
*** RX REPORT ***

RECEPTION OK

TX/RX NO	7382
CONNECTION TEL	
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ST. TIME	09/21 15:52
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PGS.	5
RESULT	OK

5 - Page FAX
 Received on 9/21/04
 From Benton County
 Commissioner, Claude Oliver

Doney Chiqui
 9/22/04



RECEIVED
SEP 21 2004
BENTON COUNTY
COMMISSIONERS

Facsimile Transmission from the Office of
Congressman Doc Hastings
1323 Longworth House Office Building
Washington, DC 20515
Voice: (202) 225-5816 Fax: (202) 225-3251

To: CLAUDE OLIVER

Fax Number: 509-786-5625

Date: 9-21-04

Pages to Follow: 4

From: Doc Hastings
 Ed Cassidy
 Ilene Clauson
 Sandra Mercer
 James Brown

Todd Young
 Staci Stevenson
 Jessica Gleason
 Tyler Prout
 Jenny Gorski

Other

Notes: CLAUDE - PER THE ATTACHED, HOW CAN WE PRIVATEIZE
FFTF OR JUSTIFY A "RE-START OPTION" IN THE EIS IF YOU
WERE CORRECT ON 8/10 THAT "THE SODIUM DRAIN HAS GIVEN US
NO OPTION TO GO FORWARD"?

Confidentiality Notice

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FROM : CONG DOC HASTINGS

FAX NO. :

Sep. 21 2004 09:38AM P2

SEP. 20. 2004 5:23PM P 1/2

PHONE NO. : 5097379524

FROM : CITIZENS FOR MEDICAL ISOTOPIES



**Board of County Commissioners
BENTON COUNTY**

Claude L. Oliver
DISTRICT 3

P.O. Box 190 • Prosser, WA 99360-0190
Phone (509) 786-5600 or (509) 736-3080
Fax (509) 786-8625

Senator Maria Cantwell
717 Hart Senate Office Building
Washington DC 20518

Attorney General Christine Gregoire
1121 Washington Street SE
PO Box 48100
Olympia, WA 98504-0100

Senator Patty Murray
173 Russell Senate Office Bldg.
Washington, D.C. 20518

Congressman Doc Hastings
1323 Langworth House Office Bldg.
Washington, D.C. 20515

President George W. Bush
Secretary of HHS Tommy Thompson
Secretary of U.S. Labor Elaine Chao
U.S. DOE-RL Keith Klein
Benton-Franklin Health District

Secretary of Energy Spencer Abraham
Washington State Labor Council
Governor Gary Locke
Benton-Franklin County Council of Govts.
Citizens for Medical Isotopes

Dear Elected Officials,

September 20, 2004

The U.S. Department of Energy (DOE) will be holding a scoping meeting on the Environmental Impact Statement (EIS) process for the Fast Flux Test Facility (FFTF) decommissioning in Richland, WA on September 22, 2004 at the Red Lion/Hanford House hotel from 7 PM to 10 PM. You are invited to attend and, for the record, present your position on this subject on behalf of our community.

In the past, you have stated that the FFTF was a very valuable asset that would be a great loss if permanently shut down:

- Senator Maria Cantwell, you wrote on 9/29/03, "I have consistently asked that any decision regarding the future of Hanford's FFTF be scientifically based and conducted with an open and fair process." (Reference 1)
- Senator Patty Murray, you wrote on 11/14/03, "In addition to the loss of jobs that was caused by the Department's decision, the facility's discontinuation is a further letdown because I saw great promise in the production of medical radioisotopes for diagnostic and therapeutic use." (Reference 2)
- Congressman Doc Hastings, you wrote on 11/4/03, "The FFTF is the largest and most modern facility of its kind in the world and has enormous potential to support national needs in nuclear research, materials testing, and medical isotope production." (Reference 3)

As political leaders in Washington State, you need to look for opportunities to preserve and create jobs, prevent the loss of high technology American jobs, and address national health and energy needs. You will be hard pressed to find a better opportunity to achieve the above than to privatize the FFTF.

With this high degree of agreement about the value of FFTF, perhaps you will also agree that FFTF merits a proper, lawful EIS. The Holland Report (Reference 4), a U.S. DOE review of the decision to deactivate the FFTF, concluded that a private sector partnership for the FFTF is worthy of further consideration. The option glaringly missing from DOE's proposed EIS is that of restarting the reactor. Four U.S. DOE reports

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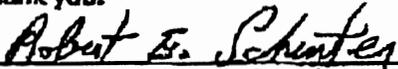
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FROM : CITIZENS FOR MEDICAL ISOTOPES

(References 5 through 8) since the Holland Report state America's need for a fast reactor like the FFTF for energy independence, isotope production, waste reduction, and national security. Your offices must commit, on the record, how you intend to assure that a lawful EIS is prepared.

We will reserve seats for all of you and look forward to hear what you have to say at the Richland scoping meeting. The Notice of Intent regarding the scoping meetings can be found online at <http://www.hanford.gov/calendar> under the Public Comment Period Section.

Thank you.


