

NWAlert!

Hanford Clearinghouse

408 S.W. Second Avenue, Room 408, Portland, Oregon 97204, 295-2101

Twists and Tours
by Kathleen Reyes

As you approach it, there is little to suggest that Richland is in fact the 13th richest city in the country. After you cross the Columbia River from Umatilla, Oregon into Washington State, the landscape is desert rolling hills as far as the eye sees, broken only by elegant, ephemeral disks of cloud that hang like UFOs.

Richland itself lies in the well of a 'Y' where the Yakima River meets the Columbia. It is a classic of unembellished middle-class order. Residential areas resemble barracks in economy of architecture and symmetry in a town forced upon the desert solely to support the Hanford Nuclear Reservation, on its northern border. Other forms of business seem to be concentrated in hotels and uninspired shopping centers.

If you enter a restaurant on a weekday morning the only woman there is likely to be either a waitress or you, presuming you pass the physical. The room will be populated with white men in pale short-sleeved business shirts and black coffee, most of them wearing some kind of badge. About a half dozen of us "members of the public" were in town on June 12th to take a Dept. of Energy (DOE) tour on the decommissioning of "surplus radioactive facilities", so even we soon wore badges nailing down our names and businesses.

By 9:45 that Wednesday morning we were ushered into a conference room at Richland's Federal Building along with 20 or so Oregon Dept. of Energy (ODOE) employees who were also on the tour. The walls were appointed with visual displays that had such titles as "Office of Civilian Radioactive Waste Management" and "Safeguards and Security," with labeled illustrations like "Tactical Response Team firing M-16s."

As our concern was supposed to be the eventual decommissioning of the Trojan Nuclear Reactor, we watched a slide show explaining that decommissioning is what you do with radioactive contaminated facilities which are no longer useful. There are over 340 such facilities now, of which 34 have actually gone through the process. We were shown how a contaminated steam generator from Surry, Pennsylvania had been shipped via the Panama Canal and up the Columbia to Hanford on an elaborate raft, and how technology could be expected to accommodate a similar but shorter cruise for the 447 1/2-ton Trojan reactor core. We were told about the cost-effectiveness of "In-Situ" disposal for the eight World War II-era reactors at Hanford which were shut down and defueled for "safe-storage" between 1966

Rather than removing all radioactive components, in-situ disposal would mean burying the eight reactor blocks where they are, on the flood plain near the Columbia River. During the several minutes when questions were entertained, someone asked about the possibility of a dam failure on the Columbia washing a reactor core toward Portland. DOE official Clarence Miller replied that since Portland would be washed away anyhow, such refuse from Hanford would hardly be of concern.

Our next destination was B-reactor, the first of the eight plutonium-producing reactors to go on line in 1944. Nagasaki plutonium started here. Officials told us they're working on having B-reactor preserved as a public historical treasure.

A woman tour guide commented on points of interest during the half-hour bus ride to B-reactor. Here is the Fast Flux Test Facility, there is N-reactor. There is the shell of the high school, the only remnant of the work camp of 50,000 people (one for every two Nagasaki casualties, speaking conservatively) established to build and operate reactors in the 40's—she did not go into why. She switched to nature. That's where the elk herd lives on Rattlesnake Mountain. There is where Battelle Laboratory is experimenting on irrigating without flowing water. And the silence of the desert, which still manages to be beautiful between decrepit railroad tracks and pipe-laden, grey blocky facilities—underlined the untroubled but quiet invasions of local nature by ambient radiation and leakages. I wondered too late about what had been in my coffee cup.

At B-reactor we were shown where the reactor had once been loaded and tended. In the control room, a sign on the wall-sized panel used to monitor the reactor said, "Bumping Panel May Cause Scram." Supposedly, SCRAM is an acronym from the neanderthal days of nuclear technology, when a Safety Control Rod Ax Man was always at ready to shut down the reactor by swinging his hatchet at a cord which suspended the requisite control rod. Hence, SCRAM means an automatic reactor shutdown.

Questions about facts like this get answered. We met with very little success on technical questions — such as How susceptible is the reactor core to rust? "I/we don't know" (often followed by "so-and-so might know") was the frequent response. No mention of 'firestorm'. No mention of 'flash burn'. No reference to "100,000 casualties".



