



Recommendation No. 29

January 28, 1997

Recommendation for the Notice of Intent to Prepare an EIS on Aluminum-clad Spent Nuclear Fuel at SRS

The Savannah River Site Citizens Advisory Board has reviewed the DOE Notice of Intent (NOI) on the preparation of an Environmental Impact Statement (EIS) for the management of spent nuclear fuel at the Savannah River Site. The Board notes with extreme alarm that the scope of the proposed alternative actions excludes consideration of conventional processing of foreign source fuel unless required solely for health and safety reasons. The Board strongly recommends that DOE expand the scope to include the full evaluation of chemical processing of these materials because:

1. DOE decisions regarding chemical processing at SRS have never been the subject of DOE-sponsored public debate.
2. The NOI does not adhere to the May 13, 1996 Record of Decision on Foreign Research Reactor Spent fuel which stated that chemical separation could receive active consideration as an alternative to new treatment or packaging technology by the year 2000. That conventional processing would be considered was affirmed in Dr. Mario Fiori's November 13, 1996 letter to CAB Chairman Robert Slay in response to CAB Recommendation No. 26 on this subject.
3. The draft of the DOE report "Technical Strategy for the Treatment, Packaging and Disposal of Aluminum Based Spent Nuclear Fuel" included a table of evaluation results that scored processing as the leading alternative in all criteria addressed. Of particular interest to the CAB and the citizens that it represents were two criteria, Confidence in Success and Timeliness, which can be considered a measure of the ability of DOE to ultimately remove these materials from this site.
4. Conventional processing would generate as end products low enriched uranium and high level waste. The former can be sold as fuel for power. The latter is a waste form that is already being handled at SRS and that is considerably likely to meet repository waste criteria. In addition, any other treatments would introduce a new waste form. These facts are of great importance to stakeholders concerned about open ended storage of the materials at the site.

As has been stated by the CAB in past recommendations to DOE, our concerns are not over the introduction of spent nuclear fuels to SRS nor over the ability of the site to safely and efficiently handle and treat these materials. Rather, they are that DOE apparently does not plan to fully and fairly evaluate the one course of action that is most likely to lead to the removal of the wastes from South Carolina.

Agency Responses

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