



Final Environmental
Impact Statement for the



Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375)

Volume 5: Appendix J,
Comment Response Document (Cont.)
(Sections J.3.3 through J.4)

January 2016



U.S. DEPARTMENT OF ENERGY



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January 2016

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NOTATION

(The following list of acronyms and abbreviations and units of measure is a duplication of the list in the main portion of the GTCC EIS and is provided here for the convenience of the reader.)

ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
AEA	Atomic Energy Act of 1954
AEC	U.S. Atomic Energy Commission
AIP	Agreement in Principle
AIRFA	American Indian Religious Freedom Act of 1978
ALARA	as low as reasonably achievable
AMC	activated metal canister
AMWTP	Advanced Mixed Waste Treatment Project
ANOI	Advanced Notice of Intent
AQRV	air-quality-related value
ARP	Actinide Removal Process
ATR	Advanced Test Reactor (INL)
bgs	below ground surface
BLM	Bureau of Land Management
BLS	Bureau of Labor Statistics
BNSF	Burlington Northern Santa Fe
BRC	Blue Ribbon Commission on America's Nuclear Future
BSL	Biosafety Level
BWR	boiling water reactor
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAP88-PC	Clean Air Act Assessment Package 1988-Personal Computer (code)
CCDF	complementary cumulative distribution function
CEDE	committed effective dose equivalent
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFA	Central Facilities Area (INL)
CFR	<i>Code of Federal Regulations</i>
CGTO	Consolidated Group of Tribes and Organizations
CH	contact-handled
CRMD	Cultural Resource Management Office
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
CWA	Clean Water Act
CX	Categorical Exclusion

1	DCF	dose conversion factor
2	DCG	derived concentration guide
3	DOE	U.S. Department of Energy
4	DOE-EM	DOE-Office of Environmental Management
5	DOE-ID	DOE-Idaho Operations Office
6	DOE-NV	DOE-Nevada Operations Office
7	DOE-RL	DOE-Richland Operations Office
8	DOI	U.S. Department of the Interior
9	DOT	U.S. Department of Transportation
10	DRZ	disturbed rock zone
11	DTRA	Defense Threat Reduction Agency
12	DWPF	Defense Waste Processing Facility
13		
14	EAC	Early Action Area
15	EDE	effective dose equivalent
16	EDNA	Environmental Designation for Noise Abatement
17	EIS	environmental impact statement
18	EPA	U.S. Environmental Protection Agency
19	ERDF	Environmental Restoration Dispersal Facility
20	ESA	Endangered Species Act of 1973
21	ESRP	Eastern Snake River Plain (INL)
22		
23	FFTF	Fast Flux Test Facility (Hanford)
24	FGR	Federal Guidance Report
25	FONSI	Finding of No Significant Impact
26	FR	<i>Federal Register</i>
27	FTE	full-time equivalent
28	FY	fiscal year
29		
30	GAO	U.S. Government Accountability (formerly General Accounting) Office
31	GMS/OSRP	Office of Global Material Security/Off-Site Source Recovery Project
32	GSA	General Separations Area (SRS)
33	GTCC	greater-than-Class C
34		
35	HAP	hazardous air pollutant
36	HC	Hazard Category
37	HEPA	high-efficiency particulate air
38	HEU	highly enriched uranium
39	HF	hydrogen fluoride
40	HFIR	High Flux Isotope Reactor (ORNL)
41	HMS	Hanford Meteorology Station
42	HOSS	hardened on-site storage
43	h-SAMC	half-shielded activated metal canister
44	HSW EIS	Final Hanford Site Solid (Radioactive and Hazardous) Waste Program
45		Environmental Impact Statement
46		
47		

1	ICRP	International Commission on Radiological Protection
2	IDA	intentional destructive act
3	IDAPA	Idaho Administrative Procedures Act
4	IDEQ	Idaho Department of Environmental Quality
5	IDF	Integrated Disposal Facility
6	INL	Idaho National Laboratory
7	INTEC	Idaho Nuclear Technology and Engineering Center (INL)
8	ISFSI	independent spent fuel storage installation
9		
10	LANL	Los Alamos National Laboratory
11	LCF	latent cancer fatality
12	L _{dn}	day-night sound level
13	L _{eq}	equivalent-continuous sound level
14	LEU	low-enriched uranium
15	LLRW	low-level radioactive waste
16	LLRWPA	Low-Level Radioactive Waste Policy Amendments Act of 1985
17	LMP	Land Management Plan (WIPP)
18	LWA	Land Withdrawal Act (WIPP)
19	LWB	Land Withdrawal Boundary (WIPP)
20		
21	MCL	maximum contaminant level
22	MCU	modular caustic side solvent extraction unit
23	MDA	material disposal area (LANL)
24	MOA	Memorandum of Agreement
25	MOU	Memorandum of Understanding
26	MOX	mixed oxides
27	MPSSZ	Middleton Place-Summerville Seismic Zone
28	MSL	mean sea level
29		
30	NAAQS	National Ambient Air Quality Standard(s)
31	NAGPRA	Native American Graves Protection and Repatriation Act of 1990
32	NASA	National Aeronautics and Space Administration
33	NCRP	National Council on Radiation Protection and Measurements
34	NDA	NRC-licensed disposal area (West Valley Site)
35	NEPA	National Environmental Policy Act of 1969
36	NERP	National Environmental Research Park
37	NESHAP	National Emission Standard for Hazardous Air Pollutants
38	NHPA	National Historic Preservation Act
39	NI PEIS	Nuclear Isotope PEIS
40	NLVF	North Las Vegas Facility
41	NMAC	<i>New Mexico Administrative Code</i>
42	NMED	New Mexico Environment Department
43	NMFS	National Marine Fisheries Services
44	NNHP	Nevada Natural Heritage Program
45	NNSA	National Nuclear Security Administration (DOE)
46	NNSA/NSO	NNSA/Nevada Site Office

1	NNSS	Nevada National Security Site (formerly Nevada Test Site or NTS)
2	NOAA	National Oceanic and Atmospheric Administration
3	NOI	Notice of Intent
4	NPDES	National Pollutant Discharge Elimination System
5	NPS	National Park Service
6	NRC	U.S. Nuclear Regulatory Commission
7	NRHP	<i>National Register of Historic Places</i>
8	NTS SA	Nevada Test Site Supplemental Analysis
9	NTTR	Nevada Test and Training Range
10		
11	ORNL	Oak Ridge National Laboratory
12	ORR	Oak Ridge Reservation
13		
14	PA	programmatic agreement
15	PCB	polychlorinated biphenyl
16	PCS	primary constituent standard
17	PEIS	programmatic environmental impact statement
18	P.L.	Public Law
19	PM	particulate matter
20	PM _{2.5}	particulate matter with an aerodynamic diameter of 2.5 µm or less
21	PM ₁₀	particulate matter with an aerodynamic diameter of 10 µm or less
22	PPV	Peak Particle Velocity
23	PSD	Prevention of Significant Deterioration
24	PSHA	Probabilistic Seismic Hazards Assessment
25	PWR	pressurized water reactor
26		
27	R&D	research and development
28	RCRA	Resource Conservation and Recovery Act
29	RDD	radiological dispersal device
30	RH	remote-handled
31	RH LLW EA	Remote-Handled Low-Level Waste Environmental Assessment (INL)
32	RLWTF-UP	Radioactive Liquid Waste Treatment Facility-Upgrade (LANL)
33	ROD	Record of Decision
34	ROI	region of influence
35	ROW	right-of-way
36	RPS	Radioisotopic Power Systems
37	RSL	Remote Sensing Laboratory
38	RWMC	Radioactive Waste Management Complex (INL)
39	RWMS	Radioactive Waste Management Site (NNSS)
40		
41	SA	Supplemental Analysis
42	SAAQS	State Ambient Air Quality Standards
43	SALDS	State-Approved Land Disposal Site
44	SCDHEC	South Carolina Department of Health and Environmental Control
45	SCE&G	South Carolina Electric Gas
46	SDA	state-licensed disposal area (West Valley Site)

1	SDWA	Safe Drinking Water Act
2	SHPO	State Historic Preservation Office(r)
3	SNF	spent nuclear fuel
4	SR	State Route
5	SRS	Savannah River Site
6	SWB	standard waste box
7	SWEIS	Site-Wide Environmental Impact Statement
8		
9	TA	Technical Area (LANL)
10	TC&WM EIS	Tank Closure and Waste Management EIS (Hanford)
11	TEDE	total effective dose equivalent
12	TEDF	Treated Effluent Disposal Facility
13	TEF	Tritium Extraction Facility
14	TLD	thermoluminescent dosimeter
15	TRU	transuranic
16	TRUPACT-II	Transuranic Package Transporter-II
17	TSCA	Toxic Substances Control Act
18	TSP	total suspended particulates
19	TTR	Tonapah Test Range
20	TVA	Tennessee Valley Authority
21		
22	US	United States
23	USACE	U.S. Army Corps of Engineers
24	USC	<i>United States Code</i>
25	USFS	U.S. Forest Service
26	USFWS	U.S. Fish and Wildlife Service
27	USGS	U.S. Geological Survey
28		
29	VOC	volatile organic compound
30		
31	WAC	waste acceptance criteria or <i>Washington Administrative Code</i>
32	WHB	Waste Handling Building (WIPP)
33	WIPP	Waste Isolation Pilot Plant
34	WSRC	Westinghouse Savannah River Company
35	WTP	Waste Treatment Plant (Hanford)
36	WVDP	West Valley Demonstration Project
37		
38		
39		

UNITS OF MEASURE

ac	acre(s)	m ³	cubic meter(s)
ac-ft	acre-foot (feet)	MCi	megacurie(s)
		mg	milligram(s)
°C	degree(s) Celsius	mi	mile(s)
cfs	cubic foot (feet) per second	mi ²	square mile(s)
Ci	curie(s)	min	minute(s)
cm	centimeter(s)	mL	milliliter(s)
cms	cubic meter(s) per second	mm	millimeter(s)
		mph	mile(s) per hour
d	day(s)	mR	milliroentgen(s)
dB	decibel(s)	mrem	millirem
dBA	A-weighted decibel(s)	mSv	millisievert(s)
		MW	megawatt(s)
°F	degree(s) Fahrenheit	MWh	megawatt-hour(s)
ft	foot (feet)		
ft ²	square foot (feet)	nCi	nanocurie(s)
ft ³	cubic foot (feet)		
		oz	ounce(s)
g	gram(s) or acceleration of gravity (9.8 m/s/s)	pCi	picocurie(s)
gal	gallon(s)	ppb	part(s) per billion
gpd	gallon(s) per day	ppm	part(s) per million
gpm	gallon(s) per minute		
		R	roentgen(s)
h	hour(s)	rad	radiation absorbed dose
ha	hectare(s)	rem	roentgen equivalent man
hp	horsepower		
		s	second(s)
in.	inch(es)	t	metric ton(s)
kg	kilogram(s)	VdB	vibration velocity decibel(s)
km	kilometer(s)		
km ²	square kilometer(s)	yd	yard(s)
kph	kilometer(s) per hour	yd ²	square yard(s)
kV	kilovolt(s)	yd ³	cubic yard(s)
		yr	year(s)
L	liter(s)		
lb	pound(s)	μg	microgram(s)
		μm	micrometer(s)
m	meter(s)		
m ²	square meter(s)		

J.3.3 CREDO Campaign Form Letter

Table J.3-3 tabulates all individuals who submitted comments via the CREDO Campaign form letter along with the comment document identifiers assigned to each. One representative letter (Barber, Kristen, Comment Document ID No. L213) was used to identify the comment. The comment is identified in brackets on the left side of the page, and the corresponding response is shown on the right side of the same page. All other comment letters resemble the representative letter. The representative letter, comment identified in that letter, response, and all the other comment documents received for this campaign are presented here in Section J.3.3 on pages J-1767 through J-1827, as indicated in the table. It may be helpful for readers to review Section J.2 for an overview of the 10 Topics of Interest of this CRD.

TABLE J.3-3 Individuals Who Submitted Comments via the CREDO Campaign Form Letter

Last Name, First Name	Comment Document ID No.	Starting Page No.
Barber, Kristin*	L213	J-1767
Bartholomew, Gabriele	L214	J-1768
Batts, Katherine	L215	J-1769
Bekker, Rhonda	L216	J-1770
Bering, Stacie	L217	J-1771
Borden, Phyllis	L218	J-1772
Boynton, Llory	L219	J-1773
Burns, Carl	L220	J-1774
Chastain, Jody	L221	J-1775
Chroman, J.	L222	J-1776
Davis, Galen	L223	J-1777
Dewell, Alice	L224	J-1778
Downing, Michelle	L225	J-1779
Fairchild, Jane	L226	J-1780
Frothingham, Dianne	L227	J-1781
Gray, Lee	L228	J-1782
Hansen, Heidi	L229	J-1783
Harkness, Linda	L230	J-1784
Hauer, Valerie	L231	J-1785
Herron, Andria	L232	J-1786
Hodapp, Paul	L233	J-1787
Houghton, Richard	L234	J-1788
Howard, Gary	L235	J-1789
Howe, Cheri	L236	J-1790
Iverson, Luanna	L237	J-1791
Kee, Marion	L238	J-1792
Ketchum, Deann	L239	J-1793
Knutson, Maureen	L240	J-1794
Leyrer, Sarah	L241	J-1795
Lovett, Wendell	L242	J-1796
Magnuson, John	L243	J-1797
Mattson, Dana	L244	J-1798

TABLE J.3-3 (Cont.)

Last Name, First Name	Comment Document ID No.	Starting Page No.
Mccracken, Philip	L245	J-1799
Mckay, Barbara	L246	J-1800
Meinz, Vern	L247	J-1801
Methe, Leslie	L248	J-1802
Mikkelsen, Susan	L249	J-1803
Morey, Barbara	L250	J-1804
Morgan, Donald	L251	J-1805
Parish, Dave	L252	J-1806
Paul, Hollis	L253	J-1807
Pearson, Sharon	L254	J-1808
Rabinowitz, Alan	L255	J-1809
Ray, Beth	L256	J-1810
Rosen, Susan	L257	J-1811
Rosenthal, Elizabeth	L258	J-1812
Rozenbaum, Scott	L259	J-1813
Sanders, Aurelia	L260	J-1814
Seymore, Lee Roy	L261	J-1815
Sheldon, Sue	L262	J-1816
Siverts, Linda	L263	J-1817
Swalla, Billie	L264	J-1818
Todd, Therald	L265	J-1819
Trowbridge, Cynthia	L266	J-1820
Twisdale, March	L267	J-1821
Verschuyt, Sharon	L268	J-1822
Walsh, Terry	L269	J-1823
Webster, Theresa	L270	J-1824
Winsor, Robert	L271	J-1825
Woods, Paul	L272	J-1826
Zeiler, Telle	L273	J-1827

* Barber, Kristin (Comment Document No. L213) is the representative letter.

1
2
3

CREDO Campaign
Barber, Kristin, Commenter ID No. L213
(Representative Letter)

L213-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Kristin Barber
 2306 Henry St.
 Bellingham, WA 98225-2209

CitizenLetter

An urgent message from a concerned citizen.

May 14, 2011

DOE Secretary Steven Chu
 US Department of Energy
 1000 Independence Ave SW
 Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.

The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

Kristin Barber

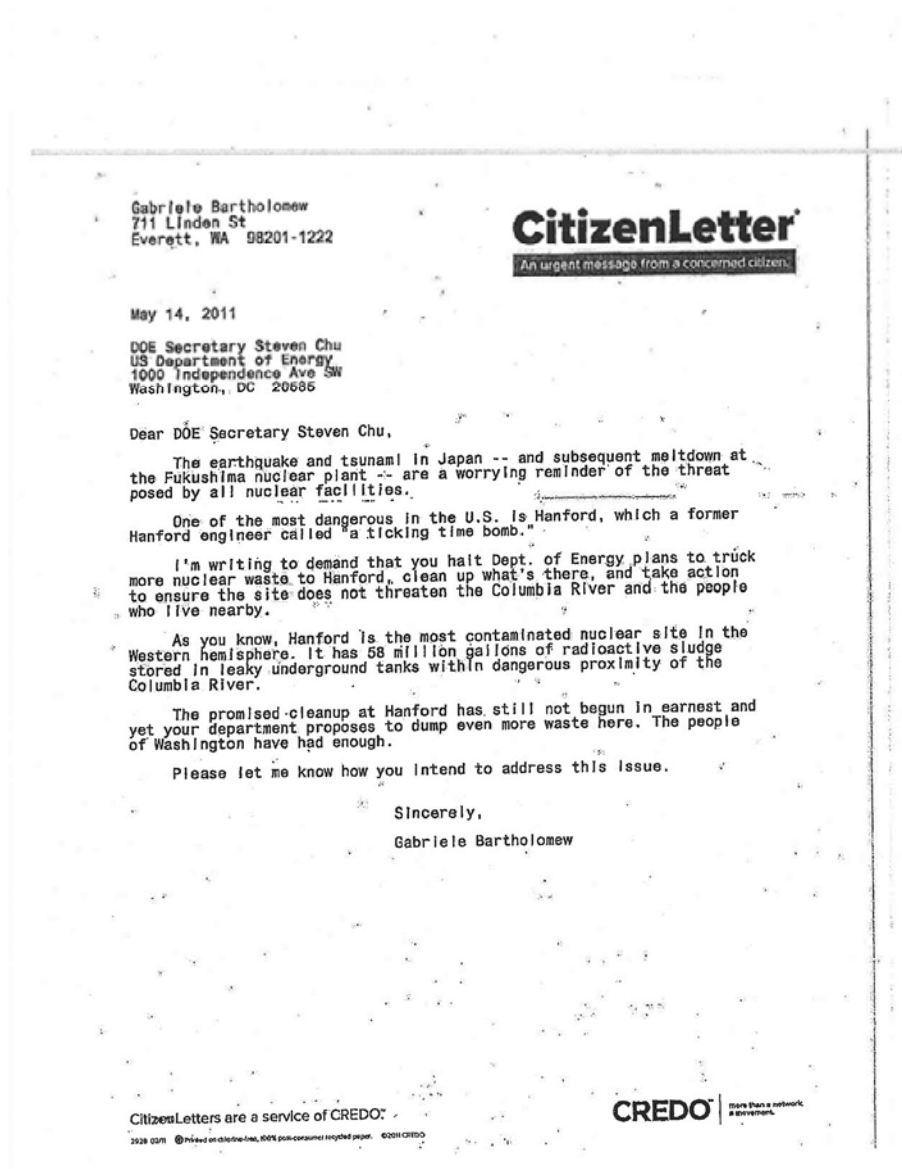
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Barber, Kristin - L213

CREDO Campaign
Bartholomew, Gabriele, Commenter ID No. L214



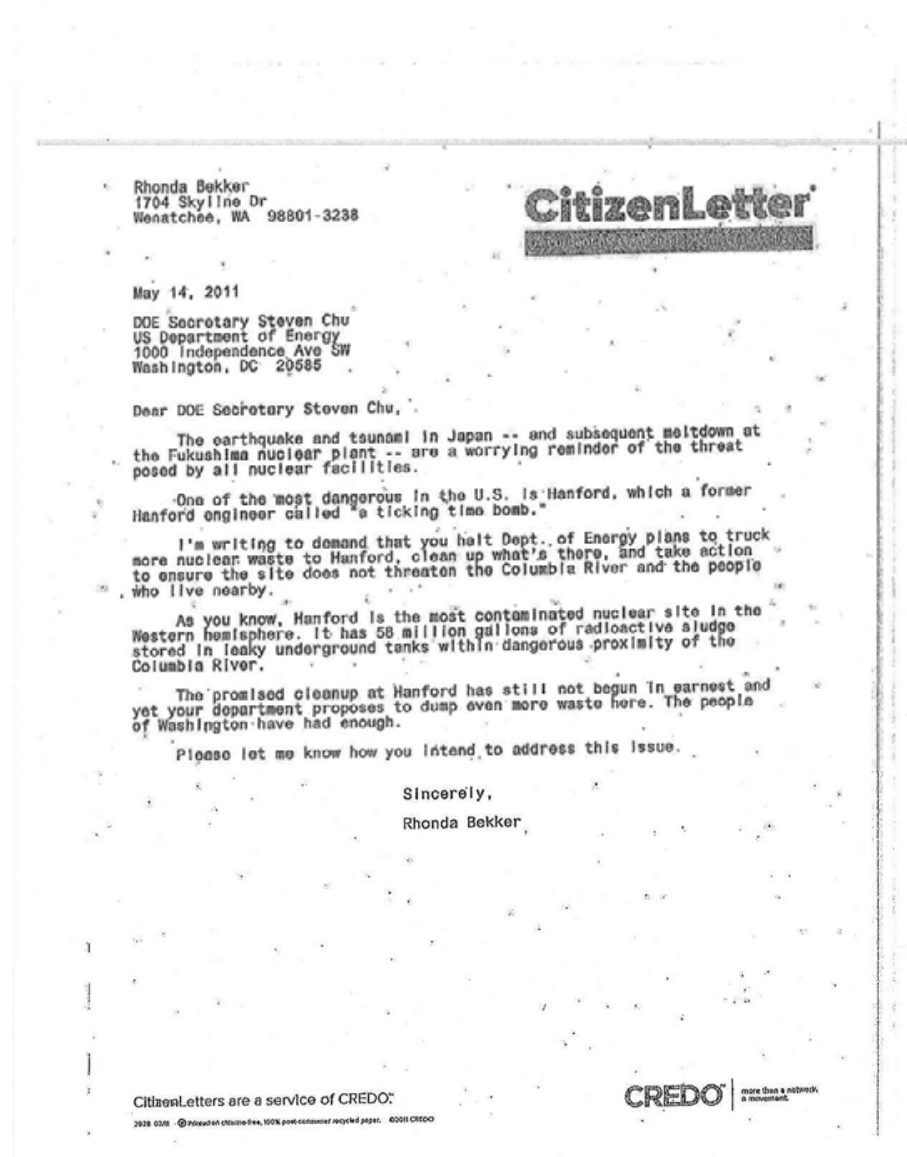
Bartholomew, Gabriele - L214

CREDO Campaign
Batts, Katherine, Commenter ID No. L215

<p>Katherine Batts 21815 State Route 9 SE Woodinville, WA 98072-9794</p> <p>May 14, 2011</p> <p>DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585</p> <p>Dear DOE Secretary Steven Chu,</p> <p>The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.</p> <p>One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."</p> <p>I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.</p> <p>As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.</p> <p>The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.</p> <p>Please let me know how you intend to address this issue.</p> <p style="text-align: right;">Sincerely, Katherine Batts</p>	<p>CitizenLetter</p> <p><small>CitizenLetters are a service of CREDO.</small></p> <p><small>2010 CREDO © Printed on chlorine free, 100% post-consumer recycled paper. ©2010 CREDO</small></p> <p>CREDO <small>more than a network, a movement.</small></p>
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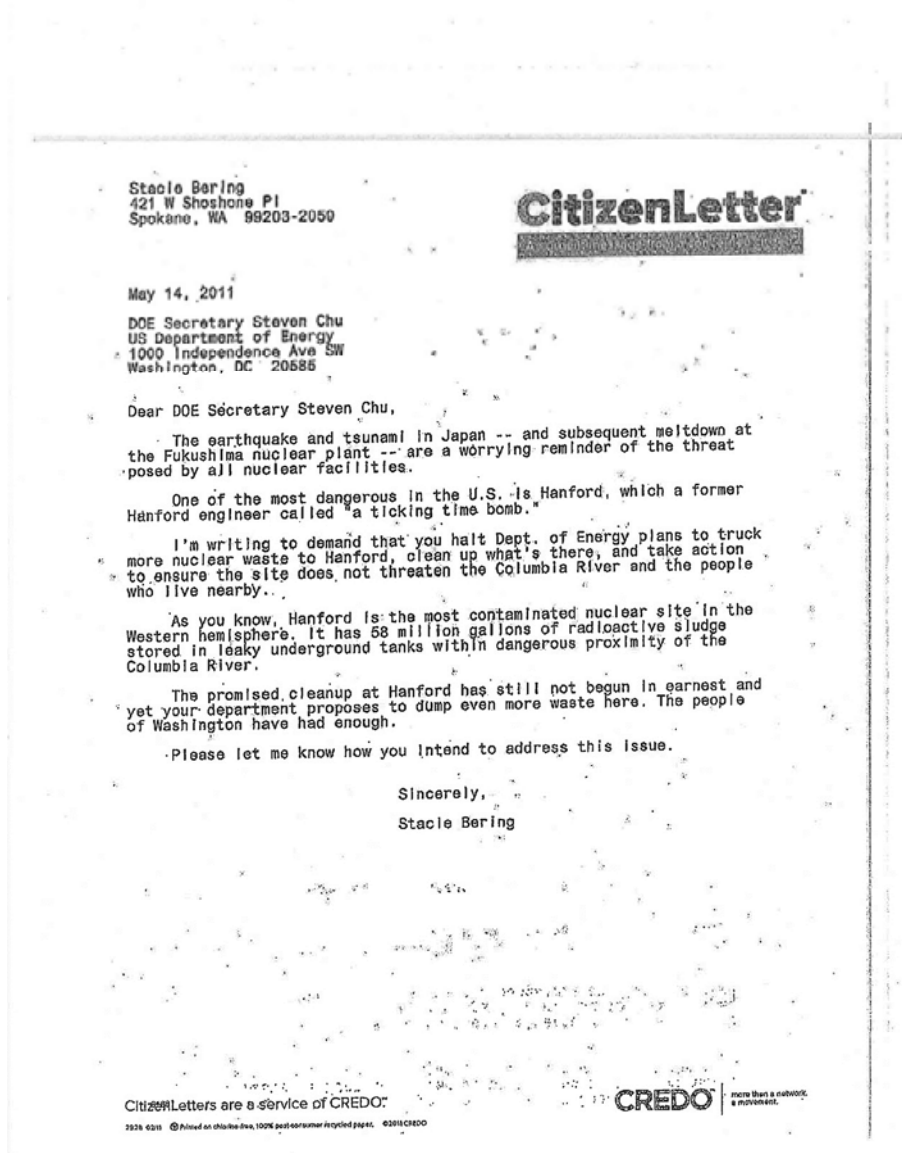
Batts, Katherine - L215

