

9/1/2011
76FR 54502

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Dan,

Here are some comments from the WA State Department of Health. In addition to these comments we request that you cover the NRC's findings post Fukushima and how these findings will be considered for the CGS license renewal. There is much interest in this topic.

Sincerely,

Lynn Albin

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RULES AND REGULATIONS
DIVISION

Non-WDOH comments:

- Page 2-21, Lines 36040. Paragraph states that a component of the environmental monitoring program's water quality monitoring program was discontinued in 1995 after "years of data showed no discernable changes in river water quality..". Since no information is given for when that part of the program began, there is no way for the public or the decision maker to quantify the study.
- Page 2-26, Lines 6-11. Paragraph states that there is a limited number of groundwater-supply wells that provide drinking water. The paragraph lists three wells at FFTF, one well at the Hanford Patrol Training Center, and one at the Yakima Barricade. However, LIGO takes drinking water from a well. This should be listed also.
- Page 2-27, Line 14. Sentence states that the Columbia River crosses the west of the CGS site. The Columbia River is actually to the east of the site.
- General comment. The shrub-steppe ecosystem is prone to fire. In June of 2000, a fire burned over 200,000 acres of Hanford and neighboring property. Several other fires have been in the 10,000 to 100,000 acre range. There should be a discussion of fire risk in the EIS.
- Page 2-71, Line 20. Should be spelled "McChord".
- Page 2-17, Line 21. Should be "Yakima Training Center". Please note that the county and city are spelled Y-A-K-I-M-A. The Native American tribe is spelled Y-A-K-A-M-A.
- General Comment. In the cumulative impacts, there is no mention of the Pomona Heights to Vantage 230 kV line to be constructed by PacifiCorp starting in 2012. BLM is doing the EIS with Yakima Training Center as a cooperating agency.

WDOH Comments

- General Comment. The draft GEIS does not do any analysis based on Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks. In the document, the only mention of schools concerns public schools and their enrollment but ignores the private schools in the area. Also, it should be noted that within eight miles of CGS are at least 2 schools. Country Haven Academy is a private school and Edwin Markham elementary is a public school. Combined enrollment is around 300 students. Impact analysis should be in accordance with EO 13045. It is acknowledged that NRC

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Template = ADM-013

E-RIDS = ADM-03
Call = D. Doyle (did)
S. Freeman (SZFI)

regulations consider radio-sensitivity differences of gender and age, however an EIS considers all effects to the environment, just not the radiological. Analysis of non-nuclear alternatives would therefore not consider health of children in this EIS. Also, although the NRC can disregard EO 13045 as an independent regulatory agency, it would seem to be an incomplete analysis of the proposed action and the alternatives.

- General Comment. In Section 4, the radiological environmental monitoring program is described. Starting on page 4-15, the “Special Interest Monitoring Stations” are described and is said to be done to comply with EFSEC resolutions. However, nowhere in the document does it state why the monitoring is done at those locations. At the very least, they should list the resolution that the monitoring station was developed for. NEPA documents are public disclosure documents and should give members of the public background on which to base their comments.
- General Comment. Section 4.3.3. states that there is infiltration of circulating cooling water into the groundwater through the drywells around the cooling towers. It does not appear that there was analysis of the effects to the movement of the plume beneath CGS toward the Columbia River or other facilities.
- Section 8.1.3. This section states that impact to surface-water quality would be small. Although this might be true, more consideration should be taken of the additional impermeable surfaces of the 135 acres for the new facility. This comment also holds true for Section 8.2.3 and the additional 500 acres of impermeable surfaces.
- Section 8.5.8. The analysis of the socioeconomic impact should probably be moderate. Reasoning for this would be that non-renewal of CGS would cause the decommissioning to be done earlier. This action would coincide to a large degree with the loss of Hanford jobs due to ending of much of the cleanup there. Between the two actions, there would be a large effect to the local socioeconomic conditions of the local region.