Dr. Robert E. Schenter, President, National Association of Cancer Patients


Ken Dobbins, Councilman, City of West Richland


Claude Oliver, Commissioner, Benton County


Keith Smith, Washington State Organized Labor FFTF Liaison


Robert Brown, Chairman, American Nuclear Society - Eastern Washington Section

References

1. E-mail, Cantwell to Brunell, 9/29/03, 8:46 AM, "From the Office of Senator Cantwell" regarding the Fast Flux Test Facility
2. Letter, Murray to Daily, 11/14/03, regarding the Fast Flux Test Facility
3. Letter, Hastings to Benitz, 11/4/03, response "...regarding the Fast Flux Test Facility (FFTF)."
4. Review of the Decision to Permanently Deactivate the Fast Flux Test Facility, US DOE, Brookhaven Area Office, July 27, 2003
5. A Technology Roadmap for Generation IV Nuclear Energy Systems, 03-GA50034, US DOE Nuclear Energy Research Advisory Committee and the Generation IV International Forum, December 2002.
6. Report to Congress on Advanced Fuel Cycle Initiative: The Future Path for Advanced Spent Fuel Treatment and Transmutation Research, US DOE Office of Nuclear Energy, Science, and Technology, January 2003
7. Audit Report: Plutonium-238 Production, DOE/IG-0607, US DOE Office of Inspector General, Office of Audit Services, June 2003
8. The US Generation IV Implementation Strategy, 03-GA50432-06, US DOE Office of Nuclear Energy, Science, and Technology, September 2003

Tri-City Herald
8/10/04
Cont: From FP

FFTF: DOE has narrowed bids for cleanup to 3 proposals

Continued from A1

But in the Tri-Cities, a Monday night meeting that drew about 70 supporters of restarting the reactor was suffused with the gloom of a wake.

"This is the most advanced, most safe, most efficient and, in my opinion, most beautiful nuclear reactor in the world," said Wanda Munn, a retired engineer who spent almost 20 years working at FFTF. "This is a tragedy."

Supporters have proposed using the reactor to make tritium for weapons and isotopes to power missions deep into outer space. But the mission that drew the most fervent support called for using the reactor to make radioactive isotopes for new nuclear medicine procedures to more

efficiently kill cancer cells.

In recent years, supporters have pushed for the commercialization of the reactor, primarily to produce medical isotopes. DOE turned down the latest proposal Friday, said John Deichman, chief executive of Mimir Medical, a corporation formed to purchase the reactor. Deichman is a former executive manager at Hanford.

The company had a goal of raising more than \$1 billion and said it had the Standard and Poors audit to prove it had a viable plan. Mimir would have been profitable by its third year of operation and would have paid for the eventual dismantling of the reactor, Deichman said.

DOE is proceeding with the steps it needs to complete the decommissioning of the reactor.

It had requested bid proposals from small busi-

nesses for the estimated \$500 million cleanup and closure of the reactor, which operated from 1982-92. The field has been narrowed to three proposals.

DOE also soon will be asking for public comment on how the reactor should be decommissioned, including whether its core should be left standing or torn down to the ground and what should happen to its waste.

The sodium being drained from the reactor is being stored as a solid in steel canisters at the FFTF complex. DOE plans to have it processed into a caustic substance that can be reused in the process of turning other Hanford waste into a glasslike substance for permanent disposal.

Reporter Annette Cary can be reached at 502-1633 or via e-mail at acary@trib-cityherald.com.

*** RX REPORT ***

RECEPTION OK

TX/RX NO	7383	
CONNECTION TEL		5095471204
CONNECTION ID		
ST. TIME	09/21 20:01	
USAGE T	02'36	
PGS.	7	
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7- Page FAX
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 Commissioner, Claude Oliver
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Senator Maria Cantwell
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1121 Washington Street SE
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Senator Patty Murray
123 Russell Senate Office Bldg.
Washington, D.C. 20510

Congressman Doc Hastings
1323 Longworth House Office Bldg.
Washington, D.C. 20515

CC:
President George W. Bush
Secretary of HHS Tommy Thompson
Secretary of U.S. Labor Elaine Chao
U.S. DOE-RL Keith Klein
Benton-Franklin Health District

Secretary of Energy Spencer Abraham
Washington State Labor Council
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Thank you.

Robert E. Schenter

Dr. Robert E. Schenter, President, National Association of Cancer Patients

Ken Dobbin

Ken Dobbin, Councilman, City of West Richland

Claude Oliver

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Keith Smith

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Robert Brown

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8. *The US Generation IV Implementation Strategy*, 03-GA0439-06, US DOE Office of Nuclear Energy, Science, and Technology, September 2003

Sodium draining begins at FFTF

Tri-City Herald
8/10/04
Front Page

*After primary cooling loop
drainage is finished, restart
will become too expensive*

By **Amanda Cary**
Herald staff writer

Sodium began draining from a hole drilled in a primary cooling loop of Hanford's Fast Flux Test Facility at 10:20 a.m. Monday.

By late afternoon 15,000 of the 150,000 gallons of liquid sodium in the primary cooling loops had been drained from the research reactor. Earlier this year, the secondary cooling loops were drained.

"The sodium drain has given us no option to go forward," said Benton County Commissioner Claude Oliver, who has fought for a restart of the Department of Energy's newest reactor. Once sodium is drained, a restart would be prohibitively expensive.

Both Republican and Democratic administrations have looked at uses for the Hanford reactor over the last decade but found no mission they believed was economically viable for the reactor.

"This is just another step in the demetallation process we've been engaged in for some time," said Colleen Clark, spokeswoman for DOE's Richland Operations Office. "The focus is on doing it safely and on schedule."

Over the weekend, Gerald Poller of Heart of America Northwest sent an e-mail thanking those who had fought to have the reactor permanently shut down. With the focus at Hanford on cleaning up waste left from past production of plutonium for the nation's nuclear weapons program, watchdog groups pushed for no new waste-producing work at the nuclear reservation.

See FFTF, Page A2

Tri-City Herald
8/10/04
Cont: from FP

FFTF: DOE has narrowed bids for cleanup to 3 proposals

Continued from A1

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"This is the most advanced, most safe, most efficient and, in my opinion, most beautiful nuclear reactor in the world," said Winada Murro, a retired engineer who spent almost 20 years working at FFTF. "This is a tragedy."

Supporters have proposed using the reactor to make krypton for weapons and isotopes to power missions deep into outer space. But the mission that drew the most fervent support called for using the reactor to make radioactive isotopes for new nuclear medicine procedures to more

efficiently kill cancer cells.