We were next shuttled to the site where the Surry steam generator is being stored and tested. Another middle-aged, white male official gave a slide presentation on the transport and testing of the generator. Almost all of the officials who gave presentations shared the same traits, but this one had a tie pin with all the signs of the zodiac in gold.

When we viewed the tour generator itself we met a "jumper" with the word "Georgia" patched to his sport shirt. Jumpers are workers who wear many layers of protective clothing while jumping in and out of extremely radioactive situations, often working for mere minutes at a time. Radiation exposure is gauged in "rems" (radiation equivalent man), and five per year is the U.S. limit (Japan's limit is two). This jumper had received, he figured, three rems in six months. "It won't hurt you," he said; adding thoughtfully, "you'd want to wait awhile before you had a kid". Meanwhile, a worker next to the generator itself said that the radiation level some five feet away from it was about 40 milli-rems per hour, whereupon a woman from our ODOE group turned and strode out of the room.

The tail of the tour brought us back to the federal building, where we were shown a video about using electrolytes to clean radioactive accumulations from equipment. This went almost exactly like a Tarn-X commercial. We might have wiled away hours there at the Hanford Science Center, playing video games with loaded questions ("Is nuclear power: a. safer, b. more dangerous, c. no difference — compared to other forms of energy?"). Instead, some of us dug up Larry Caldwell, one of that nearly nonexistent breed that both lives in Richland and is actively anti-nuclear. He gave us an illuminating tour of his own, to such sites as the Columbia High handball court which was adorned by the class of '84-'85 with a huge mushroom cloud rising behind an 'R' for Richland. Several of us had our pictures taken in front of it. Almost the way a hunter has a portrait taken with a beast.

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Hanford Site Comes Under Fire

by John Arum

The three month comment period for the draft Environmental Assessments (EA's) for the nine proposed repository sites ended on March 20. Since the beginning of the public comment period the U.S. Dept. of Energy has been deluged with critical comments, receiving over 1500 responses relating to the Hanford site alone. Three Federal agencies, the States of Washington and Oregon, and hundreds of organizations and private citizens commented on the Hanford draft EA. The sheer volume of these comments, as well as their critical content, has delayed the publications of the final EA's until at least November.

The majority of the comments we have reviewed have been highly critical of the DOE's optimistic assessment of the Hanford site. Most of the comments related to a few major areas. These are: 1) groundwater hydrology, 2) groundwater chemistry, 3) earthquake faulting potential 4) land use conflicts and 5) nuclear engineering.

Groundwater - A Key Factor

Most of the comments saw the problems relating to groundwater flow as the critical issue at the Hanford site. The Environmental Protection Agency (EPA) perhaps made this point best of all.

"Under actual repository conditions, only the Hanford site appears to have the potential for substantial groundwater flows past the emplaced radioactive waste.... This comparative finding is particularly important because groundwater flow is by far the most likely pathway for long-term release of these wastes into the environment" (EPA General Comments).

With the importance of groundwater flow at Hanford, comments relating to the DOE's groundwater modeling are highly significant. The Nuclear Regulatory Commission (NRC) in their comments criticized the application of the existing data to the DOE's mathematical models.

The NRC staff, tested the DOE's favorable conclusion that the ground water would not reach the accessible environment for more than 10,000 years; and calculated the groundwater travel times based on the same data and models used by DOE. According to NRC, their tests "demonstrate that substantially lower estimates of median travel times can result from reasonable interpretations of existing data and the DOE's conceptual model". Most of these estimates are less than 10,000 years, and some are less than 1,000 years". (NRC Major Comments p.1)

A groundwater traveltime of less than 1,000 years would disqualify the Hanford site from further consideration.

The Nuclear Regulatory Commission, for the purposes of the test accepted the DOE's model of groundwater flow. However, the DOE formula itself has come under intense

criticism because it inadequately and optimistically assesses the actual groundwater flow system at Hanford. The DOE has assumed that groundwater at Hanford flows horizontally through the permeable flowtops and interbeds between the layers of basalt.

However, the Department of Interior wrote in its comments that, "the assumption that the dense interiors of the basalt flows are of very low permeability (ie. impervious to water) may be incorrect". Thus, groundwater could flow vertically, as well as horizontally reaching usable aquifers and the Columbia River.

