Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

Scoping Comments for the Fast Flux Test Facility Decommissioning Environmental Impact Statement

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) reviewed the Notice of Intent (NOI) for the Environmental Impact Statement (EIS) for Decommissioning of the Fast Flux Test Facility (FFTF) at Hanford, near Richland, Washington. We noted that facilities and capabilities at Argonne National Laboratory - West (ANL-West) at INEEL present a possible alternative for conducting key waste processing activities related to the decommissioning of FFTF.

The INEEL CAB submits the following recommendations for consideration during the scoping period for the FFTF EIS.

1. The INEEL CAB recommends that DOE evaluate the environmental impacts of construction and operation of the Remote Treatment Facility at Hanford instead of INEEL.

2. The INEEL CAB recommends that DOE evaluate the environmental impacts of building a new sodium processing facility at Hanford. In particular, the cost savings and reduced risks due to elimination of the need for transportation to INEEL should be evaluated.

3. The INEEL CAB recommends that the Draft EIS include complete and detailed descriptions of each alternative considered, including:

    - Detailed descriptions of how each alternative would be implemented
    - Bounding estimates of the volumes and characteristics of materials and wastes that would be shipped to ANL-W
    - Complete descriptions of all activities that would be conducted at ANL-W involving those materials and wastes
    - Complete descriptions of the on-site treatment and storage required for responsible management of those materials while they remain in Idaho
    - Complete descriptions of ultimate disposal for all those materials
    - Size, frequency, and number of expected shipments of all nuclear and hazardous materials and waste coming into Idaho and leaving Idaho on an annual basis
    - Availability of approved shipping containers and plans for acquiring shipping containers if not already available
    - Requirements for safeguards and securities needed to protect shipments and the populations that live along transportation routes

- Detailed timelines and schedules for each major milestone associated with each alternative

- Estimates of the duration of time that materials shipped to Idaho would remain in Idaho

- Detailed explanation of the size and required competencies of the workforce necessary to implement each alternative

- DOE's plans for remaining in compliance with all federal and state regulations and all court-enforceable and legally-binding requirements (including the Idaho Settlement Agreement) under realistic budget assumptions

- Full evaluation of the extent to which fuel separation techniques would present a nuclear arms proliferation risk

- Detailed explanations of any alternatives dismissed from further evaluation and DOE's rationale for determination that each is unworthy of further consideration.

4. The INEEL CAB recommends that the FFTF EIS include full and complete cost information for each alternative, including:

   - Estimates of the costs of implementing each alternative, including activities at Hanford to remove the radioactive sodium, reactor components, and sodium bonded spent nuclear fuel; preparation for shipment to ANL-W, treatment costs, and interim storage costs until all materials can be sent to their final disposal site

   - Estimates for any necessary upgrades to existing facilities, new construction, and increases in security and safeguards (at the site and during transportation events) necessitated by the proposed shipment of materials and waste to ANL-W

   - Funding sources for all activities, including upgrades, new construction, and security and safeguards, as well as projected impacts on other projects funded by the same funding source

   - Estimates of all transportation costs to and from ANL-W, including packaging

   - Cost and schedule impacts on other ANL-W customers

5. The INEEL CAB recommends that the Draft EIS evaluate all impacts associated with receiving, handling, storage, and treatment of radioactive sodium, reactor components, and sodium-bonded spent nuclear fuel under each alternative course of action.

6. The INEEL CAB recommends that the Draft EIS evaluate all impacts of transportation associated with the radioactive sodium (in liquid and solid form), reactor components, and sodium bonded spent nuclear fuel that would be shipped to ANL-W for treatment, including, bounding estimates of the volumes and characteristics of all radioactive and hazardous materials and wastes that would be produced at ANL-W as a result of treatment of the incoming materials and waste.

7. In any alternative that would entail shipments of sodium coolant to INEEL for treatment, consider converting the liquid sodium hydroxide to a solid form before shipment back to Hanford.

8. The Draft EIS should explain DOE's contingency plans if a geologic repository is not approved and constructed to receive spent nuclear fuel.

9. The waste resulting from reprocessing of sodium-bonded spent nuclear fuel should be returned to Hanford. Co-mingled wastes should be allocated on a prorated basis.