 with a problem that you can't quantify. You don't
20 know how large this is. On the graphs over on the
21 wall, it talks about amounts of wastes that currently
22 exist, and then we're told that the vast amounts and
23 the primary waste will be created between 2035 and
24 2062. The public would always like to be part of the
25 decision-making process that determines whether or not

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1 you make a lot more waste. That obviously is not the
2 scope here. But we always wind up with this thing in
3 our lap where it says, but this waste exists, what are
4 you going to do? And it's a source of frustration,
5 and it seems to always be there. Perhaps in this
6 case, that waste generation is far enough out that
7 people will get a chance to talk about whether they
8 want more nuclear power and whether they want new
9 generations of weapons, where I suppose this would
10 come.

11 If Yucca Mountain were to be chosen, the
12 license application, we are told, will be submitted
13 for a Yucca Mountain repository in June of '08. I'm
14 not sure when there would be a license application
15 submitted for this project if it was to happen at
16 Yucca Mountain. But I would make comment saying that
17 if Yucca Mountain were to be chosen during the process
18 that you've just entered, it would certainly prejudice
19 a licensing decision that will be in process at that
20 time. It also would muddy a lot of the waters. There
21 is no EPA standard, radiation standard for Yucca
22 Mountain, but it's due and supposedly will be there at
23 some point, and it will be much harder to figure out
24 if a Yucca Mountain repository complies with an EPA
25 standard when this sort of undetermined amount of

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1 product would also be included in there.

2 It's already been mentioned that it's a
3 tremendous problem to put a licensed facility adjacent
4 to or combine it with an unlicensed facility. But at
5 Yucca Mountain, which is the only spot up on the board
6 that is, according to DOE, intended at some day to be
7 licensed, that shouldn't make this thing easier, it
8 should make it more complicated, because this presents
9 a terrible conflict of interest and makes everything
10 much more complicated than it even is now, and it's
11 already complicated.

12 Thank you.

13 MR. BROWN: Thanks very much.

14 That concludes the list of folks who
15 signed up ahead of time to speak. So let me ask if
16 there's anybody else in the audience who would like to
17 add comments at this point. If so -- fine. Please
18 step to the microphone. Again, identify yourself, and
19 if there's an organizational affiliation, add that.
20 And welcome.

21 MR. ARNOLD: Thank you. My name is
22 Richard Arnold. I am the spokesperson for the
23 Consolidated Group of Tribes and Organizations, a
24 group that represents 16 tribes with cultural and
25 historic ties to basically the Nevada Test Site and

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1 Southern Nevada areas with all the various federal
2 lands that are involved.

3 There's a variety of issues I'd like to
4 just present for consideration. First and foremost,
5 it's nice to see that the identification of the
6 environmental issues that are going to be evaluated
7 that are inclusive of Native American concerns. We
8 believe that that's paramount from our perspective, of
9 course, also with the potential impacts to the
10 historical and cultural artifacts and sites and
11 environmental justice, because we believe that from
12 the tribal perspective, that there are indeed
13 environmental justice issues with things specific to
14 the Nevada Test Site being -- access violations and
15 religious violations of holy lands that are
16 traditional creation places and important for our
17 after-life.

18 One of the things with the Nevada Test
19 Site programs and the tribes and the involvement
20 there, and even inclusive of Yucca Mountain, is that
21 there's been a standard that's been set for
22 consultation and for involvement of tribes to voice
23 their concerns. First and foremost, that needs to
24 continue. Secondly, that needs to be replicated for
25 those other sites that are being -- that are under

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1 consideration.

2 As such, locally we've been involved in
3 writing actual text in the EIS. So we would again
4 recommend that that be considered in this analysis.
5 That also -- the Indian involvement needs to, I guess,
6 continue throughout the entire process. So any --
7 beyond just checking a box and things, it's meaningful
8 involvement and information that's being provided in
9 the analysis of the proposed action.

10 We've also done things because of -- when
11 you mention Yucca Mountain, and when you mention --
12 and there's transportation issues and things that are
13 a part of that, those transportation issues, depending
14 upon how the stuff would be transported, may indeed go
15 across -- or they are going across lands that were at
16 one time tribal lands. And so those need to also be
17 evaluated systematically.

18 We don't believe that it would be
19 appropriate to try to do tiered studies, because
20 there's some information that may be out there that
21 there needs to be in-depth and systematic analysis to
22 make sure that we're not just taking stuff that --
23 trying to extrapolate information that may or may not
24 be accurate or germane to what the proposed project
25 is.

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1 Let's see here. I guess I was a little
2 taken aback, I guess, and maybe it's just me, and just
3 happen to be kind of a local yocal kind of guy, but
4 when I looked on the website for additional
5 information for this project, it seemed to be a bit
6 presumptuous for Nevada. One of the things that I saw
7 in there was that it lists all the different sites
8 around and what they're proposing to do. However,
9 when it came to -- Yucca Mountain had a little bit
10 more detailed information, and Nevada Test Site had
11 even more information. It wasn't -- there wasn't
12 parity of the information that was shared.

13 For example, it talked about how Area Five
14 on the Nevada Test Site, it basically falls within
15 1375 square miles. It's the largest restricted area
16 in the U.S. It's surrounded by thousands of
17 additional acres of land withdrawn. I mean, it sounds
18 a little bit presumptuous in that, well, gee, what
19 about the other sites? Why aren't we providing that
20 kind of information, too, in order to systematically
21 and objectively evaluate all the sites. So I believe
22 that that kind of gives a little bit of an edge maybe
23 in one respect, and secondly is that it gives the
24 impression of, once again, that it's kind of like this
25 barren wasteland out here, and it's not. It's our

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1 home. It's everything to us as Indian people, and
2 then as Nevadans the same way.

3 So those would be, I guess, the comments
4 that I have. Unfortunately, I was hoping that -- I
5 thought I had heard before the break that there was
6 going to be some opportunity for some questions prior
7 to the comments, because I did have the question as
8 to, with the proposed date for the draft EIS when that
9 was going to be. I understand you had to go back and
10 look at the schedule, but what is kind of anticipated.

11 And then the second questions that I
12 would've had would've been who was going to be
13 preparing the EIS, who was the contractor?

14 Thank you.

15 MR. BROWN: Is there anyone else who would
16 like to add any comments at this time?

17 Okay. We are scheduled to remain
18 available to take comments until nine o'clock.
19 Customarily what we do is take a recess at this point.
20 If anybody else arrives who would like to comment, or
21 if anybody else in the audience after further
22 discussion decides they'd like to add something, just
23 see me. We will reconvene and put your comment on the
24 record. The court reporter, again, will remain here
25 until nine o'clock, as well.

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(Recess from 8:06 p.m., until 9:00 p.m.)

MR. BROWN: The hour of nine o'clock has arrived. I've asked if any other member of the public wishes to add any statements, again noting that no member of the public at this time wishes to say anything further for this environmental impact statement. This meeting is adjourned. Thank you.

(Meeting adjourned at 9:00 p.m.)