



CONFEDERATED TRIBES  
of the  
*Umatilla Indian Reservation*

P.O. Box 638  
PENDLETON, OREGON 97801  
Area Code (503) Phone 276-3165

July 16, 1984

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Mr. Charles R. Head, Acting Director  
Operations Division, Office of Civilian  
Radioactive Waste Management  
U.S. Department of Energy, RW-13  
Forrestal Building  
1000 Independence Avenue  
Washington, D.C. 20585

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WM Project 10  
Docket No. \_\_\_\_\_  
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LPDR   
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RE: Comments on Draft Mission Plan

Dear Mr. Head:

The following comments comprise the input of the Confederated Tribes of the Umatilla Indian Reservation on the draft Mission Plan. Despite the lateness of the comments, I hope that they will be useful to you.

NON-GEOLOGICAL FACTORS

A major deficiency in the Mission Plan is the inadequate treatment of "non-geological" factors in the proposed siting criteria and guidelines for the nuclear waste repository. The Mission Plan gives major emphasis to choice of a geologic medium that will provide reasonable assurance of long-term isolation of radwastes from the biosphere. While these geological considerations are, of course, of great importance to appropriate site selection, it is perhaps equally important that those non-geologic activities associated with the nuclear waste program, such as the handling and transportation of nuclear wastes, be given thorough treatment and proper weight in the repository site selection process.

As now proposed, the siting guidelines and decision-making process do not appear to provide consideration of trade-offs among the sites in terms of non-geologic factors. The costs and risks of public exposure to radiation which may result from shipping nuclear wastes to the candidate repository sites as compared with the relative risks and costs of geologic waste confinement may not be fully considered in the site selection process as now proposed. Provision for such trade-off should be reflected in the overall Mission Plan and attendant Siting Guidelines.

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Mr. Charles R. Head, Acting Director  
July 16, 1984  
PAGE 2

DEFENSE WASTES

A second area of concern is the possible decision by the President to proceed with a separate repository for defense-related nuclear wastes. While the Nuclear Waste Policy Act and the Mission Plan are oriented toward inclusion of defense wastes in the civilian repository, the Act provides for evaluation by the President by January 1985 of the need for a "defense-only" repository. Because of this contingency, the Mission Plan should provide for alternative plans for setting aside a site for such repository. It should also address the regulatory and institutional issues and problems associated with such a possibility.

It has been stated that defense wastes will be processed, i.e., vitrified. The Mission Plan should address where processing will occur. Since a significant amount of these wastes are currently located at the Hanford Reservation, will processing be conducted there and if such a processing facility is so located, does this contemplate processing at the Hanford site of other defense wastes shipped there from other locations

Thank you for your consideration of these points.

Sincerely,

CONFEDERATED TRIBES OF THE  
UMATILLA INDIAN RESERVATION

  
Elwood H. Patawa, Chairman  
Board of Trustees

cc: Catherine E. Wilson  
Robert Siek, CERT  
Mike Farrow  
Larry Edwards  
Chester Spencer  
Catherine Russell  
Mel Sampson  
LuAnn Jamison

EHP/rmn