CREDO Campaign
Bekker, Rhonda, Commenter ID No. L216



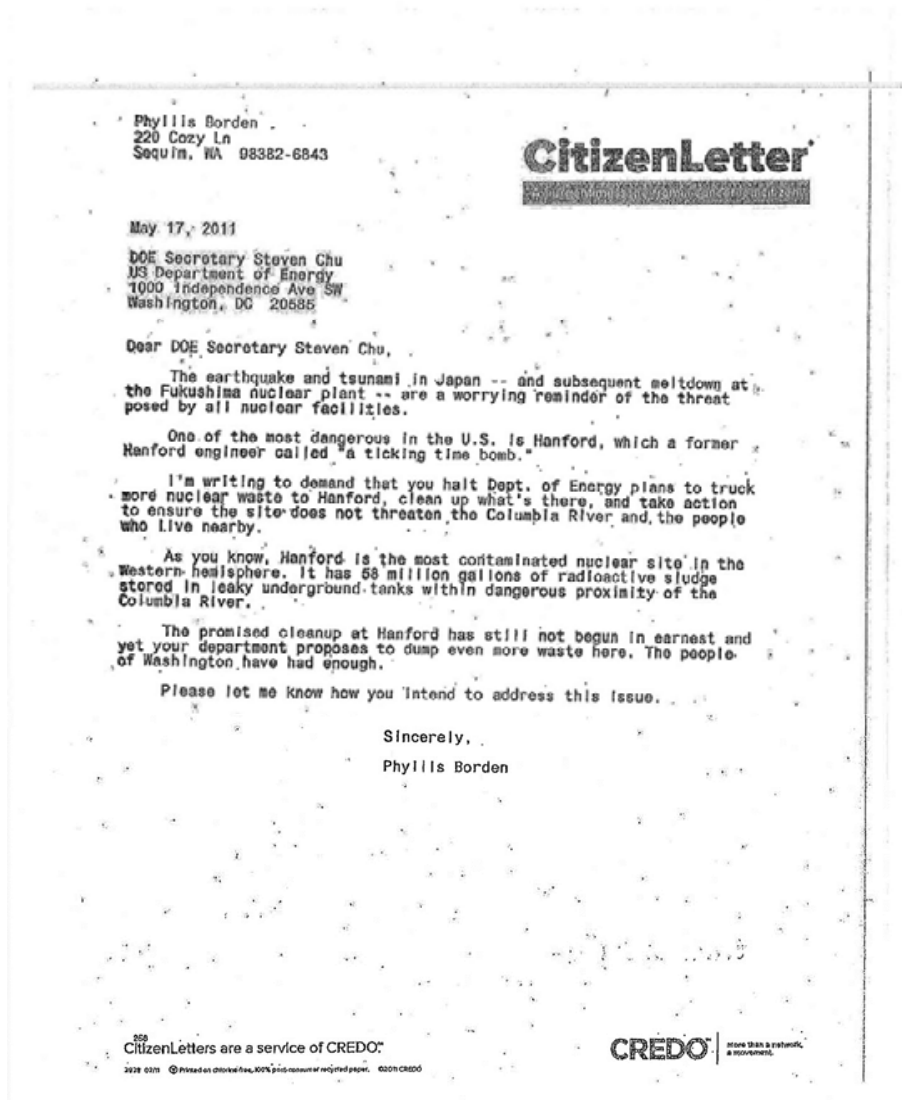
Bekker, Rhonda - L216

CREDO Campaign
Bering, Stacie, Commenter ID No. L217



Bering, Stacie – L217

CREDO Campaign
Borden, Phyllis, Commenter ID No. L218



Borden, Phyllis - L218

CREDO Campaign
Boynton, Llory, Commenter ID No. L219

Llory Boynton
73 Enchantment Way
Sequim, WA 98382-9038

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

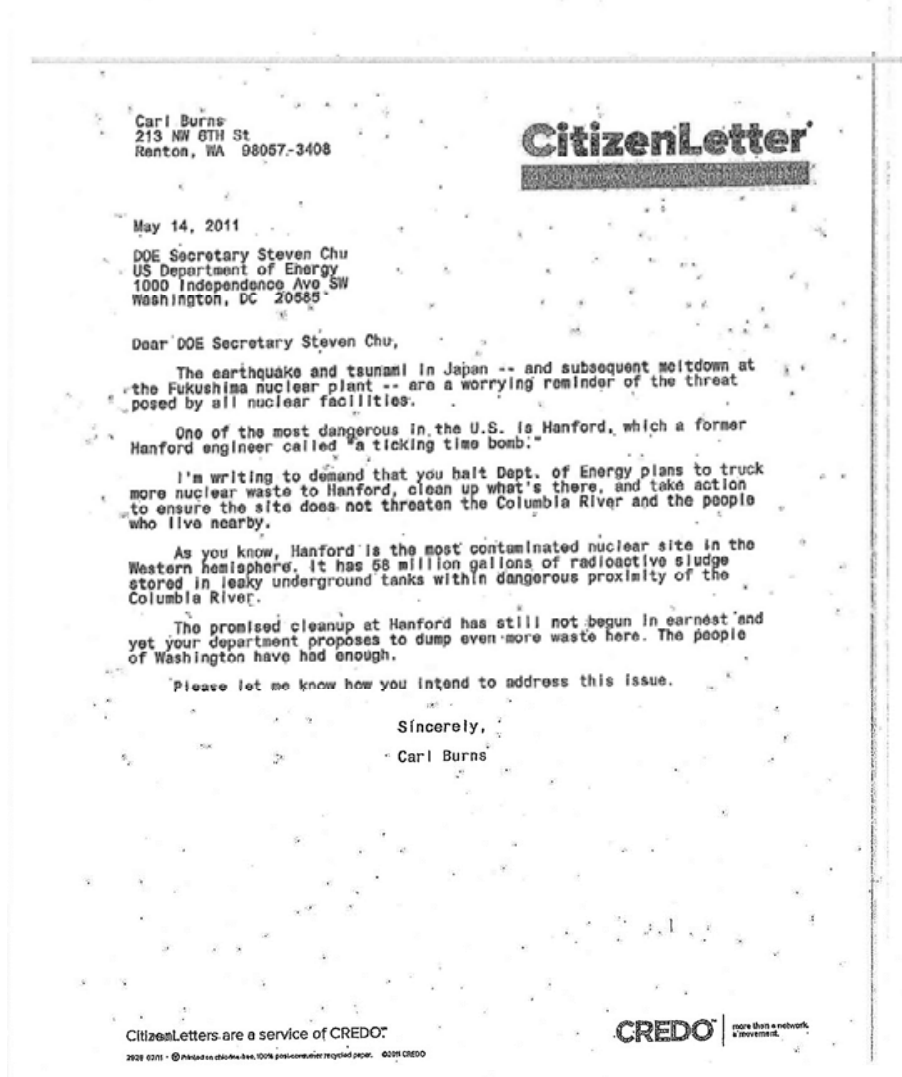
Llory Boynton

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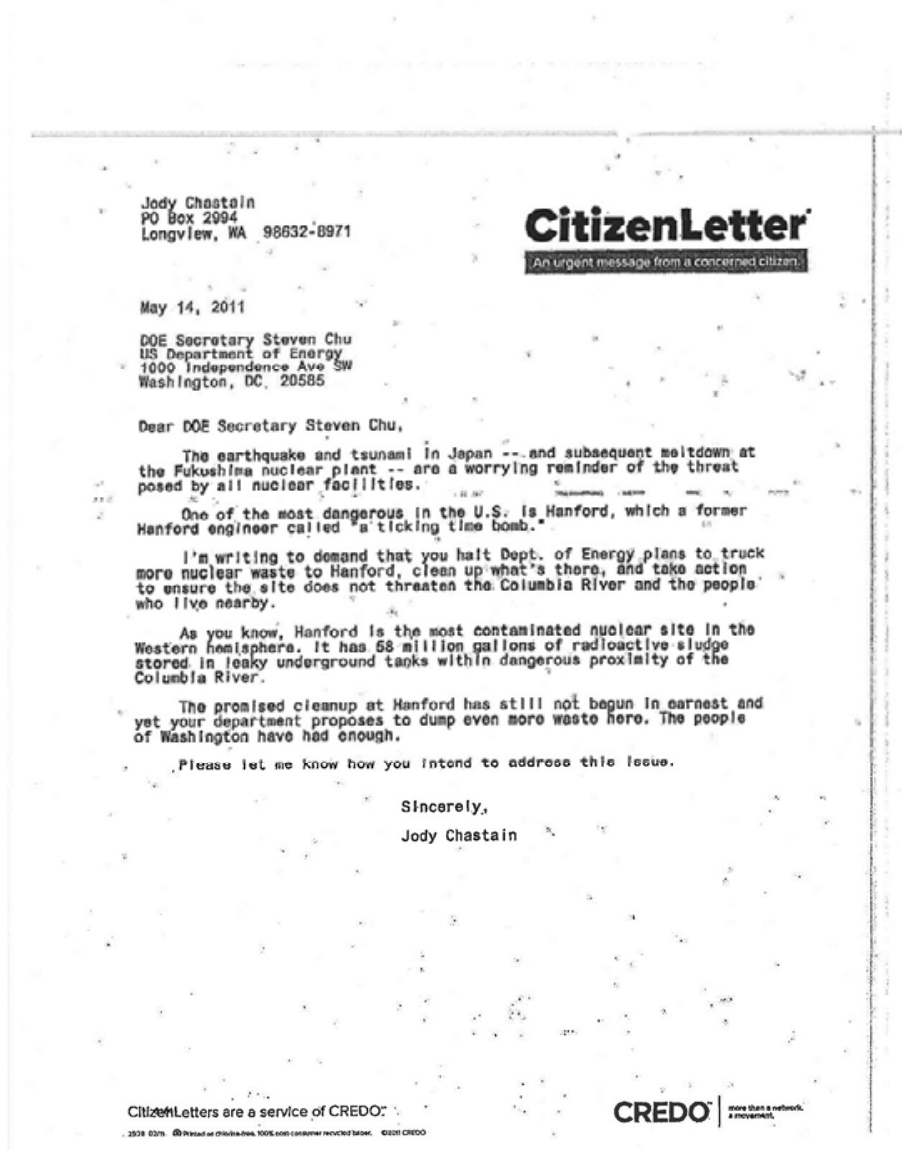
Boynton, Llory - L219

CREDO Campaign
Burns, Carl, Commenter ID No. L220



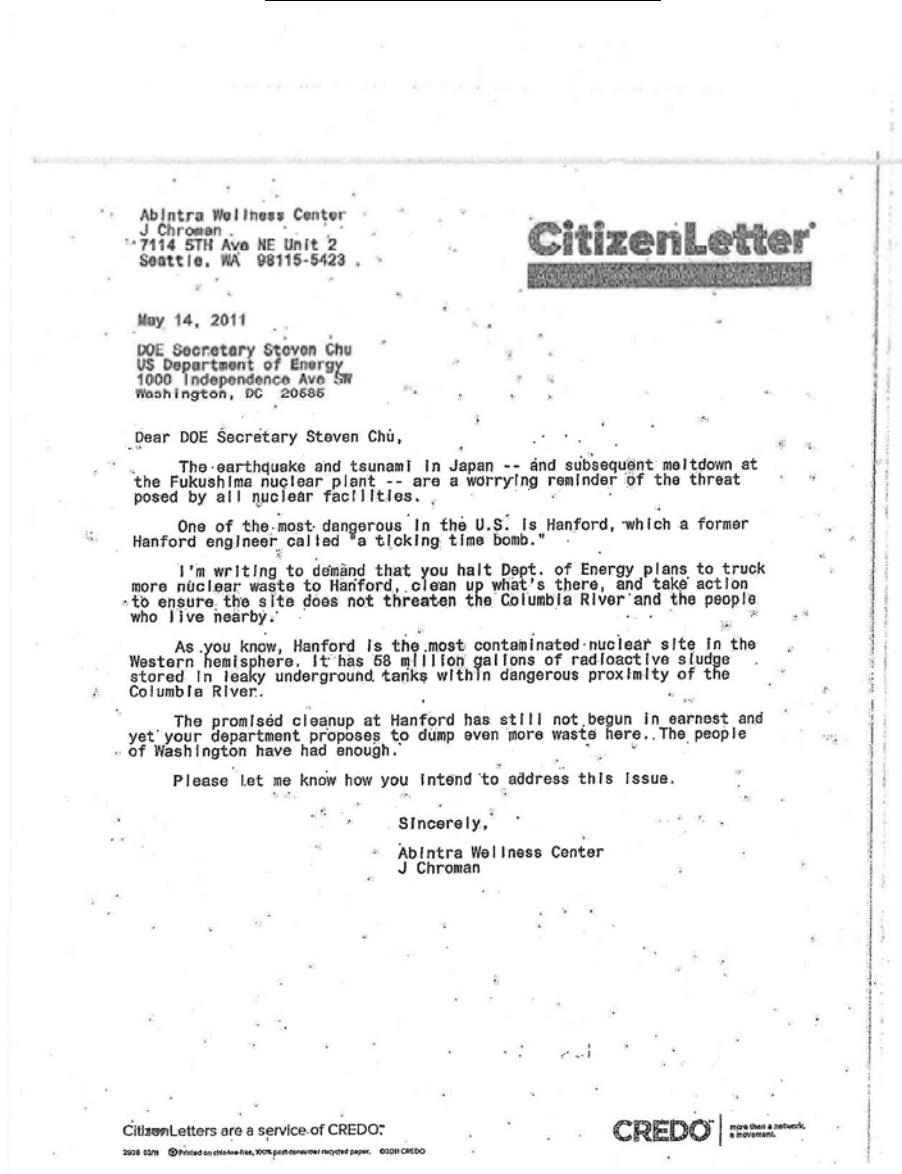
Burns, Carl - L220

CREDO Campaign
Chastain, Jody, Commenter ID No. L221



Chastain, Jody - L221

CREDO Campaign
Chroman, J., Commenter ID No. L222



Chroman, J. - L222

CREDO Campaign
Davis, Galen, Commenter ID No. L223

Galen Davis
9114 8TH AVE NE
Seattle, WA 98115-2811

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.

The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

Galen Davis

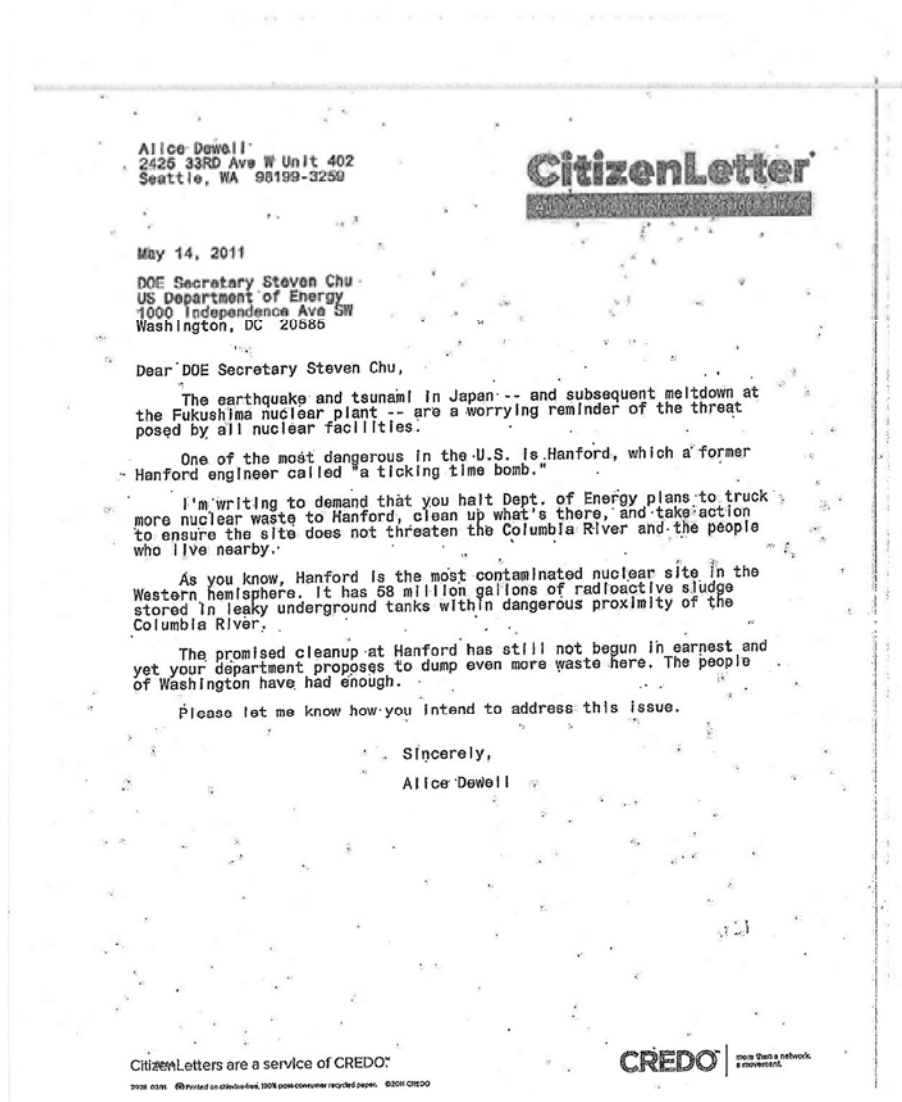
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a movement.

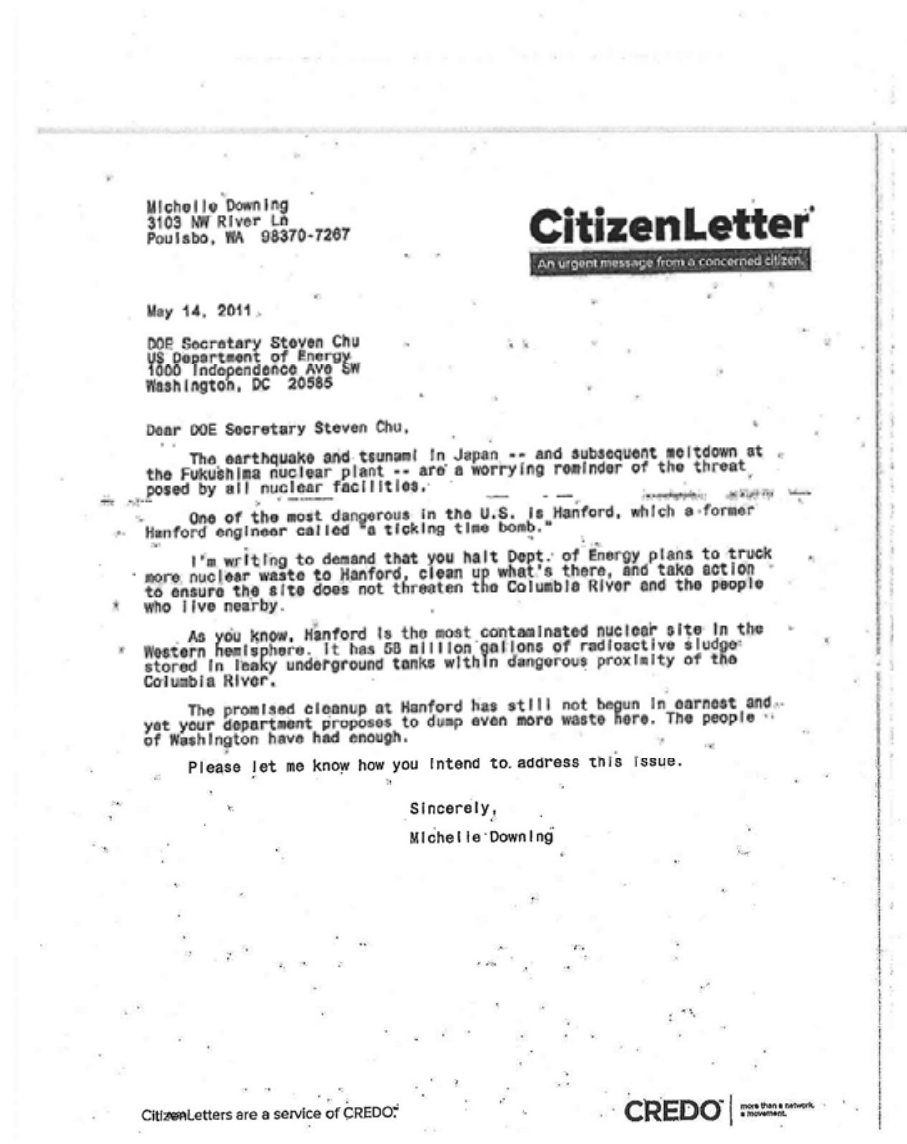
Davis, Galen - L223

CREDO Campaign
Dewell, Alice, Commenter ID No. L224



Dewell, Alice - L224

CREDO Campaign
Downing, Michelle, Commenter ID No. L225



Downing, Michelle - L225

CREDO Campaign
Fairchild, Jane, Commenter ID No. L226

Jane Fairchild
9437 58TH Ave S
Seattle, WA 98118-5626

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu:

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerely,

Jane Fairchild

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a movement.

Fairchild, Jane - L226

CREDO Campaign
Frothingham, Dianne, Commenter ID No. L227

Dianne Frothingham
1105A N 5TH St
Tacoma, WA 98403-1610

CitizenLetter
[Redacted]

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

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Please let me know how you intend to address this issue.

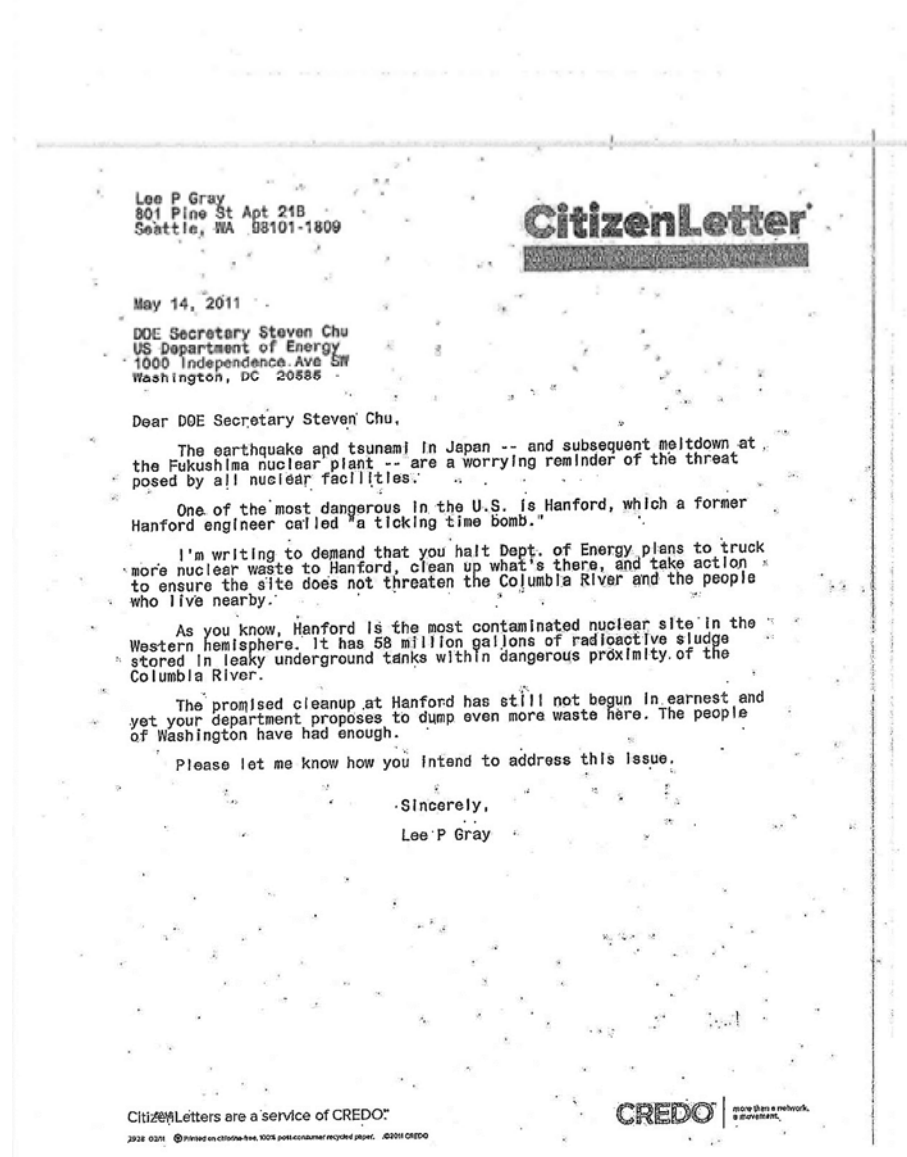
Sincerely,
Dianne Frothingham

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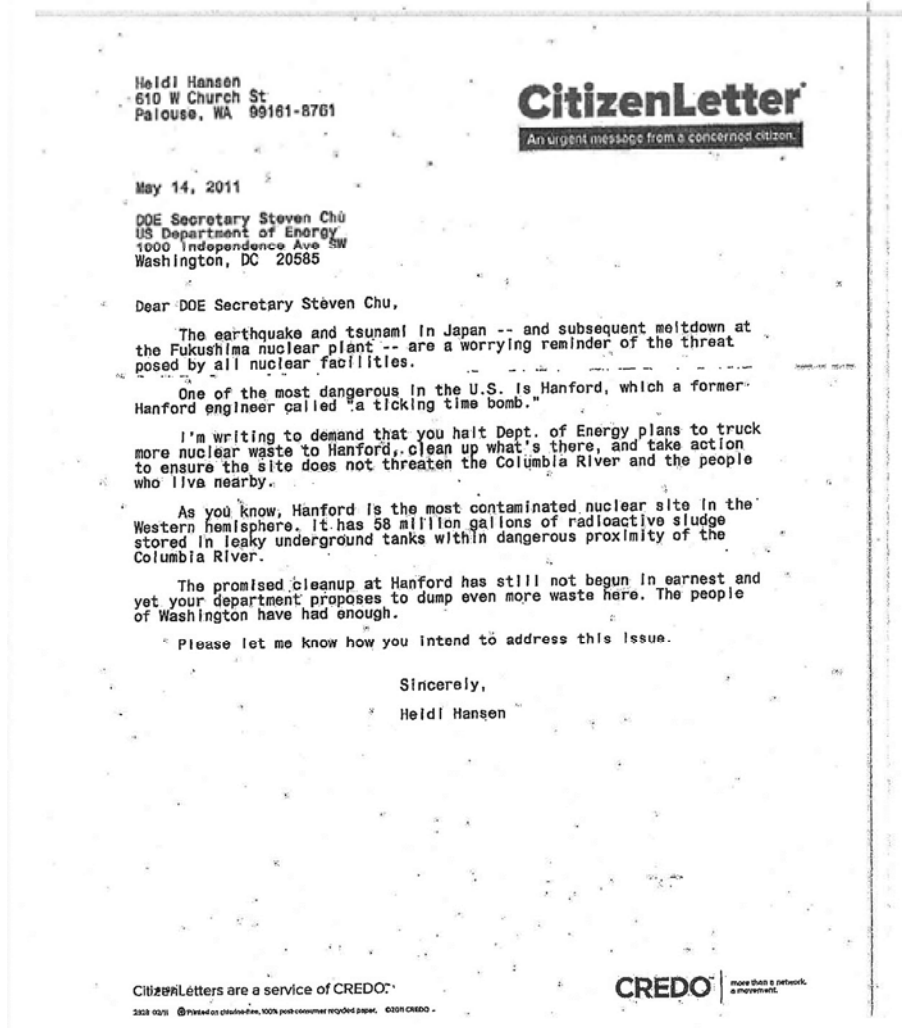
Frothingham, Dianne - L227

