

January 5, 2000 Hearing by NRC re draft policy statement on the decommissioning criteria for the West Valley Demonstration Project and the West Valley site

Background: June 3, 1999, Commissioners approved application of the License Termination Rule (LTR, 10 CFR Part 20, Subpart E) as the decommissioning criteria

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I have had a lifelong interest in nature and the environment, spurred by a grade school trip to the Buffalo Museum of Science, that led to years of after-school classes in Native American culture, Birds, Mammals, Mineralogy and Geology. A teaching assignment at what was then called the Cattaraugus Indian School led me to a particular interest in the plight of reservation residents, and later to monitor decisions being made in regard to the West Valley site, as they impact areas occupied by the Seneca Nation and beyond, particularly Cattaraugus Creek and Lake Erie.

As a longtime member of the League of Women Voters, I am dedicated to good government practices, including the people's right to participate in the decision-making process. In addition to those better-known positions regarding good government, the League also holds numerous positions on other topics with which I concur, most notably the topic of Natural Resources. These positions address the protection of land, air and water, including pollution and land use issues.

I have been impressed by the people involved in the Citizens Task Force (CTF), their dedication and decorum. I watched the proceedings for over a year before I joined the group and I find it heartening that we have reached a point where the fruits of the labors of that committee are being seen in responses made by government entities in charge. As a participant in the dialogues with the Department of Energy (DOE) on nuclear waste from weapons production, I can honestly say there is an apparent improvement in government response to people's concerns, which I hope to see continue.

I was particularly heartened by the action of the five Nuclear Regulatory Commissioners who took the original draft drawn up by the staff and made significant and necessary additions to help develop a strong statement on behalf of the environment.

Among the points made by the CTF was the issue of institutional controls, often retitled stewardship. The institutional controls necessary for this site, even if they were to be defined more precisely than we have heard thus far, will be impossible to achieve. If the dangers of Love Canal were ignored in less than fifty years, we cannot expect future generations to care as much as we care now about dangerous radioactive materials at the site. No government can impose budgets on its successor. Thinking even 100 years into the future is mind-boggling; planning for a thousand years or more is virtually impossible. It is essential that the people of the immediate area as well as those of Western New York and the province of Ontario are assured that all that can possibly be done to clean up the site will be done. Postponing a full cleanup until some point in the future is not only reckless, but will be unduly costly, if indeed the political will is there to tackle the problem.

I urge you to take seriously the points made by the CTF, all of which serve to strengthen the document even more in the interest of protecting the people of the area in the future, far beyond our lifetimes.

Thank you for this opportunity to be heard.

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