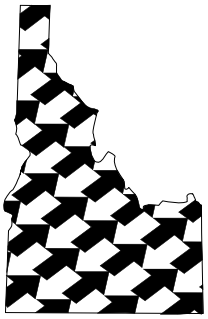

Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

PROPOSED PLAN FOR WASTE AREA GROUP 8 (NAVAL REACTORS FACILITY) AT THE IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY

INTRODUCTION

The following is submitted to the U.S. Department of Energy, Idaho Operations Office; the U.S. Environmental Protection Agency, Region X; the State of Idaho; and the U.S. Department of Energy, Naval Reactors as the Idaho National Engineering and Environmental Laboratory Citizens Advisory Board's (INEEL CAB) comments on the Proposed Plan for Waste Area Group 8 – Naval Reactors Facility (NRF) at the INEEL:

RECOMMENDATION

The INEEL CAB recommends selection of Alternative 3* as the preferred alternative for cleanup at NRF. It is less costly than the other alternative which also achieve appropriate risk reduction objectives. It also reduces risks to a more acceptable level than the less costly alternatives. By consolidating materials at an existing site at the NRF, the preferred alternative also minimizes transportation, risks to site workers, and potential for airborne contamination.

While the INEEL CAB supports the risk reduction measures that would be achieved through implementation of Alternative 3, we are concerned about the much higher costs compared to Alternative 2** and about the accuracy of cost estimates as presented. The Board recommends that the Record of Decision (ROD) provide documentation that no other, less-costly alternatives exist which could achieve the desired risk reduction objectives. In addition, the ROD should provide documentation of total life-cycle cost estimates for all alternatives to allow comparisons among them and to document the justification for selecting an alternative which will require long-term institutional controls and monitoring.

The INEEL CAB members understand that the assumptions used in the risk assessment process are conservative**.** The Proposed Plan does not describe the assumptions with enough detail to allow members of the general public to understand. The ROD should provide a better explanation of the risk assessment process and make it understandable to the general public (e.g., use quantities people can relate to).

The INEEL CAB also understands that the primary risk imposed by contamination at NRF is direct exposure. That fact is not well communicated in the Proposed Plan. It should be better communicated in the ROD so as to limit concerns among people living at a distance from the facility.

* Alternative 3 would involve limited excavation of an estimated 58,080 cubic feet of contaminated soil and placement of the soil in the S1W leaching beds; containment of on-site disposal areas with earthen covers; removal to an approved low level radioactive disposal area of contaminated underground piping and concrete structures; and implementation of monitoring, fencing, other barriers, and/or land use restrictions.

** Alternative 2 would involve various institutional controls and additional monitoring. Long-term monitoring of the soils and groundwater would continue through the control period. Fencing or other barriers would be constructed around the sites of concern to inhibit access to the area. Land use restrictions would be obtained near the end of the control period to prevent excavation in areas where wastes are contained and would include the placement of permanent property markers with posted signs.