In recent years, supporters have pushed for the commercialization of the reactor, primarily to produce medical isotopes. DOE turned down the latest proposal Friday, said John Deichman, chief executive of Mirion Medical, a corporation formed to purchase the reactor. Deichman is a former executive manager at Hanford.

The company had a goal of raising more than \$1 billion and said it had the Standard and Poors seal of approval by its third year of operation and would have paid for the eventual dismantling of the reactor, Deichman said.

DOE is proceeding with the steps it needs to complete the decommissioning of the reactor. It has requested bid proposals from small bus-

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DOE also soon will be asking for public comments on how the reactor should be decommissioned, including whether its core should be left standing or torn down to the ground and what should happen to its waste.

The sodium being drained from the reactor is being stored at a site in steel canisters at the FFTF complex. DOE plans to have it processed into a ceramic substance that can be reused in the process of turning other Hanford waste into a glasslike substance for permanent disposal.

Reporter Annette Cary can be reached at 509-1623 or via e-mail at anary@tricityherald.com.

PUBLIC SCOPING PERIOD FOR THE FAST FLUX TEST FACILITY DECOMMISSIONING ENVIRONMENTAL IMPACT STATEMENT



BACKGROUND

The U.S. Department of Energy (DOE) is preparing a National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) on the proposed decommissioning of the Fast Flux Test Facility (FFTF) and certain support facilities at the Hanford Site, Richland, Washington.

The FFTF was a 400 megawatt (thermal) liquid-metal (sodium) cooled nuclear test reactor. Built in the 1970s, it was used between 1982 and 1992 to develop and test advanced nuclear fuels, materials, equipment and reactor safety designs for the Liquid Metal Fast Breeder Reactor Program. The FFTF also was used in ancillary experimental activities to produce a variety of medical and industrial isotopes. The facility was shut down and is in the process of being deactivated. Deactivation activities under way at this time include: draining sodium systems, washing the fuel to remove sodium and placing the fuel into dry cask storage, and deactivating auxiliary plant systems. The EIS will document previous DOE NEPA decisions regarding management and disposition of FFTF fuel, which includes the sodium-bonded fuel. However, decisions regarding the disposition of FFTF fuel are not within the scope of this decommissioning EIS.

DOE's purpose and need is to reduce long-term risks associated with the deactivated FFTF and its ancillary support facilities, and to reduce surveillance and maintenance costs. Therefore, DOE proposes to decommission the deactivated FFTF and its support facilities.

PRELIMINARY ALTERNATIVES

DOE has made a programmatic decision to permanently shutdown and deactivate FFTF. DOE is currently performing deactivation activities consistent with this decision; therefore, restart of the FFTF will not be considered a reasonable decommissioning alternative. Other decommissioning alternatives that arise during public scoping and preparation of the draft EIS will be considered.

The DOE proposed alternatives to be considered in this EIS presently include:

* **No Action:** Complete the permanent deactivation of the FFTF consistent with previous DOE NEPA decisions, such that the FFTF and its support facilities could be maintained in a safe long-term surveillance and maintenance condition for the foreseeable future. Final decommissioning would not occur.

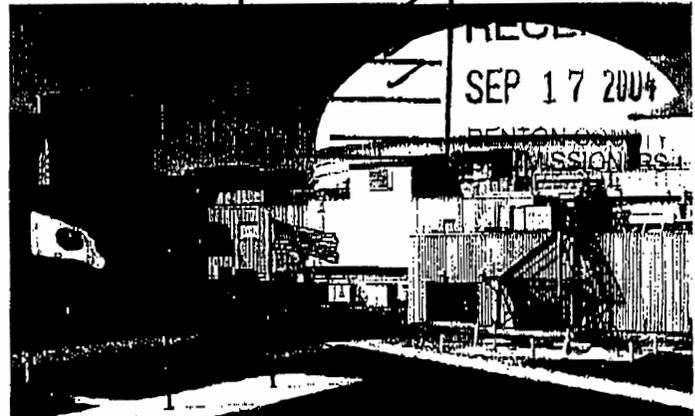
Entombment: Decontaminate, dismantle, and remove the above-grade Reactor Containment Building (RCB) dome and structures within. The below-grade structures (e.g., the FFTF Reactor Vessel filled with radioactive and contaminated equipment, piping, etc.) would be grouted and left in place. Equipment and special components (e.g., sodium-filled filters) would be removed, treated onsite or at Idaho National Engineering and Environmental Laboratory (INEEL), and disposed at Hanford or an offsite facility. Associated buildings would be demolished and the rubble disposed at Hanford.

Removal: Decontaminate, dismantle, and remove the above-grade RCB dome. The below-grade structures (e.g., FFTF Reactor Vessel, radioactive equipment, piping, etc.) also would be removed. The removed reactor vessel and piping would be disposed at Hanford. Equipment and special components (e.g., sodium-filled filters) would be removed, treated onsite or at INEEL, and disposed at Hanford or an offsite facility. Associated buildings would be demolished and the rubble disposed at Hanford.

Public Comment

Submit comments by
October 8, 2004 to:

Mr. Douglas H. Chapin
NEPA Document Manager
FFTF Decommissioning EIS
U.S. Department of Energy
P.O. Box 550 MS: A3-04
Richland, WA 99352-0550
Fax: (509) 376-0177
Email:
Douglas_H_Chapin@rl.gov



The EIS will analyze reasonable alternatives for the FFTF waste, and reasonable onsite (Hanford) and offsite (INEEL) alternatives for the management and disposition of the Hanford Site radioactive sodium inventory, which includes the FFTF sodium.

