



SRS Citizens Advisory Board

Waste Management Committee

Meeting Summary

March 21, 2000
North Augusta Community Center
North Augusta, SC

The Waste Management Committee (WMC) met on Tuesday, March 21, 2000, at the North Augusta Community Center, North Augusta, SC. Attendance was as follows:

CAB Members

Wade Waters*
Georgia Leverett*
Karen Patterson*
Bill Lawless
Lola Richardson*

Stakeholders

Rick McLeod
Bill McDonell
Meryl Alalof
Perry Holcomb
Lee Poe
Larry Callair

DOE/Contractors

Virgil Sauls, DOE
Gerri Flemming, DOE
Maxcine Miles, DOE
M. Simmons, DOE
Peter Hudson, BNFL
Sonny Goldston, WSRC
Helen Villazor, WSRC

Beckie Gaston-Witter**

Regulators

Mira Malek, SCDHEC
None, EPA

*Denotes Committee Member

* *Denotes absent Committee member

Wade Waters opened the meeting by asking for introductions and then reminded the attendees to complete and return the survey form.

Schedule Review: Helen Villazor provided an explanation of the CAB's decision to pilot CAB meetings every month with board business conducted every other month, and committee meetings the months in-between. Ms. Villazor then discussed the agenda items planned for April 25, 2000, the first scheduled committee meeting day. Mr. Lee Poe asked that he be provided time during the public comment period to express his disappointment with the new pilot program.

Review of CAB Recommendations 94 and 97: The first agenda item was to include a review of CAB Recommendation 94, "Solid Waste Division System Plan Low-Level Radioactive Waste Disposal" and Recommendation 97, "The Shipment of Pu-238 Wastes to the Waste Isolation Pilot Plant". Ms. Karen Patterson, motion manager for both of these recommendations requested that the review be rescheduled for April 25, 2000 Waste Management Committee meeting.

Orphan Waste Status Solid Waste Division (SWD) Response to CAB Recommendation 103: In response to CAB Recommendation 103, "Waste Management Programmatic Environmental Impact

Statement Orphan Waste", Sonny Goldston provided the committee with the estimated plan and scope of work that meets the SRS Waste Acceptance Criteria (WAC) to dispose of orphan waste at SRS. Mr. Goldston said that with the issuance of the Waste Management Programmatic Environmental Impact Statement (WMPEIS), Record of Decision (ROD) on February 24, 2000, SRS is now allowed to ship wastes to the Nevada Test Site (NTS) that are not economically or technically practical to dispose at SRS. Therefore, plans are underway to begin shipments to NTS for orphan wastes that do not meet the SRS WAC. The SRS wastes or materials known as orphan waste include 28,000 cubic feet of tritium-contaminated debris; Iodine-129 contaminated ion exchange resin and carbon filter media; and Carbon-14 reactor deionizers. In response to a question posed by Mr. Lee Poe, Mr. Goldston defined orphan waste as waste that previously had no path to disposal; however, with the issuance of the WMPEIS ROD, SRS can now consider two paths, i.e., to either put it in the vaults or send it to NTS. However, because of the recent availability of the ROD, SRS has to determine if the orphan waste fits into the category of special case waste. At this time, the option of sending it to NTS, appears to be the preferred choice since NTS has higher levels for treatment. In addition, the site is 1700 feet to the groundwater level with no path for contamination to leach into NTS's groundwater. In response to Mr. Poe's question on whether this waste was incinerable, Mr. Goldston explained that some of the material consists of concrete and metal; therefore, it is non-incinerable. Mr. Poe recommended that SRS either look at the cost of performing treatment activities or developing a technology that retains the tritium rather than keep on sending it to NTS, which could become expensive. Mr. Goldston explained that as more sites begin shipping waste to NTS, it is conceivable the costs will become lower.

