

Background:

The U.S. Department of Energy (DOE) has recently announced that they have changed the preferred alternative in the Tank Closure and Waste Management Environmental Impact Statement (TC&WM EIS or EIS) to indicate that there will be no preferred alternative for additional tank waste treatment.

Previously, the Department had agreed with the State of Washington that vitrification was the preferred alternative for both high-level and low-level waste. Now they are indicating that waste not scheduled to be treated in the low-activity vitrification plant may be treated by some other process that will be decided at some later date. This change in direction is of great concern to the Hanford Advisory Board (HAB or Board). It was not supported by public comment during review of the draft TC&WM EIS. It is not supported by the actual data in the EIS. It is also not supported by cost analysis in the Kosson report that demonstrated the alternate approaches to treatment of low activity waste are cost equivalent.

DOE spent \$400 million examining bulk vitrification and steam reforming. Both technologies proved unsuccessful technically and financially. Those funds would have been better spent building a second Low Activity Waste (LAW) vitrification facility. Funding, particularly for technology development, is extremely limited. In the opinion of the Board, exploration of an alternative to LAW vitrification should not be pursued.

In anticipation of the release of the Final TC&WM EIS, the Board requests that the public and the Board be provided sufficient time (90 days) to review the Final EIS and have dialogue with DOE in respect to its findings prior to DOE issuing any formal records of decision based upon the EIS. Moreover, DOE and Ecology should coordinate their efforts to allow public comment on both the EIS and the draft Hanford Resource Conservation and Recovery Act (RCRA) permit at the same time.

The Board reminds the Tri-Party Agreement (TPA) agencies that when the federal government proposes a major project, the purpose of an environmental impact statement is to identify environmental impacts from the proposed action, and alternatives to that action that minimize such impacts or that mitigate the environmental damage insofar as practicable.

Advice:

- The Board advises DOE to defer decisions on the Final TC&WM EIS for a minimum of 90 days to allow sufficient time for review and comment by the Board and interested public.

- The Board supports the State of Washington in advising DOE to select and build a second Low Activity Waste vitrification facility.
- The Board advises DOE to discontinue efforts to utilize bulk vitrification, cast stone and steam reforming as alternatives to vitrification. The analysis in the draft EIS shows that these methods result in an adverse environmental impact, namely, the release of unacceptable amounts of Technetium 99 and other contaminants to the groundwater.
- The Board advises DOE to select alternatives that result in the earliest return of the groundwater to its highest beneficial use.
- The Board advises DOE to select alternatives and make decisions that comply to a strict application of all environmental laws and regulations.

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