**USDOE will take comments on the proposed scope of this EIS through
October 8, 2004.**

Two scoping meetings are planned:

September 22, 2004
RICHLAND, WASHINGTON
Red Lion Inn - Hanford House
802 George Washington Way

September 30, 2004
IDAHO FALLS, IDAHO
Shilo Inn
780 Lindsay Boulevard

Meeting Time: 7:00 p.m. to 10:00 p.m.

To obtain a copy of the Notice of Intent (NOI) or if you have questions about the proposed action, please contact the FFTF EIS Information Phone Line: 1-888-886-0821.

The NOI can be found online at
<http://www.hanford.gov/calendar>
under the Public Comment Period Section

FFTF Decommissioning EIS

Department of Energy
P.O. 550 MSIN A7-75
Richland WA, 99352-0550

10-07-2004 12:45 From-

BUILDING & CONSTRUCTION TRADES COUNCIL

Affiliated with Building and Construction
Trades Department, AFL-CIO



October 7, 2004

Governor Gary Locke
Legislative Building
P O Box 40002
Olympia, WA 98504-0002

Dear Governor Locke,

Attached please find a Resolution passed by the Central Washington Building and Construction Trades Council and the Hanford Atomic Metal Trades Council. The Resolution addresses multiple Public Law non compliance as well as Labor Agreement violation issues.

The above named organizations are concerned that worker safety, the environment and community interest have been compromised without the Environmental Impact Statement being completed prior to contractor decommissioning and /or dismantling activity beginning.

Any assistance you can provide in having the deficiencies corrected will be greatly appreciated. If you need additional information or have any questions, please do not hesitate to contact me.

Fraternally,

Mike Keizer
President
lkj
enc

Doug
Chapin



**CENTRAL WASHINGTON
BUILDING & CONSTRUCTION
TRADES COUNCIL**



P. O. Box 2387, Pasco, WA 99302-2387
(509) 547-3453



Hanford Atomic Metal Trades Council
P. O. Box 898, Richland, WA 99352
(509) 946-0326

FFTF CLOSURE

WHEREAS, DOE has let a closure contract for FFTF; and

WHEREAS, 40 CFR Part 1500 - Purpose, Policy and Mandate, Section 1500.1 Purpose states:

a) The National Environmental Policy Act (NEPA) is our basic national charter for protection of the environment. It establishes policy, sets goals (section 101), and provides means (section 102) for carrying out the policy. Section 102(2) contains "action-forcing" provisions to make sure that federal agencies act according to the letter and spirit of the Act. The regulations that follow implement section 102(2). Their purpose is to tell federal agencies what they must do to comply with the procedures and achieve the goals of the Act. The President, the federal agencies, and the courts share responsibility for enforcing the Act so as to achieve the substantive requirements of section 101.

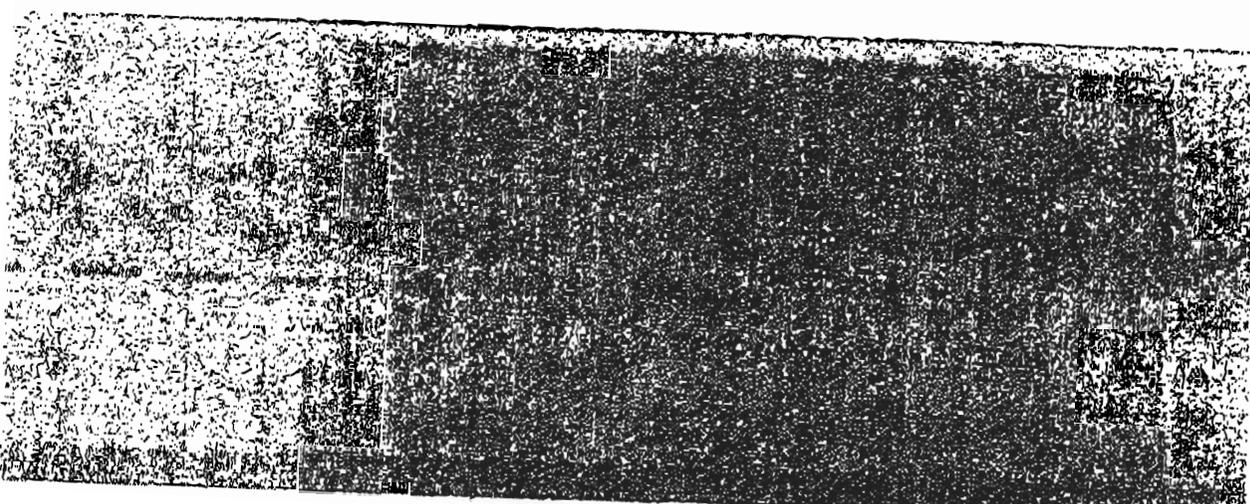
b) NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.

c) Ultimately, of course, it is not better documents, but better decisions that count. NEPA's purpose is not to generate paperwork - even excellent paperwork - but to foster excellent action. The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore and enhance the environment. These regulations provide the direction to achieve this purpose; and

WHEREAS, Section 1500.2 Policy states:

Federal agencies shall to the fullest extent possible:

a) Interpret and administer the policies, regulations and public laws of the United States in accordance with the policies set forth in the Act and in these regulations. (b) Implement procedures to make the NEPA process more useful to decision makers and the public; to reduce paperwork and the

