

## Public Involvement of Document Submittals for Decontamination and Decommissioning of Nuclear Reactors

During the upcoming years, the Idaho National Laboratory Site Environmental Management Citizens Advisory Board (CAB) will be asked to review documents pertaining to the decontamination and decommissioning of nuclear reactors. **The CAB recommends that all such documents submitted to it include the following information:** 

- The decision-making process used to select the chosen alternative;
- An explanation of radiation risk in terms the "reasonable person" understands. (This should be related to risks related to the general population and include disease and mortality risks.)
- Clear, defined path forward for waste generated by the project with special emphasis on the final disposition of radioactive and hazardous wastes. If no clear path forward exists, it is extremely important to the CAB that the Department of Energy explain that situation and state its plans for providing for the disposition of all waste from the project, including assumptions related to waste acceptance criteria, research and development assumptions and worse case scenarios if no future path is available.
- Explanations regarding any residual contamination and residual radiation to include risk analysis and explanations why clean/close was not chosen.

The CAB understands that the regulatory mechanisms employed in the project (e.g., engineering evaluation/cost analysis, environmental impact statement) determines the public comment period. It is vital to the CAB that it has adequate time to review documents before the expiration of the public comment period. The CAB meeting cycle is well known. The CAB recommends that consideration of the CAB meeting cycle be included when release dates of documents are selected and that public comment periods be extended, if possible, to accommodate the CAB meeting cycle.