SRS Citizen's Advisory Board

Recommendation No. 32

January 28, 1997

Recommendation on Waste Isolation Pilot Plant Disposal Phase Draft SEIS-II

The SRS Citizens Advisory Board appreciates the opportunity to comment on the Waste Isolation Pilot Plant (WIPP) Disposal Phase Draft Supplemental Environmental Impact Statement (SEIS-II; DOE/EIS-0026-S-2). We believe that the deep salt repository at WIPP is the best location for SRS transuranic (TRU) wastes. But we are concerned that the data and costs presented in SEIS-II do not support our belief, despite the estimated 2,325 deaths over 10,000 years from the loss of institutional control (viz, SEIS-II attributes 99% of the deaths to Rocky Flats Environmental Technology Site RFETS; see p. 5-153). Our belief is that the special properties of plutonium 238 (Pu-238) should prevent the No-Action Alternative 2 from being chosen.

We recommend that SRS:

1. Confirm the dose calculations, health consequences, and the Pu-238 and Pu-239 inventory numbers at SRS for all of the action and no action alternatives published in the draft SEIS-II.
2. Ship the high activity Pu-238 to WIPP first.
3. Include any TRU waste generated as a result of processing Rocky Flats plutonium in the inventory numbers.

We recommend that WIPP:

1. Plan for the capacity to dispose all SRS TRU wastes at WIPP as our preferred Alternative (Action Alternative 1).
2. Determine for the No-Action Alternative 2 and WIPPÕs Proposed Alternative (which leaves TRU wastes at SRS) the health consequences at SRS in the event of a loss of institutional control followed by a catastrophic release of SRS TRU wastes under two scenarios: for when the TRU wastes at SRS are sufficiently treated and for when the TRU wastes at SRS are not treated at all.
3. For No-Action Alternative 2, the loss of life, cancer incidences, and criticality accidents should be included in current dollar costs.
4. In the SEIS-II, document the unique characteristics of Pu-238 relative to Pu-239 (see SRT-MTS-96-3026, or SR1-6-MW-51). This means that Pu-238 is roughly 400 to 500 times more dangerous than Pu-239. Although the chemical and physical properties of the two nuclides are identical, their radioactive properties are significantly different. Our concerns are more related to the possibility of inhalation as a valid pathway and should be considered.

Agency Responses

Department of Energy-SR