CREDO Campaign
Gray, Lee, Commenter ID No. L228



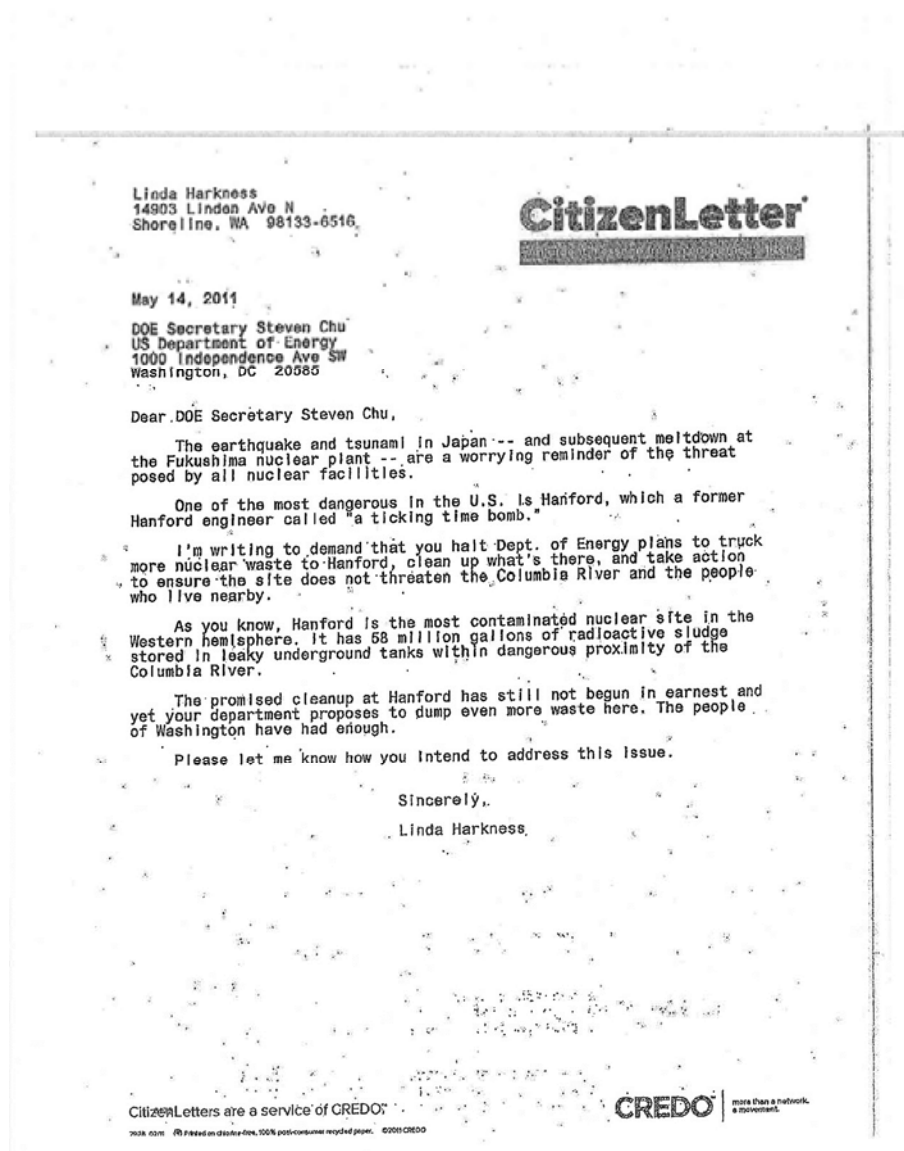
Gray, Lee - L228

CREDO Campaign
Hansen, Heidi, Commenter ID No. L229



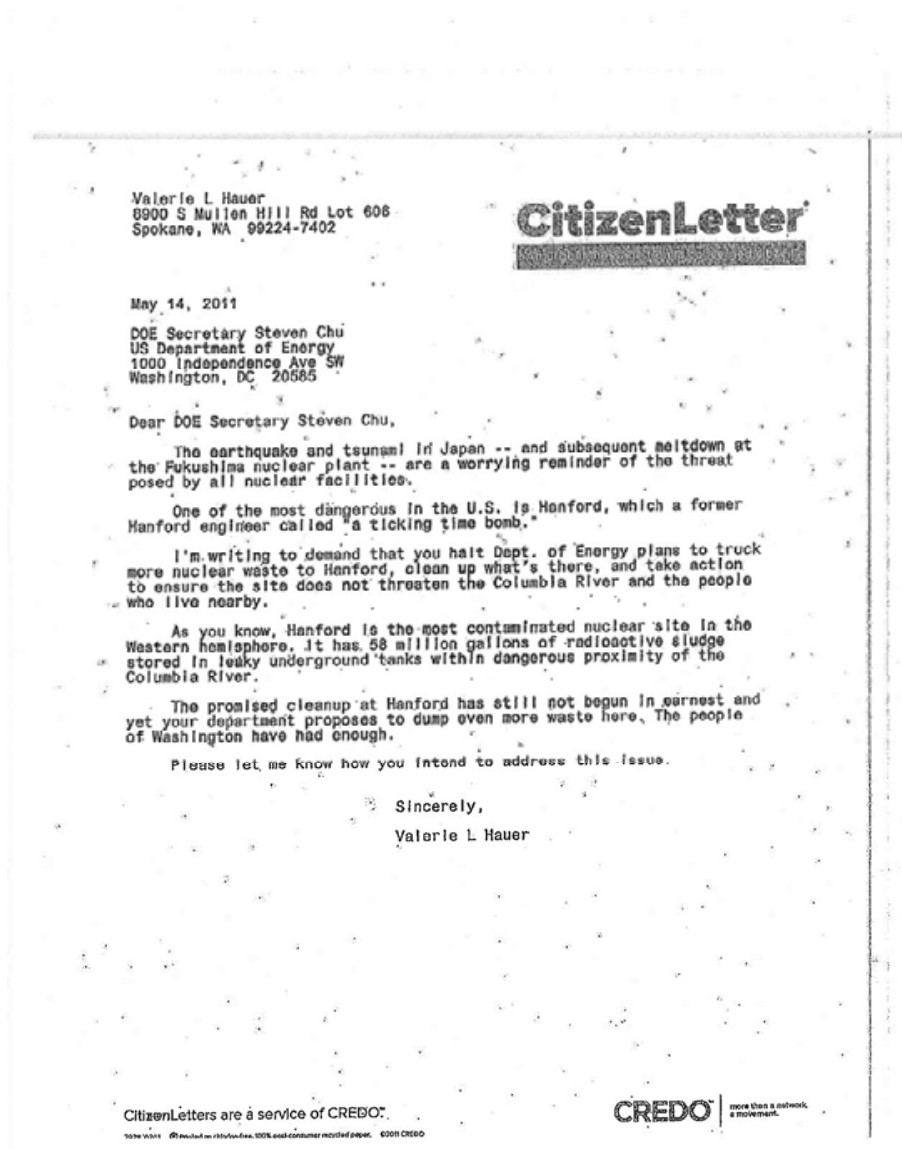
Hansen, Heidi - L229

CREDO Campaign
Harkness, Linda, Commenter ID No. L230



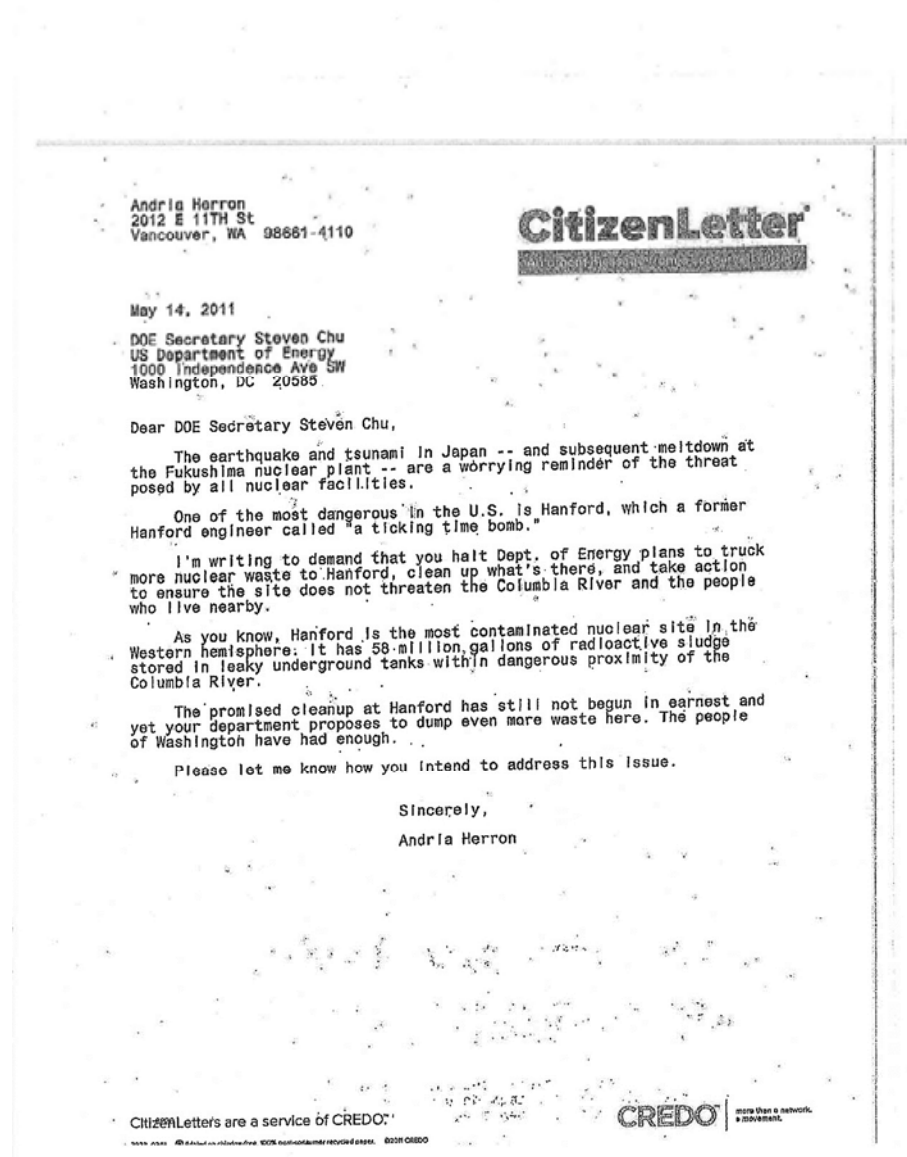
Harkness, Linda - L230

CREDO Campaign
Hauer, Valerie, Commenter ID No. L231



Hauer, Valerie - L231

CREDO Campaign
Herron, Andria, Commenter ID No. L232



Herron, Andria - L232

CREDO Campaign
Hodapp, Paul, Commenter ID No. L233

<p>Paul W Hodapp 8523 N Shiloh Hills Ct Spokane, WA 99208-5815</p> <p>May 14, 2011</p> <p>DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585</p> <p>Dear DOE Secretary Steven Chu,</p> <p>The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.</p> <p>One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."</p> <p>I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.</p> <p>As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.</p> <p>The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.</p> <p>Please let me know how you intend to address this issue.</p> <p style="text-align: right;">Sincerely, Paul W Hodapp</p>	<p>CitizenLetter</p> <p><small>CitizenLetters are a service of CREDO.</small></p> <p>CREDO <small>more than a network, a movement.</small></p>
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Hodapp, Paul - L233

CREDO Campaign
Houghton, Richard, Commenter ID No. L234

<p>Richard Houghton 7538 Guemes Island Rd Anacortes, WA 98221-9570</p> <p>May 17, 2011</p> <p>DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585</p> <p>Dear DOE Secretary Steven Chu,</p> <p>The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.</p> <p>One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."</p> <p>I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.</p> <p>As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 56 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.</p> <p>The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.</p> <p>Please let me know how you intend to address this issue.</p> <p style="text-align: right;">Sincerely, Richard Houghton</p>	<div style="text-align: center;">CitizenLetter <small>An urgent message from a concerned citizen.</small></div> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>
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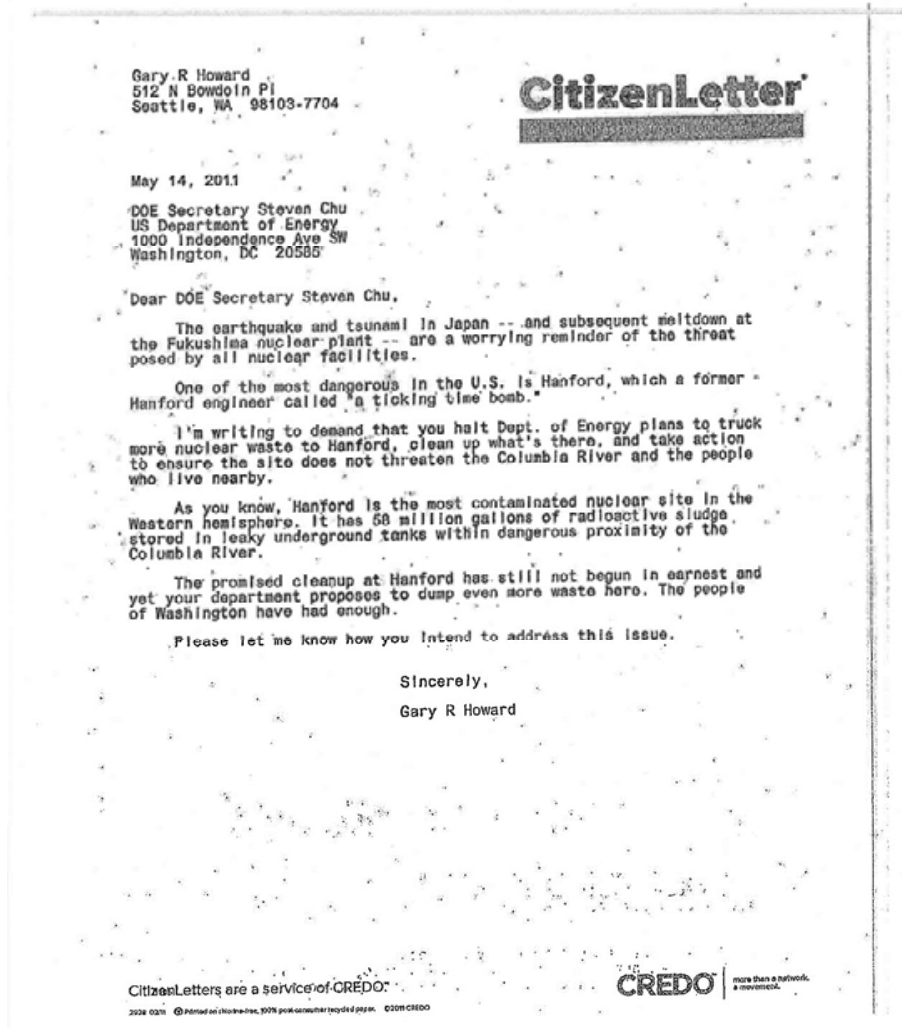
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Houghton, Richard - L234

CREDO Campaign
Howard, Gary, Commenter ID No. L235



Howard, Gary - L235

CREDO Campaign
Howe, Cheri, Commenter ID No. L236

Cheri Howe
3300 Carpenter Rd SE # C76
Lacey, WA 98503-4072

CitizenLetter

An urgent message from a concerned citizen.

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerely,

Cheri Howe

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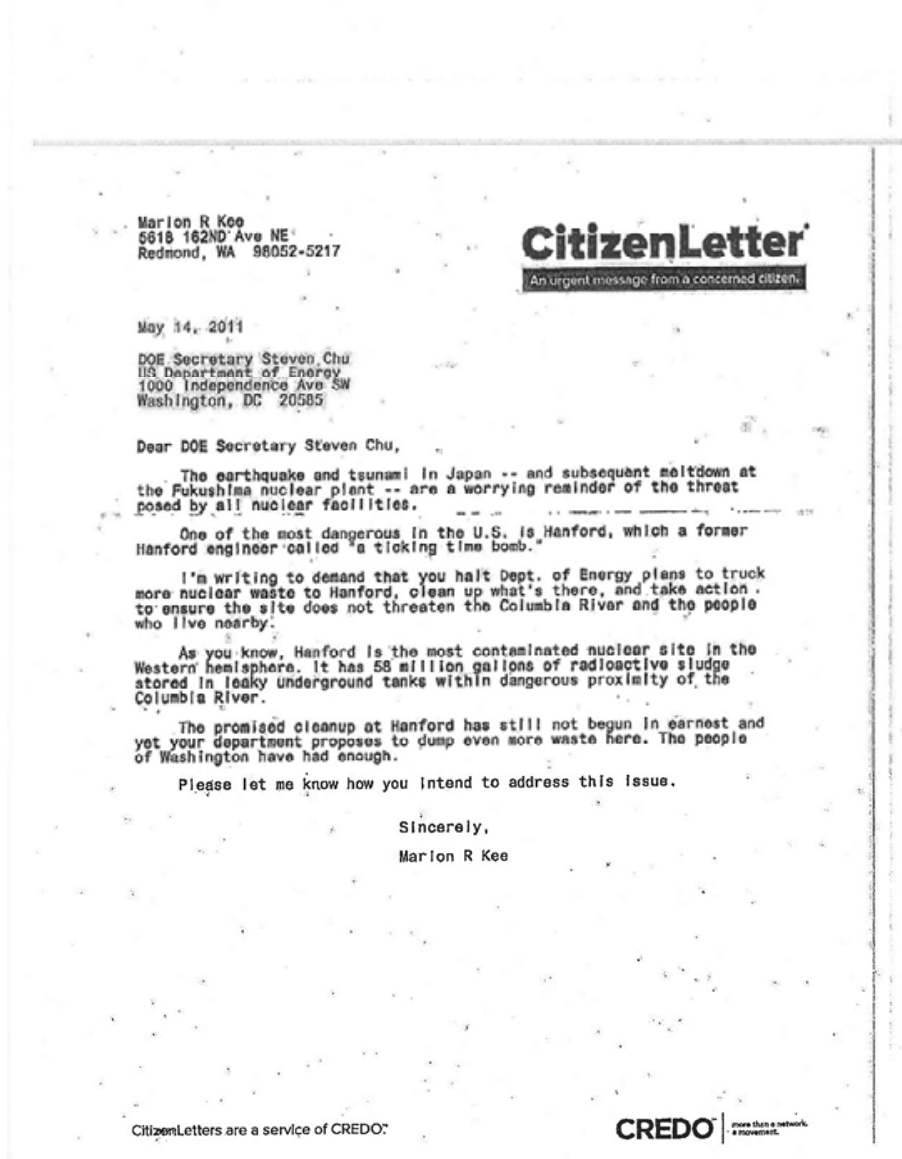
Howe, Cheri - L236

CREDO Campaign
Iverson, Luanna, Commenter ID No. L237

<p>Luanna Iverson 3509 72ND PI SE Mercer Island, WA 98040-3343</p>	<p>CitizenLetter <small>An urgent message from a concerned citizen.</small></p>
<p>May 14, 2011</p>	
<p>DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585</p>	
<p>Dear DOE Secretary Steven Chu,</p>	
<p>The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.</p>	
<p>One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."</p>	
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<p>As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.</p>	
<p>The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.</p>	
<p>Please let me know how you intend to address this issue.</p>	
<p style="text-align: right;">Sincerely,</p>	
<p style="text-align: right;">Luanna Iverson</p>	
<p><small>CitizenLetters are a service of CREDO.</small></p>	
<p>CREDO <small>more than a network, a movement.</small></p>	

Iverson, Luanna - L237

CREDO Campaign
Kee, Marion, Commenter ID No. L238



Kee, Marion - L238

CREDO Campaign
Ketchum, Deann, Commenter ID No. L239

Deann Ketchum
903 Bellevue Pl E Apt 202
Seattle, WA 98102-4403

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Please let me know how you intend to address this issue.

Sincerely,
Deann Ketchum

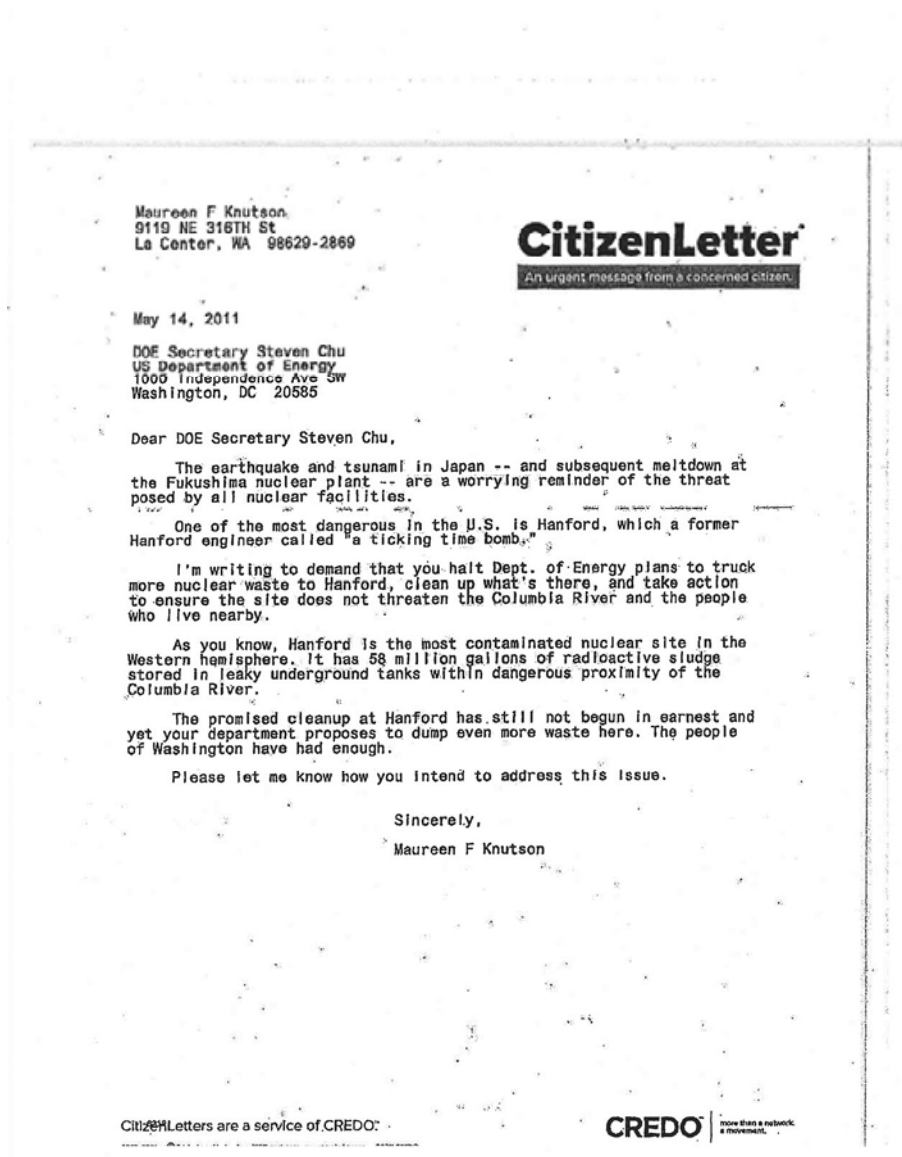
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Ketchum, Deann - L239

CREDO Campaign
Knutson, Maureen, Commenter ID No. L240



Knutson, Maureen – L240

CREDO Campaign
Leyrer, Sarah, Commenter ID No. L241

Sarah Leyrer
1030 W Columbia Ave Apt A
Moses Lake, WA 98837-2033

CitizenLetter
An urgent message from a concerned citizen.

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

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The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

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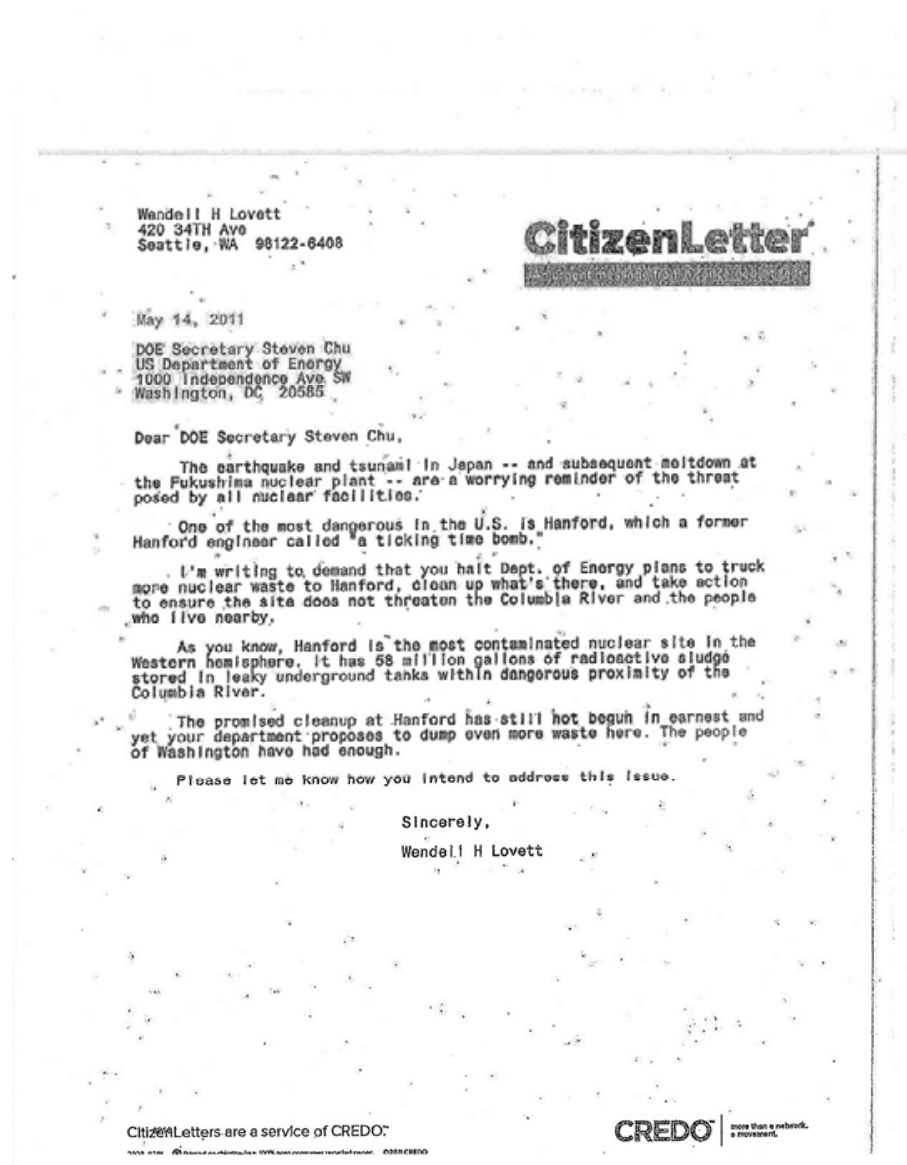
Sincerely,
Sarah Leyrer

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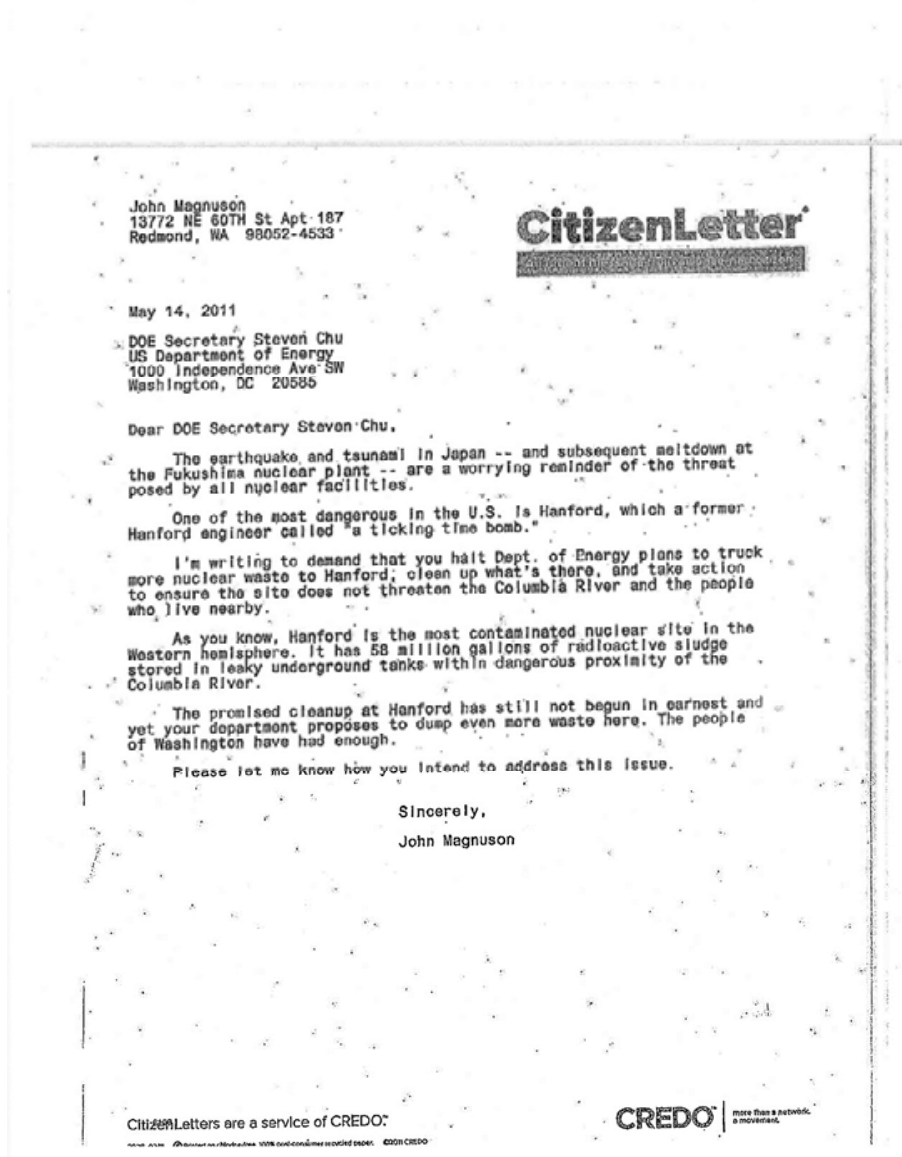
Leyrer, Sarah - L241

CREDO Campaign
Lovett, Wendell, Commenter ID No. L242



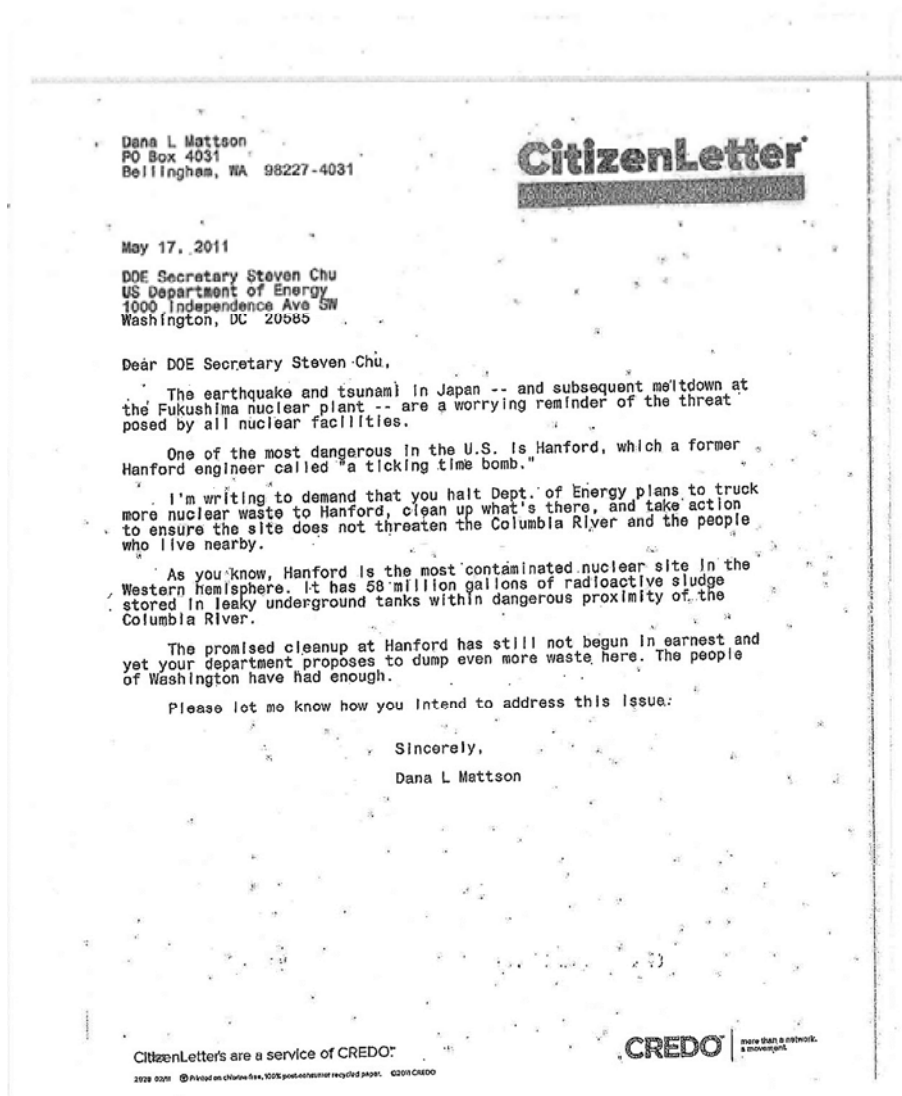
Lovett, Wendell - L242

CREDO Campaign
Magnuson, John, Commenter ID No. L243



Magnuson, John - L243

CREDO Campaign
Mattson, Dana, Commenter ID No. L244



Mattson, Dana - L244

CREDO Campaign
Mccracken, Philip, Commenter ID No. L245

Philip Mccracken
5029 Guemes Island Rd # B
Anacortes, WA 98221-9039

CitizenLetter
An urgent message from a concerned citizen.