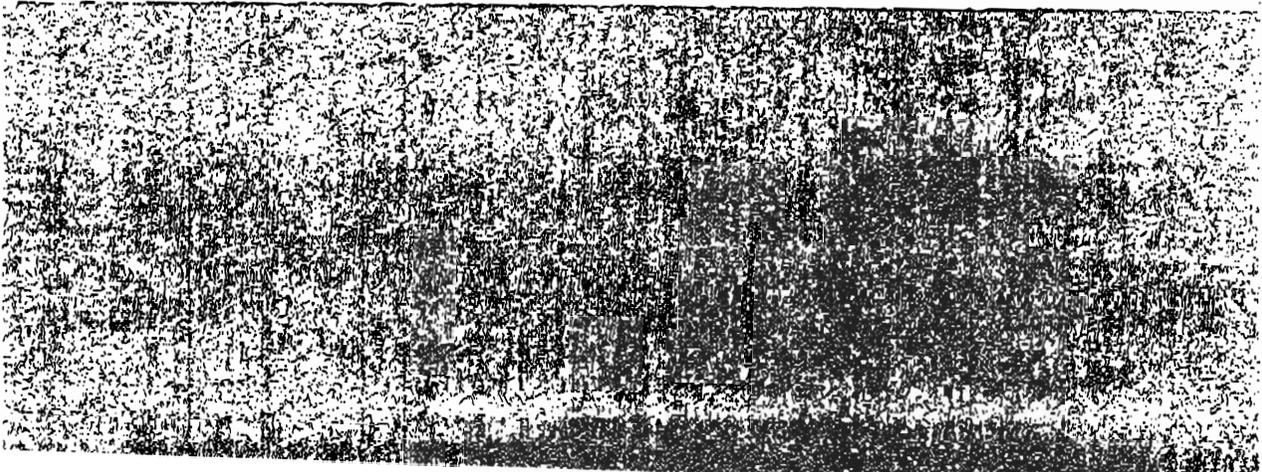


BE IT FURTHER RESOLVED, that the above named organizations ask DOE to suspend any contract awards and / or contractor activities in regards to FFTF decommissioning and dismantling; and

BE IT FINALLY RESOLVED, that the above named organizations proceed to inform their parent organizations and the public of the apparent violations under Public Law 91-190 in an attempt to achieve accountability under Public Law and the Hanford Site Stabilization Agreement.


Mike Keizer, President
C.W.B. & C.T.C


Jim Bareman, President
HAMTC



**FFTF DECOMMISSIONING EIS
SCOPING MEETING
FORMAL WRITTEN COMMENT**

10/7/04

I BELIEVE THE DOE HAS VIOLATED THE ENVIRONMENTAL POLICY ACT NEPA. WE THE TAXE PAYER SHOULDN'T HAVE TO PAY FOR THE VIOLATION MORE THE TAKING DOWN OF IT. THEY ARE BULL HEADED IN NOT SELLING IT SO THAT IT COULD BE USED TO MAKE MEDICAL ISOTOPES. IT WOULD MAKE JOBS ^{LAST} LONGER AND SAVE LIVES.

I KNOW THAT THE UN. AND SOME OTHERS DON'T BELIEVE IN HELPING THE POOR PEOPLE.

ALL THESE PEOPLE THE BIG BUSINESSES WANT THAT GREEN MONEY.

THE MEDICAL ISOTOPES WOULD EVEN HELP OUR COUNTY AS A SURVEILLANCE FIELD. KILL ANTHRAX, MAD COW DISEASE TOO. AS WELL AS A LOT OF CANCERS

DOE NEEDS TO PAY FOR THEIR MISTAKES; FOR NOT DOING WHAT JUDGE SHAE TOLD DOE TO DO.

WE DON'T NEED ANOTHER DUMPING SITE. THE PLANT FFTF COULD ALSO ^{HAVE} BEEN USED TO HELP CLEAN UP THE WASTE THAT THEY ARE PUTTING IN THE GROUND.

Warren Zesiger

Written comments may be submitted to:

Doug Chapin, NEPA Document Manager
FFTF Decommissioning EIS
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A3-04
Richland, Wa. 99352
Fax: (509) 376-0177
douglas_h_chapin@rl.gov

Name WARREN L ZESIGER
(Please Print)

Address PO BOX 895
BENTON CITY, WA. 99320

Provide Comments by October 8, 2004

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RECEPTION OK

TX/RX NO	7425	
CONNECTION TEL		509 588 6115
CONNECTION ID		
ST. TIME	10/07 20:03	
USAGE T	00'58	
PGS.	1	
RESULT	OK	



Department of
Science & Engineerin
(DOSE)

CONFEDERATED TRIBES

of the

Umatilla Indian Reservation

P.O. Box 638

PENDLETON, OREGON 97801

Area code 541 Phone 276-0105 FAX 278-5380

Fed Ex: Old Mission Hwy 30, Pendleton, OR 97801

FAX

Date: Oct. 07, 2004

Number of pages including cover sheet: 5

To:

Mr. Douglas Chapin

NEPA Document Mgr. FTF

USDOE - Richard Operations

Richland, WA

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CC:

From:

Dosinda Shippen

CTUIR - DRSE

Phone: (541)966-2400 966-2410

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REMARKS:

Urgent

For your review

Reply ASAP

Please comment

Had copy will be mailed.

Comments on proposed decommissioning of FTF @ Hanford

TREATY JUNE 9, 1855 ♦ CAYUSE, UMATILLA AND WALLA WALLA TRIBES



CONFEDERATED TRIBES
of the
Umatilla Indian Reservation
DEPARTMENT OF SCIENCE AND ENGINEERING

P.O. Box 638
73239 Confederated Way
PENDLETON, OREGON 97801
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October 7, 2004

Mr. Douglas H. Chapin
NEPA Document Manager
FFTF Decommissioning EIS
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, Mail Stop A3-04
Richland, WA 99352

Dear Mr. Chapin:

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Science and Engineering (DOSE) is in receipt of the Department of Energy's (DOE) Notice of Intent (NOI) to Prepare an EIS for Decommissioning the FFTF at the Hanford Site, Richland, WA. The CTUIR DOSE submits the following comments on the FFTF Decommissioning EIS Scoping NOI (69 FR 50176, August 13, 2004).