The DOE bases its conclusion on borehole drilling tests which show that the flow interiors do not contain many fractures. As the Interior Dept. has pointed out, however, these "vertical boreholes cannot provide a reasonable test of vertical fractures" These tests "greatly underestimate" the actual flow of groundwater through fractures.

EPA argues that DOE's groundwater model is overly optimistic because it is based on an average flow pathway. EPA points out that water will travel the path of least resistance "not between boreholes as they happen to be placed". EPA recommends that the reported value for groundwater travel time not be the average value, but the 95% certain value as in standard scientific methodology. Use of this more realistic value would probably disqualify Hanford as a potential site.

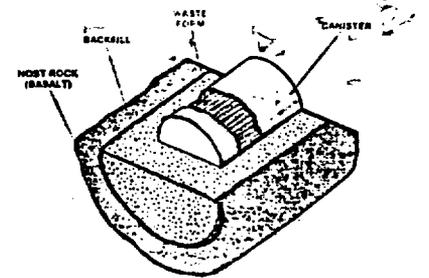
Finally, many comments have pointed out that the DOE underestimates the changes in groundwater travel time which will be caused by repository operations. EPA and NRC both point out that the heat from nuclear waste is likely to have a significant impact on the groundwater flow system at Hanford. The heat could fracture the rock, opening up new pathways, and heat up groundwater causing it to rise. These effects, according to EPA, "are likely to increase the pre-emplacment (water) flow substantially, perhaps by several orders of magnitude". In other words, the placement of hot nuclear waste inside a repository in Hanford basalt, will cause water to move faster. The EPA has noted that these problems are not likely to exist at the other potential sites.

Geochemistry- A Compensating Factor?

The DOE has responded to criticisms of the site by asserting that any problems with geohydrology are more than made up for by the favorable chemistry of Hanford's basalt. Recent comments challenge this DOE myth.

The basis of DOE's claim of a favorable geochemistry has been the non-corrosive (or "reducing") environment, which allegedly retards the corrosion of waste canisters and causes any radionuclides which do escape to stick to the basalt, preventing their release into the environment.

According to NRC, existing conditions; even if they were as favorably "reducing" as the DOE claims, will not necessarily reduce radionuclides to their least soluble and most adsorptive



states. Hanford's clearly unfavorable water system magnifies the significance of NRC's point about geochemistry.

Tectonics-Nuclear Shake and Bake?

The NRC also questioned DOE's claims that active earthquake faults do not exist at the Hanford site. According to the NRC,

"Existing evidence suggests recent fault movement in the reference repository location area. An extension of the 115 to 140 km long Rattlesnake-Wallula lignament, capable of an earthquake magnitude of 6.5 Ms, can be postulated to pass a mile from the reference repository location." (emphasis added)

Evidence for this, cited by The Nuclear Regulatory Commission (NRC) are the hundreds of microearthquakes recorded in the area in the last 15 years, including 10 quakes within the repository site itself. Such comments from an agency like NRC, clearly indicate that the DOE has not evaluated existing data objectively, and suggests that Hanford is an unsuitable site.

Land Use Conflicts-Radioactive Waste

Several comments have noted that the DOE has clearly neglected resource conflicts which could disqualify the site. First among these is the fact that the Hanford site is adjacent to the 200 area-a dumping ground for high-level military waste for over 40 years. As the State of Washington remarked in its comments, the existing nuclear waste is as much a part of the Hanford environment as "t' jackrabbits and sagebrush". Both the EF and Washington State have noted that the construction and operation of a nuclear waste repository in an area already contaminated with various radioisotopes, (such as tritium and plutonium) will make accurate monitoring of contamination from a repository difficult, if not impossible.

Nuclear Engineering-Up to the Task?

Regardless of whether the Hanford site is suitable from the standpoint of isolation of waste from the environment, the DOE's critics remind us of probable difficulties involved in the construction and operation of a repository.

One area of concern is the waste package (see drawing). NRC believes that the Department of Energy greatly overestimated the lifetime of the canisters. The DOE's assessment failed to take into account such factors as oxidation, localized corrosion and the effect of the bentonite clay packing material.

The Interior Department, has an even more dismal view of the possibility of constructing a repository at Hanford. According to the Dept. of Interior,

"The combination of rock stress, potentially large volumes of water inflow at high pressure, and high working temperatures in a potentially methane rich atmosphere is a unique problem, and the assumption that previous experiences will make solutions of the problems simple, is probably overly optimistic."