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

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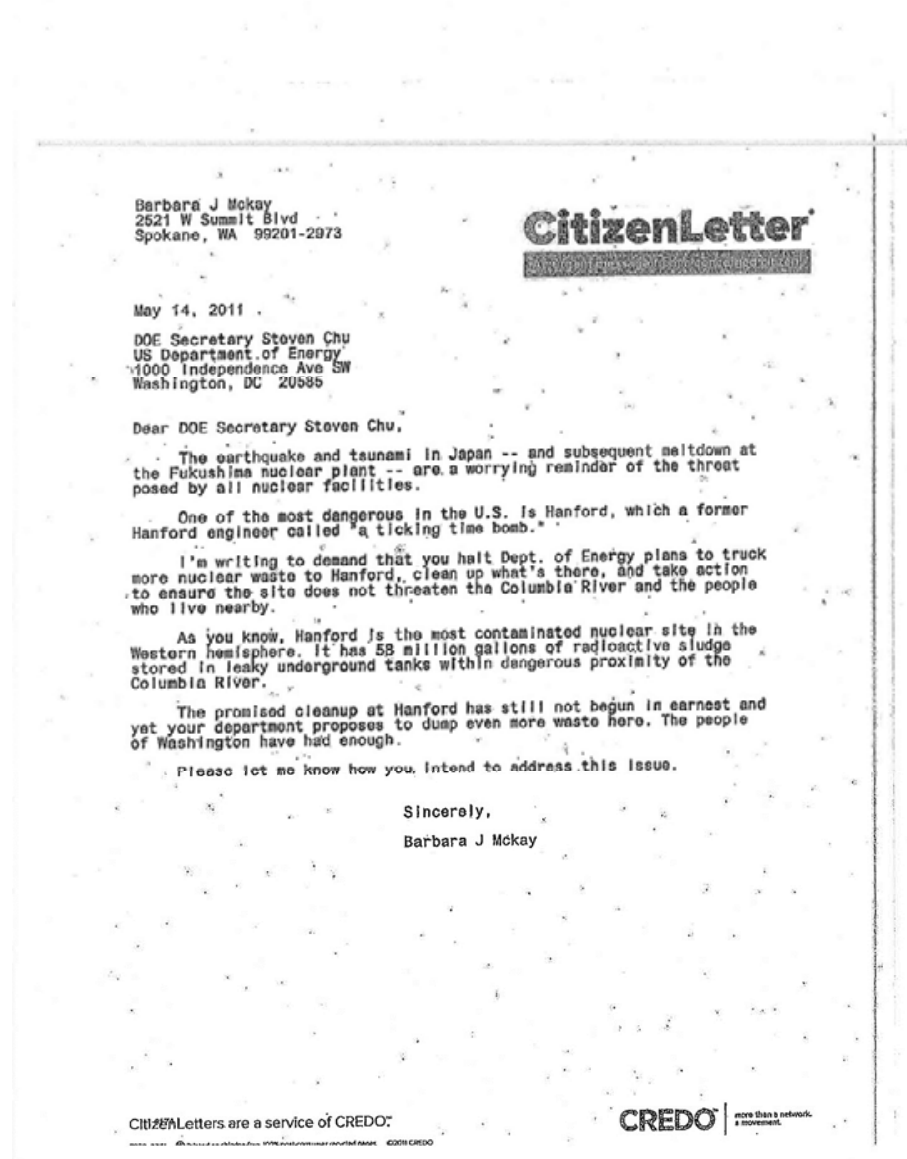
Please let me know how you intend to address this issue.

Sincerely,
Philip Mccracken

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Mccracken, Philip - L245

CREDO Campaign
Mckay, Barbara, Commenter ID No. L246



McKay, Barbara – L246

CREDO Campaign
Meinz, Vern, Commenter ID No. L247

Vern Meinz
3504 107TH Ave SW
Olympia, WA 98512-9105

CitizenLetter

May 14, 2011

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US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

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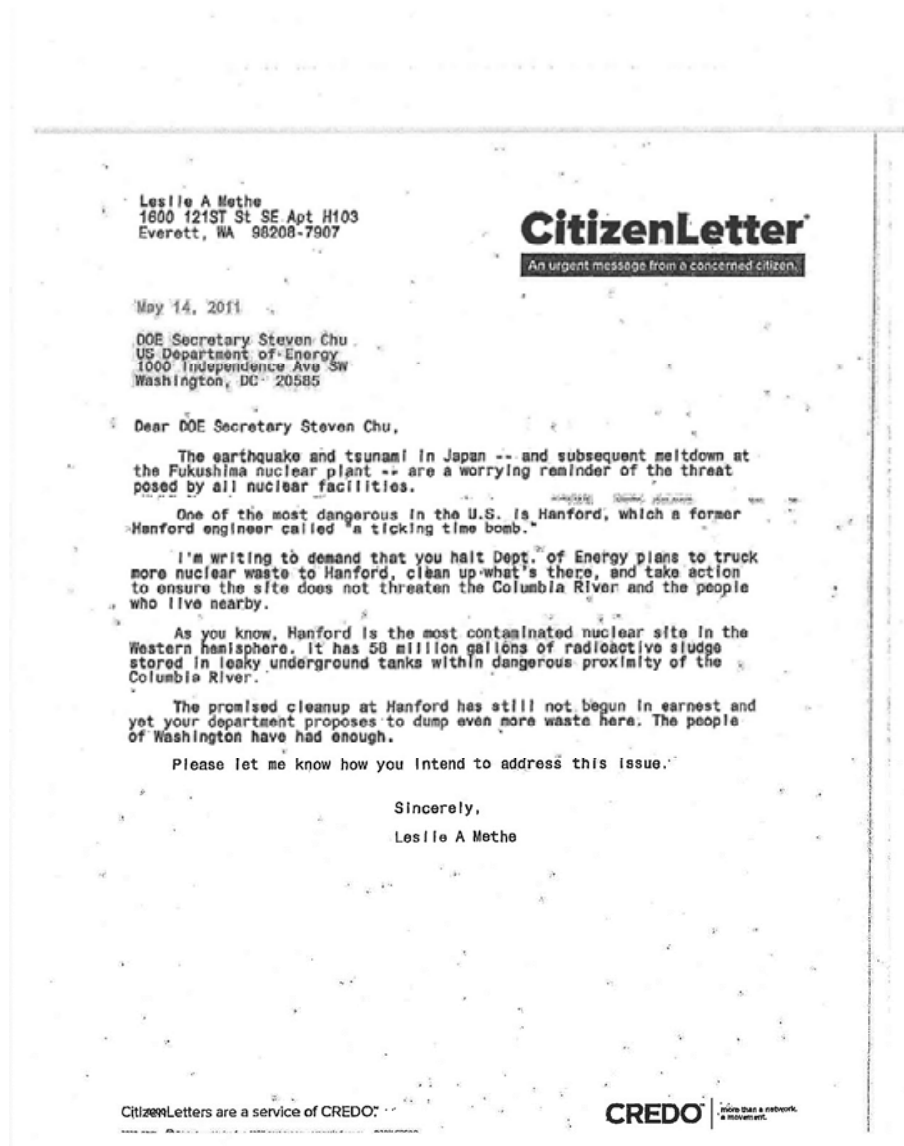
Sincerely,
Vern Meinz

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Meinz, Vern - L247

CREDO Campaign
Methe, Leslie, Commenter ID No. L248



Methe, Leslie - L248

CREDO Campaign
Mikkelsen, Susan, Commenter ID No. L249

<p>Susan Mikkelsen 4710 Burke Ave N Seattle, WA 98103-6820</p> <p>May 14, 2011</p> <p>DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585</p> <p>Dear DOE Secretary Steven Chu,</p> <p>The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.</p> <p>One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."</p> <p>I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.</p> <p>As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 55 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.</p> <p>The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.</p> <p>Please let me know how you intend to address this issue.</p> <p style="text-align: right;">Sincerely, Susan Mikkelsen</p>	<div style="border: 1px solid black; padding: 5px; display: inline-block;">CitizenLetter</div>
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Mikkelsen, Susan - L249

CREDO Campaign
Morey, Barbara, Commenter ID No. L250

Barbara E Morey
707 O St
Port Townsend, WA 98368-4111

CitizenLetter
An urgent message from a concerned citizen.

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

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Sincerely,

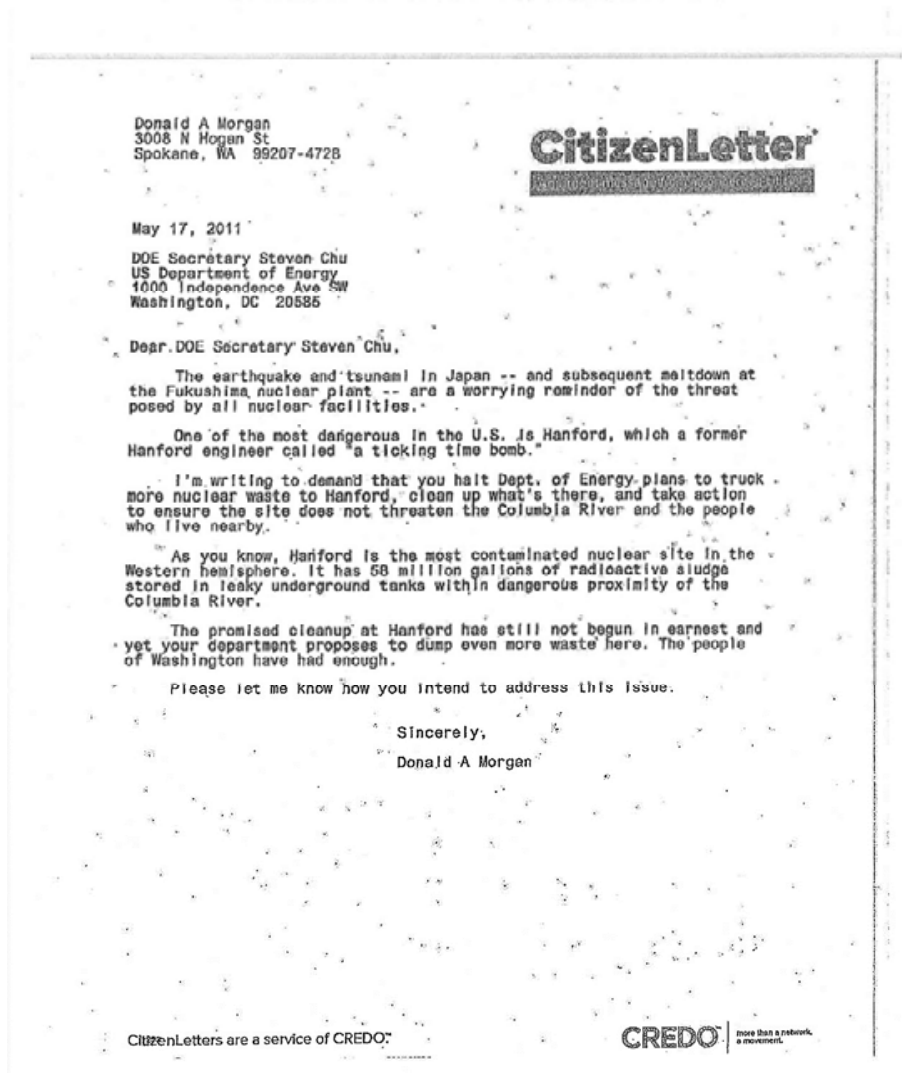
Barbara E Morey

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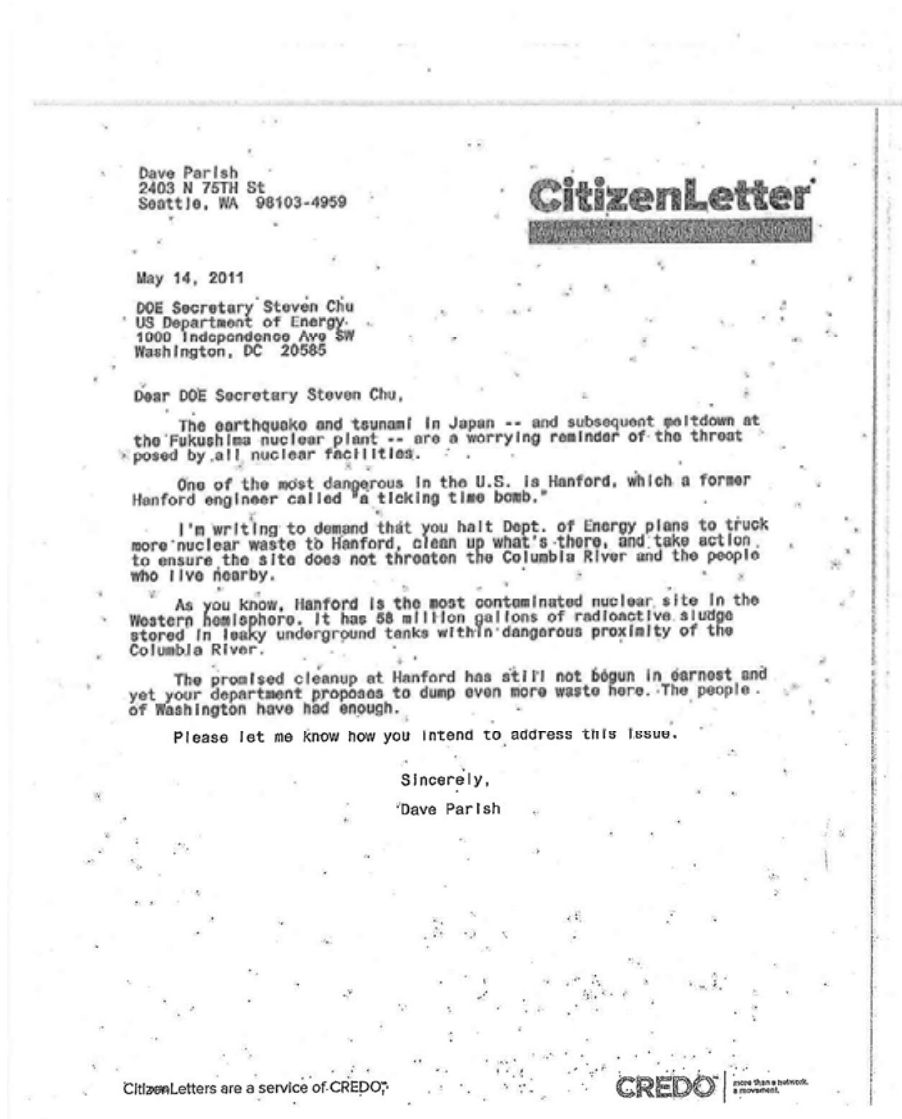
Morey, Barbara - L250

CREDO Campaign
Morgan, Donald, Commenter ID No. L251



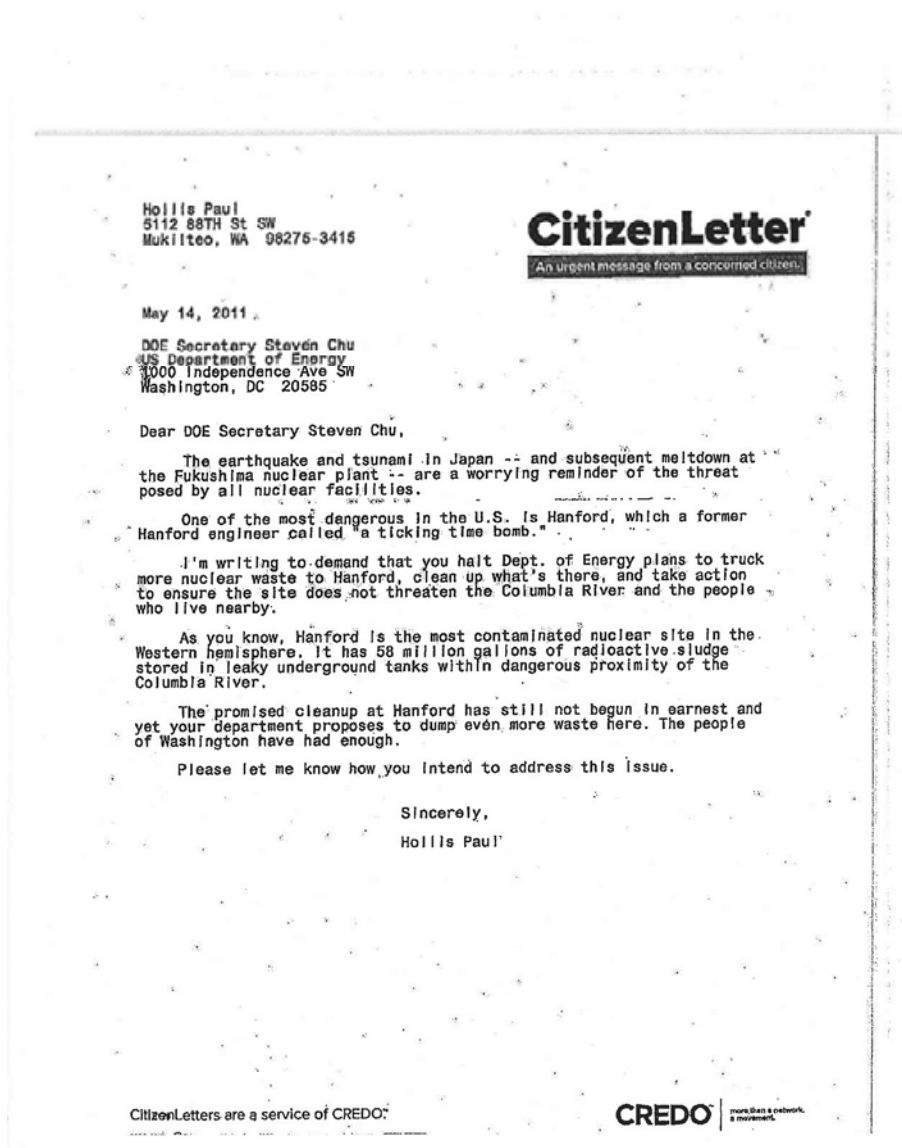
Morgan, Donald - L251

CREDO Campaign
Parish, Dave, Commenter ID No. L252



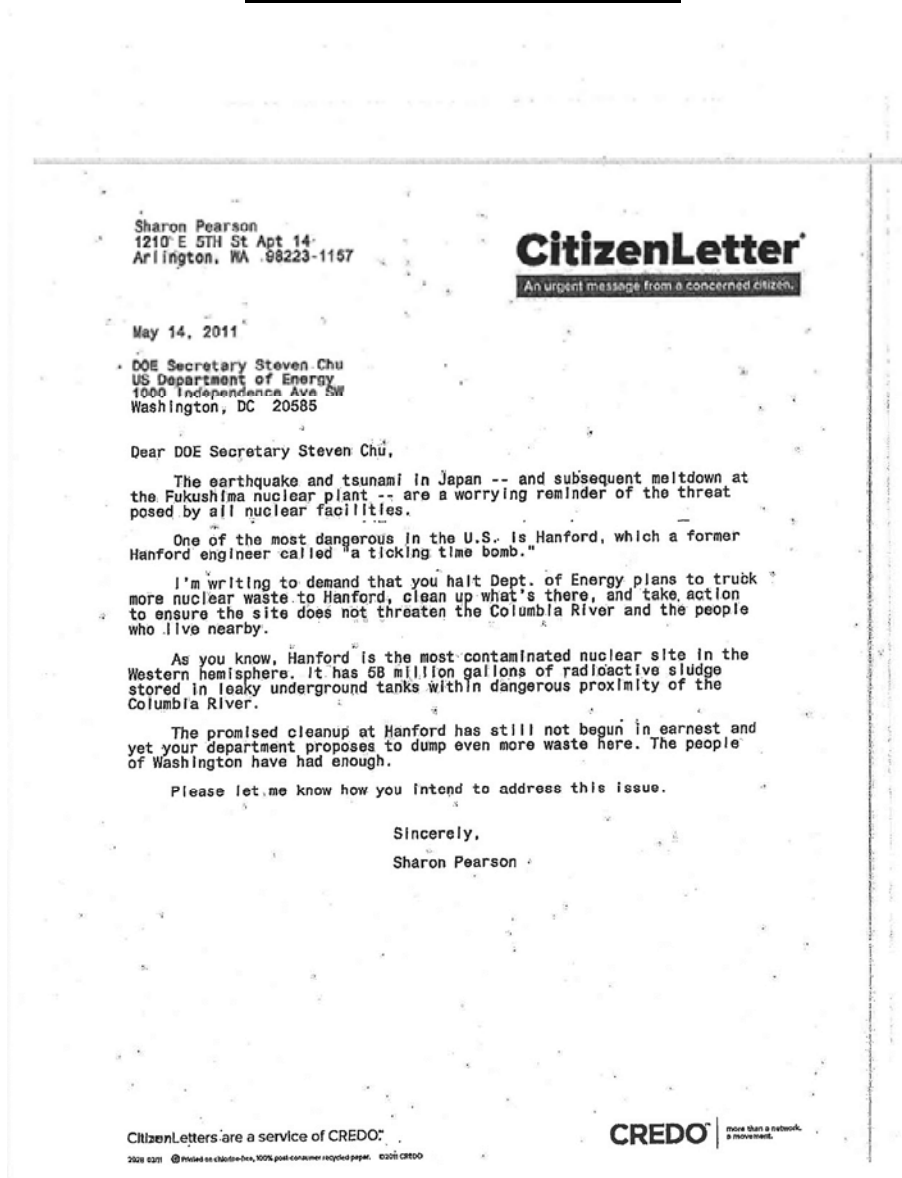
Parish, Dave - L252

CREDO Campaign
Hollis, Paul, Commenter ID No. L253



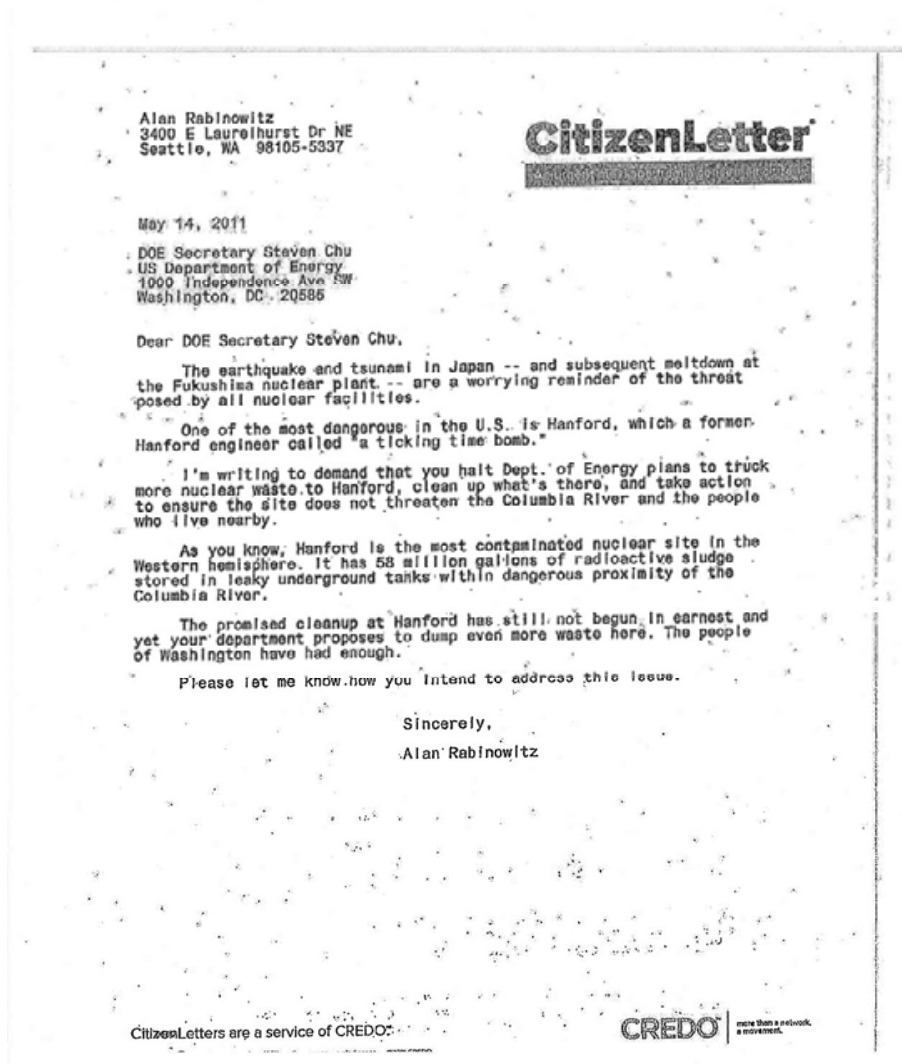
Hollis, Paul - L253

CREDO Campaign
Pearson, Sharon, Commenter ID No. L254



Pearson, Sharon - L254

CREDO Campaign
Rabinowitz, Alan, Commenter ID No. L255



Rabinowitz, Alan - L255

CREDO Campaign
Rav, Beth, Commenter ID No. L256

<p>Beth L Ray 28611 N River Estates Dr Chattaroy, WA 99003-8848</p> <p>May 14, 2011</p> <p>DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585</p> <p>Dear DOE Secretary Steven Chu,</p> <p>The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.</p> <p>One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."</p> <p>I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.</p> <p>As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.</p> <p>The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.</p> <p>Please let me know how you intend to address this issue.</p> <p style="text-align: right;">Sincerely, Beth L Ray</p>	<div style="text-align: center;">CitizenLetter <small>An urgent message from a concerned citizen.</small></div> <div style="text-align: center;"><small>U.S. Department of Energy/DOE</small></div>
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Ray, Beth - L256

CREDO Campaign
Rosen, Susan, Commenter ID No. L257

Susan Rosen
3912 Martin Way E Ste B
Olympia, WA 98506-5220

CitizenLetter
AN urgent message from a concerned citizen.

