

DOE and NRC Public Meeting  
Comments  
SRS F Tank Farm Waste Determination  
July 14, 2010

My name is Ernie Chaput and I am representing the Economic Development Partnership of Aiken and Edgefield Counties, South Carolina. My organization has long followed SRS programs and provided comments which, we believe, facilitate the best interests of our community.

Closure of high level waste tanks is the culmination of the program to eliminate the greatest SRS risk to public health and the environment -- the risk resulting from liquid radioactive wastes stored in aging underground tanks. Tank closure is a goal worth striving for, and one which SRS and DOE should be proud.

Because criteria for tank closure were controversial in the past, the Congress, in the FY 2005 Authorization Act, provided DOE with thoughtful guidance on tank closures. They specifically addressed the question "How clean is clean?" Their guidance is important in assuring that a reasoned balance is maintained between health and environmental concerns, timely closure actions and the effective expenditure of limited financial resources.

I am here today to support the exercising of technical judgment in determining tank closure cleanup criteria which is inherent in the Congressional guidance. We believe the combined technical capabilities and professionalism of the SRS contractors, DOE, NRC, South Carolina DHEC and EPA, with input from the public, will result in the proper tank closure criteria.

There may be a temptation to spend undue efforts to remove an additional curie, or to wait for the next cleaning technology which is "just about ready." We believe that such actions would be a mistake for three reasons:

1. Such actions will not have any meaningful benefit to the public or site workers. SRS will always remain under federal jurisdiction, with a vigorous program of post-closure control.
2. Delay in closure action results in tank "heels" being vulnerable to leakage for longer periods of time than if grouted at the earliest opportunity.
3. Attempts to remove marginal additional curies from the tanks will utilize financial resources which are better used in removing and vitrifying waste from active tanks.

In making the waste determination, sometimes "good enough is good enough." We support your exercising the judgment provided by Congressional wisdom in legislation.

We have one additional comment for your consideration. There will be many tank closure actions during the next 20 years, and we recommend that DOE and NRC develop

a streamlined process for making and reviewing the necessary waste determinations and other closure actions. A streamlined process can save valuable time and staff efforts.

Thank you for the opportunity to provide these comments.