



Battelle

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June 17, 1992

Ms. Sandra Wastler
U.S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Parkway
Rockville, MD 20852

Dear Ms. Wastler:

**SUBJECT: PNL 5/18/92 Letter on Concerns about ENVIROCARE ER/EIS
and 6/15/92 Telephone Resolution of Concerns**

This letter is to summarize our understanding of the resolution of the concerns PNL had expressed in a letter dated May 18, 1992. Resolution was based on a review of the Scope of the EIS as defined in the 1991 Scoping Process and a conference telephone call with NRC on June 15, 1992.

Scope -- The scope will be limited as described in the "SUMMARY OF THE SCOPING PROCESS FOR THE ENVIROCARE ENVIRONMENTAL IMPACT STATEMENT", NRC, dated October 15, 1991, to ENVIROCARE receiving, storing and disposing of the 11e(2) material. It is our understanding that no consideration is to be given to where the waste material is located, its effect on the setting in which it is located, or how it is transported to ENVIROCARE; however, generic transportation is to be considered under environmental consequences.

Justification and Need -- Justification for excavation of the material at its present location and transport of the material to ENVIROCARE will not be discussed. A need statement will be based on the October 15, 1991, "SUMMARY" cited above; i.e., "to provide a secure disposal site for large volume, low radioactivity Section 11e(2) wastes that would otherwise represent an environmental hazard through dispersal from their existing location in tailings piles."

Alternatives -- There still seems to be some confusion about alternatives between those the ER contains and those described as to be discussed by the "SUMMARY OF THE SCOPING PROCESS...". We feel that because the ER explicitly states only two alternatives are considered, it is still short on adequate discussion and/or documentation for alternatives, specifically "(2) alternative design and operation of the facility at the existing site, (3) alternative disposal methods, (4) alternative site stabilization and closure plans.". It may be that with the

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inclusion in the revised ER of Q2 responses and based on the stated purpose of the licensing action (...to expand the range of wastes that can be disposed of at an existing facility..) some of the alternatives can be dismissed, based on an existing, successful disposal operation. PNL will examine the alternatives.

Please let me know if you have any comments or questions on this summary. I can be reached on FTS 444-8308 or 509-376-8308.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. W. Wallace".

Richard W. Wallace
Technician Specialist
Hydrology Section
GEOSCIENCES DEPARTMENT