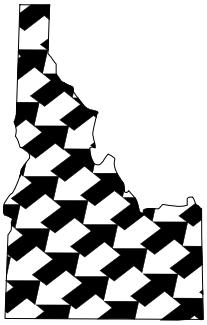

Environmental Management Site-Specific Advisory Board - Idaho National Engineering Laboratory

PROPOSED NUCLEAR WEAPONS NONPROLIFERATION POLICY CONCERNING FOREIGN RESEARCH REACTOR SPENT NUCLEAR FUEL

The Environmental Management Site Specific Advisory Board for the Idaho National Engineering Laboratory (EM SSAB-INEL) recommends Management Alternative 1 as the preferred alternative for the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel.

One minority perspective to the recommendation of Alternative 1 is articulated below, and one minority perspective is articulated within the alternative. Both are written in italics.

Alternative 1 proposed that the United States should accept and manage foreign research reactor (FRR) spent nuclear fuel (SNF) containing uranium of U.S. origin. The Board recommends this alternative with the following caveats:

- Any appropriate spent fuel containing highly enriched uranium (HEU) and low enriched uranium (LEU) would be accepted only for a period of ten years.
- Developing nations would be subsidized, but the United States would charge a competitive rate to other nations for FRR SNF management activities.
- The aluminum-based and TRIGA (Training, Research, Isotope, General Atomics) FRR SNF would be managed at the Savannah River Site and the Idaho National Engineering Laboratory.
  Minority perspective provided by one Board member: In taking aluminum-based and TRIGA SNF from other countries the Board should encourage involved/appropriate federal agencies to negotiate with countries regarding acceptable storage of FRR SNF, or absorbing SNF into their existing reprocessing streams.
- The United States would take title to the SNF at specified ports of entry.
- Regularly scheduled commercial ships should be used to provide marine transport of the FRR SNF.
- Once in the United States' possession, ground transport should take place by rail or highway, not by barge.
- Dry storage technologies should be used as often as possible, especially in any new construction.
- Near term chemical separation, blending HEU down to LEU, should take place in the United States, but only at facilities currently performing activities of this nature. No new reprocessing activities should be initiated, and only the FRR SNF should undergo blending down to LEU. No domestic fuel should be reprocessed.

The EM SSAB-INEL also urges continued focus on a permanent geologic repository. The Board has also submitted to DOE a recommendation on the SNF and INEL Draft EIS. The comments in that recommendation regarding the management and transportation of SNF remain applicable. We urge the DOE to refer to that recommendation as well.

Minority perspective provided by one Board member:

"I support a modified Foreign Research Reactor Spent Nuclear Fuel Environmental Impact Statement No Action Alternative which includes onsite storage of SNF at the facility of origin, and absolutely no reprocessing. The proliferation threat discussion is like listening to a couple of old farmers arguing over whether to shut the barn door after the horses have run out. Solutions to radioactive waste management will never be developed unless the generators bear full responsibility for health, safety, and costs of permanent disposal in the country of origin. Moreover, without this responsibility, there will be no incentive to stop generating more radioactive waste.

DOE failed to present a credible Programmatic Spent Nuclear Fuel Management Environmental Impact Statement for current SNF inventories. The fundamental flaws in the EIS are recognized by US District Court, which quickly issued an injunction against additional shipments to INEL upon request by the State of Idaho. These two management plans are inextricably related and both contain the same fundamental flaws, not the least of which is DOE's denial that significant quantities of SNF is dumped in shallow land burial at the Radioactive Waste Management Complex."