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Mr. Russell Jim
c/o Yakima Tribal Council
P. O. Box 151
Toppenish, WA 98948

Dear Mr. Jim:

In accordance with our informal agreement to keep you abreast of NRC staff views concerning DOE activities at BWIP, we are enclosing a copy of our comments on the issues that are to be addressed in the Department of Energy's (DOE) planned draft environmental impact statement (EIS) on the disposal of certain defense radioactive wastes stored at the Hanford site.

Sincerely,

Original Signed By:

Joseph O. Bunting, Chief
Licensing Process and
Integration Branch

Enclosure:
Letter to Mr. Schreiber

cc: Erlene Reber
James Hovis

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MAY 04 1983

Mr. John J. Schreiber, Director
Waste Management Division
U. S. Department of Energy
Richland, WA 99352

Dear Mr. Schreiber:

We have reviewed the Department of Energy's (DOE) notice of intent to prepare an environmental impact statement (EIS) pertaining to the disposal of certain radioactive defense wastes stored at the Hanford site near Richland, Washington (48 FR 14029, April 1, 1983). We have the following comments concerning the preparation and scope of the EIS.

Our principal concern relates to the extent to which any proposed action considered in the EIS will comply with NRC regulations for the disposal of radioactive wastes. We would encourage DOE to give adequate consideration to future licensing requirements at the early stages of planning and development so that licensing delays can be avoided.

The geologic disposal alternative (alternative No. 1) involves using a geologic repository for disposal of defense waste. It is important to coordinate the waste form development with the overall repository system development to ensure that the waste form will perform in a satisfactory manner under repository conditions. Furthermore, the EIS should recognize that in this alternative the defense waste would need to be in a form satisfying the requirements specified in 10 CFR Part 60.

In the onsite stabilization and isolation alternative (alternative No. 2) the majority of radioactive wastes would be stabilized and isolated in place. If this alternative is deemed to be retrievable surface storage facilities or other facilities authorized for the express purpose of subsequent long-term storage of high-level radioactive waste, Section 202(4) of the Energy Reorganization Act of 1974 requires that they be licensed by NRC. This requirement should be considered in the EIS.

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We appreciate the opportunity to comment on issues to be addressed in the planned draft EIS. The staff is available to discuss these comments if you should desire to do so. Please keep us informed of further developments so that we may participate as appropriate in the environmental review process.

Sincerely,

Original Signed By:

Robert E. Browning, Acting Director
Division of Waste Management