The goals of DOE in preparing an EIS for decommissioning the FFTF at Hanford appear to include: permanent deactivation, the reduction of long-term risks from the deactivated facilities, and to reduce surveillance and the costs of maintenance. Since the deactivation (sodium removal and shutdown) is already underway we are responding to the EIS and the decommissioning of the reactor, buildings, piping, etc.

The NOI is asking how DOE should evaluate decommissioning alternatives, and not what our preferred alternative is, but we can readily state that our default preference is always full removal and the return to baseline conditions. Therefore, we will pay close attention to the issues of life cycle costs and long-term risk profiles, original conditions, and vadose and groundwater conditions.

The DOE has proposed three alternatives to be considered in the EIS and the Tribes submit the following concerns and comments as we understand the alternatives to mean.

1. **No Action** means that the permanent deactivation of the FFTF would be completed and final decommissioning would not occur. The Tribes' concern with the "No Action" alternative is that by only deactivating and not decommissioning the FFTF that there will be an extraordinary long-term cost associated with surveillance and maintenance (S&M) at the site. There will also be long-term risks associated with only deactivation; thus, concerns with safety must be considered.

2. **Entombment** means that the Reactor Containment Building (RCB) will be dismantled and removed but that the FFTF Reactor Vessel (and all contaminated items, i.e., lead and DU shielding) would be collapsed in place and grouted to grade. Other equipment would be removed, treated onsite or at INEEL and disposed at Hanford or an offsite facility. The Tribes provide the following comments to entombment:

- There must be assurances that the costs for S&M will be continuously funded or for as long as the material (radioactivity, lead, DU) remains intrinsically hazardous.
- DOE must carefully evaluate the risks that will be delayed but not reduced with entombment because there is a considerable difference between risks that are reduced, delayed, consolidated, or moved. Second, DOE must clearly illustrate how the "risks" change with the configuration because long-term risks after entombment will probably not be much different than "No Action" risks except for some of the physical hazards. See **FIGURE 1**.¹
- Entombment will create yet another near-surface radioactive waste landfill which is not acceptable because DOE already has numerous trenches and landfills that are already permitted in the area for radioactive waste.
- There must be an assumption that institutional controls will fail in 100 years (paper controls) and 500 years (physical controls); and, the potential for an inadvertent intruder or intentional scavenger must be included in the controls.
- Considering the controversy surrounding DU, DOE must insure that DU is completely referenced and not dismissed as nontoxic. DU is a huge issue wherever it is used.

3. **Removal** means that the RCB dome and structures within will be decontaminated, dismantled and removed and the FFTF Reactor Vessel that is filled with radioactive and contaminated equipment removed and disposed at Hanford. In addition, the associated buildings would be demolished and disposed at Hanford.

- Although there is not a discussion on barriers in the NOI, the thickness of a barrier could probably be less than that for entombment.
- There is some uncertainty on how hazardous or radioactive that the remains will be after removal; however, with removal there should be much less residual hazard and risk than for entombment.
- We offer the same comments as cited with entombment: risk descriptions, life cycle costs, and the failure of institutional controls.

In addition to the above, the DOSE is providing some additional comments on FFTF waste and disposition at the Hanford Site as well as a couple other remarks.

¹ This figure shows long-term risk profiles achieved at various stages of D&D. The profiles were modified from a presentation made at Waste Management in 1997 as can be seen from the note page. CTUIR can provide more detail on how to add short-term and long-term risks, worker and public risks, etc.

- It does not make sense to ship slightly radioactive sodium (large volumes) to INEL to neutralize and then to ship back to Hanford for disposal. The waste should be disposed of where it is neutralized. At the least, DOE must insure that they describe the "Hanford Site radioactive sodium inventory" – how much, where it is, what chemical form it is in, and so on.
- Groundwater is not mentioned in the NOI, but there appears to be iodine and nitrate contamination originating in the 400 Area, as well as tritium from the 200 Area. The EIS must include vadose data and groundwater data. The FFTF drinking water well data must also be included.
- It is not clear whether the EIS addresses the 400 Area or some smaller portion. It should cover all sources and contamination in the 400 Area and not only the buildings.
- Although the 400 Area is not in the central plateau, it is in the upland portion of the site. Cumulative risks from 400 + 600, or 400 + 200 + 600 should be discussed.
- Any overlap with the 200 Area ecological DQO (or upland natural resources) should be discussed; there may be some efficiency if both are addressed together.
- As a practical matter, there are presumably some uncontaminated buildings in the area. While one of our goals is to reduce the visible profile across the site, small buildings that could be moved rather than demolished might be considered for use. While it is quicker and cheaper to demolish and bulldoze the buildings into their basements this fails to consider waste minimization and reuse/recycling potential.

In closing, the CTUIR DOSE reiterates that our preference in reducing long term risks associated with deactivation is for full removal and a return to baseline conditions. You may contact me at 541-966-2400 if there are any questions or concerns.

