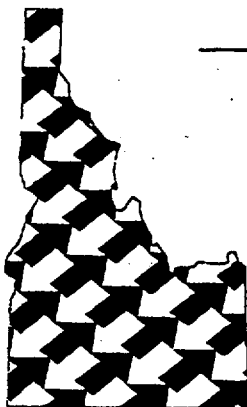


Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory



01-CAB-011

January 30, 2001

Beverly Cook
U.S. Department of Energy, Idaho Operations Office
850 Energy Drive, MS 1203
Idaho Falls, ID 83401

Dear Ms. Cook:

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has long been interested in the closure of tanks containing high-level radioactive wastes (HLW) at the Idaho Nuclear Technology and Engineering Center (INTEC). Becoming involved in the closure planning process has been somewhat frustrating due to tight schedules and complex closure planning processes. However, we recently received copies of the Idaho Hazardous Waste Management Act/Resource Conservation and Recovery Act Closure Plan for Idaho Nuclear Technology and Engineering Center Tanks WM-182 and WM-183 and were pleased to find evidence of the consultation, communication, and responsiveness between DOE and the INEEL CAB's HLW Committee.

We believe that the process of involving the CAB to date on this document is an example of how to work with the CAB in an effective manner. DOE's HLW program personnel are to be commended.

We submit the attached recommendation, #81, addressing our comments on the Closure Plan. The recommendation was developed by consensus and finalized at the January 2001 meeting of the full Board.

We look forward to DOE-ID's response to INEEL CAB Recommendation #81.

Sincerely,

Stanley Hobson
Chair, INEEL Citizens Advisory Board

cc: Monte Wilson, INEEL CAB HLW Committee Chair

Joel Case, DOE-ID
Keith Lockie, DOE-ID
Carolyn Huntoon, DOE-HQ
Martha Crosland, DOE-HQ
Fred Butterfield, DOE-HQ
Governor Dirk Kempthorne
Larry Craig, U.S. Senate
Mike Crapo, U.S. Senate
Mike Simpson, U.S. House of Representatives
Helen Chenoweth-Hage, U.S. House of Representatives
Robert L. Geddes, President Pro-Tem, Idaho Senate
Laird Noh, Chair, Idaho Senate Resources and Environment Committee
Bruce Newcomb, Speaker, Idaho House of Representatives
JoAn Wood, Chair, Idaho House Resources and Conservation Committee
Jack Barraclough, Chair, Idaho House Environmental Affairs Committee
Gerald Bowman, DOE-ID
Kathleen Trever, State of Idaho INEEL Oversight
Wayne Pierre, U.S. Environmental Protection Agency Region X
John Sackett, Argonne National Laboratory - West

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Lawrence Knight
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Marilyn Paarmann
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Monte Wilson

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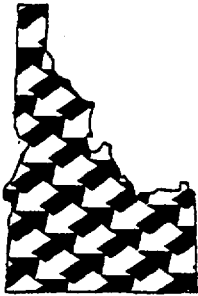
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Wendy Green Lowe
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*David - Kathy &
Great job!
Lah*

INFORMATION ONLY



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

**Idaho Hazardous Waste Management Act/Resource Conservation and Recovery
Act Closure Plan for Idaho Nuclear Technology
and Engineering Center Tanks WM-182 and WM-183**

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has long been interested in the closure of tanks containing high-level radioactive wastes (HLW) at the Idaho Nuclear Technology and Engineering Center (INTEC). We received presentations at recent CAB meetings and our CAB's HLW Committee talked via conference call with the U.S. Department of Energy's Idaho Operations Office (DOE-ID) and contractor staff on several occasions. Committee representatives have observed mock demonstrations of tank closure procedures and attended the annual DOE-sponsored HLW Tank Closure Workshop.

We learned how complicated the closure process is, involving separate closure plans to meet the requirements of the Resource Conservation and Recovery Act (RCRA), DOE Orders, and Waste-Incidental-to-Reprocessing determinations. We also learned that the schedules for compliance with the various closure planning processes do not allow CAB review of draft closure plans.

We received copies of the Idaho Hazardous Waste Management Act/Resource Conservation and Recovery Act Closure Plan for Idaho Nuclear Technology and Engineering Center Tanks WM-182 and WM-183. It is our understanding that the Closure Plan has been submitted to the State of Idaho (the regulator) and that the State will open a public comment period on the document at some point in the future.

In reading the draft Closure Plan, we find evidence of the consultation, communication, and responsiveness between DOE and the INEEL CAB's HLW Committee. All of our prior questions have been responded to and all of our prior concerns addressed. The result is a document that the CAB can understand and accept. We believe that the process of involving the CAB to date on this document is an example of how to work with the CAB in an effective manner. DOE's HLW program personnel are to be commended.

The INEEL CAB recommends that DOE follow a process similar to this for involving the CAB in future closure plans.

Following are a few comments and questions on the Idaho Hazardous Waste Management Act/Resource Conservation and Recovery Act Closure Plan for Idaho Nuclear Technology and Engineering Center Tanks WM-182 and WM-183.

- It is possible that wastes produced as a result of cleaning tanks 182 and 183 should not be put in other Tank Farm Facility (TFF) tanks. If the resulting wastes do not require classification as HLW, it would not make sense to put them into a tank containing HLW as the result would simply increase the total volume of waste that will subsequently have to be handled (treated and disposed) as HLW.
- When will the DOE Tier 1 plan be prepared and ready to review (no date was identified)?

- The impression is that either clean closure or landfill closure will be implemented, but it is unclear what determination process will be used to decide whether the tanks will be eligible for clean closure or they will be required to meet the requirements of a landfill closure. What are the parameters or criteria for landfill closure (deferred until 2012)? Why does landfill closure come into the picture (Section 5 states, "if landfill closure is necessary" many times)? Discussion is needed for clarification about the parameters that would be used to support a determination of whether landfill closure is or is not necessary.
- It is unclear how the ongoing cleanup involving the soils around the tanks (being conducted in compliance with the Comprehensive Environmental Response, Compensation, and Liability Act) relates to the closure plan for the tanks. Will the soils be included in the landfill cleanup, if it is necessary?
- On page 33 of the main document, it states that closure may require a vessel off-gas system to be installed. The document later states that a temporary off-gas system will be installed. The document needs to elaborate on how the determination will be made to install the off-gas system.