The Interior Department, in effect, agrees with the conclusion of former U.S. Geological Survey employee, Dr. Donald White who warned that "the problems of constructing a repository at Hanford may be intolerable in terms of money, time, energy and loss of lives."

Contamination of the Columbia

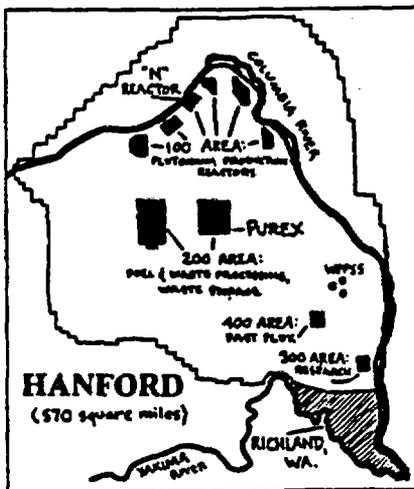
All of these comments relating to the various technical issues at Hanford neglect the final and ultimately most important issue, the effect of radioactive contamination of the Columbia River ecosystem. The DOE has failed throughout the Draft Environmental Assessment to even consider the possibility that radioactive contamination would have an impact on the river.

The EPA points out that the Hanford reach of the Columbia is the last free flowing stretch of water on the Columbia left in the United States. This part of the river is a critical spawning habitat for salmon and steelhead. DOE does not consider the impact of radioactive contamination on this resource and made no attempt to analyze the manner in which radionuclides would be dispersed throughout the region by the Columbia River.

It is damning that the DOE has not considered this most crucial issue - How will radioactive wastes at Hanford affect those of us who live and work downstream?

The DOE, quite obviously, has come under scathing criticism for its assessment of Hanford's suitability. Now it is up to the DOE to respond to this criticism and admit that Hanford is much less favorable than they would like us to believe. It will be interesting to note what responses the DOE will make in the final EA - which is due this fall.

(For more information or to obtain a copy of the Draft EA and the comments of the various agencies, contact the Hanford Clearinghouse office).



Calendar

Calendar: July 1985

July 7 7:00 pm Oregon Hanford Oversight Committee meeting Friends Meetinghouse 4312 S.E. Stark St. Portland call 295-2101. OHOC meets on the first and third Sunday evenings of each month.

July 8 7 pm Hanford Repository Advisory Committee 1120 SW 5th room B the Portland Building Staffed by Oregon Dept. of Energy, this committee is just beginning to look at the possible impacts on Oregon, of a repository at Hanford. (This is the public advisory component of the "Governor's" Committee, the Repository Review Committee) for information on the work of this group call Oregon DOE 1-378-6469

July 16 9 am Teledyne Wah Chang Public Hearings Tuesday A public pre-hearing conference dealing with Teledyne's radioactive waste room 100 of the Dept. of Justice Building at 100 Center St. in Salem, Or. Measure 9 supporters, plan to attend! For information about opportunities for public participation call Lloyd Marbet 637-3549

July 16 12 noon Rally at the Oregon state Capitol in Salem Forelows on Board kicks off two new initiative petitions! Also, Greenpeace Northwest will work with FOB on a campaign against radioactive pollution in Oregon. For information on this, call FOB 637-3549 or Jim Puckett of Greenpeace Northwest at 224-4600, in Portland.

July 16 7:30 pm Information meeting International Shadow Project will commemorate the 40th anniversary of the bombing of Hiroshima and Nagasaki. Linclon St. Methodist Church, S.E. 52nd and Lincoln St. contact Andy Robinson 248-9275 or Donna Slepak 655-7033 Training meetings for those planning to participate in Portland will be held on these dates (you must attend one of these)

- o July 23 7:30 at Oasis Cafe 1616 N.W. Savier, Portland
- o July 29 2:00 pm at Linclon St. Methodist Church, Portland
- o August 1 7:30 pm Lincoln St. Methodist Church
- o August 3 10:00 am and 4:00 pm Oasis Cafe

July 20 Sat. noon Nicaragua Libre 6th Anniversary Picnic Wallace Park NW Quimby and 24th sponsored by PCASC for details call 227-5102 Portland

July 21 Neighborfair sponsored by KGW Waterfront Park in Portland Many local groups will have literature booths, if you

would like to help staff a Hanford Oversight Committee table call the Clearinghouse office!