Sincerely,

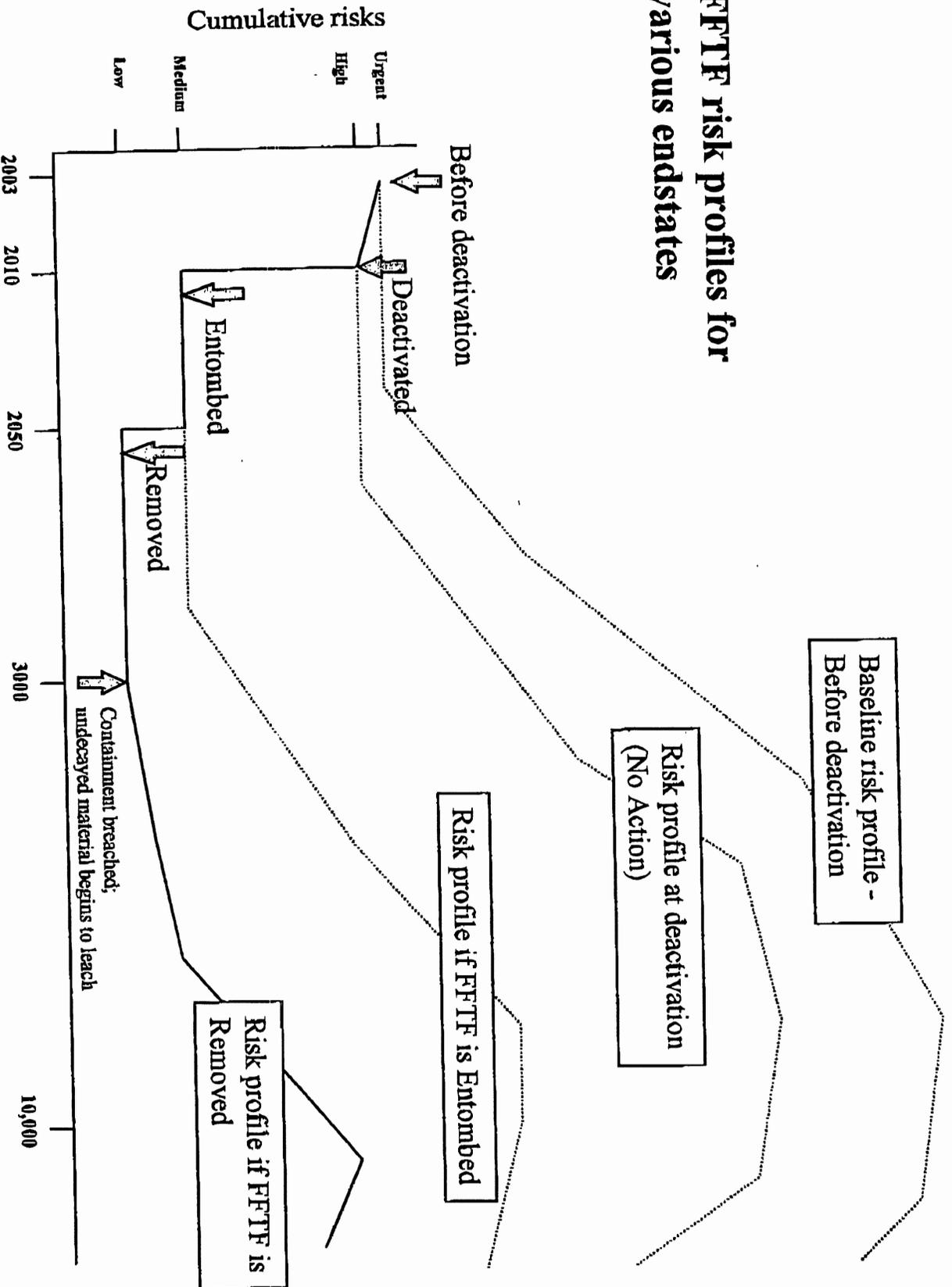
Rosenda Shippentower

Rosenda Shippentower, Policy Analyst
 Department of Science & Engineering
 Confederated Tribes of the Umatilla
 Indian Reservation

Cc: Stuart Harris, Director, DOSE

Figure 1

FFTF risk profiles for various endstates



*** RX REPORT ***

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RESULT	OK	

October 8, 2004
Mr. Douglas H. Chapin
NEPA Document Manager
FFTF Decommissioning EIS
U. S. Department of Energy
P. O. Box 550 MS: A3 - 04
Richland, WA 99352 - 0177
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Email: Douglas_H_Chapin@rl.gov

Dear Mr. Chapin:

According to Page 14, Lines 8 through 9, of United States Federal District Judge Edward F. Shea's Order, dated February 28, 2003, "Prior to committing any resources to any one of the options for decommissioning, the DOE must prepare an EIS. 40 C. F. R. § 1502.2 (f). In light of Judge Shea's ruling, this current gigantic leap forward into the FFTF Decommissioning EIS, accompanied with the millions of dollars spent to achieve this action, obviously ignore adherence to this specified Order. The intent of public scoping and draft EIS preparation, according to DOE definition is to consider additional alternative options, as in the \$1 Billion offer for Privatization (independently verified by Standard & Poor's); preservation of the FFTF Facility as a museum (similar to B Reactor); an offer from Japan for the purchase price of \$ 5 Billion; or the NO ACTION choice, to counter the typical "it's just politics" excuse for destroying this marvelous reactor.

It is my personal belief that each person is specifically drawn to their life's work according to interests and abilities endowed by their creator, and therefore, owe accountability for stewardship of positions, properties, and also the inherent responsibilities. Honestly, avoiding consequences from Judge Shea's Order doesn't concern me nearly as much as being accountable to the Judge of All Judges, primarily when He restates: "Whatever you do unto the least of these, you do unto me." Daily, 1,500 fellow Americans die when conventional cancer treatments fail them, and you perhaps say, "That is not my problem, there was nothing I could do . . ." when you participated in orchestrating the demise of this awesome instrument rather than have it produce so much good for our planet.

For any person who identifies themselves as a Christian, I would recommend intense examination of their reasons used for excluding personal accountability; an equivalency to Nazi soldier's excuses, "Just following orders, etc. . ." for their participation in incinerating Jews at the Concentration Camps. Certainly, care providers and anyone who has helplessly watched their beloved suffer the agony of cancer with knowledge that there could be less debilitating treatment options, watching this reckless destruction of the FFTF (**America's Hope Diamond** in diagnosis and treatment for Heart Disease and Cancer), is devastating.

