



## Department of Energy

Washington, DC 20585

April 11, 2014

Mr. Herbert Bohrer, Chair  
Idaho National Laboratory  
Site Environmental Management Citizens Advisory Board  
1425 Higham Street  
Idaho Falls, Idaho 83402

Dear Mr. Bohrer:

Thank you for your March 4 letter concerning several Environmental Management Site Specific Advisory Board (EM SSAB) recommendations relating to the recycle and reuse of metals.

The Office of Environmental Management (EM) agrees with the EM SSAB that recycling of reclaimed assets has a number of benefits, including supporting environmental sustainability goals by recovery of valuable materials, value to the local economies, waste reduction, cost avoidance, etc. We also agree that cost evaluation should include life-cycle costs of using virgin materials (mining, smelting, refining, and commoditization, disposal, etc). Further, EM is considering your recommendation to establish a recycling program to address radiologically contaminated metals. We agree that it is important to weigh costs associated with recycling and reuse against cradle-to-grave costs of virgin materials; recycling excess materials has been, and will continue to be, one of our priorities during site cleanup activities.

The EM SSAB recommends that the Department of Energy (DOE) adopt International Atomic Energy Agency standards for free-release. The Department currently has no plan to adopt international standards for release of material. DOE's requirements are documented in DOE Order 458.1, *Radiation Protection of the Public and the Environment*. This Order establishes DOE's processes for clearance and release of property and is generally consistent with international guidance, but does not include radionuclide-specific criteria. It is notable, however, that DOE participated in the recent revision to American National Standard ANSI/HPS N13.12, *Surface and Volume Radioactivity Standards for Clearance* (May 2013) which was done in part to harmonize the Standard and its screening criteria with international guidance. DOE is in the process of evaluating whether and how ANSI/HPS N13.12 might be used by the Department for control and clearance.

We appreciate your recommendations for conducting feasibility studies for microwave, laser, and smelter technologies for recycling of the surface decontaminated metals. We will continue to evaluate the merits and feasibility of studying promising decontamination technologies. We agree that storage of high-value material may be a



viable approach pending development of innovative technologies, but this needs to be balanced with the cost of storage.

We appreciate your continued support and take your input very seriously. Please continue to work with your site point-of-contact to offer thoughts and recommendations on EM's cleanup activities.

If you have any questions, please contact me or Mr. Frank Marcinowski, Deputy Assistant Secretary for Waste Management, at (202) 586-0370.

Sincerely,



David Huizenga  
Acting Assistant Secretary  
for Environmental Management

cc: Candice Trummell, EM-3  
Kristen Ellis, EM-3.2  
Frank Marcinowski, EM-30  
Christine Gelles, EM-30