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

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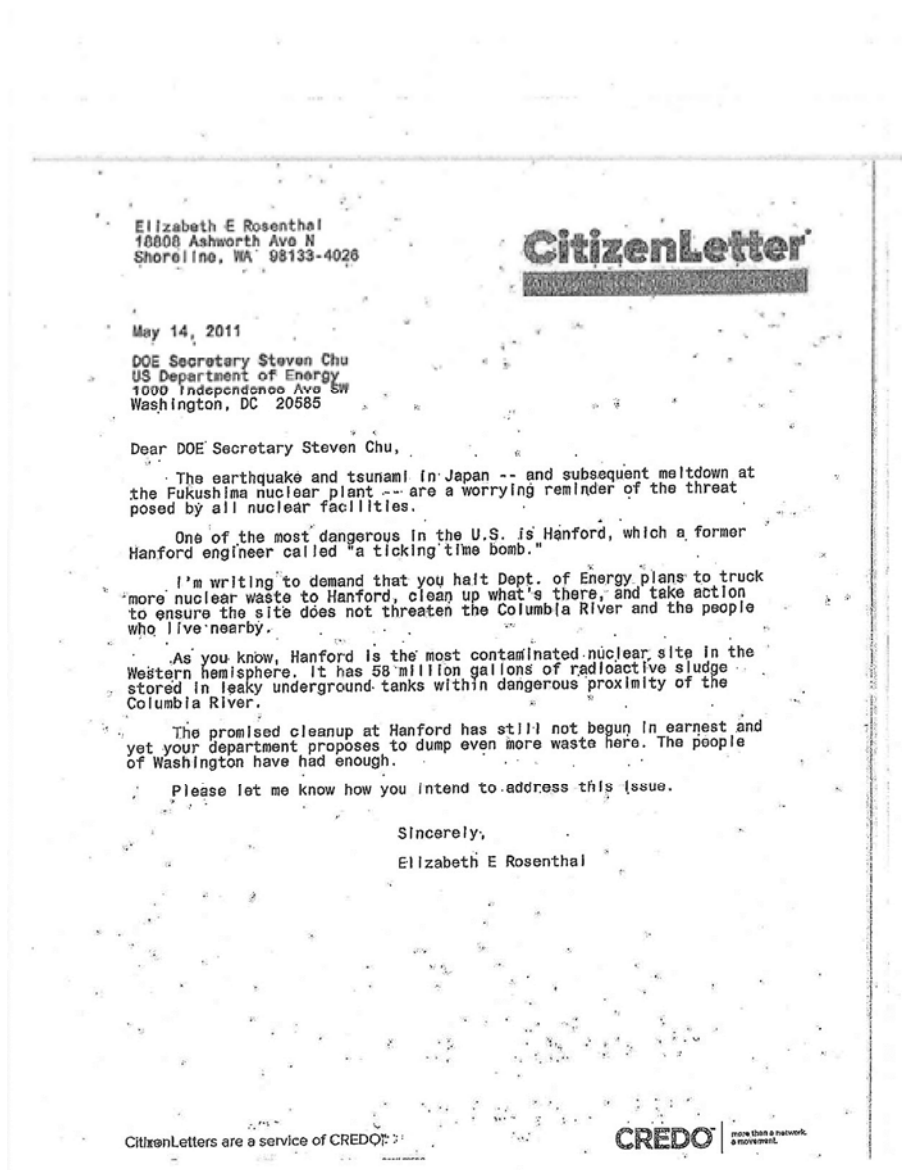
Sincerely,
Susan Rosen

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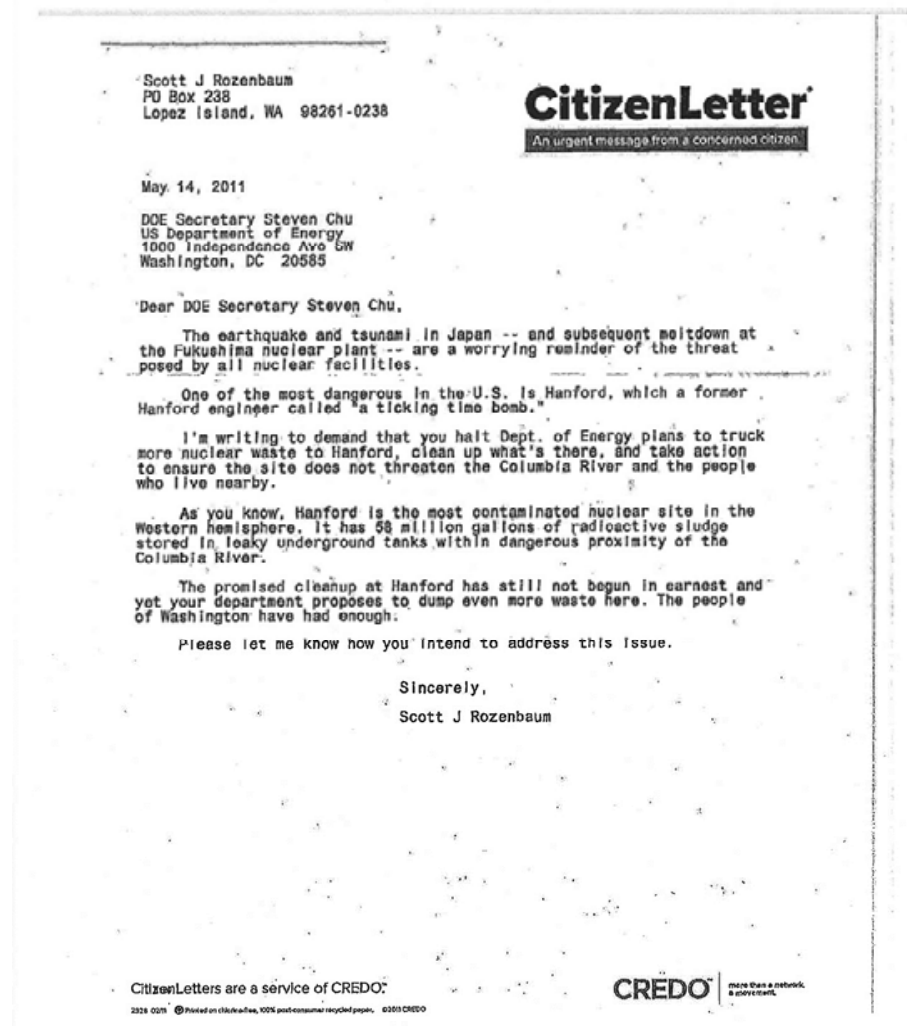
Rosen, Susan - L257

CREDO Campaign
Rosenthal, Elizabeth, Commenter ID No. L258



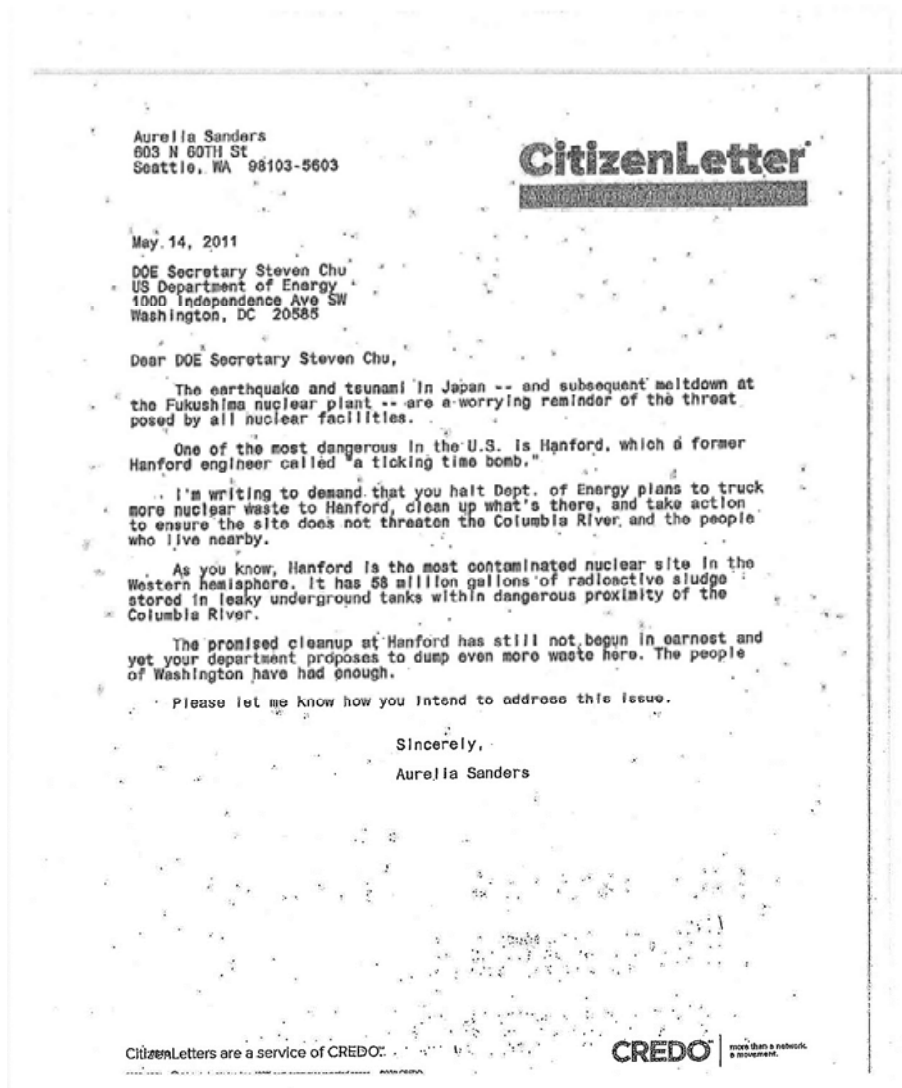
Rosenthal, Elizabeth - L258

CREDO Campaign
Rozenbaum, Scott, Commenter ID No. L259



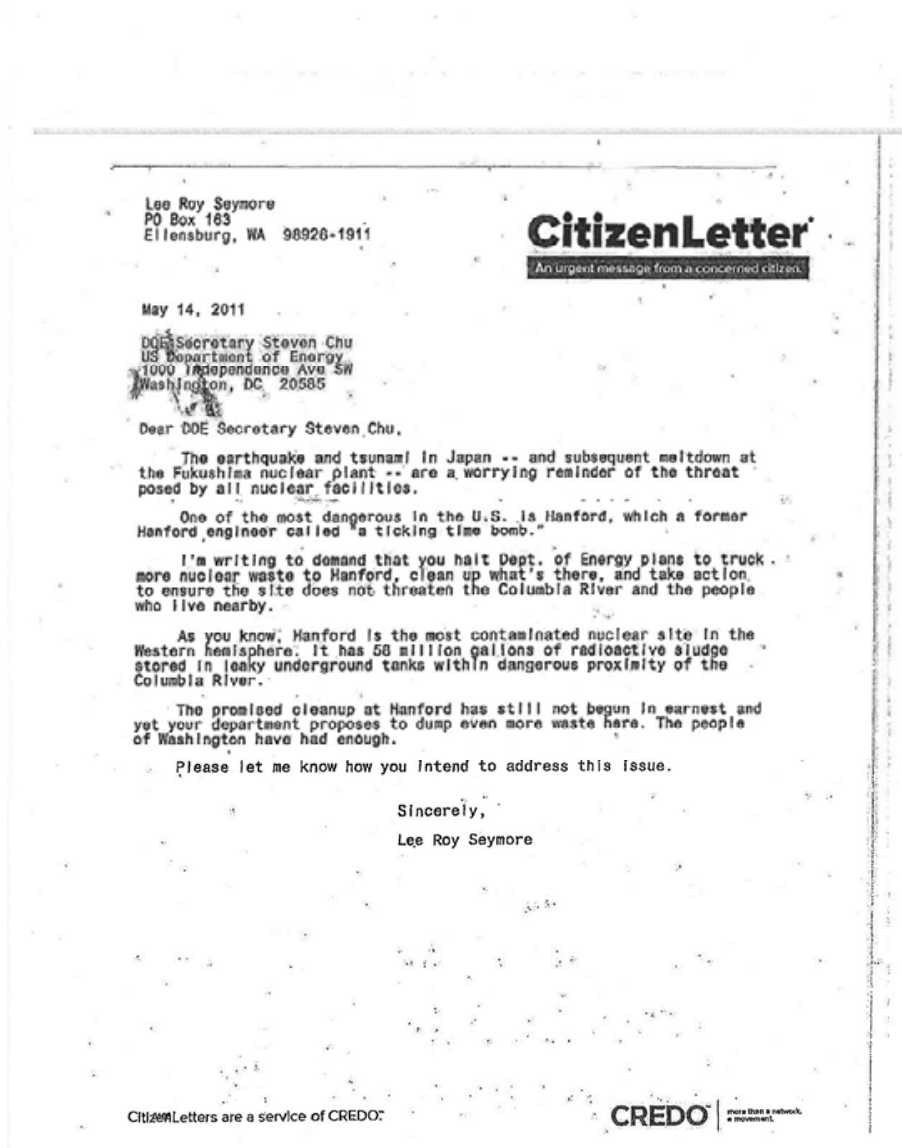
Rozenbaum, Scott - L259

CREDO Campaign
Sanders, Aurelia, Commenter ID No. L260



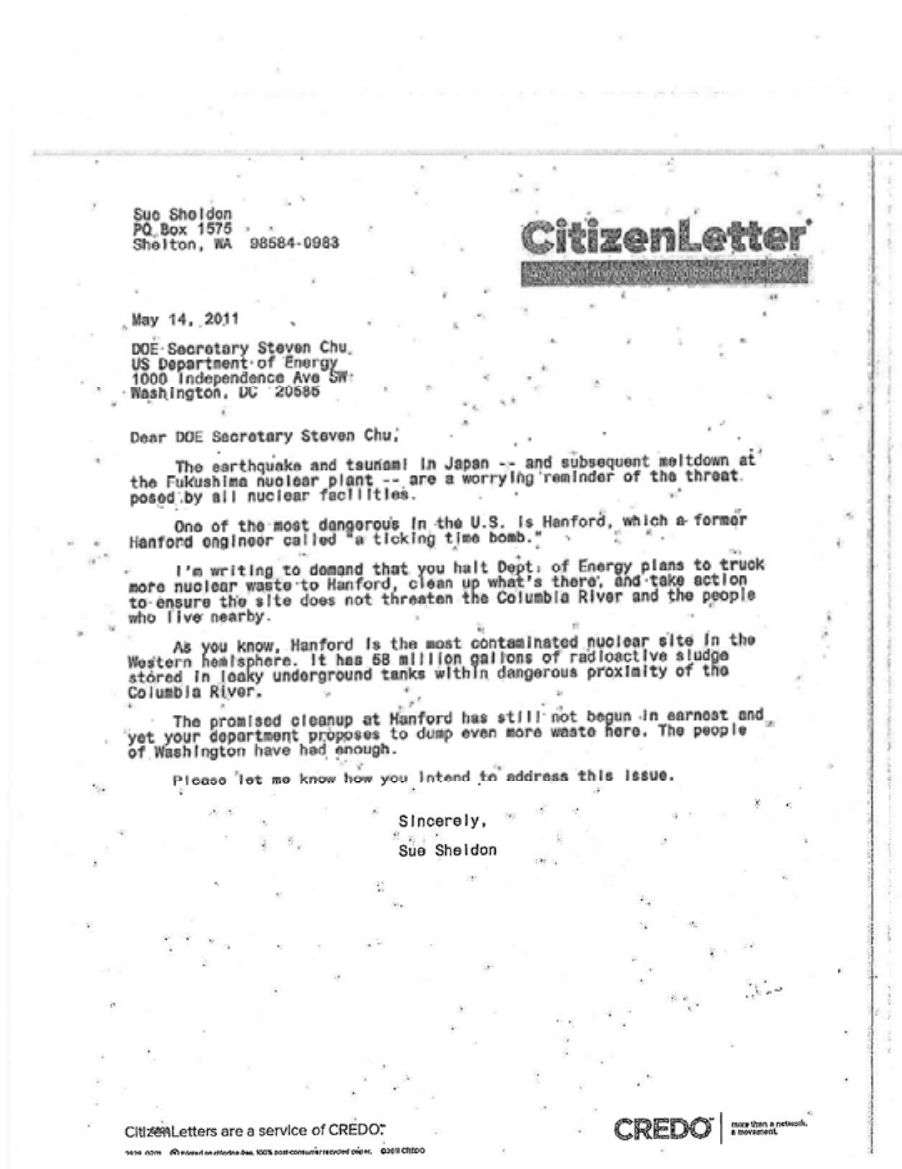
Sanders, Aurelia - L260

CREDO Campaign
Seymore, Lee Roy, Commenter ID No. L261



Seymore, Lee Roy - L261

CREDO Campaign
Sheldon, Sue, Commenter ID No. L262



Sheldon, Sue - L262

CREDO Campaign
Siverts, Linda, Commenter ID No. L263

Linda Siverts
8804 N Post St
Spokane, WA 99208-4138

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

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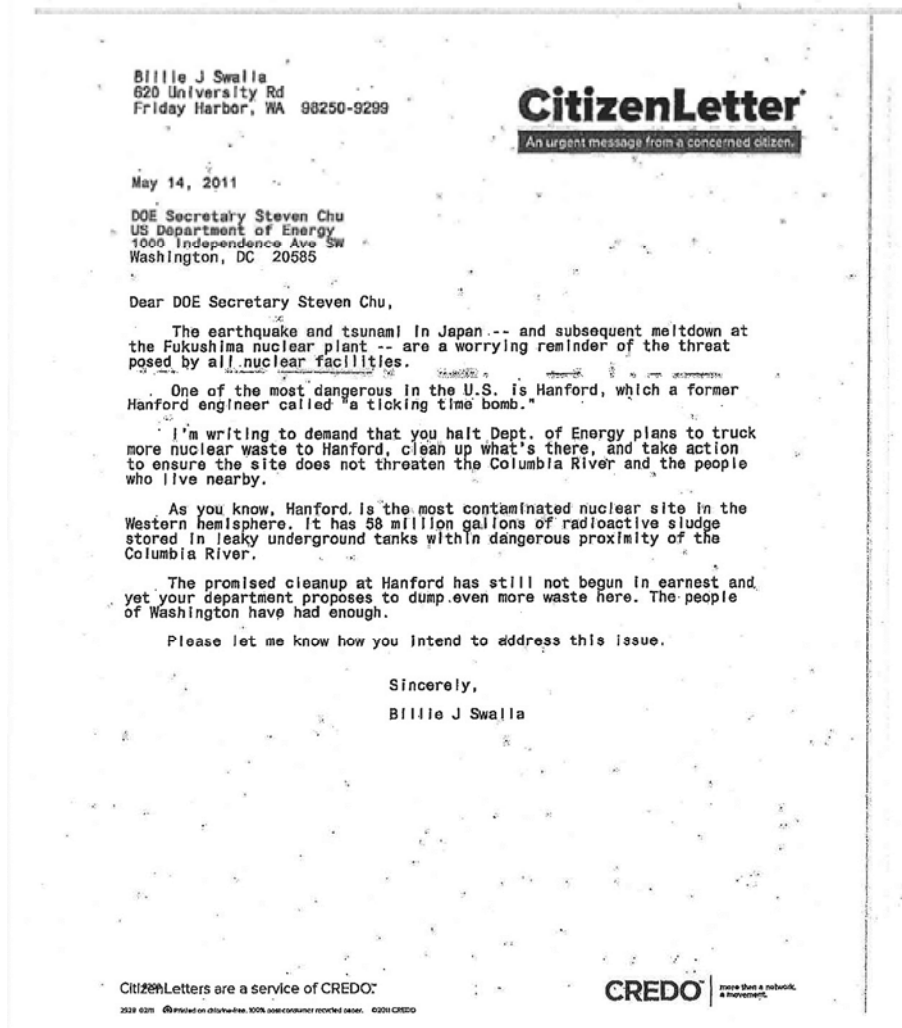
Sincerely,
Linda Siverts

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Siverts, Linda - L263

CREDO Campaign
Swalla, Billie, Commenter ID No. L264



Swalla, Billie - L264

CREDO Campaign
Todd, Therald, Commenter ID No. L265

Therald Todd
4505 Holcomb St
Port Townsend, WA 98368-2120

CitizenLetter

An urgent message from a concerned citizen.

May 17, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.

The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

Therald Todd

CitizenLetters are a service of CREDO.

CREDO More than a network.
A movement.

Todd, Therald - L265

CREDO Campaign
Trowbridge, Cynthia, Commenter ID No. L266

Cynthia Powell Trowbridge
3537 Gylany Way
Greenbank, WA 98253-9758

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May 14, 2011

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US Department of Energy
1600 Independence Ave SW
Washington, DC 20585

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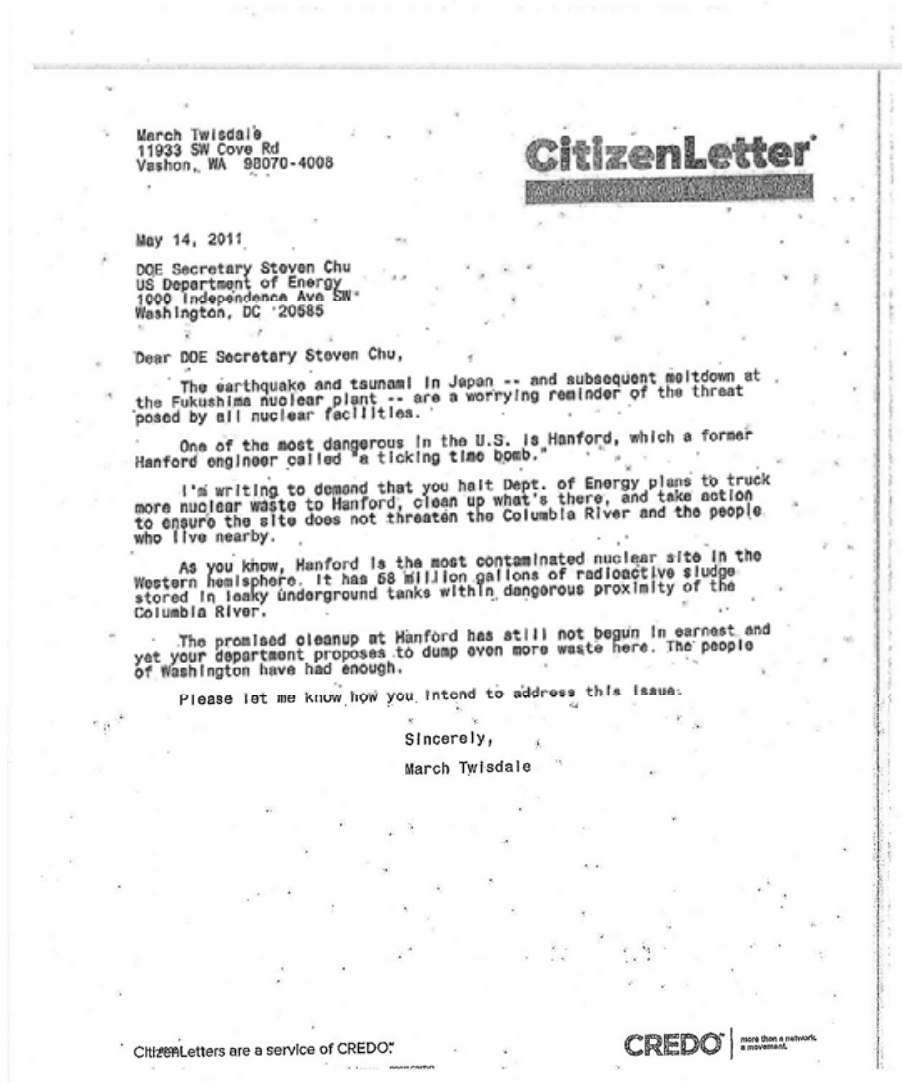
Sincerely,
Cynthia Powell Trowbridge

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CREDO more than a network,
a movement.

