Recommendation No. 51

November 18, 1997

Environmental Management Integration High Level Waste

Background

The West Valley High Level Waste Canister Management Alternatives Evaluation¹ evaluates three alternatives for handling these High Level Waste Canisters. They are: (1) continual storage in an existing process building at West Valley until shipment to the repository (\$657 million), (2) storage in a new facility to be built at West Valley until shipment to the repository (\$152 million) or (3) shipment to Savannah River Site for long-term storage prior to shipment to the repository (\$27 million). The latter alternative is by far the least expensive for DOE and is consistent with *The Complex-Wide Environmental Management Integration Report*² which has vitrified high level waste coming to the Savannah River Site (SRS) from West Valley for interim storage prior to shipping to geologic disposal in the Federal Repository. The West Valley High Level Waste is vitrified in canisters of the same dimensions as those used by SRS and will represent about 6% of the total number of canisters to be produced at SRS.

There are several benefits to the proposed action (Alternative 3):

- 1. For DOE the proposed action is the less costly alternative and it enables timely completion of the West Valley Demonstration Project Act.
- 2. For West Valley the proposed action fulfills commitments to stakeholders and the state of New York to remove the high level waste from West Valley.
- 3. For the Savannah River Site, the proposed action requires that the planned second glass canister storage building at SRS be built 18 months ahead of the current schedule and that the shipping and receiving facility at SRS be built 13 years ahead of the current schedule. Bringing the high level waste to SRS requires construction of the infrastructure required to ship waste from SRS to the Federal Repository.

4. Before the waste can be shipped from West Valley, the shipping casks must be built and licensed thus ensuring that a precedent would have been set for licensing transport of vitrified high level waste from SRS to the Federal Repository.

Therefore, the Citizens Advisory Board recognizes that SRS is the most logical site for the interim storage of West Valley vitrified high level waste. However, if SRS accepts the waste, the Citizens Advisory Board wants assurances that SRS will receive the funds to safely store and transport these wastes, that the necessary facilities will be constructed and wants an unequivocal commitment from DOE that SRS legacy high level waste will be removed from SRS by 2026 with other high level waste to follow immediately.

Without these assurances the Citizens Advisory Board will not endorse the shipping of West Valley vitrified high level waste to SRS.

Therefore, the Savannah River Site Citizens Advisory Board recommends that the vitrified high level waste from West Valley come to SRS for storage prior to shipment to the geologic repository PROVIDED THAT:

- shipments can be done safely,
- the shipping and receiving facility is constructed prior to starting shipment,
- shipments are licensed and shipping casks constructed,
- the second glass canister storage building is under construction prior to shipment, incremental operating funds are provided to SRS for handling the West Valley high level waste and,
- DOE commits to starting shipment of SRS high level waste canisters to the geologic repository by 2015, completing shipment of SRS legacy high level waste canisters by 2026, and the remaining high level waste to follow promptly.

The Citizens Advisory Board emphasizes that this recommendation is contingent upon the waste being shipped to a final repository. Therefore, prior to shipment of the waste from West Valley to SRS, the Citizens Advisory Board recommends that DOE and South Carolina enter into an agreement that delineates the equity considerations (e.g., waste transfers into and out of the site, future missions, spent fuel, etc.) Implementation of this recommendation will follow the framework of that agreement.

West Valley High Level Waste Canister Management, Alternatives Evaluation performed as part of the ongoing Complex-Wide EM Integration Effort, Participants: Department of Energy - West Valley, Department of Energy -Savannah River Site, West Valley Nuclear Services Company, Inc. And Lockheed Martin Idaho Technologies Corporation, September 23, 1997.

^{2.} A Contractor Report to the Department of Energy on Environmental Management Baseline Programs and Integration Opportunities (Discussion Draft), Complex-Wide EM Integration Team, May 1997.

Minority Report

Seven members of fifteen present on November 18, 1997, respectfully submit the following minority report with SRS Citizens Advisory Board Recommendation No. 51: Environmental Management Integration - High Level Waste.

Six major concerns were raised prior to adoption of this recommendation:

- That SRS is going to start accepting waste from all over and concentrating high level waste at one site is a very big issue.
- The cost estimates associated with the three alternatives presented and the lack of cost analysis data are concerns.
- That this recommendation appears to force a DOE decision regarding a final repository, and that acceptance of this recommendation will in fact not move DOE any closer to this decision.
- That this recommendation will establish a precedent that Savannah River stakeholders will allow the acceptance of waste and it is not known if another site may just as easily accept the West Valley canisters.
- That although the recommendation is presented as a means of ensuring transportation licensing, this is not the only means of acquiring the needed licensing and technology and shipping requirements will likely change over the next 30 years.
- Fulfilling a commitment to the stakeholders of New York should not be a priority of the SRS CAB. "We don't need to satisfy the politicians from New York to make them look good to their constituents," stated Board Member Jimmy Mackey.

Submitted by:

Jimmy Mackey, Beaufort, S.C. Deborah Simone, Thomson, Ga. Becky Witter, Savannah, Ga. Mary Elfner, Savannah, Ga. Bill Donaldson, Tybee Island, Ga. Brendolyn Jenkins, Aiken, S.C. Beaurine Wilkins, Augusta, Ga.

Agency Responses

Department of Energy-SR

Department of Health and Environmental Control

Environmental Protection Agency