July 26-29 Citizens Alert, strategy meeting for "top 3" states of the first repository. Reno, Nevada Contact HEAL (309) 448-9715 for more information.

July 27 5th Annual Hobo Parade, a main focus is the plight of the homeless and un-employed in the Northwest. Meet at NW Everett and 8th at 12 noon. Bring your 'radiation suits' and signs to help bring attention to Hanford!

Asian Pacific Committee James Orak 249-2051 in Portland Call for dates of future meetings of this group with a focus on Nuclear Free Pacific and Indigenous peoples issues. Last meeting was a potluck!

August 5 Monday Portland Freeze Coalition sponsors commemoration of Hiroshima and Nagasaki bombings 7:30 pm Waterfront Park call Kay Reid 222-0004 for details or planning meeting dates

August 9 Friday Pioneer Square Park Freeze Coalition commemoration of the bombing of Nagasaki noon to three pm October 5 Portland PSR Fall Symposium at Lewis and Clark College Volunteers needed! call 239-8556

Oct. 26-27 PSR regional conference, "Hanford and Health: How Does the Hanford Reservation Affect the Health of the Northwest?" to be held in Spokane, Washington. Contact Hanford Education Action League P.O.B. 4634, Spokane, WA 99202 or Portland PSR 239-8556



More Nuclear Waste

Videotapes Air on

Cable T.V.!

These programs are part of a series of videotapes from the Nuclear Waste Conference sponsored by the Columbia River Intertribal Fish Commission in February 1985.

To receive their newsletter send your name and address to: CRITFIC, Public Information Office, 2705 E. Burnside, Suite 114, Portland, OR 97214

Programs this month are on cable channel 7 in east and west Portland:

July 8 9:30 pm Mon. Dr. Susan Lambert, of the Dodd Project for Radiation Studies Radiation: Psychology and the Family (30 minute program)

July 18 6:00 pm Thurs. Dr. Susan Lambert, repeat.

July 13 2:30 pm Sat. Catherine Russell, Nuclear Regulatory Commission and Dean Tousley, atty, Nuclear Waste Policy Act: An Overview (one hour)

July 15 9:30 pm Mon. Catherine Russell, NRC and Dean Tousley atty, repeat.

Nuclear Waste—Oregon Fights
for a Voice
by Sherry Manning

While the Department of Energy anxiously pushes forward with its plans to build a repository at Hanford for the thousands of tons of spent fuel spread across the nation, Oregon's lawmakers and regulatory agencies are only now beginning to assess the impacts this repository would have on the state. Public officials in Oregon are finally taking the first cautious steps to ensure adequate state participation in the site selection process.

The Oregon State Legislature, the Portland City Council and the Multnomah County Commissioners have all passed resolutions asking Congress to give Oregon the same rights as Washington in the site selection process. Several other efforts are underway in both Salem and Washington D.C. to review and regulate the activities of the DOE at Hanford.

The Oregon State Legislature passed a resolution setting up a interim task force on hazardous materials. This committee will examine the problems of nuclear waste at Hanford from a legislation oriented perspective and report back to the 1987 legislative session.

Congressman Jim Weaver (D-Or.) has introduced legislation (HR 1343) into the House of Representatives which would amend the Nuclear Waste Policy Act to give Oregon the same rights as Washington in the siting of a repository anywhere in the Columbia River Basin.

Congressman Ron Wyden (D-Or) is attempting to transfer monitoring responsibilities for defense facilities out of the hands of the DOE. Wyden would like the EPA to perform these chores on the assumption that EPA will be more objective in its analysis than DOE. Wyden has also asked the DOE to continue doing well tests throughout the region to more accurately assess groundwater movement. He has requested that military facilities be required to follow the same environmental standards as commercial nuclear reactors. This may ignore the fact that EPA has still not complied with a court order requiring it to issue standards for airborne releases of radioactivity under the Clean Air Act.

Oregon DOE has formed an agency review committee dealing with nuclear waste storage and transportation at Hanford. U.S. DOE has agreed to channel \$100,000 annually through the State of Washington to fund this committee. Members, particularly the Oregon Department of Geology and the Water Resources Department, have expressed their concern that this level of funding is totally inadequate to accomplish a comprehensive review of DOE activities at Hanford. They are concerned that with the present level of funding the review committee will only serve as a "rubber stamp" for decisions made in the State of Washington or by the U.S. DOE.