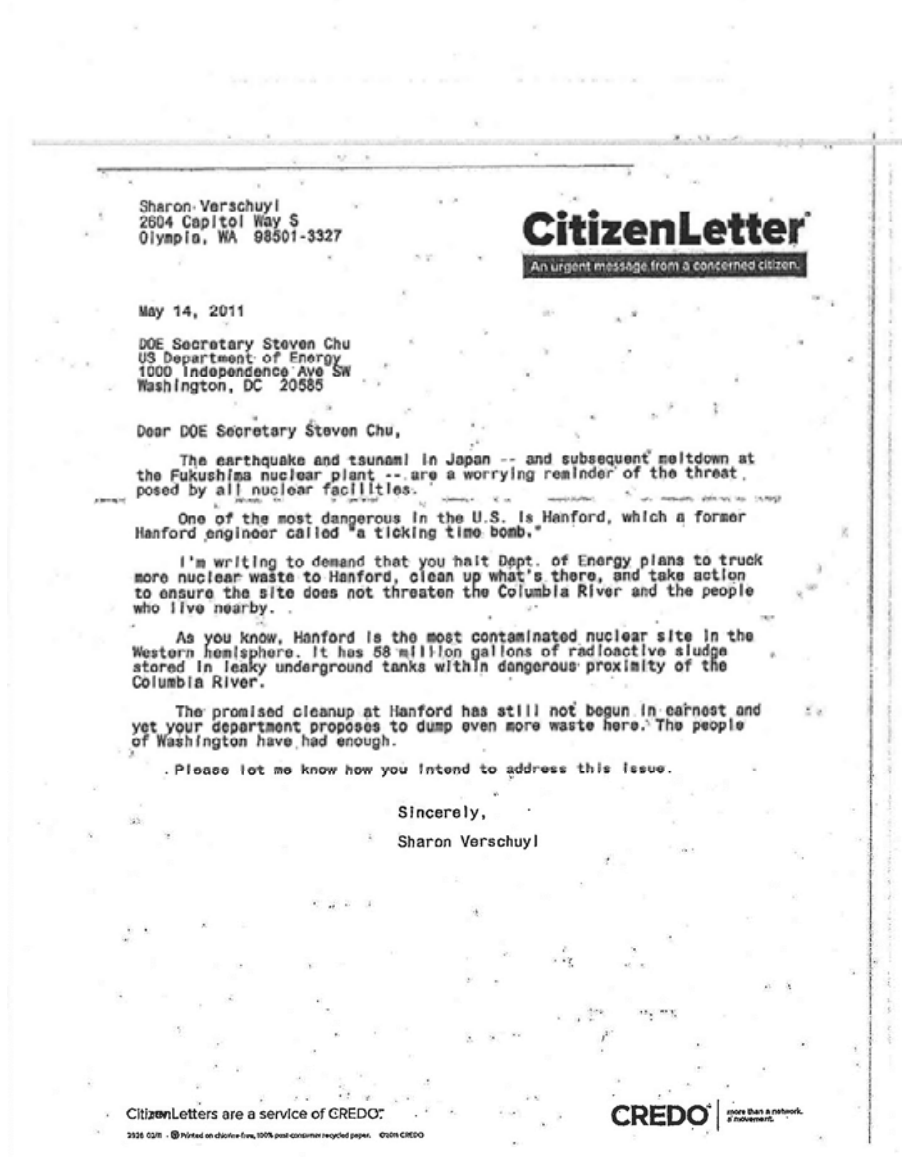
Trowbridge, Cynthia - L266

CREDO Campaign
Twisdale, March, Commenter ID No. L267



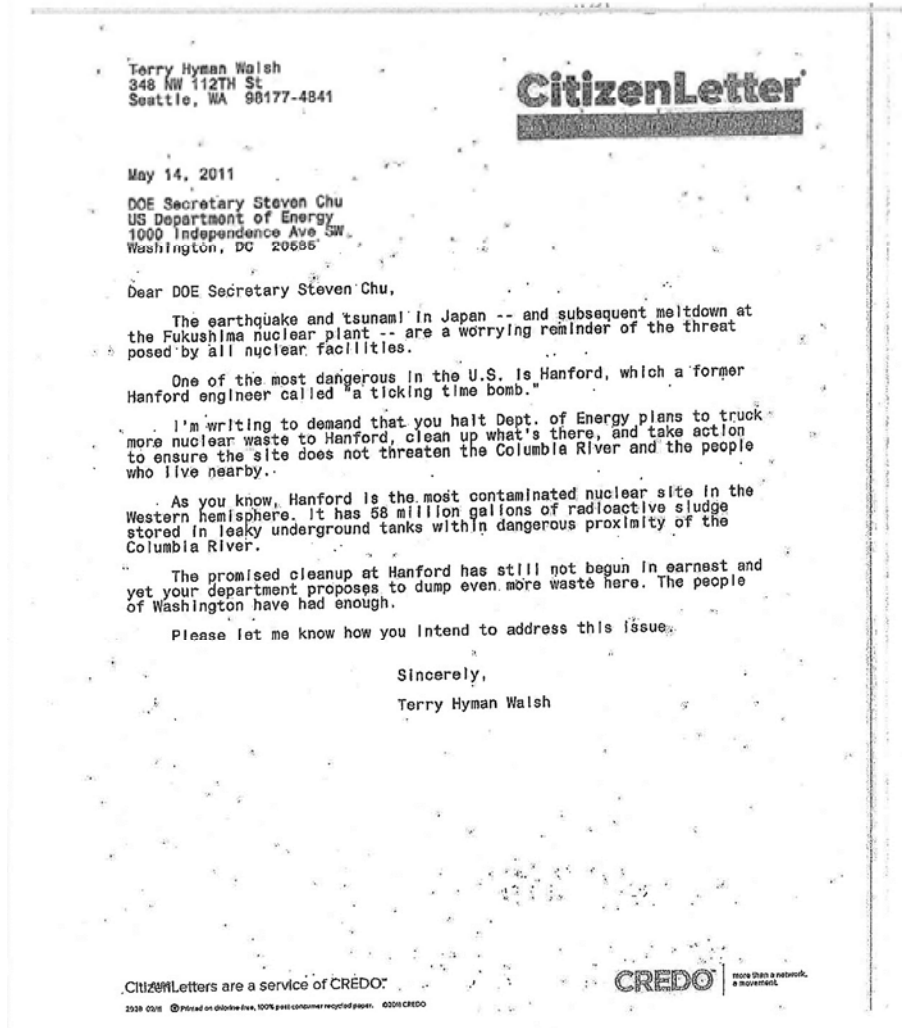
Twisdale, March - L267

CREDO Campaign
Verschuyt, Sharon, Commenter ID No. L268



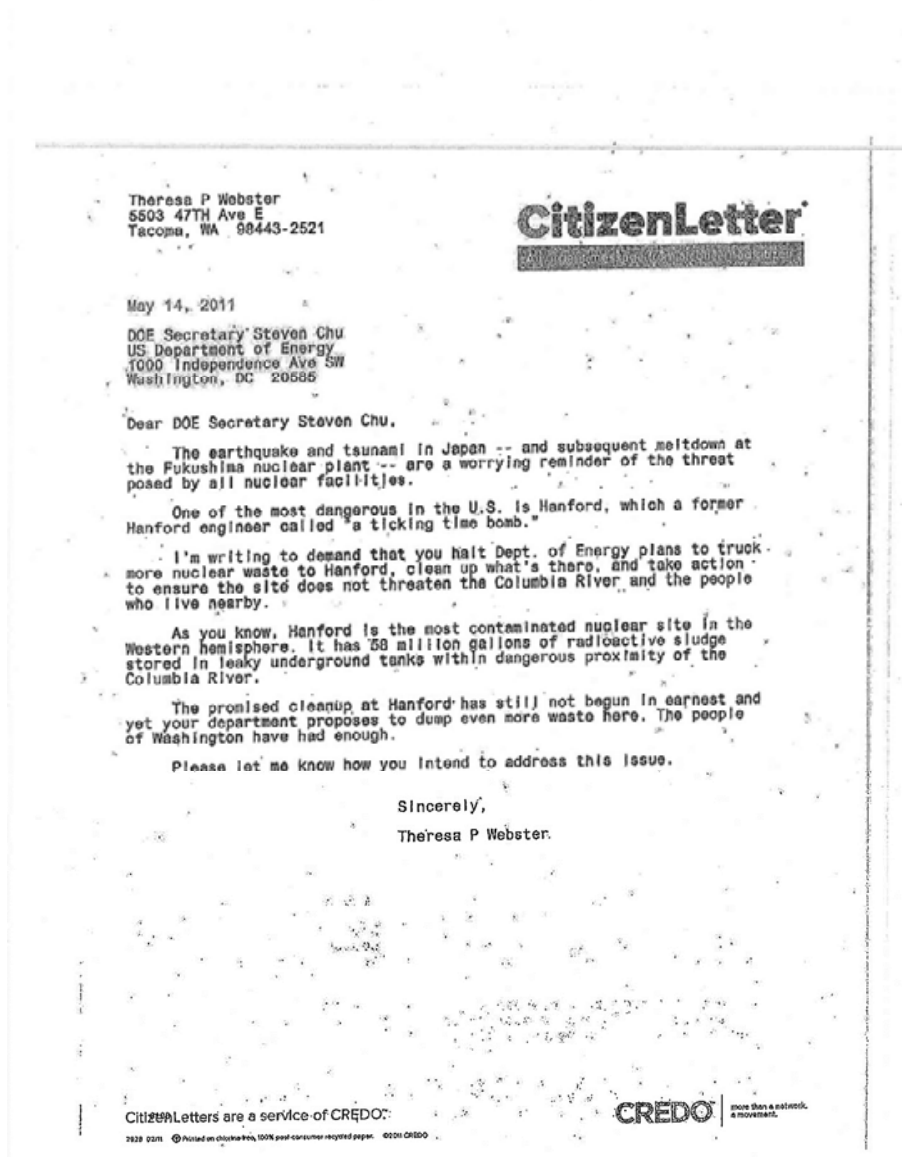
Verschuyt, Sharon - L268

CREDO Campaign
Walsh, Terry, Commenter ID No. L269



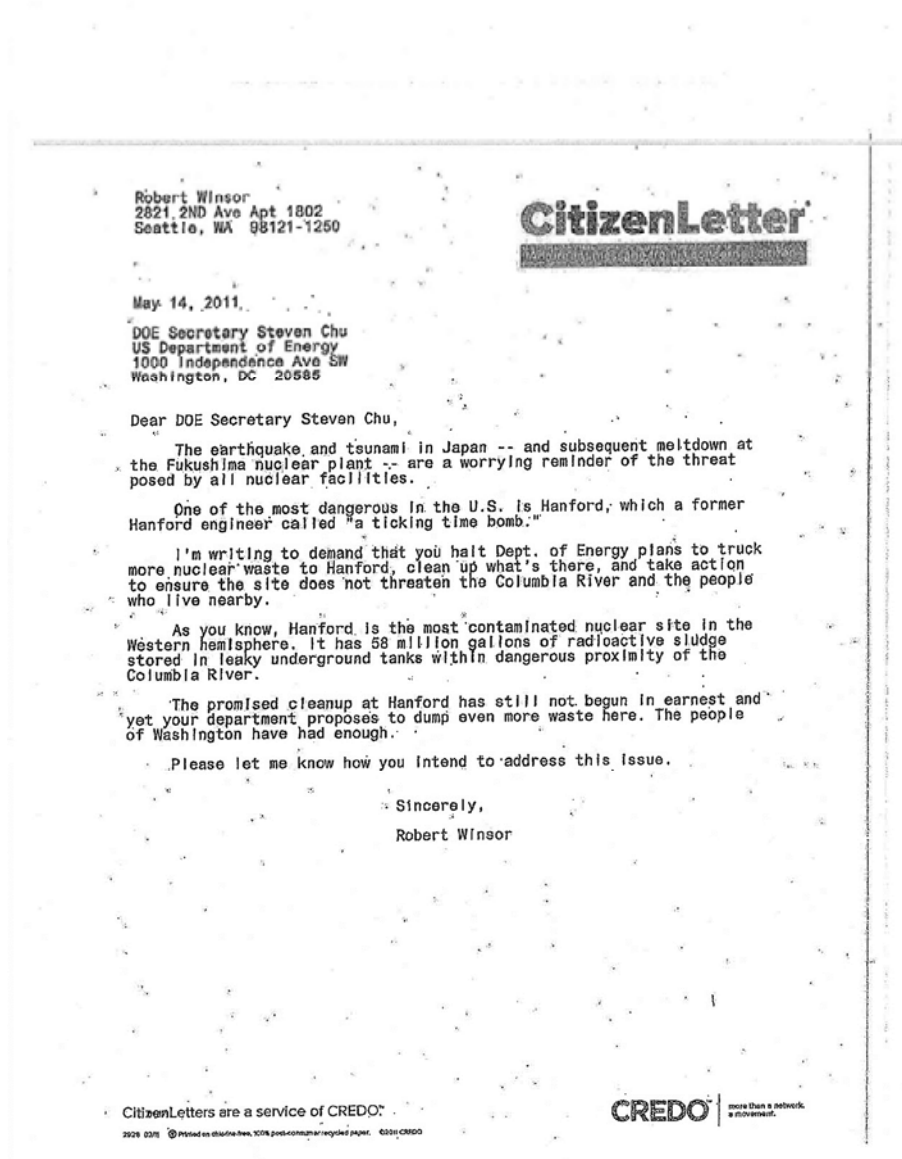
Walsh, Terry – L269

CREDO Campaign
Webster, Theresa, Commenter ID No. L270



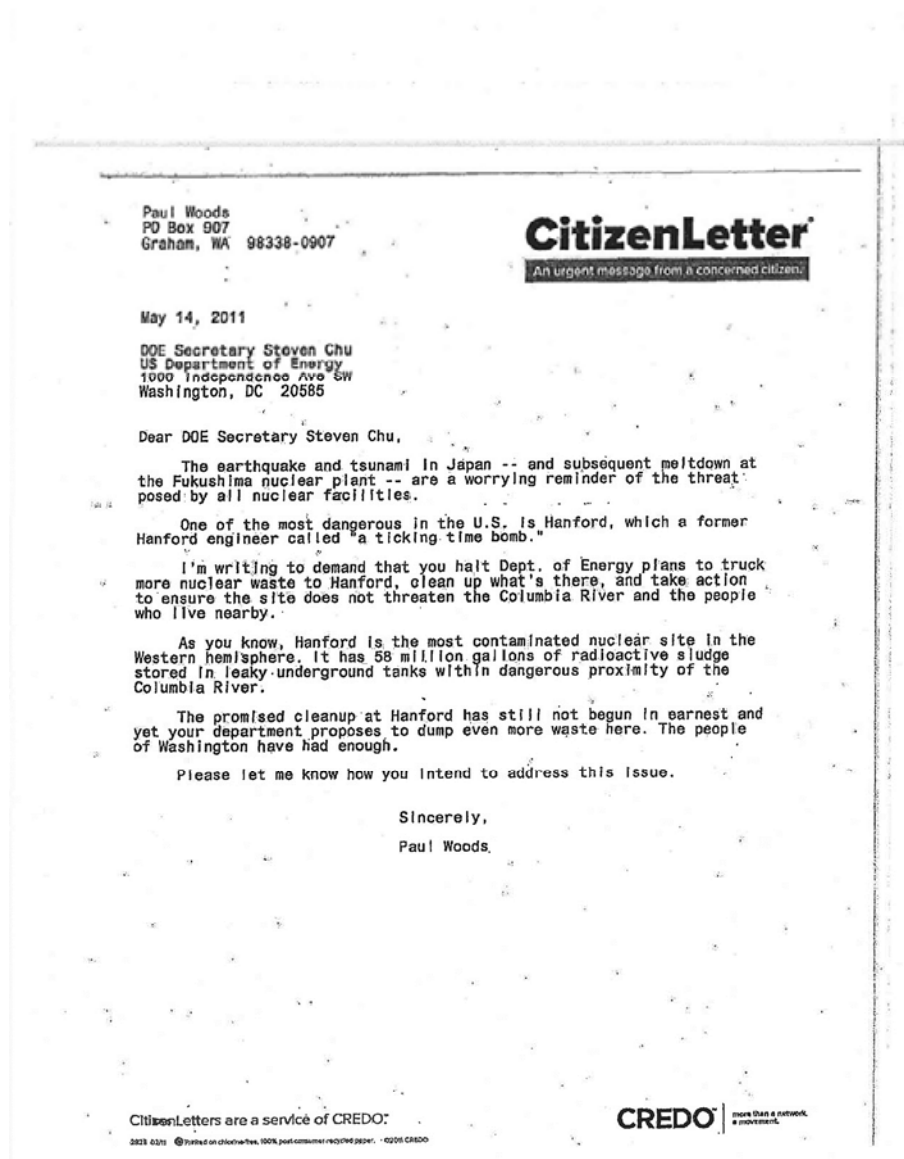
Webster, Theresa - L270

CREDO Campaign
Winsor, Robert, Commenter ID No. L271



Winsor, Robert - L271

CREDO Campaign
Woods, Paul, Commenter ID No. L272



Woods, Paul – L272

CREDO Campaign
Zeiler, Telle, Commenter ID No. L273

Telle Zeller
214 15TH Ave E Apt 9
Seattle, WA 98102-5891

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu
US Department of Energy
1000 Independence Ave SW
Washington, DC 20585

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Sincerely,

Telle Zeller

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CREDO more than a network, a movement.

Zeiler, Telle - L273

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J.3.4 Concerned Citizens for Nuclear Safety Campaign Form Letter

Table J.3-4 tabulates all individuals who submitted comments via the Concerned Citizens for Nuclear Safety Campaign form letter along with the comment document identifiers assigned to each. One representative letter (Abrahamsen, Chris, Comment Document ID No. L13) was used to identify the comments. The comments are identified in brackets on the left side of the page, and the corresponding responses are shown on the right side of the same page. All other comment letters resemble the representative letter. The representative letter, comments identified in that letter, responses, and all other comment documents received for this campaign are presented here in Section J.3.4 on pages J-1831 through J-1887, as indicated in the table.

TABLE J.3-4 Individuals Who Submitted Written Comments via the Concerned Citizens for Nuclear Safety Campaign Form Letter

Last Name, First Name	Comment Document ID No.	Starting Page No.
Abrahamsen, Chris*	L13	J-1831
Allen, Sabrina	L14	J-1832
Bliven, Rachel	L26	J-1833
Boyer, Jan	L40	J-1834
Brenden, Robert	L88	J-1835
Buono, Gail	L29	J-1837
Cate, Mary Ray	L23	J-1838
Chiltan, Maria	L10	J-1839
Conway, Patty	L25	J-1840
Corliss, Roy	L11	J-1841
Donahue, Lisa	L47	J-1842
Dryden, Robert	L27	J-1843
Duggan, Jaime	L33	J-1844
Fair, Linda	L206	J-1845
Fairmont, Lorraine	L42	J-1846
Finney, Dee	L88	J-1847
Giles, Gail	L41	J-1849
Gregory, Michael	L36	J-1850
Hayden, Hallie	L88	J-1851
Hayden, Kimberly	L88	J-1853
Hemprling, Joe	L16	J-1855
Humason, Scott	L43	J-1856
Johnson, Jan	L38	J-1857
Kennedy, Bridgette	L39	J-1858
Keppel, Roberta	L21	J-1859
Klukkort, Jim	L15	J-1860
Koffman, Arkee	L12	J-1861
Koponen, Emmy	L45	J-1862
Kotowski, Sheri	E97	J-1863
Krysl, Marilyn	L44	J-1864
Lapalwe, Monica	L49	J-1865

TABLE J.3-4 (Cont.)

Last Name, First Name	Comment Document ID No.	Starting Page No.
Lawless, Jessica	L32	J-1866
Martin, Bruce	E40	J-1867
Murphy, Pat	L48	J-1868
Orozco, Martha	L20	J-1869
Paulette, Robert	L88	J-1870
Phillip, Sheridan	L28	J-1872
Quintana, Marlene	L57	J-1873
Redondo, Petry	L31	J-1874
Robinson, Windell	L22	J-1875
Romero-Oak, Judy	L18	J-1876
Ruark, Ramona	L24	J-1877
Scarbrough, Jarrod	L19	J-1878
Seaton, Paula	L88	J-1879
Sinha, Barbara	L9	J-1881
Stangarone, Richard	L35	J-1882
Suellentrop, Ann	L46	J-1883
Unknown, Unknown	L30	J-1884
Unknown, Unknown	L321	J-1885
Unknown, Ed	L17	J-1886
Wilson, Marguerite	L37	J-1887

* Abrahamsen, Chris (Comment Document ID No. L13) is the representative letter.

1
2
3
4

Concerned Citizens for Nuclear Safety Campaign
Abrahamsen, Chris, Commenter ID No. L13
(Representative Letter)

June 25
May 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name:

Chris Abrahamsen

Address:

710 W. Mission San Diego
92120, CA, San Diego

Email:

L13-1

DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like waste. This range is consistent with NEPA implementing regulations given in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNS, SRS, and WIPP Vicinity for which two reference locations, one within and one outside the WIPP Land Withdrawal Boundary, were considered). DOE has determined that it was reasonable to analyze only these six sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Although some commenters stated that this range of disposal sites is too narrow, they did not offer specific locations for analysis. It would not be reasonable to analyze in detail an essentially unlimited number of additional non-DOE or nonfederal sites. Nevertheless, DOE also conducted a generic evaluation of commercial disposal facilities on nonfederal lands in the EIS to order to provide, to the extent possible, information regarding the potential long-term performance of other (nonfederal) locations for siting a GTCC waste land disposal facility.

L13-2

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

J-1831

January 2016

Abrahamsen, Chris - L13

Concerned Citizens for Nuclear Safety Campaign
Allen, Sabrina, Commenter ID No. L14

June 29
2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Sabrina Allen

Address:

1556 Calle Ocho Feliz

Email:

artist_sabrina@hotmail.com

Allen, Sabrina - L14

Concerned Citizens for Nuclear Safety Campaign
Bliven, Rachel, Commenter ID No. L26

June 25
May 25, 2011

received
JUN 27 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Rachel Bliven

Address:

120 A University Rd. Santa Fe NM 87505

Email:

rachelbliven@gmail

Bliven, Rachel - L26

Concerned Citizens for Nuclear Safety Campaign
Boyer, Jan, Commenter ID No. L40

May 25, 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

Boyer, Jan - L40

Concerned Citizens for Nuclear Safety Campaign
Brenden, Robert, Commenter ID No. L88

May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Paula Seaton Robert L Pavlette

Address:

*P.O. Box 144 (same)
Embudo, N.M. 87531*

Email:

paula.seaton46@gmail.com

More Signatures over →

Brenden, Robert - L88

Concerned Citizens for Nuclear Safety Campaign
Brenden, Robert, Commenter ID No. L88 (cont'd)

Emmy Koponen
~~P.O. Box 456~~
Dixon, NM 87527

Emmy Koponen

Maria Chilton
Dixon, NM

Maria Chilton

Robert Brenden
Box 175
Dixon, NM 87527

Robert Brenden

Dec Finney
P.O. Box 329
Dixon, NM 87527

Dec Finney

Hallie Hayden
PO # 592
Dixon, NM 87527
(Hallie Hayden)

Kimberly M. Hayden
Kimberly M. Hayden
PO Box 592
Dixon, NM 87527

Concerned Citizens for Nuclear Safety Campaign
Buono, Gail, Commenter ID No. L29

May 15, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name: GAIL BUONO
Address: 19 Copper Trl.
Santa Fe, NM 87508
Email: _____

Buono, Gail – L29

Concerned Citizens for Nuclear Safety Campaign
Cate, Mary Ray, Commenter ID No. L23

May 24, 2011

received
JUL 27 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Yours truly,

Name:

Mary Ray Cate

Address:

1677 Cerrito Verde
Santa Fe NM 87501

Email:

Cate, Mary Ray - L23

Concerned Citizens for Nuclear Safety Campaign
Chiltan, Maria, Commenter ID No. L10

June 25
May 25, 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
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1000 Independence Ave., S.W.
Washington, D.C. 20585



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The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,

Name:

Maria Chiltan

Address:

PO Box 512

Dixon, NM 87527

Email:

maria.chiltan@hotmail.com

Chiltan, Maria - L10

Concerned Citizens for Nuclear Safety Campaign
Conway, Patty, Commenter ID No. L25

May 24, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Patty Conway

Address:

1205 Sandose Ave

Santa Fe 87505

Email:

conway-patty@yahoo.com

Conway, Patty - L25

Concerned Citizens for Nuclear Safety Campaign
Corliss, Roy, Commenter ID No. L11

June 25
May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Roy Corliss

Address:

1370 CERRO GORDO

Email:

raycorliss@yahoo.com

Corliss, Roy - L11

Concerned Citizens for Nuclear Safety Campaign
Donahue, Lisa, Commenter ID No. L47

June 25
May ____, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name: Lisa Donahue
Address: 1807 Second St.
Santa Fe, NM 87505
Email: _____

Donahue, Lisa - L47

Concerned Citizens for Nuclear Safety Campaign
Dryden, Robert, Commenter ID No. L27

May 24, 2011

received
JUN 27 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name: Robert Dryden
Address: 8 Alcalde Rd
Santa Fe NM 87508
Email: hotguyx102002@yahoo.com

Dryden, Robert - L27

Concerned Citizens for Nuclear Safety Campaign
Duggan, Jaime, Commenter ID No. L33

June 25
May 25, 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Jaime Duggan

Address:

3660 Catalina Way
Boulder, CO 80304

Email:

Duggan, Jaime - L33

Concerned Citizens for Nuclear Safety Campaign
Fair, Linda, Commenter ID No. L206

May 31, 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

JUN - 9 2011



RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name: Linda M. Fair (Fair)
Address: P O Box 156
El Prado NM 87529
Email: _____

Fair, Linda - L206

Concerned Citizens for Nuclear Safety Campaign
Fairmont, Lorraine, Commenter ID No. L42

June
May 12, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name: Lorraine H. Fairmont
Address: 2115 Poplar Ave
Boulder, CO 80304
Email: _____

Fairmont, Lorraine - L42

Concerned Citizens for Nuclear Safety Campaign
Finney, Dee, Commenter ID No. L88

May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Paula Seaton Robert L Pavlette

Address:

*P.O. Box 144 (same)
Embudo, N.M. 87531*

Email:

paula.seaton46@gmail.com

More Signatures over →

Finney, Dee - L88

Concerned Citizens for Nuclear Safety Campaign
Finney, Dee, Commenter ID No. L88 (cont'd)

Emmy Koponen
~~P.O. Box 456~~
Dixon, NM 87527

Emmy Koponen

Maria Chilton
Dixon, NM

Maria Chilton

Robert Brenden
Box 175
Dixon, NM 87527

Robert Brenden

Dee Finney
P.O. Box 329
Dixon, NM 87527

Dee Finney

Hallie Hayden
PO # 592
Dixon, NM 87527
(Hallie Hayden)

Kimberly M. Hayden
Kimberly M. Hayden
PO Box 592
Dixon, NM 87527

Concerned Citizens for Nuclear Safety Campaign
Giles, Gail, Commenter ID No. L41

June 25
May 25, 2011

received
JUN 25 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name: GAIL GILES
Address: 2450 Calle Contessa
SE 87505
Email: giles.gail@sbccglobal.net

Giles, Gail - L41

Concerned Citizens for Nuclear Safety Campaign
Gregory, Michael, Commenter ID No. L36

June 25
May 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name: Michael Gregory
Address: 107 Paseo Del Pinon
SE, NM 87508
Email: _____

Gregory, Michael - L36

Concerned Citizens for Nuclear Safety Campaign
Hayden, Hallie, Commenter ID No. L88

May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Yours truly,

Name:

Paula Seaton Robert L Pavlette

Address:

*P.O. Box 144 (same)
Embudo, N.M. 87531*

Email:

paula.seaton46@gmail.com

More Signatures over →

Hayden, Hallie - L88

Concerned Citizens for Nuclear Safety Campaign
Hayden, Hallie, Commenter ID No. L88 (cont'd)

Emmy Koponen
~~P.O. Box 456~~
Dixon, NM 87527

Emmy Koponen

Maria Chilton
Dixon, NM

Maria Chilton

Robert Brenden
Box 175
Dixon, NM 87527

Robert Brenden

Dee Finney
P.O. Box 329
Dixon, NM 87527

Dee Finney

Hallie Hayden
PO # 592
Dixon, NM 87527
(Hallie Hayden)

Kimberly M. Hayden
Kimberly M. Hayden
PO Box 592
Dixon, NM 87527

Concerned Citizens for Nuclear Safety Campaign
Hayden, Kimberly, Commenter ID No. L88

May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name:

Paula Seaton Robert L Pavlette

Address:

*P.O. Box 144 (same)
Embudo, N.M. 87531*

Email:

paula.seaton46@gmail.com

More Signatures over →

Hayden, Kimberlye - L88

Concerned Citizens for Nuclear Safety Campaign
Hayden, Kimberly, Commenter ID No. L88 (cont'd)

Emmy Koponen
~~P.O. Box 456~~
Dixon, NM 87527

Emmy Koponen

Maria Chilton
Dixon, NM

Maria Chilton

Robert Brenden
Box 175
Dixon, NM 87527

Robert Brenden

Dee Finney
P.O. Box 329
Dixon, NM 87527

Dee Finney

Hallie Hayden
PO # 592
Dixon, NM 87527
(Hallie Hayden)

Kimberly M. Hayden
Kimberly M. Hayden
PO Box 592
Dixon, NM 87527

Concerned Citizens for Nuclear Safety Campaign
Hemprling, Joe, Commenter ID No. L16

May ^{June 25} 2011

received
JUN 27 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name: JOE HEMPRLING
Address: 1824 KINGS RD
Santa Fe, NM
Email: Joseph - hemprling@gmail.com

Hemprling, Joe - L16

Concerned Citizens for Nuclear Safety Campaign
Humason, Scott, Commenter ID No. L43

JAN 25
May 25, 2011

received
JUN 7 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,

Name:

Scott Humason

Address:

P.O. Box 5494

Santa Fe, NM 87502

Email:

Humason@ gmail.com

Humason, Scott - L43

Concerned Citizens for Nuclear Safety Campaign
Johnson, Jan, Commenter ID No. L38

June 25
May 25, 2011

received
JUN 25 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name: Jan Hill Johnson
Address: PO Box 31864
Santa Fe, NM 87594
Email: hillsister54@gmail.com

Johnson, Jan - L38

Concerned Citizens for Nuclear Safety Campaign
Kennedy, Bridgette, Commenter ID No. L39

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name: Bridgette Kennedy

Address: 2125 Paseo Armon
Santa Fe NM 87501

Email: _____

Kennedy, Bridgette - L39

Concerned Citizens for Nuclear Safety Campaign
Keppel, Roberta, Commenter ID No. L21

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name:

Roberta V. Keppel

Address:

*829 W Manhattan Ave
Santa Fe NM 87501*

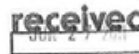
Email:

bokeppel@netzero.net

Keppel, Roberta - L21

Concerned Citizens for Nuclear Safety Campaign
Klukkort, Jim, Commenter ID No. L15

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name:

Jim Klukkort Jim KLUKKORT

Address:

11 W. GUTIERREZ HWY 3613
SF, NM 87506

Email:

twohouses@aol.com

Klukkort, Jim - L15

Concerned Citizens for Nuclear Safety Campaign
Koffman, Arkee, Commenter ID No. L12

June 29
May 29, 2011

received
JUN 27 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name:

Arkee Koffman

Address:

712 Galisteo Rd.
Santa Fe NM 87505

Email:

Koffman, Arkee - L12

Concerned Citizens for Nuclear Safety Campaign
Koponen, Emmy, Commenter ID No. L45

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name:

Emmy Koponen

Address:

P.O. Box 456 Dixon NM 87827

Email:

emmy.koponen@gmail.com

Koponen, Emmy – L45

Concerned Citizens for Nuclear Safety Campaign
Kotowski, Sheri, Commenter ID No. E97

June 27, 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Sheri Kotowski
PO Box 291
Dixon, New Mexico 87527

Kotowski, Sheri – E97

Concerned Citizens for Nuclear Safety Campaign
Krysl, Marilyn, Commenter ID No. L44

May 25, 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name:

MARILYN KRYSL

Address:

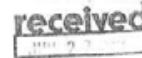
2003 MESA DR. #4, Bldg, CO

Email:

Krysl, Marilyn - L44

Concerned Citizens for Nuclear Safety Campaign
Lapalwe, Monica, Commenter ID No. L49

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name:

Monica Lapalwe

Address:

2751 Via Caballero del Sur
Santa Fe NM 87505

Email:

Lapalwe, Monica - L49

Concerned Citizens for Nuclear Safety Campaign
Lawless, Jessica, Commenter ID No. L32

June 25, 2011
May



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name: Jessica Lawless
Address: 2405 Agua Fria St.
Santa Fe, NM 87505
Email: _____

Lawless, Jessica - L32

Concerned Citizens for Nuclear Safety Campaign
Martin, Bruce, Commenter ID No. E40

June 27, 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name: Bruce Martin

Address: 408 Taylor Ranch Road
Alamogordo, New Mexico 88310

Email: dbmartin@zianet.com

Martin, Bruce – E40

Concerned Citizens for Nuclear Safety Campaign
Murphy, Pat, Commenter ID No. L48

June 25
May 25, 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name: PAT MURPHY
Address: 100 RIO VISTA PLC
S FE, NM
Email: SISTERSPIRIT45@yahoo.com

Murphy, Pat - L48

Concerned Citizens for Nuclear Safety Campaign
Orozco, Martha, Commenter ID No. L20

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name: Martha L. Orozco
Address: 115 Ocena RD #18
Santa Fe NM 87507
Email: watson.m.02@Gmail.Com

Orozco, Martha - L20

Concerned Citizens for Nuclear Safety Campaign
Paulette, Robert, Commenter ID No. L88

May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name:

Paula Seaton Robert L Paulette

Address:

*P.O. Box 144 (same)
Embudo, N.M. 87531*

Email:

paula.seaton46@gmail.com

More Signatures over →

Paulette, Robert - L88

Concerned Citizens for Nuclear Safety Campaign
Paulette, Robert, Commenter ID No. L88 (cont'd)

Emmy Koponen
~~P.O. Box 456~~
Dixon, NM 87527

Emmy Koponen

Maria Chilton
Dixon, NM

Maria Chilton

Robert Brenden
Box 175
Dixon, NM 87527

Robert Brenden

Dec Finney
P.O. Box 329
Dixon, NM 87527

Dec Finney

Hallie Hayden
PO # 592
Dixon, NM 87527
(Hallie Hayden)

Kimberly M. Hayden
Kimberly M. Hayden
PO Box 592
Dixon, NM 87527

Concerned Citizens for Nuclear Safety Campaign
Phillip, Sheridan, Commenter ID No. L28

June 25
May 2011

Received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,

Name:

Sheridan Phillip

Address:

3224 Casa Rinconada

Santa Fe NM 87507

Email:

Phillip, Sheridan - L28

Concerned Citizens for Nuclear Safety Campaign
Quintana, Marlene, Commenter ID No. L57

received
JUN 27 2011

June 20, 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name:

Marlene Quintana

Address:

210 Rencher Ave, SE,
Albany, N.M. 87105

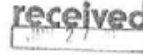
Email:

mq1986@cardnm.org

Quintana, Marlene - L57

Concerned Citizens for Nuclear Safety Campaign
Redondo, Petry, Commenter ID No. L31

June 25
May ____, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Perry L. Redondo

Address:

P.O. Box 26

TESUQUE, NM 87574

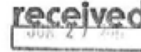
Email:

PERRY.L.REDONDO@HOTMAIL.COM

Redondo, Petry - L31

Concerned Citizens for Nuclear Safety Campaign
Robinson, Windell, Commenter ID No. L22

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Windell Robinson

Address:

526 1/2 Alvarado, P.O. Box

Albuquerque, NM 87108-3621

Email:

Robinson, Windell - L22

Concerned Citizens for Nuclear Safety Campaign
Romero-Oak, Judy, Commenter ID No. L18

May ^{June 25} 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name: Rev. Judy Romero-Oak
Address: 1809 Knott St NE
Alb. 87112
Email: judyroak@yahoo.com

Romero-Oak, Judy - L18

Concerned Citizens for Nuclear Safety Campaign
Ruark, Ramona, Commenter ID No. L24



May 24, 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Ramona Ruark

Address:

P.O. Box 32894

Santa Fe NM 87594

Email:

Ruark, Ramona - L24

Concerned Citizens for Nuclear Safety Campaign
Scarborough, Jarrod, Commenter ID No. L19

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name: Jarrod Scarborough
Address: 35 Apache Plume Rd.
Los Lunas, NM 87031
Email: jaremeister@gmail.com

Scarborough, Jarrod - L19

Concerned Citizens for Nuclear Safety Campaign
Seaton, Paula, Commenter ID No. L88

May 27, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Paula Seaton Robert L Pavlette

Address:

*P.O. Box 144 (same)
Embudo, N.M. 87531*

Email:

paula.seaton46@gmail.com

More Signatures over →

Seaton, Paula – L88

Concerned Citizens for Nuclear Safety Campaign
Seaton, Paula, Commenter ID No. L88 (cont'd)

Emmy Koponen
~~P.O. Box 456~~
Dixon, NM 87527

Emmy Koponen

Maria Chilton
Dixon, NM

Maria Chilton

Robert Brenden
Box 175
Dixon, NM 87527

Robert Brenden

Dee Finney
P.O. Box 329
Dixon, NM 87527

Dee Finney

Hallie Hayden
PO # 592
Dixon, NM 87527
(Hallie Hayden)

Kimberly M. Hayden
Kimberly M. Hayden
PO Box 592
Dixon, NM 87527

Concerned Citizens for Nuclear Safety Campaign
Sinha, Barbara, Commenter ID No. L9

June 25
May 25, 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

RE: Comments on the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D)

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Thank you for your consideration of my comments.

