Idaho National Engineering and Environmental Laboratory
Citizens Advisory Board

Overall Approach to Cleanup and Closure of the Subsurface Disposal Area

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) is extremely interested in the cleanup and closure of the Subsurface Disposal Area (SDA) at the Radioactive Waste Management Complex (RWMC). The threat that the buried waste poses to the Snake River Plain Aquifer is unacceptable to the Idaho citizenry and to the INEEL CAB.

The INEEL CAB has received presentations addressing the ongoing efforts to excavate waste using the Glovebox Excavator Method project and Pit 4. We have reviewed the Engineering Evaluation/Cost Analysis for the Accelerated Retrieval Project II.

The Department of Energy (DOE)'s effort to validate existing records raises our confidence in the overall data available to support the cleanup and closure of the SDA. Because it is beyond the INEEL CAB's capabilities and knowledge to define "reliability of historical records," we suggest, as general guidelines, that when material is excavated from locations where the records predicted it to be (within a reasonable margin of error in position), and is then examined and characterized consistent with what the records predicted it to be, such records should continue to be used to guide excavation site choices. **If the historical records (including the location of marker shipments as related to survey monuments) prove to be unreliable, the INEEL CAB recommends that further excavation be based on alternative analysis techniques, such as geotechnical surveys.**

To date, DOE has focused its excavation of the SDA on only one area at a time. **The INEEL CAB recommends that DOE, using the best available information, expand the scope of excavation to allow simultaneous activity at multiple sites throughout the SDA. If presented with funding constraints to either simultaneous activity at multiple sites or removal of the entire SDA, the INEEL CAB recommends that DOE focus its efforts on those areas that contain waste identified as presenting the highest risk.**

The INEEL CAB recommends that DOE continue to characterize all waste that is removed. If acceptable disposal options exist, then DOE should dispose of excavated waste at whatever facility (Envirocare of Utah; the Waste Isolation Pilot Plant; or the Idaho Comprehensive Environmental Response, Compensation, and Liability Act Disposal Facility) is appropriate. **The INEEL CAB recommends that DOE segregate and retain for further analysis any excavated waste that does not meet the current waste acceptance criteria of the potential disposal facility rather than putting it back into the pit.**

It appears that the characterization facility at the Advanced Mixed Waste Treatment Facility does not have enough capacity for the stored waste. We understand that the Centralized Characterization Project (CCP) at the Accelerated Retrieval Project, while originally intended for buried waste solely, will now be used to characterize the stored waste to support efforts to meet

milestone B.1.c in the Idaho Settlement Agreement, which requires DOE to ship 6,000 cubic meters of transuranic waste to the Waste Isolation Pilot Plant by December 31, 2005.

The INEEL CAB continues to believe that the buried waste is one of the highest priorities to the citizens of Idaho. **The INEEL CAB recommends that any excess capacity at the CCP (beyond what is required to meet the Idaho Settlement Agreement milestone) be used to characterize the excavated material.**

The CAB believes that public support for new missions for the Idaho National Laboratory will increase as DOE demonstrates the ability to complete a satisfactory cleanup of historic contamination.