Respectfully submitted

Linda. Alexander ☺

*** RX REPORT ***

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October 8, 2004
Mr. Douglas H. Chapin
NEPA Document Manager
FFTF Decommissioning EIS
U. S. Department of Energy
P. O. Box 550 MS: A3 - 04
Richland, WA 99352 - 0177
FAX: (509) 376 - 0177
Email: Douglas_H_Chapin@rl.gov

Dear Mr. Chapin:

According to Page 14, Lines 8 through 12, of United States Federal District Judge Edward R. Shea's Order, dated February 28, 2003, "Prior to committing any resources to any one of the options for decommissioning, the DOE must prepare an EIS. 40 C. F. R. § 1502.2 (f). Upon completion of the EIS, DOE will have made a final decision on decommissioning that can be the subject of a lawsuit seeking court review." In light of Judge Shea's ruling, this current gigantic leap forward into the FFTF Decommissioning EIS, accompanied with the millions of dollars spent to achieve this action, obviously ignore adherence to this specified Order. The intent of public scoping and draft EIS preparation, according to DOE definition is to consider additional alternative options, as in the \$1 Billion offer for Privatization (independently verified by Standard & Poor's); preservation of the FFTF Facility as a museum (similar to B Reactor); an offer from Japan for the purchase price of \$ 5 Billion; or the NO ACTION choice, to counter the typical "it's just politics" excuse for destroying this marvelous reactor.

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Respectfully submitted

Linda. Alexander ☺

Shoshone-Bannock Tribes

Land Use Department

P.O. Box 306

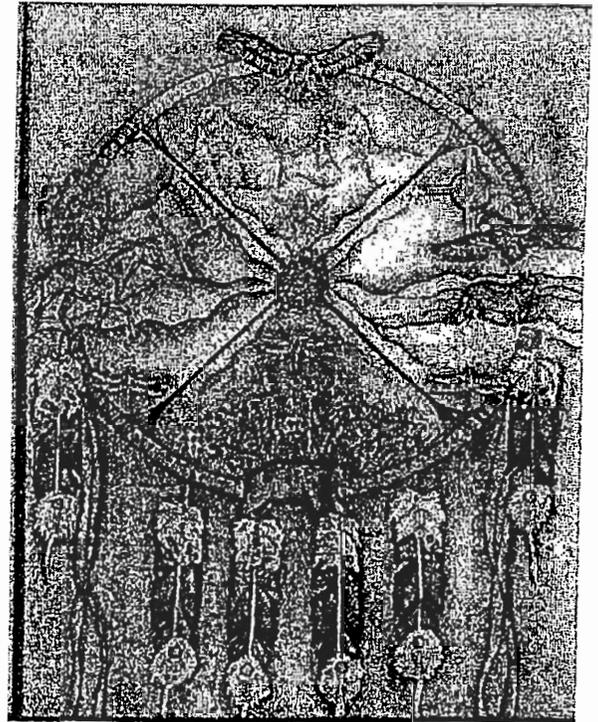
Pima Drive

Fort Hall, ID 83203

PHONE: 208-478-_____

FAX: 208-478-3897

FROM THE DESK OF:



FAX COVER SHEET

TO: Douglas Chapin FAX: 509

COMPANY: DOE

DATE: 10/08/04

RE: FAST FLUX comments

Sho-Ban Tribes

OF PAGES (INCLUDING COVER SHEET): _____

October 8, 2004

Mr. Douglas H. Chaplin
NEPA Document Manager
FFTF Decommissioning EIS
U.S. Department of Energy
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Richland, WA 99352-0550
email: Douglas_H_Chaplin@rl.gov

Subject: Comments by the Shoshone-Bannock Tribes' Air Quality Department on the FFTF Decommissioning EIS

Mr. Douglas H. Chaplin:

The Shoshone-Bannock Tribes appreciate the opportunity to comment on the scoping for the Fast Flux Facility Decommissioning (FFTF).

The DOE proposed that in all but the "No Action" alternatives, radioactive waste would be transported through the Fort Hall Reservation, homeland to the Shoshone-Bannock Tribes (hereafter "Tribes"). The Tribes are very concerned in any alternatives that result in the transport of highly radioactive material through the Fort Hall Reservation. Furthermore the DOE is increasing the risks to the environment, by preliminarily selecting a limited set of alternatives, at the INEEL; the aboriginal lands of the Tribes, by the proposed treatment and storage of the FFTF decommissioned/deactivated material, when treatment and storage of these materials could be accomplished at the Hanford site.

The FFTF used sodium rather than water to cool the reactor. Sodium burns when exposed to air and explodes upon contact with water. Because of the increased risk associated with the transportation of radioactive sodium and sodium filter material, the DOE needs to include in the final EIS alternatives that provide that the material from the FFTF deactivation and decommissioning be treated and stored on-site.

The DOE should also include as an alternative evaluation the possibility that the Yucca Mountain, or other designated High-Level waste repository, may not be open to accept high-level waste from the INEEL that originated from the FFTF.. The Tribes oppose long-term storage of high-level waste at the INEEL because over time, the INEEL is becoming a *de facto* high-level storage facility.

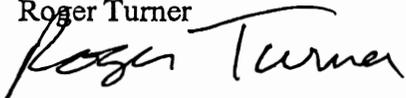
FFTF Comments
October 8, 2004
Page 2

To avoid this possibility all FFTF alternatives that potentially create high-level waste should include appropriate selection and scoping of alternatives for the return of these materials to Hanford, or to avoid the transport of them for treatment at the INEEL, in the first place. The alternatives should include a cost analyses associated with the possibility that wastes generated at the INEEL from treatment of the FFTF material, may not be accepted at Yucca Mountain, or at the WIPP site, as scheduled presently by DOE.

The Shoshone-bannock Tribes appreciate this opportunity to comment on the FFTF EIS scoping.

Sincerely yours,

Roger Turner

A handwritten signature in black ink that reads "Roger Turner". The signature is written in a cursive style with a large, sweeping initial "R".

*** RX REPORT ***

RECEPTION OK

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