Yours truly,

Name: Barbara Sinha
Address: 132 Camino Los Abuelos
Santa Fe NM 87508
Email:

Sinha, Barbara - L9

Concerned Citizens for Nuclear Safety Campaign
Stangarone, Richard, Commenter ID No. L35

June 25
May 25, 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

Richard Stangarone

Address:

107 Paseo Del Pinon

Santa Fe, NM 87508

Email:

Stangarone, Richard - L35

Concerned Citizens for Nuclear Safety Campaign
Suellentrop, Ann, Commenter ID No. L46

June 19, 2011

received
JUN 21

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Yours truly,

Name:

Ann Suellentrop

Address:

1865 S. Pyle

KCKS 66103

Email:

ann.suellen@gmail.com

Suellentrop, Ann - L46

Concerned Citizens for Nuclear Safety Campaign
Unknown, Unknown, Commenter ID No. L30

June 25
May 25, 2011

received
JUN 27 2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585

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Yours truly,

Name:



Address:

104 Avenida de Velazquez

Taos NM 87571

Email:

Huic93@yahoo.com

Unknown, Unknown - L30

Concerned Citizens for Nuclear Safety Campaign
Unknown, Unknown, Commenter ID No. L321

June 25
May, 2011



Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
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Thank you for your consideration of my comments.

Yours truly,

Name:

John Chandra

Address:

116 Bob St.

Santa Fe, N.M. 87501

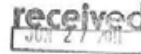
Email:

Unknown, Unknown - L321

Concerned Citizens for Nuclear Safety Campaign
Unknown, Ed, Commenter ID No. L17

May-June 25
2011

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
Washington, D.C. 20585



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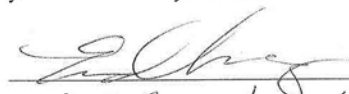
Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:


305 CACIE LEON NW
ABO, NM 87114

Unknown, Ed - L17

Concerned Citizens for Nuclear Safety Campaign
Wilson, Marguerite, Commenter ID No. L37

June 15
May 2011

received

Mr. Arnold M. Edelman, EIS Document Manager
U.S. Department of Energy
GTCC EIS
Cloverleaf Building, EM-43
1000 Independence Ave., S.W.
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Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,

Name:

Marguerite Wilson

Address:

9 Fido Lane
Santa Fe NM 87508

Email:

marguerite@cybormesa.com

Wilson, Marguerite - L37

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J.3.5 Snake River Alliance Campaign Form Letters

Table J.3-5 tabulates all individuals who submitted comments via the Snake River Alliance Campaign form letter along with the comment document identifiers assigned to each. There were two versions of the form letter, identified as version “a” and version “b”. One representative of each version of the letter (Allen, John, Comment Document ID No. L176 for version a; Aiegel, Jennifer, Comment Document ID No. L130 for version b) was used to identify the comments. The comments are identified in brackets on the left side of the page, and the corresponding response is shown on the right side of the same page. All other comment letters resemble the representative version “a” or “b” letter. The representative letters, comments identified in the letters, responses, and all other comment documents received for this campaign are presented here in Section J.3.5 on pages J-1892 through J-1953, as indicated in the table.

TABLE J.3-5 Individuals Who Submitted Letters via the Snake River Alliance Campaign Form Letters

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.
Adams, Miranda	a	L123	J-1892
Aiegel, Jennifer*	b	L130	J-1893
Allen, John*	a	L176	J-1892
Ames, Peggy	a	L103	J-1894
Anderson, Vivian	a	L119	J-1893
Avitua, Camille	a	L177	J-1894
Baltes, Julie	a	L165	J-1895
Baltes, Mark	a	L181	J-1895
Barker, Ken	b	L112	J-1896
Bogle, Andrea	b	L192	J-1896
Bolin, Celeste	a	L142	J-1897
Bracht, Edward	a	L114	J-1897
Briggs, E.	a	L139	J-1898
Bryan, Clifford	a	L169	J-1898
Carroll, Susan	a	L111	J-1899
Carter, Richard	a	L122	J-1899
Childers, Dee	a	L196	J-1900
Collins, Bill	a	L146	J-1900
Coney, David	a	L199	J-1901
Costello, Jenne	a	L175	J-1901
Crisp, Travis	a	L148	J-1902
Crisp, Travis	a	L163	J-1902
Crowley, Stephen	a	L200	J-1903
Dadalay, John	a	L137	J-1903
Daley, Katherine	a	L64	J-1904
Davis, Bill	a	L174	J-1904
Davis, Michelle	a	L113	J-1905
Donnelly, Jack	b	L190	J-1905
Emerson, Gen	a	L121	J-1906
Emerson, Steve	a	L197	J-1906
Enno, Christina	a	L183	J-1907

TABLE J.3-5 (Cont.)

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.
Evans, Scott	a	L154	J-1907
Everett, Victoria	b	L188	J-1908
Farmers, Scott and Linda	a	L107	J-1908
Forrest, Robert	a	L71	J-1909
Franklin, James	a	L157	J-1909
Franklin, Joanne	a	L193	J-1910
Greco, Nancy	a	L135	J-1910
Greenwell, Neesa	a	L178	J-1911
Greer, Dalyn	a	L168	J-1911
Haga, Keith	a	L138	J-1912
Haga, Martha	a	L149	J-1912
Hall, Roy	b	L108	J-1913
Heoethriizzer, Wietebe	a	L109	J-1913
Hesp, Joan	a	L117	J-1914
Hillam, Devin	a	L102	J-1915
Hueftle, Keene	a	L167	J-1915
Hyatt, Larry	a	L126	J-1916
Jacob, Margaret	a	L172	J-1916
Jenks, Vyonne	a	L65	J-1917
Jolly, Linda	a	L134	J-1917
Jones, Diane	a	L195	J-1918
Jones, Kenneth	a	L69	J-1918
Jull, Paula	a	L155	J-1919
Keener, Edwin	b	L129	J-1920
Keener, Martha	a	L201	J-1919
Kelly, Tim	a	L156	J-1920
Kirkpatrick, Unknown	b	L133	J-1921
Landry, Louis	a	L144	J-1921
Leffel, Craig	a	L164	J-1922
Lovell, Brenda	a	L116	J-1922
Maack, Share	a	L110	J-1923
Marshall, Judy	b	L66	J-1923
Masak, Regina	b	L72	J-1924
Maschaer, Kate	a	L101	J-1925
Matthew, Ellen	a	L205	J-1924
McFadden, Marques	a	L203	J-1926
Miller, Ken	a	L147	J-1926
Miller, Samuel	a	L182	J-1927
Miller, Virginia	b	L141	J-1927
P., Ann	a	L106	J-1925
Paquette, Holly	b	L140	J-1928
Parker, George	a	L67	J-1928
Patterson, Kathy	a	L62	J-1929
Patterson, William	a	L73	J-1929
Pollard, Leslie	b	L186	J-1930
Pollard, Stan	a	L162	J-1930
Proksa, Margo and Dennis	a	L170	J-1931
Proksa, Sanni	b	L151	J-1931
Puckett, Bob	a	L179	J-1932

TABLE J.3-5 (Cont.)

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.
Puckett, Su	a	L166	J-1932
Puopolo, Mia	a	L158	J-1933
Pursley, Ben	a	L136	J-1933
Reid, Heidi	a	L127	J-1934
Reneay, Nava	a	L105	J-1934
Reynolds, Anne	a	L160	J-1935
Ritter, Stephen	b	L153	J-1935
Robinson, Pat	a	L145	J-1936
Rodie, Jan	b	L70	J-1937
Rule, Andrea	a	L191	J-1936
Rush, Irene	a	L132	J-1937
Russell, Brennan	a	L115	J-1938
Rydakh, Amanda	b	L60	J-1938
Schmidt, Eliza	a	L198	J-1939
Scott, Gale Dawn	a	L74	J-1939
Scott, Linda	a	L173	J-1940
Seward, Michelle	b	L68	J-1941
Seward, Peggy	a	L75	J-1940
Seymour, Jan	b	L61	J-1941
Shipley, Andrea	a	L143	J-1942
Smith, E.	a	L189	J-1942
Smith, Gary	a	L171	J-1943
Stewart, Mark	a	L131	J-1943
Swain, Merle	b	L159	J-1944
Swinford, Joseph	b	L187	J-1945
Tate, Karen	a	L128	J-1944
Thompson, Pennee	b	L185	J-1945
Tyson, Andy	a	L118	J-1946
Unknown, John	a	L152	J-1946
Unknown, Ray	b	L120	J-1947
Von, Lori	b	L63	J-1947
Wallace, Eric	a	L125	J-1948
Wattens, Ron	b	L180	J-1949
Weatherly, Joe	a	L124	J-1948
Weatherman, T.	a	L194	J-1949
Weber, John	a	L202	J-1950
Webs, Lori	a	L104	J-1950
Weeq, Susan	b	L76	J-1951
Weston, Andrew	a	L204	J-1951
White, Crystal	a	L150	J-1952
Yeatts, Carole	a	L161	J-1953
Yoshida, Takayaki	a	L184	J-1952

* Allen, John (Comment Document ID No. L176) is representative letter version a; Aiegel, Jennifer (Comment Document ID No. L130) is representative letter version b.

Snake River Alliance CampaignAdams, Miranda, Commenter ID No. L123Allen, John, Commenter ID No. L176 (Representative Letter version a)

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites considered in this draft EIS all belong to the federal government, and the DOE's study does not even try to prove they are best for GTCC disposal based on objective criteria. Of all the arid sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes hardened on-site storage at commercial reactor sites.

From:

John Allen
 1310 El Rancho
 Pocatello ID 83401

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes con consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: *Miranda Adams*
 mirandaadams@hotmail.com

L176-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

L176-2 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

Snake River Alliance Campaign**Aiegel, Jennifer, Commenter ID No. L130 (Representative Letter version b)****Anderson, Vivian, Commenter ID No. L119**

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes WIPP in New Mexico. But WIPP was opened with a promise to the people of New Mexico that it would be used *solely* for waste from nuclear weapons production. Commercial waste is specifically prohibited. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced and does not consider legally barred disposal.

From:

Jennifer Aiegel
3802 W. Tatt St.
Boise, ID, 83703

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From:

VIVIAN ANDERSON
22655 EEL LN
MIDDLETON, IDAHO
83644

L130-1 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

L130-2 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

Snake River Alliance Campaign
Ames, Peggy, Commenter ID No. L103
Avitua, Camille, Commenter ID No. L177

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:

Peggy S M Ames
 764 Grace Dr
 Pacata 16 ID 53201

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

Camille Avitua
 713 Tyne Ave
 Am. Indian Falls, ID 83211

Ames, Peggy – L103
 Avitua, Camille – L177

Snake River Alliance Campaign
Baltes, Julie, Commenter ID No. L165
Baltes, Mark, Commenter ID No. L181

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From: *MARK BALTES*
PO Box 7903
Bonnie ID 83707

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: *Julie Baltes*
PO Box 7903
Bonnie, Id. 83707

Baltes, Julie – L165

Baltes, Mark – L181

Snake River Alliance Campaign
Bolin, Celeste, Commenter ID No. L142
Bracht, Edward, Commenter ID No. L114

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Celeste Bolin
4019 N. 36th St.
Bozeman, MT 59717

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Edward BRACHT MD
642 E. PENNSYLVANIA ST
BOZEMAN MT 59706

Bolin, Celeste - L142
Bracht, Edward - L114

Snake River Alliance Campaign
Briggs, E., Commenter ID No. L139
Bryan, Clifford, Commenter ID No. L169

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

*E. Manley Briggs, M.P.
1316 Harrison St. W.
Borah, ID 83702*

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

*Clifford Bryan
Box 8196
Pocatello, ID 83209*

Briggs, E. – L139

Bryan, Clifford – L169

Snake River Alliance Campaign
Carroll, Susan, Commenter ID No. L111
Carter, Richard, Commenter ID No. L122

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From: Susan Carroll, 200 N. 3rd St #301
Boise ID 83702

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Richard Carter
2343 S. Ridge Point Way
Boise, Idaho 83712



Carroll, Susan - L111
Carter, Richard - L122

Snake River Alliance Campaign
Childers, Dee, Commenter ID No. L196
Collins, Bill, Commenter ID No. L146

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

Dee Childers
16717 Harbor Ln
Eagle ID 83616
Dee Childers

208-830-4455

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From:

Bill Collins

Childers, Dee - L196

Collins, Bill - L146

Snake River Alliance Campaign
Coney, David, Commenter ID No. L199
Costello, Jenne, Commenter ID No. L175

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From:

David C. Coney
407 3/4 Warren Street
Boise, ID 83706

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:

Jenne Costello
904 W. Goring St
Boise, ID 83704

Coney, David – L199
Costello, Jenne – L175

Snake River Alliance Campaign
Crisp, Travis, Commenter ID No. L148
Crisp, Travis, Commenter ID No. L163

10: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From: Travis Crisp
601 N. 14th St. Boise, ID 83702

10: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Travis Crisp
4265 Bristol St.
Boise, ID, 83704

Crisp, Travis – L148

Crisp, Travis – L163

Snake River Alliance Campaign
Crowley, Stephen, Commenter ID No. L200
Dadalay, John, Commenter ID No. L137

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Stephen CROWLEY
408 E. 51st ST
Garden City, ID, 83714

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: John Dadalaya
2415 Mt. View Dr.

Crowley, Stephen - L200

Dadalay, John - L137

Snake River Alliance Campaign
Daley, Katherine, Commenter ID No. L64
Davis, Bill, Commenter ID No. L174

To: Document Manager
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From:

Katherine Daley
1135 E. Bonnaixille
Perate, ID 83201

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From:

Bill Davis
910 N. Hayes
Perate, ID 83201

Daley, Katherine – L64

Davis, Bill – L174

Snake River Alliance Campaign
Davis, Michelle, Commenter ID No. L113
Donnelly, Jack, Commenter ID No. L190

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: *Michelle Davis*
1916 W. State St
Boise, ID 83702

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes WIPP in New Mexico. But WIPP was opened with a promise to the people of New Mexico that it would be used *solely* for waste from nuclear weapons production. Commercial waste is specifically prohibited. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced and does not consider legally barred disposal.

From: *Jack Donnelly*
6512 Kirkwood Rd. Boise, 83709

Davis, Michelle - L113
Donnelly, Jack - L190

Snake River Alliance Campaign
Emerson, Gen, Commenter ID No. L121
Emerson, Steve, Commenter ID No. L197

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Gen Emerson
1975 WILMINGTON DR.
BOISE, ID 83704

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From: Steve T. Emerson
1975 N. Wilmington Dr.
Boise, ID
83704

Emerson, Gen - L121
Emerson, Steve - L197

Snake River Alliance Campaign
Enno, Christina, Commenter ID No. L183
Evans, Scott, Commenter ID No. L154

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From:

Christina Enno
Belle Kinghorn Dup B
Pocatello ID 83201

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From:

SCOTT EVANS
8912 W. BARTON RD.
POCATELLO, ID. 83204 - 7101

Enno, Christina - L183

Evans, Scott - L154

Snake River Alliance Campaign
Everett, Victoria, Commenter ID No. L188
Farmers, Scott and Linda, Commenter ID No. L107

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: *Victoria Everett*
408 E. 5th St
Garden City, ID 83714

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: *Scott & Linda Farmers*
314 CARDINAL AVE
MERIDIAN ID 83642

Everett, Victoria – L188
 Farmers, Scott and Linda – L107

Snake River Alliance Campaign
Forrest, Robert, Commenter ID No. L71
Franklin, James, Commenter ID No. L157

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites considered in this draft EIS all belong to the federal government, and the DOE's study does not even try to prove they are best for GTCC disposal based on objective criteria. Of all the arid sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes hardened on-site storage at commercial reactor sites.

From:

Robert E. Forrest
950 N. Grant
Pocatello, ID 83201

To: Document Manager
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From:

JAMES E. FRANKLIN
2720 N. TURNBERRY WAY
MERIDIAN, ID. 83646

Forrest, Robert – L71
Franklin, James – L157

Snake River Alliance Campaign
Franklin, Joanne, Commenter ID No. L193
Greco, Nancy, Commenter ID No. L135

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From:

Joanne Franklin
2720 N. Turnberry Way
Meridian, Id. 83646

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

NANCY GRECO
442 S. GARFIELD
POCAHELLO, ID 83204

Franklin, Joanne – L193

Greco, Nancy – L135

Snake River Alliance Campaign
Greenwell, Neesa, Commenter ID No. L178
Greer, Dalyn, Commenter ID No. L168

To: Document Manager
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From: Neesa Greenwell
1513 Jensen St.
Pocatello Idaho 83201

To: Document Manager
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From: Dalyn Greer
9485 W Kate Dr.
Boise, Id. 83714

Greenwell, Neesa – L178

Greer, Dalyn – L168

Snake River Alliance Campaign
Haga, Keith, Commenter ID No. L138
Haga, Martha, Commenter ID No. L149

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From:

Keith Haga 12614 N. Schicks
Ridge Rd.
Boise, ID 83714

To: Document Manager

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From:

Martha Haga 12614 N. Schicks
Ridge Rd.
Boise, ID 83714

Haga, Keith - L138

Haga, Martha - L149

Snake River Alliance Campaign
Hall, Roy, Commenter ID No. L108
Heoethriizzer, Wietebe, Commenter ID No. L109

10: DOCUMENT MANAGER

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From:

Roy Hall

7513 Wesley Dr. Boise ID 83704

10: DOCUMENT MANAGER

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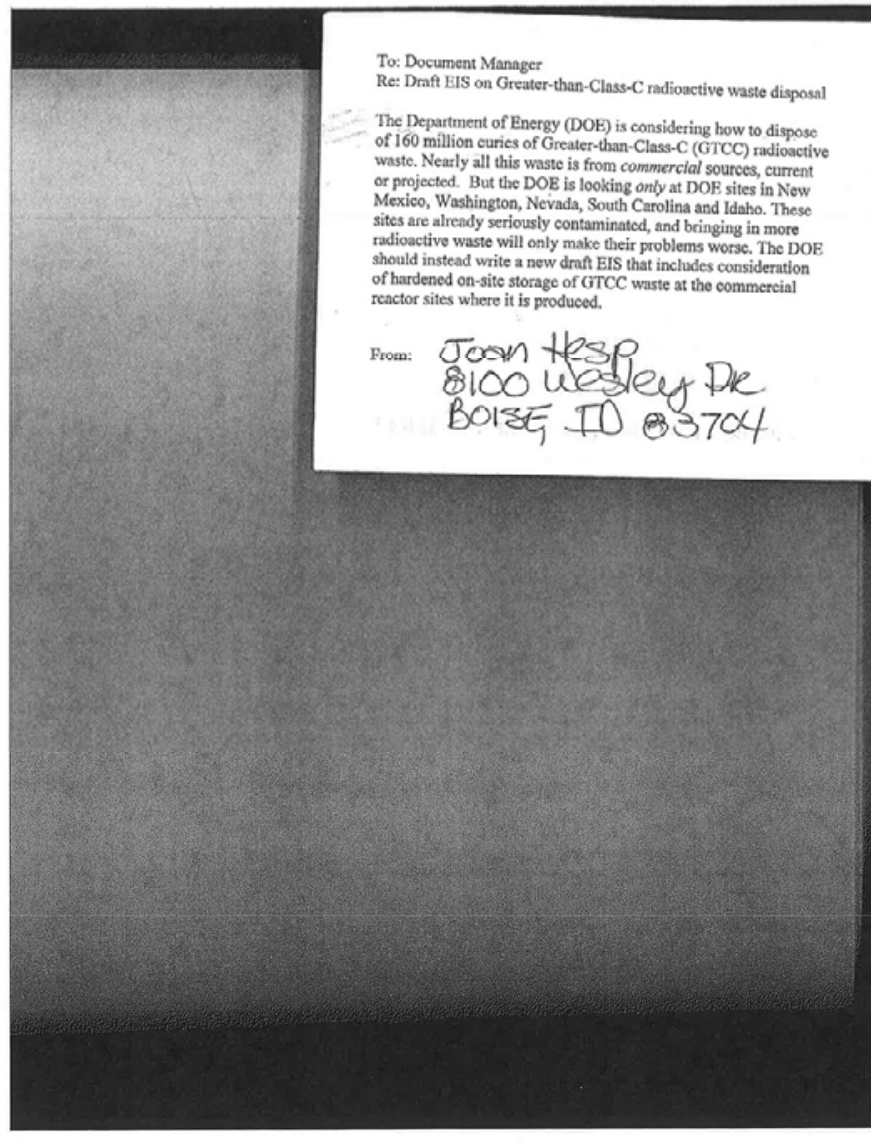
From:

Wietebe Heoethriizzer

Hall, Roy – L108

Heoethriizzer, Wietebe – L109

Snake River Alliance Campaign
Hesp, Joan, Commenter ID No. L117



Hesp, Joan - L117

Snake River Alliance Campaign
Hillam, Devin, Commenter ID No. L102
Hueftle, Keene, Commenter ID No. L167

To: Document Manager
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From:

Devin Hillam
344 S 12th Ave #1A
Pocatello, ID 83201

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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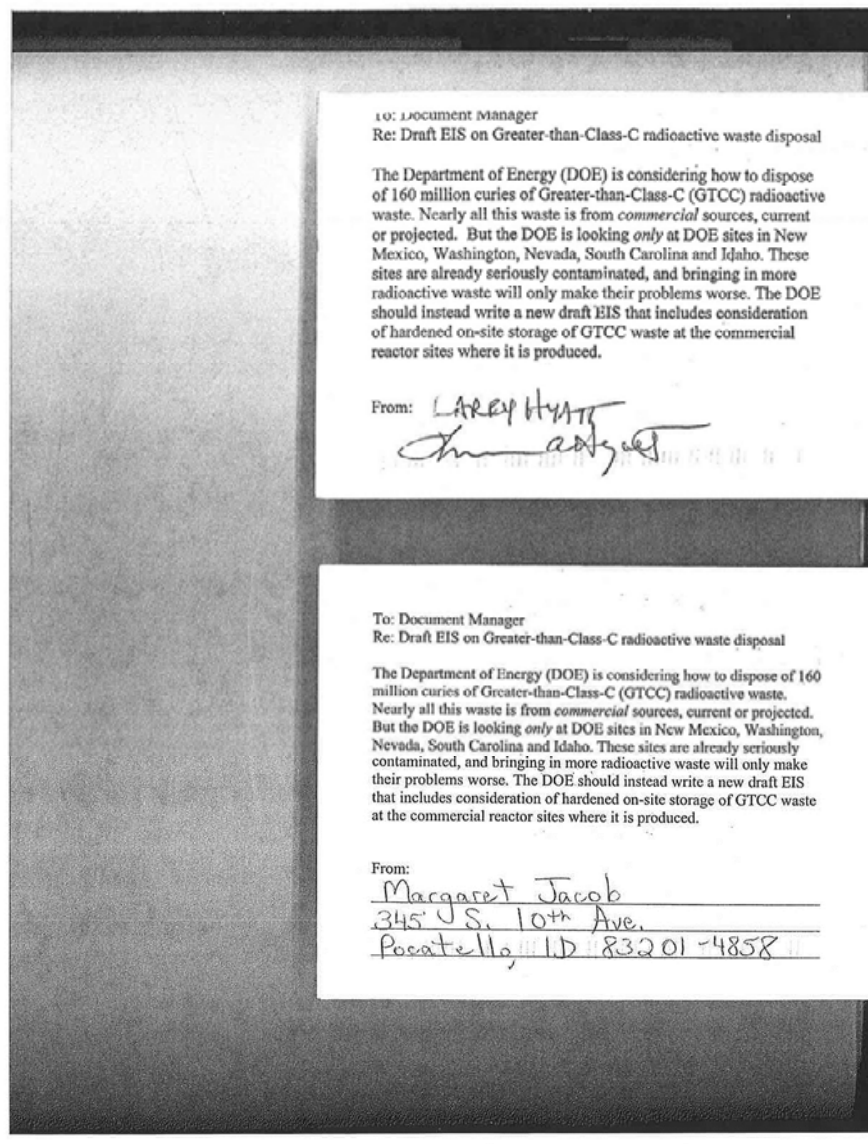
From:

Keene Hueftle
1630 Monte Vista Dr
P1H 83201

Hillam, Devin – L102

Hueftle, Keene – L167

Snake River Alliance Campaign
Hyatt, Larry, Commenter ID No. L126
Jacob, Margaret, Commenter ID No. L172



Hyatt, Larry – L126
Jacob, Margaret – L172

Snake River Alliance Campaign
Jenks, Vyonne, Commenter ID No. L65
Jolly, Linda, Commenter ID No. L134

To: Document Manager
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From: Vyonne Jenks
132 Oakland Ave
Praterello, Idaho