In addition to the official agency review committee, the Oregon DOE has hand-picked a group of citizens, including members of public interest groups like the Hanford Oversight Committee, to advise the review committee on public concerns. It remains to be seen what kind of influence this committee will have on policy decisions by the state agencies. (see calendar)

While each one of these proposals have merits, we must view these efforts skeptically. We must determine whether obtaining affected state status and veto power really constitutes victory if Congress can simply override our veto.

For a variety of reasons, all Oregonians have concerns about Hanford. While taking advantage of the existing legislative and regulatory options we must bear in mind that these channels are only a first step.

In the final analysis we must reject the forced deadline the Federal government has imposed in its haste to find a solution to the disposal of nuclear waste. We must continue to encourage a solution that will safeguard our health and that of future generations.



Greenpeace Portland

The Alcyon is coming! A Greenpeace boat will be arriving soon on the Columbia River. A focus of the campaign will be radioactive waste from both the Hanford Nuclear Reservation and Teledyne Wah Chang.

Stops include Portland and Hood River and a car caravan is planned to follow the boat to the Richland area where a rally will be held at the end of July.

For more information on activities contact the Portland office of Greenpeace 224-4600 or Tom Buchanan at Seattle Greenpeace (206 632-4326)

Deadly Legacy

All radioactive materials, over time, lose their capability to harm human beings. They run out of steam, so to speak, as they continuously give off their hazardous energy. Some radioactive materials disappear within seconds after their creation. For plutonium however, tens of thousands of years are required before it loses its ability to harm human beings. Plutonium ... will have to be stored—somewhere, somehow—for hundreds of generations.

—Union of Concerned Scientists

New Resources Available from the Hanford Clearinghouse! Call 294-2101 or write Room #408 Governor Building 408 S.W. 2nd Ave. Portland 97204

A list of audio cassette tapes available from Portland's Hanford Clearinghouse includes these new titles:

(copies are \$5.00)

Nuclear Issues: "if it's forever, check it out first—Dr. William Houff's speech to Spokane Chamber of Commerce, gives history of the nuclear establishment's secrecy, misrepresentation and irresponsibility toward nuclear workers, atomic vets and the affected public.

Nuclear Culture— Author Paul Loeb speaks about the Tri-Cities' mindset and the reasons for it. A thoughtful and sensitive analysis by the author of the book "Nuclear Culture: Living and Working in the World's Largest Atomic Complex", Coward, Mcann and Geohagan, Inc., N.Y., 1982

These cassettes have been made available to the Clearinghouse office by the Hanford Education Action League in Spokane (HEAL) P.O. Box 4634, Spokane WA 99202

What You Can Do About Hanford and Radioactive Waste:

Join the Hanford Oversight Committee, a coalition of groups, with chapters in Oregon and Washington; working to stop Hanford's radioactive contamination of the Northwest. See calendar for meeting dates and times. Or call 295-2101.

Convince your local city council or county commission to pass resolutions opposing the Nuclear Waste Repository. Hold public hearings in your town!

Have your civic group, union or church pass a resolution opposing the repository. The Clearinghouse has copies of resolutions available, call the office!

Write letters to elected officials—state, federal and local. Express your concerns about Hanford's facilities and the continued production of radioactive materials and their storage.

Arrange to have a program about Hanford for your group— the Hanford Clearinghouse has resources, such as tapes, literature, a slideshow and list of speakers.

Send a donation to the Hanford Clearinghouse. Your contributions keep our office open and make distribution of information possible! Subscribe to NW a l e r t ! At only \$12 (that's a dollar a month!) you will be helping the region fight radioactive contamination of the Columbia River! To subscribe to the newsletter or for more information on how you can get involved, write:

Hanford Clearinghouse
Room 408 Governor Building
408 S.W. 2nd Ave. Portland,
Oregon 97204

States, Citizen's Groups Challenge DOE by John Arum

Although not formally nominated, the Department of Energy has narrowed its choice of potential repository sites to three; Hanford, Washington, Yucca Mountain, Nevada and Deaf Smith County, Texas. However, the site selection process is being challenged by a number of states and organizations.

It has been six months since the Department of Energy (DOE) issued its guidelines for recommending sites for nuclear waste repositories and has published draft Environmental Assessments (EA's) on each of the potential sites.

