



**Savannah River Site  
Citizens Advisory Board**

## **Recommendation 188 Plutonium Disposition**

### **Background**

The Savannah River Site (SRS) Citizen's Advisory Board (CAB) has had a keen interest in the disposition path for plutonium since the cancellation of the Immobilization Facility and the Actinide Packaging and Storage Facility. These decisions meant DOE has had to rely on a 50-year old retrofitted reactor facility (KAMS) for plutonium storage, a soon-to-be-excessed facility (FB-Line) for packaging and stabilization, and no facility for final disposition. In August 2002, the CAB was told that as part of the Top-to-Bottom Review teams were being formed to find ways to expedite the disposition of all DOE-EM nuclear material, including plutonium. Proposed recommendations from each team were expected by March 2003 (Ref. 1). Documents from SRS (Ref. 2) and decisions at other sites indicate that all the surplus plutonium in the DOE complex will eventually be transported to SRS for storage and disposition. In September 2003, the CAB adopted two recommendations (Ref. 3 & Ref. 4) that specifically addressed plutonium disposition and the warranted environmental analysis under the National Environmental Policy Act (NEPA). A month later DOE provided what the Nuclear Materials Committee considers as non-committal responses to the specific recommendations (Ref. 5 & Ref. 6). In response to Recommendation 170, DOE states they are "... evaluating conceptual ideas for the disposition of EM-owned plutonium ... [and] will keep [the CAB] informed on the progress of these proposals." In response to Recommendation 171, DOE stated "Over the past year [we have] been working on a disposition strategy for non-MOXable plutonium. No decision on a disposition strategy has been made at this time. When a disposition strategy is proposed, DOE will perform the appropriate NEPA review." However, based on the possibility that a Supplement Analysis and amended ROD have been prepared and are being reviewed at DOE-HQ, the CAB is concerned that DOE may already have a proposed plutonium disposition strategy that they have not yet shared with the public. In its December 2003 report, the Defense Nuclear Facilities Safety Board (DNFSB) cautioned DOE that the current plutonium disposition plan incurs significant programmatic risks (Ref. 7). Furthermore, they proposed that DOE expedite the development of a complete, well-considered plan for the disposition of all excess plutonium to preclude unnecessary extended storage of plutonium at SRS.

### **Comments**

The National Environmental Policy Act of 1969 as amended, requires that for "major Federal actions significantly affecting the quality of the human environment" the agency prepare a detailed statement on environmental impacts. Major Federal action is subject to interpretation, but is generally interpreted as expenditures of significant funds or potential to significantly affect the environment, either during normal operations or accidents. The original Record of Decision (ROD) for the Surplus Pu EIS was to convert 33 metric tons (MT) to MOX and immobilize 17 MT. An amended ROD in 2002 cancelled the Immobilization Facility, and committed to re-evaluating MOX. A second amended ROD in 2003, committed 34 MT to MOX, including 6.5 MT of the 17 MT originally considered for immobilization (Ref. 8). The SRS Environmental Management Program Performance Management Plan (Ref. 2) discusses plutonium disposition options being considered as SRS and notes that a Supplemental EIS to select the preferred approach is needed. The CAB is extremely disappointed with the vague responses to our recommendations and equally vague presentations on the subject. At this time, no information has been provided to the CAB on any disposition options, or schedule for conducting the appropriate NEPA analysis, and making a decision. The DNFSB has called for a well-considered disposition plan. The CAB considers that any well-considered plan would automatically include public participation through the NEPA process. The CAB believes that it

would be extremely short-sighted to decide the disposition of something as politically volatile as plutonium with a Supplemental Analysis that does not consider all reasonable alternatives and provides no opportunity for public involvement. DOE has been cautioned before about the necessity of involving the CAB early in the planning process and about being open to stakeholder's input.

### **Recommendation**

The SRS CAB recommends that on or before July 26, 2004, DOE:

1. Provide specific details to the CAB on what options for complex-wide plutonium disposition are being considered.
2. Prepare a detailed response to the need for NEPA action or lack thereof for complex-wide plutonium disposition.

### **References**

1. Combined Committee Meeting Summary, SRS Citizen's Advisory Board, August 27, 2002.
2. SRS Environmental Management Program Performance Management Plan, WSRC-RP-2002-00245, rev. 6, August 7, 2002.
3. Citizens Advisory Board Recommendation No. 170 (adopted September 23, 2003), "EM Owned Plutonium Storage and Disposition at SRS."
4. Citizens Advisory Board Recommendation No. 171 (adopted September 23, 2003), "NEPA Implementation."
5. Response letter to Recommendation 170 from Mr. Jeffrey Allison, Manager DOE-SR to Mr. Wade Waters, Citizens Advisory Board Chair, dated October 20, 2003.
6. Response letter to Recommendation 171 from Mr. Jeffrey Allison, Manager DOE-SR to Mr. Wade Waters, Citizens Advisory Board Chair, dated October 24, 2003.
7. Report to Congress, Defense Nuclear Facilities Safety Board, "Plutonium Storage at the Department of Energy's Savannah River Site", December 2003.
8. Surplus Plutonium Disposition Final EIS, DOE/EIS-0283, November 1999.

### **Agency Responses**

[Department of Energy-SR](#)