



Reinterpretation of High-Level Waste

A subcommittee was formed during the October 2018 meeting of the Idaho Cleanup Project (ICP) Citizens Advisory Board (CAB) to evaluate the high-level waste (HLW) reinterpretation issue. The subcommittee was tasked to provide an overview to the CAB members on the Department of Energy (DOE) Request for Public Comment on the DOE Interpretation of HLW and develop recommendations for the reinterpretation of HLW with respect to the waste at Idaho National Laboratory (INL).

Recommendation development included review of various pertinent documents, some of which are discussed below, and verification of some factual information through relevant DOE representatives. The documents that we reviewed are presented in chronological order below.

- **The ICP CAB recommends that DOE expand the mission of the Waste Isolation Pilot Plant (WIPP):** First and foremost, DOE should begin discussions with the State of New Mexico (stakeholders and residents) and its regulators for WIPP to broaden its waste acceptance criteria (WAC) to include reclassified waste and/or waste such as the sodium-bearing waste (SBW)/waste that has gone through the Waste Incidental to Reprocessing (WIR) process. We strongly encourage the Department to act now, initiating discussions with the appropriate authorities. We recommend that a permit modification which allows waste from reprocessing to be disposed at WIPP should be pursued immediately with the State of New Mexico. We recommend DOE work with Congress to appropriately change the WIPP land withdrawal legislation to allow other waste types to be disposed at WIPP.
- **The ICP CAB recommends that DOE move forward with WIR for Sodium-Bearing Waste.** A reinterpretation is unnecessary if the 2008 WIR is implemented by DOE-HQ. DOE should complete the determination process.
- **The ICP CAB recommends that DOE Headquarters provide the ICP CAB with a briefing and provide its “Evaluation of Classification of Certain Defense Nuclear Waste” draft report as directed by Congress.** DOE should lay out its plans for alternatives to Yucca Mountain and immediately begin the process of developing a permanent repository that would accept DOE SNF and HLW. Please include a summary of the public comment on the reinterpretation proposal, and explain the Department’s next steps.
- **The ICP CAB recommends that DOE conduct public meetings in Idaho to discuss its future plans for disposition of Idaho’s HLW streams.**

- **The ICP CAB recommends that DOE immediately determine whether Yucca Mountain, on a scientific and engineering basis, shall be a long-term permanent repository for a variety of DOE and commercially generated nuclear waste. If it is a viable option, complete the Nuclear Regulatory Commission licensing process. If Yucca Mountain is not a viable option, DOE needs to assess all alternatives in addition to WIPP for a permanent long-term repository.**
- **The ICP CAB recommends that DOE engage with State of Idaho concerning the Idaho National Laboratory's SNF and HLW streams.** Consideration of alternative paths to resolution of Idaho's nuclear waste material storage issues and permanent disposition of these materials is essential. With the impending deadlines and no path of disposition at this point, we strongly feel these discussions need to take place now, rather than later.