

# New England Coalition on Nuclear Pollution, Inc.

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April 1, 2000

Jack D. Parrott, Project Scientist  
Office of Nuclear Material Safety and Safeguards  
Mail Stop T-8F37  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Parrott:

Please accept the following comments of the New England Coalition on Nuclear Pollution on the proposed decommissioning criteria for the West Valley Demonstration Project (M-32) and West Valley site.

It has been more than twenty years since the last radioactive waste was unceremoniously dumped in the Western New York Nuclear Services Center. We are happy to see that the environmental disaster there is finally being addressed.

We agree that the generic License Termination Rule (LTR) should be applied to West Valley as a minimum standard for clean up. We believe, though, that the time frame for future impacts should be increased to 10,000 years.

The Western New York Nuclear Services Center is not now and never has been an appropriate place to store radioactive waste. The radioactive waste on that site should be exhumed and, along with the contamination that has resulted from the operations there, repackaged and removed to a more appropriate storage or disposal site. While the cost of this procedure would be substantial, the cost of maintaining the waste in place for long periods of time, we believe, would be much greater. To rely on institutional controls to maintain the waste on that site for the periods of time that will be necessary if it is left on site seems like absolute folly.

The definition of the site to be cleaned up seems a bit unclear. There is the State-licensed burial ground, the NRC-licensed burial ground and the West Valley Demonstration Project. These three areas need to be defined as part of the same site to avoid conflicts in their clean up. Further, we believe that the entire area of the Western New York Nuclear Services Center should be clearly included in that site definition.

The residual waste in the high-level waste tanks should not be reclassified as "incidental" under any circumstances, and these wastes should be isolated from the environment for their full hazardous life under all applicable standards, rather than being released from regulatory control by EPA.

There is a significant amount of mixed waste on the site. All mixed waste should be removed along with all hazardous waste contaminated soil that surrounds it.

The costs of this project should be front loaded to assure that we are not leaving the burden of the failed West Valley experiment to be dealt with by our children and grandchildren.

Sincerely,



David N. Pyles

For the New England Coalition on Nuclear Pollution.