Issues: What will be the total price tag to dispose of this waste? Can on-site disposal at SRS (e.g., build another vault at SRS to dispose of the waste) be used and still meet limits developed in the Performance Assessment (PA)? Are the assumptions too conservative? Assumptions should utilize engineering safeguards of the waste itself and other engineered barriers that might make on-site disposal safe. Transportation will eventually become an issue because the waste is too heavy to ship by truck. Instead, the waste will have to be transported by rail.

Actions: Sonny Goldston is to provide Rick McLeod with information on waste volumes, for example, 24 B-25s per carbon column. Sonny Goldston is to provide curies of concentration on iodine (in cubic feet) to Lee Poe. Sonny Goldston is to come back and brief WMC/CAB on the components in grout technology to dispose of large equipment. SRS needs to move forward to get the site certified and develop training to begin disposal of orphan waste.

Waste Management Programmatic Environmental Impact Statement (WMPEIS), Low Level Waste (LLW) and Mixed Low Level Waste (MLLW), Record of Decision (ROD): Maxcine Miles outlined her presentation by explaining the ROD, how it compares to the CAB's recommendations on the WMPEIS, what the ROD means to SRS, and the path forward for implementation at SRS. Issued on February 24, 2000, the LLW and MLLW ROD addresses treatment and disposal of DOE LLW and MLLW at DOE sites across the complex, and implements the preferred alternatives issued by DOE on December 10, 1999. The LLW ROD addresses minimum treatment of LLW at all DOE sites. LLW will be disposed at the Hanford Site in Washington and the Nevada Test Site (NTS) and is available to all DOE sites. To the extent practicable, disposal of on-site LLW will continue at Idaho National Engineering and Environmental Laboratory (INEEL), Los Alamos National Laboratory in New Mexico, Oak Ridge Reservation (ORR) in Tennessee, and SRS. INEEL and SRS will continue to dispose of LLW generated by the Naval Nuclear Propulsion Program. MLLW will be treated at Hanford, INEEL, ORR and SRS. Sites have the option of treating MLLW onsite or shipping it to one of these sites in accordance with their respective Site Treatment Plans, which will include the Consolidated Incineration Facility (CIF) at SRS as well. MLLW disposal at the Hanford Site and NTS will be available to all DOE sites. For SRS, MLLW disposal will be based on state approval to receive offsite DOE waste for treatment at the CIF. Ms. Miles pointed out that while CAB Recommendation 72, "Waste Management Programmatic Environmental Impact Statement" indicated a preference for an Eastern disposal site, SRS had not been selected as a regional disposal site for LLW. However, Hanford and NTS had been selected for MLLW disposal as recommended by the CAB. SRS will also have the option to ship LLW offsite as recommended. Ms. Miles also cited CAB Recommendation 103, "Waste Management Programmatic Environmental Impact Statement Orphan

Waste", and indicated that while the ROD was not published until February 25, 2000, the preferred alternatives were noticed in the *Federal Register* in December 1999. In Recommendation 103, the CAB also requested the ROD to include SRS's ability to ship LLW to a Western Facility for disposal if the waste cannot be disposed at SRS. Ms. Miles noted that this request was identified in the ROD, just as the CAB had requested. In terms of what the ROD means to SRS, the site will continue LLW onsite disposal; continue receipt of Naval Nuclear Propulsion Program LLW; and continue treatment of MLLW and LLW onsite. However, with the ROD, SRS can now: dispose of LLW not meeting the SRS Waste Acceptance Criteria (WAC) at Hanford or NTS; dispose of MLLW at Hanford or NTS; receive MLLW for treatment from other DOE sites (at the Consolidated Incineration Facility); and ship MMLW for treatment to INEEL, ORR, or Hanford. It should be noted that MLLW decisions are contingent upon receipt of State Resource Conservation and Recovery Act (RCRA) permits. Ms. Miles concluded her presentation by indicating SRS's path forward including the evaluation of National Environmental Policy Act (NEPA) issues for the site regarding specific wastes; feasibility of each waste stream meeting either the NTS or Hanford WAC; cost effectiveness of each alternative; and transportation of the waste to the chosen site.