At least eight states and several public interest groups have filed suit, challenging the Reagan Administration's interpretation of the 1982 Nuclear Waste Policy Act (NWPA). The most far reaching and significant of these suits was filed by the Environmental Policy Institute (EPI), a non-profit public interest research group. EPI asserts that the site selection process was shot through with political deal-making, and that the DOE's guidelines (the criteria used for choosing the nine locations) are unlawful in both their origin and content.

Improper Procedures

EPI claims that the rule-making procedure which created the guidelines was conducted illegally. Since only the first draft of the guidelines was made available to the public, the DOE failed to "provide reasonable opportunity for public participation" as required by Federal law. Also, the DOE did not respond to major comments and certain proposals that the rules be changed. Nor did the DOE allow members of the public to make oral arguments relating to these proposals.

Unlawful Guidelines

More importantly, EPI alleges that the guidelines which emerged from the rule-making process were in themselves in violation of the NWPA. First, the DOE's guidelines do not require that "a detailed statement of the basis for the nomination of sites" be included in the EA's, as required by NWPA. The guidelines permit DOE to ignore Congressionally mandated criteria in selecting sites, while allowing the DOE to arbitrarily exempt potentially suitable locations, such as crystalline rock sites in the Midwest. Many geologists feel crystalline rock, such as granite, offers a more stable environment for deep geologic storage of nuclear waste.

Second, the guidelines themselves are too vague, particularly those which involve disqualifying conditions. These guidelines make it difficult to disqualify any site no matter how unsuitable. Moreover, there is a failure to set up a process which assures "a reasonable comparative evaluation" between sites, as required by NWPA. Non-geologic criteria have been unlawfully given more weight than some geologic criteria.

Finally, the weighting of guidelines that affect long-term repository performance (post-closure) versus those that affect short-term impacts (pre-closure) has been left undefined.

Third, EPI charges that the guidelines violate NWPA by not requiring that the three alternative sites available for presidential recommendation, be "suitable for development as repositories". The DOE believes that only one of these three final sites need be suitable. This position allows the DOE to waste the taxpayers' money by continuing to study sites like Hanford which have little chance of eventual licensing by the Nuclear Regulatory Commission.

Unlawful Omissions

The Environmental Policy Institute also claims that other factors which the DOE was required to consider were omitted from the guidelines.

Disregarding the statutory requirements of the Nuclear Waste Policy Act, the Dept. of Energy failed to include a guideline for considering "the advantages of regional distribution" in repository siting, relating especially to the costs of transportation. In fact, there is no guideline at all which allows for a comparative evaluation of the risks associated with transportation of nuclear waste to the different sites.

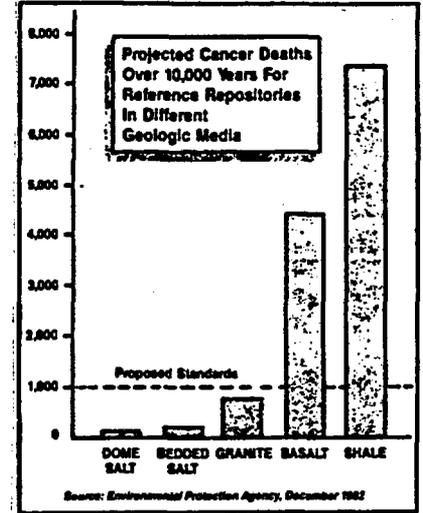
Secondly, the guidelines do not require a detailed description of repository testing, construction and operations, making it impossible for the public to gauge the impact of a repository on the environment. Particularly, the guidelines do not require the DOE to plan for the retrieval of nuclear waste in the event of a public health or national emergency. These plans are specifically required by the Nuclear Waste Policy Act.

Other technical factors have been ignored by the DOE. Most importantly for Northwest residents, EPI points out that the DOE failed to account for the presence of a major watershed system. The Columbia River has the capacity to spread radioactive contamination to areas of high population density such as Portland. Also, EPI objects to the definition of "groundwater travel time" in the guidelines. The guidelines define this concept as an "average flux"; but EPI points out that ground water can potentially travel a path of least resistance, far faster than the average.

Finally, the DOE guidelines do not require consideration of the extent of rock fracturing as a criterion for determining potential speed of groundwater travel.

