



## **SRS Citizens Advisory Board**

### **Environmental Remediation and Waste Management Subcommittee**

#### **Meeting Record**

September 14, 1998

Ramada Plaza Hotel, Augusta, GA

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The SRS CAB ER&WM subcommittee met on September 14, 1998, at the Ramada Plaza Hotel in Augusta, GA. Bill Lawless opened the meeting with introductions. CAB members present included ER&WM subcommittee Co-Chairs Bill Lawless and Kathryn May and CAB members Karen Patterson, Brendolyn Jenkins and Wade Waters. Todd Crawford, Technical Advisor for the CAB was in attendance. Gary Davis, WSRC facilitated. Attending from DOE-SR were William Noll and Mike Simmons. WSRC/BSRI/BNFL attendees included Welford T. (Sonny) Goldston, Robert Hinds, Mary Flora, Paul Huber, Jerry Faulk, Elmer Wilhite, John Sessions, Barton Marcy, Dale Bignell, Bill Rajczak, Paul Sauerborn, and Helen Villasor. Public attendees included Jim Pope, Murray Riley, Ed Wannamaker, and Sam Booher. Gary Little attended as the Associate Designated Deputy Federal Official (ADDFO).

During the public comment period, it was noted that SRS had planned public meetings three nights in a row, September 14, 15, and 16, 1998. It was suggested that SRS consider spreading the meetings out in attempt to encourage better participation by members of the public.

Bill Lawless proceeded with the agenda noting that invited regulatory participants were not available for a roundtable discussion on the CERCLA Waste issue. Brendolyn Jenkins requested the names of the people who had been invited to participate.

Bill Noll, DOE-SR began his presentation on the preferred alternatives for the Waste Management Programmatic Environmental Impact Statement (WMPEIS) by discussing the distinction between the classification of low-level waste and mixed low-level waste (MLLW). Mr. Noll explained that low-level waste (LLW) is waste that contains radioactivity and is not classified as high-level waste, transuranic waste or spent nuclear fuel or byproduct material. Mixed waste is waste containing both radioactive and hazardous components as defined by the Atomic Energy Act and the Resource Conservation and Recovery Act (RCRA). Mr. Noll said that DOE needs to make decisions on the preferred alternatives since disposal access is on the critical path to closure and completion at some sites; there is a need to avoid new construction to reduce current and projected storage costs; commercial disposal is not always available; and that permanent disposal of the waste protects human health and the environment. Mr. Noll explained that DOE is reviewing alternatives analyzed in the WMPEIS that include using the criteria of mission compatibility; existing site capabilities, minimizing environmental, health, safety, and transportation impacts, reducing costs, and ensuring regulatory compliance.

As a result, some of the options being considered are:

- reducing transportation by using on-site disposal at sites having capacity
- transferring waste from other sites to regional disposal facilities among the six candidate sites
- using existing disposal facilities for LLW
- using constructed (but not currently operating) disposal facilities for MLLW
- providing disposal in both the eastern and western sectors of the United States

Mr. Noll mentioned that discussions are on-going with state and local officials, tribes, site advisory boards, and other stakeholder groups, including participants at the intersite workshops. Brendolyn Jenkins and Karen Patterson, CAB members who attended the Low Level Waste Intersite Workshop in Las Vegas, Nevada discussed the SRS CAB's position on going forward with their intention of ranking the options pending the arrival of more information from DOE-HQ. Mr. Noll said that DOE will consider public input in developing preferences. Mr. Noll offered to contact DOE-HQ to determine when the CAB could expect arrival of the information packets so that they can begin work on their input into the decision process and also to request an extension on providing public input until November. Bill Lawless requested that an official request be sent to DOE- HQ for the extension to ensure SRS CAB participation. DOE is expected to announce the preferred disposal sites at least 30 days prior to issuing a Record of Decision for LLW and MLLW. Predicated on the extension of time, the ER&WM Subcommittee agreed to discuss the Preferred Alternatives to the WMPEIS in another upcoming subcommittee meeting and present a draft motion to the full Board at its November meeting. The ER&WM Subcommittee will keep DOE-HQ apprised of the draft motions as they emerge.

Bill Lawless introduced the "Preapproval Draft Environmental Assessment (EA): Intermodal Transportation of Low Level Waste (LLW) to the Nevada Test Site (NTS)", which has been released for comment during the public review period and will close on October 30, 1998. During the Low-Level Waste Briefing and Tour held at SRS on July 29, 1998, members of the NTSCAB discussed the possibility of the SRS CAB supporting a draft motion on intermodal transportation (rail/truck). The NTSCAB members believe that support from other site-specific advisory boards (SSABs) would help by directing any shipments from SRS to NTS. Bill Lawless will continue to seek information from members of the NTSCAB as the ER&WM Subcommittee is committed to work with the NTSCAB to develop a motion.

John Sessions presented the Practical Implementation Guidance for National Environmental Policy Act (NEPA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Integration. For example, SRS has 467 potential waste units in the (Federal Facility Agreement (FFA) process; there is an increasing number of facilities and systems being shut down and decommissioned and decontaminated; and miscues have resulted in expensive decisions. The mandate for integration can be found several sources. The Council on Environmental Quality (CEQ) has stressed that federal agencies should integrate NEPA values into the CERCLA process when feasible and appropriate. DOE Implementing Procedure 400 discusses that, when CERCLA actions trigger NEPA, their procedural and documentation requirements shall be integrated. DOE order 451.1 (NEPA Compliance Program) states that "...it is DOE's policy to incorporate NEPA values ... in DOE documents prepared under CERCLA". Both NEPA and CERCLA processes, participants, and values were compared and contrasted. The resulting guidance states that the time to integrate NEPA values is typically at the Remedial Investigation/Feasibility Study (RI/FS) stage in CERCLA; when they can best be utilized as input to the CERCLA decision. NEPA values would be incorporated as a reference in CERCLA documentation. Mr. Sessions concluded the presentation by discussing two examples at SRS: the High-Level Waste Tank Closure and the Chemicals, Metals, Pesticides (CMP) Pits Closure. Results from these two examples have shown that better decisions were made, time and money was saved, and there was a better use of limited resources. Copies of the Integration Guidance were passed out to the attendees. Bill Lawless thanked Mr. Sessions and Mr. Marcy for the presentation and congratulated them on their efforts and success in saving money and reducing regulatory administration costs and paperwork.

A review of the draft motions under consideration for the full Board meeting on September 29, 1998 was made. Draft motions discussed include: CERCLA-Generated Waste, SRL Seepage Basins, DOE Draft Order 435.1, and the SREL Carolina (Rainbow) Bay. It was agreed that the WMPEIS Preferred Alternatives draft motion be tabled until further information has been received, or after the September full Board meeting if an extension in time is granted by DOE-HQ.

No public comments were made during the final public comment period.

Bill Lawless closed the meeting at 8:30 p.m.

*Meeting handouts may be obtained by calling 1-800-249-8155.*