Issues: Disposal and storage of two types of waste: listed and characteristic. The ROD does not address any commercial facilities.

Actions: Mr. Lee Poe suggested delisting waste to evaluate the implementation of delisted waste and requested DOE to brief the WMC/CAB on the funding mechanisms in place for all materials.

Upcoming National Environmental Policy Act (NEPA) Documentation for Low Level Waste (LLW) and Mixed Low Level Waste (MLLW): In support of the Solid Waste Program, Mike Simmons provided the background behind SRS's process of preparing NEPA documents, including an Environmental Assessment (EA) to address transportation of mixed and low level waste to commercial facilities, and a Supplemental Record of Decision (ROD) to the WMPEIS documenting SRS's decision for offsite disposal of mixed waste and some low-level radioactive waste.

The EA for offsite transportation to commercial facilities is required since a limited analysis had been performed in the WMPEIS (DOE to DOE). The EA will expand analysis by establishing bounding conditions, i.e., taking a worst case scenario to determine potential risk. The EA is directed primarily for MLLW, but also addresses potential LLW. The EA will result either in a finding of no significant impact (FONSI), or an EIS will be prepared if the analysis falls outside of risk comparisons. Mr. Simmons showed a map of the United States with locations of several offsite commercial facilities (Envirocare of Utah, Inc.; East Tennessee Material and Energy Corp.; and Waste Control Specialists in Texas); however, Mr. Simmons noted that it will be expanded to include other facilities including ATG in Washington. Mr. Simmons provided a brief history of the Waste Management EIS RODs beginning with ROD #1 issued in September 1995, ROD #2 issued in May 1997, and now ROD #3. If approved, ROD #3 will enable SRS to send LLW to commercial disposal, MLLW to commercial treatment/disposal, and manage LLW and MLLW according to the WMPEIS ROD. In summarizing the presentation, Mr. Simmons said that the EA analyzing offsite transportation of MLLW and LLW should be available for public review this spring. Mr. Simmons emphasized that no decisions will be made until the analysis is complete, and that the Supplemental ROD will address the decisions in the WMPEIS ROD, commercial disposal, and the completed transportation analysis.

Issues: Ensure that the WMC/CAB and the public have an opportunity to participate during the public comment period.

Actions: As soon as the date for the public comment period is known, Mike Simmons will inform the Waste Management Committee so that the public will have ample opportunity to provide stakeholder input into the EA.

Public Comments: In a brief review of the draft motions being presented to the full Board on March 28, 2000, Lee Poe noted that equity issues cover a broad spectrum of SRS activities and should include

other programs such as Decontamination and Decommissioning as well. While Bill Lawless agreed that Lee Poe is correct in identifying other equity issues; Mr. Lawless noted that the intent of the Equity draft motion is good. However, for the intent of this motion, both Bill Lawless and Lee Poe agreed that this motion should focus only on waste management equity issues. Mr. Poe is concerned that the CAB needs to be aware of the total equity picture since the regulators appear to not be thinking about the issues, nor participating in the process. Mr. Poe said that after future equity discussions with other CAB members, the next motion should be broadened to address those equity issues not covered in this motion.

In response to Ms. Villasor's opening statement concerning the CAB's intent to pilot a new committee meeting format, Mr. Lee Poe expressed his opinion that the CAB appears to be moving backward by putting all of their committee presentations on the same day. While Mr. Poe agreed that CAB participation could increase, he is certain that the new meeting format will be conducive to losing interested stakeholders and other members of the public. Mr. Poe believes strongly that public participation will fall off dramatically, which he feels is unfortunate because the real value of evening committee meetings is where real technical expertise is imparted to the committees and the CAB. Mr. Bill McDonell, another member of the public agreed strongly with Mr. Poe.

Meryl Alalof, a new candidate for the board expressed her appreciation for the opportunity to expand her knowledge concerning SRS operations and is looking forward to the upcoming election for new members at the March 28 full Board meeting.

Wade Waters adjourned the meeting at 8:45 p.m.

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