No Onsite Testing in Nevada

Nevada and Texas, the other two front running states now slated for site characterization, have each filed separate suits against the DOE. The Nevada case could be especially important to Northwest residents in that it deals with state participation in site characterization. (Currently, only Washington but not Oregon is considered to be an affected state.)



The basalt difference: dramatic.

According to Harry Swainson, Nevada's deputy Attorney General, the DOE has refused to provide federal funding for the state to do on-site hydrologic testing at the Nevada Test Site. The DOE, without asking for public comment, has set up administrative guidelines which prohibit primary testing and data collection by all three of the affected states - including Washington. Thus, the state role has been limited to merely auditing the DOE's data and methodology.

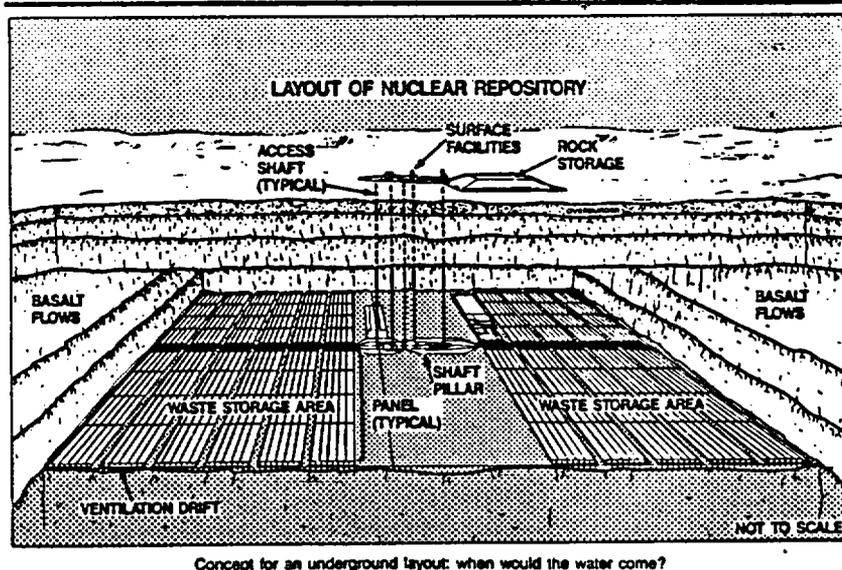
These adhoc guidelines could severely limit Washington's ability to challenge data collected at Hanford by Rockwell International, (a DOE contractor doing major studies on the site) which has been accused in the past of "filtering" data. The State of Nevada will claim in its suit that the DOE does not have authority to limit on-site testing by affected states.

Hanky-Panky in Texas

In another suit, the state of Texas has charged that DOE followed improper procedures in identifying the two potential sites in Texas. According to Renea Hicks of the Texas Attorney General's Office, the DOE did not even inform Texas of the exact location of the two sites under consideration, until last November. Furthermore, the DOE admitted that the identification of the two sites was not based on the criteria established in the Nuclear Waste Policy Act. The Texas case amply demonstrates the arbitrary and illegal nature of the site selection process. The DOE does not deny this, but merely claims that the site identification process is not subject to judicial review.

In addition to these cases, many other states, from Colorado to Vermont have intervened against the DOE. Quite clearly, the Reagan Administration's nuclear waste policy faces a showdown in court which could send the site selection process back to square one. If these suits are successful, they will represent a defeat for DOE's quick-fix solution to the nuclear waste problem and a victory for those concerned with the safe storage of high-level nuclear waste. ●

The repository must be located and engineered so that radiation will kill no more than 1,000 people in 10,000 years — a figure arrived at after experts conceded that a no-risk condition was “technically impossible.”



Editor's Note:

This issue (as fat as it is!) is a reflection of the ebb and flow of our funding. Many thanks to McKenzie River Gathering, an Oregon Foundation that gave the Hanford Clearinghouse a grant, which is literally making this July newsletter possible!

But, in order to continue publishing literature, including the newsletter, the NW alert!, your financial support is needed! Included in this issue is a fundraising appeal—please take the time now to fill it out and write a check to the Hanford Clearinghouse! You will be actively supporting our important work! Send your check to:

Hanford Clearinghouse Room 408 the Governor Building
408 SW Second Ave., Portland, Oregon 97204

Thank you! Joanne Oleksiak, editor.

Hanford Clearinghouse

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