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

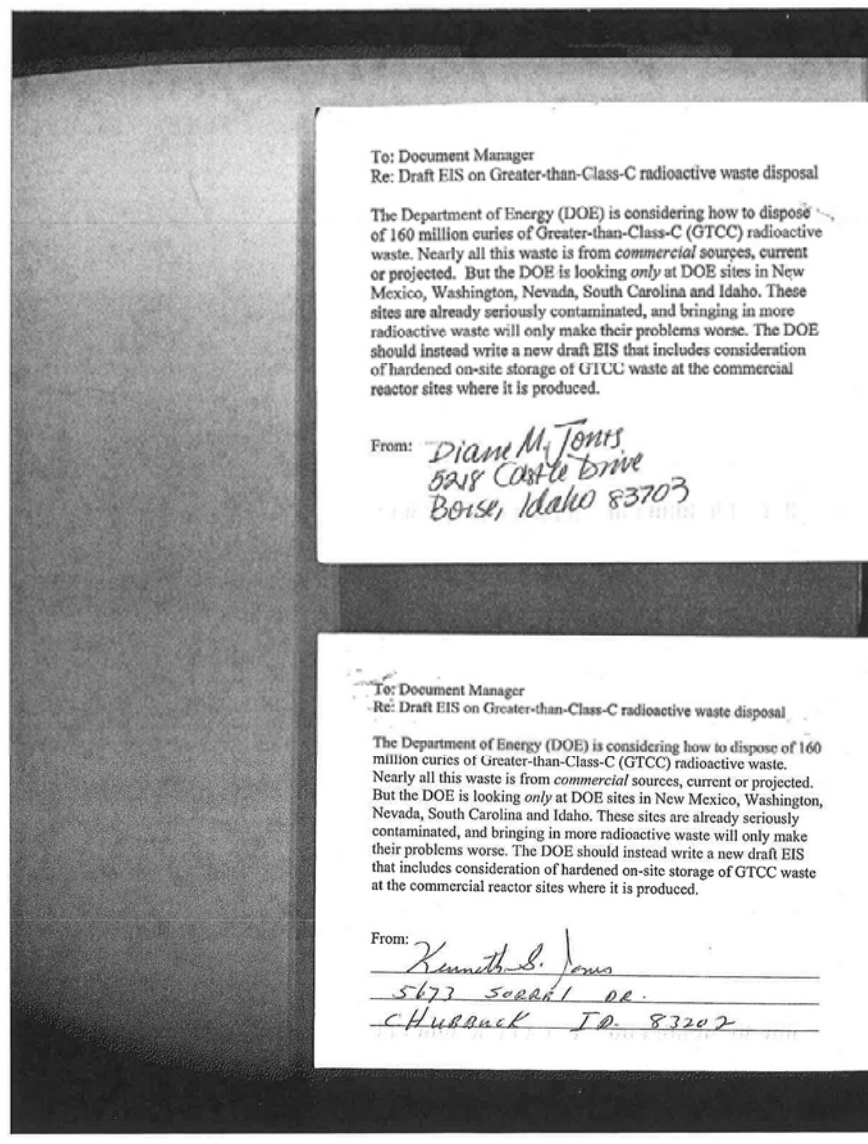
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From: Linda Jolly
3415 Mt. View Dr
Boise ID, 83706

Jenks, Vyonne – L65

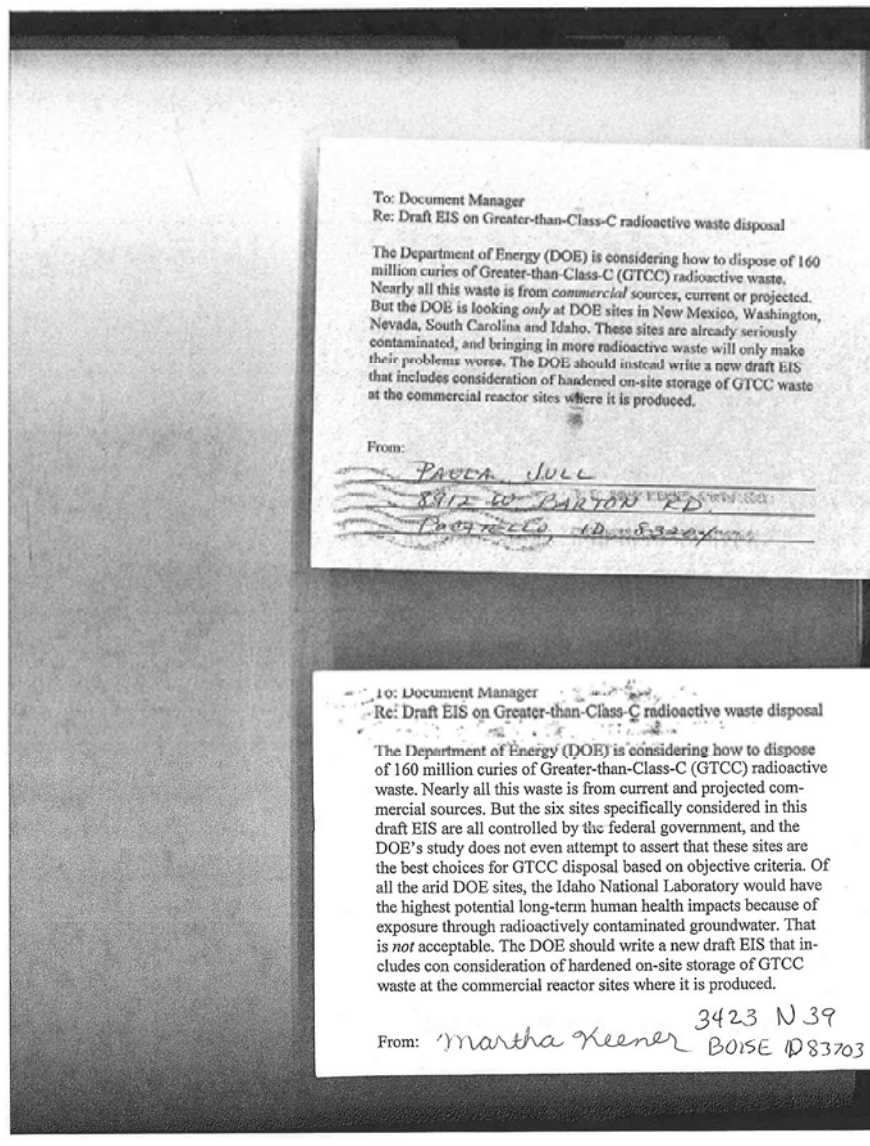
Jolly, Linda – L134

Snake River Alliance Campaign
Jones, Diane, Commenter ID No. L195
Jones, Kenneth, Commenter ID No. L69



Jones, Diane – L195
Jones, Kenneth – L69

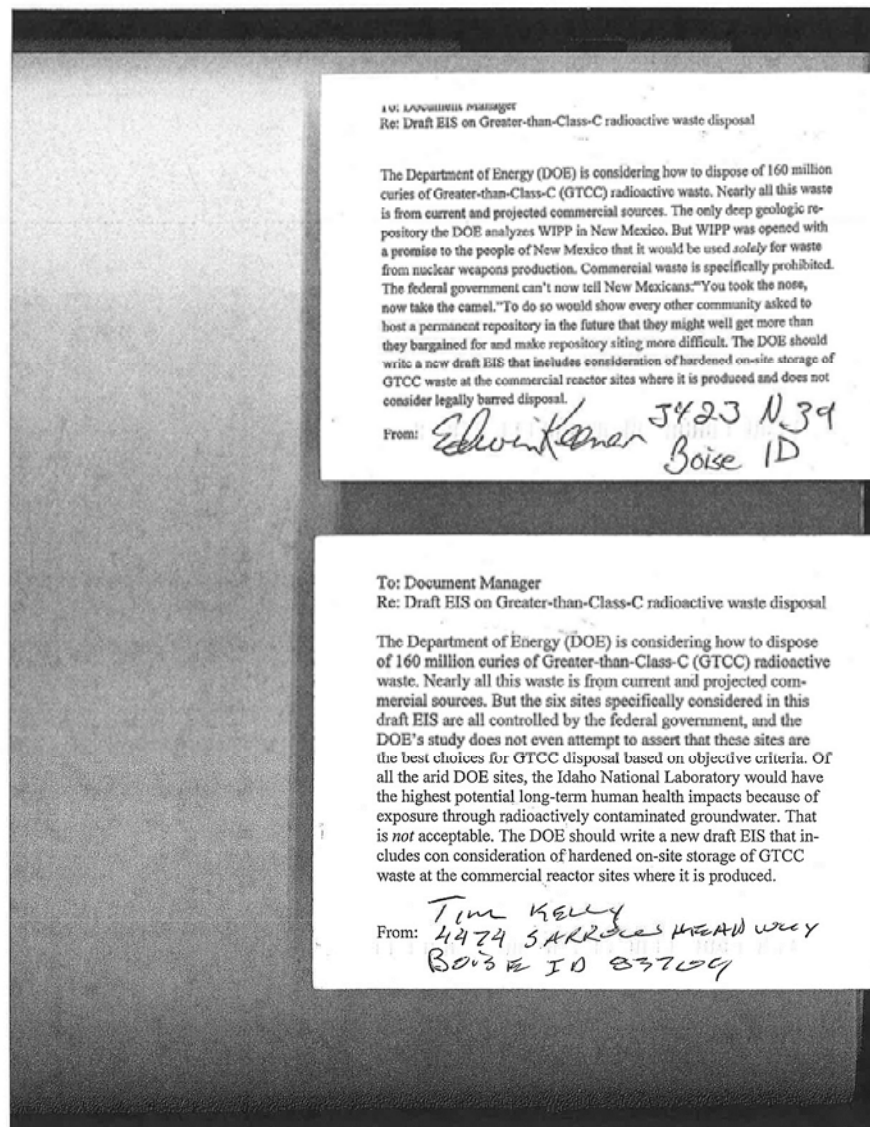
Snake River Alliance Campaign
Jull, Paula, Commenter ID No. L155
Keener, Martha, Commenter ID No. L201



Jull, Paula – L155

Keener, Martha – L201

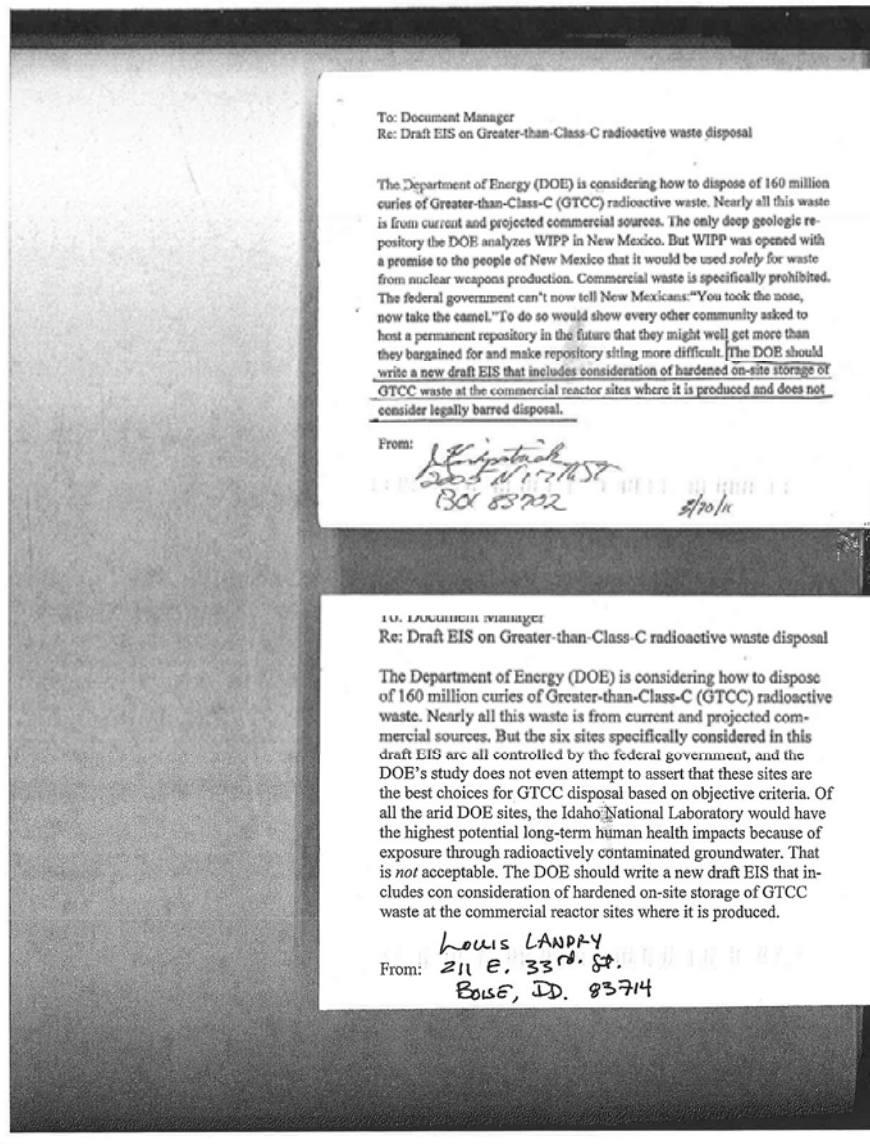
Snake River Alliance Campaign
Keener, Edwin, Commenter ID No. L129
Kelly, Tim, Commenter ID No. L156



Keener, Edwin – L129

Kelly, Tim – L156

Snake River Alliance Campaign
Kirkpatrick, Unknown, Commenter ID No. L133
Landry, Louis, Commenter ID No. L144



Kirkpatrick, Unknown – L133

Landry, Louis – L144

Snake River Alliance Campaign
Leffel, Craig, Commenter ID No. L164
Lovell, Brenda, Commenter ID No. L116

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From: CRAIG LEFFEL
510 E. 41ST ST.
GARDEN CITY, ID. 83714

To: Document Manager
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From: Brenda Lovell
249 S. Winthrop Pl
Boise ID 83709

Leffel, Craig - L164
Lovell, Brenda - L116

Snake River Alliance Campaign
Maack, Share, Commenter ID No. L110
Marshall, Judy, Commenter ID No. L66

10: Document Manager

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From:

Share Maack

1201 N. 7th St.

Boise 83702

To: Document Manager

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From:

Judy Marshall

4178 S. 5th Old Hwy 91

Idaho Falls, ID 83415

Maack, Share – L110

Marshall, Judy – L66

Snake River Alliance Campaign
Masak, Regina, Commenter ID No. L72
Matthew, Ellen, Commenter ID No. L205

To: Document Manager

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From:

Regina Masak
456 S. 8th
Pocatello, ID 83201

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

Ellen Matthew
1419 S. Colorado Ave.
Boise, ID 83706

Masak, Regina – L72
Matthew, Ellen – L205

Snake River Alliance Campaign
Maschaer, Kate, Commenter ID No. L101
P., Ann, Commenter ID No. L106

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Kate Reedy Maschaer
5933 Hilo Dr
Twente ID 83204

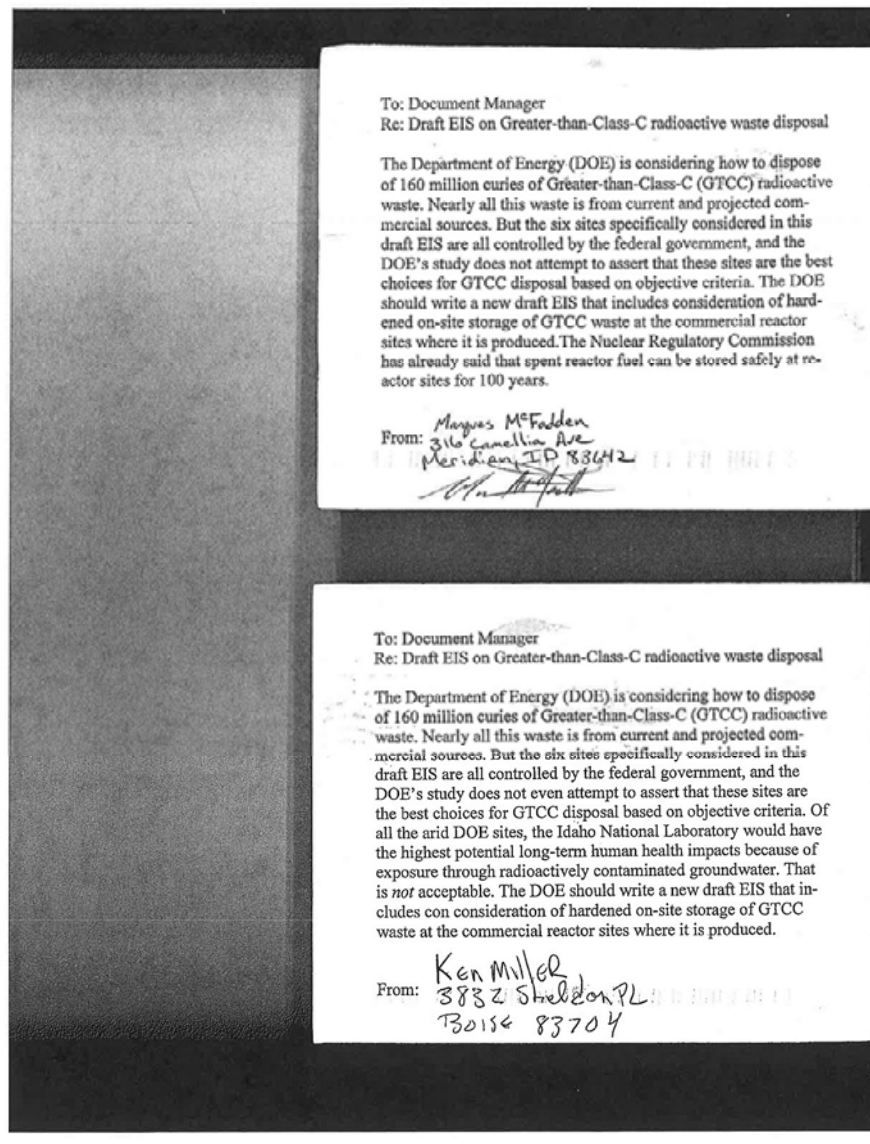
To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Ann Pette
18316 Bine Dr
Blanchett ID

Maschaer, Kate - L101
P., Ann - L106

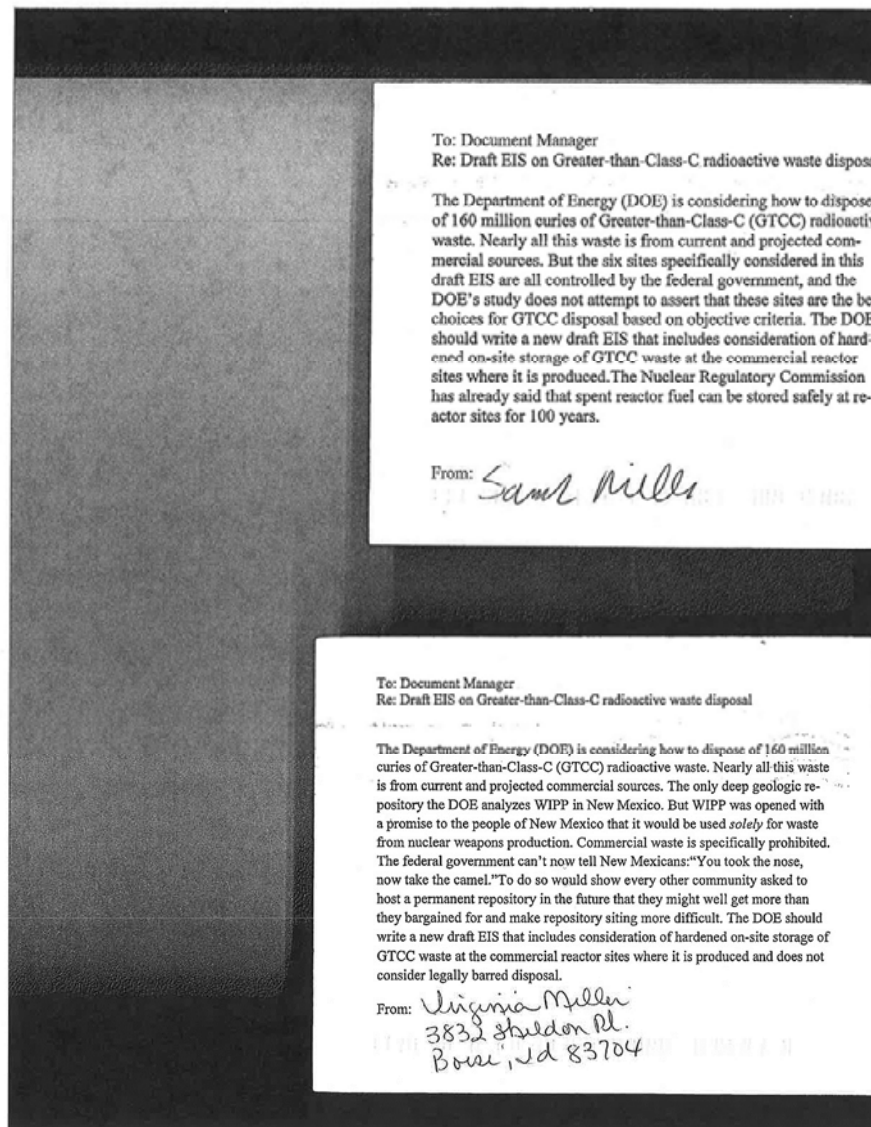
Snake River Alliance Campaign
McFadden, Marques, Commenter ID No. L203
Miller, Ken, Commenter ID No. L147



McFadden, Marques – L203

Miller, Ken – L147

Snake River Alliance Campaign
Miller, Samuel, Commenter ID No. L182
Miller, Virginia, Commenter ID No. L141



Miller, Samuel – L182
Miller, Virginia – L141

Snake River Alliance Campaign
Paquette, Holly, Commenter ID No. L140
Parker, George, Commenter ID No. L67

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes WIPP in New Mexico. But WIPP was opened with a promise to the people of New Mexico that it would be used *solely* for waste from nuclear weapons production. Commercial waste is specifically prohibited. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced and does not consider legally barred disposal.

From: HOLLY PAQUETTE
607 RESERVE ST.
BOISE, IDAHO 83712

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From: George Parker
267 Buchanan
Pocatello, Idaho 83204

Paquette, Holly – L140

Parker, George – L67

Snake River Alliance Campaign
Patterson, Kathy, Commenter ID No. L62
Patterson, William, Commenter ID No. L73

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:
Kathy Patterson
5056 W. Old Hwy 91
INCOM, ID 83243

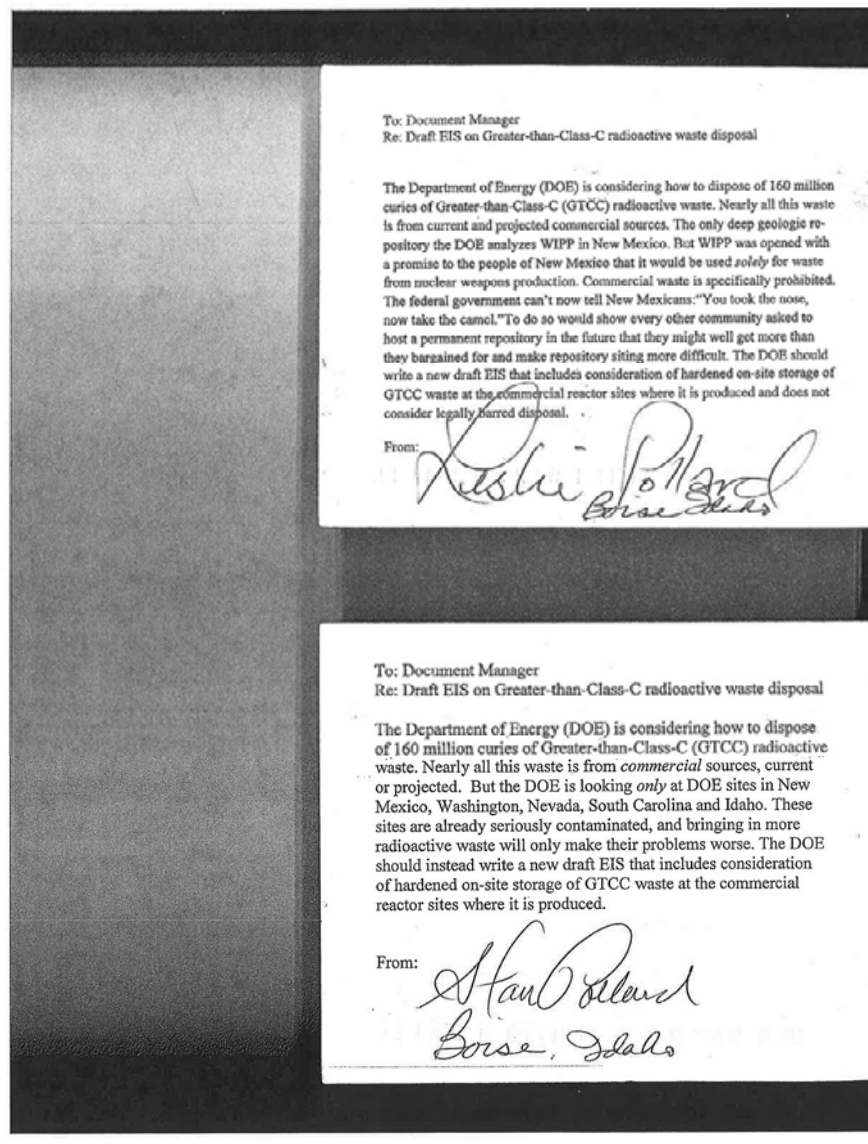
To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:
WILLIAM A. PATTERSON
5056 W. Old Hwy. 91
INCOM, ID. 83245

Patterson, Kathy - L62
Patterson, William - L73

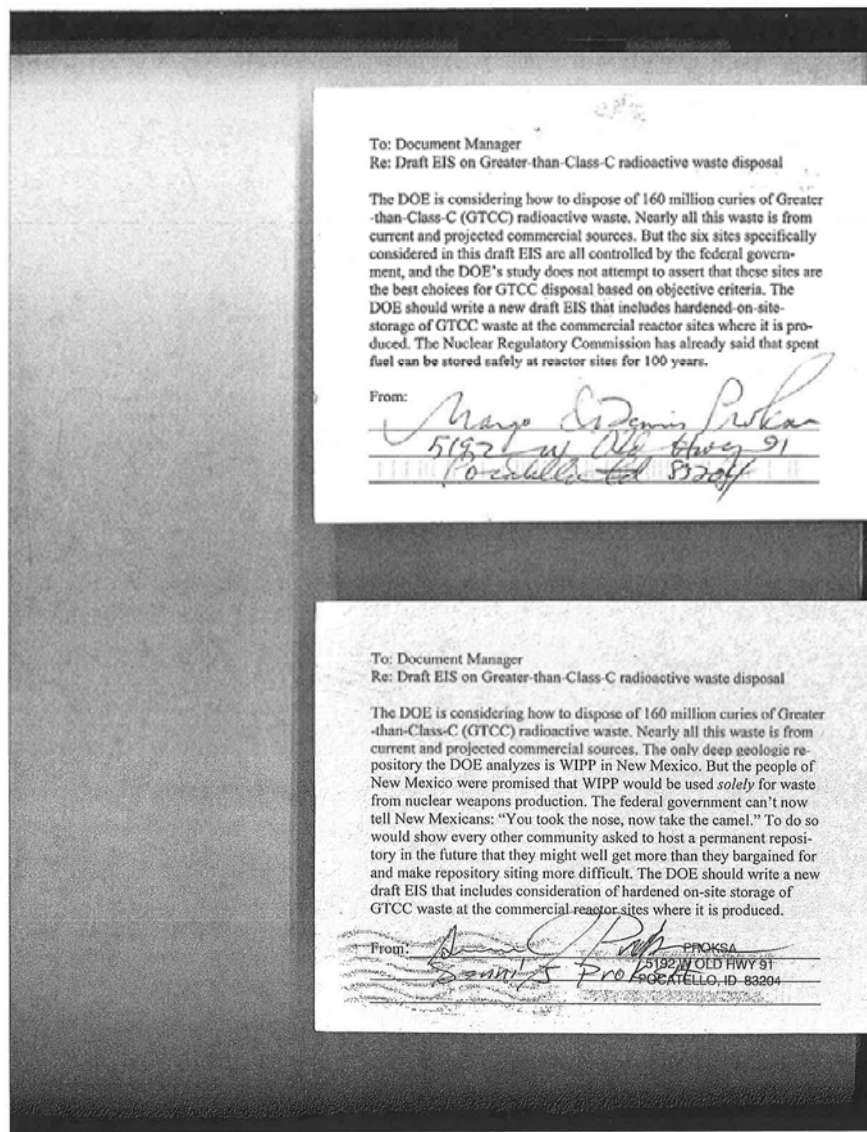
Snake River Alliance Campaign
Pollard, Leslie, Commenter ID No. L186
Pollard, Stan, Commenter ID No. L162



Pollard, Leslie – L186

Pollard, Stan – L162

Snake River Alliance Campaign
Proksa, Margo and Dennis, Commenter ID No. L170
Proksa, Sanni, Commenter ID No. L151



Proksa, Margo and Dennis – L170
 Proksa, Sanni – L151

Snake River Alliance Campaign
Puckett, Bob, Commenter ID No. L179
Puckett, Su, Commenter ID No. L166

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: SU Puckett
5025 Mohawk
Pocatello Id 83204

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

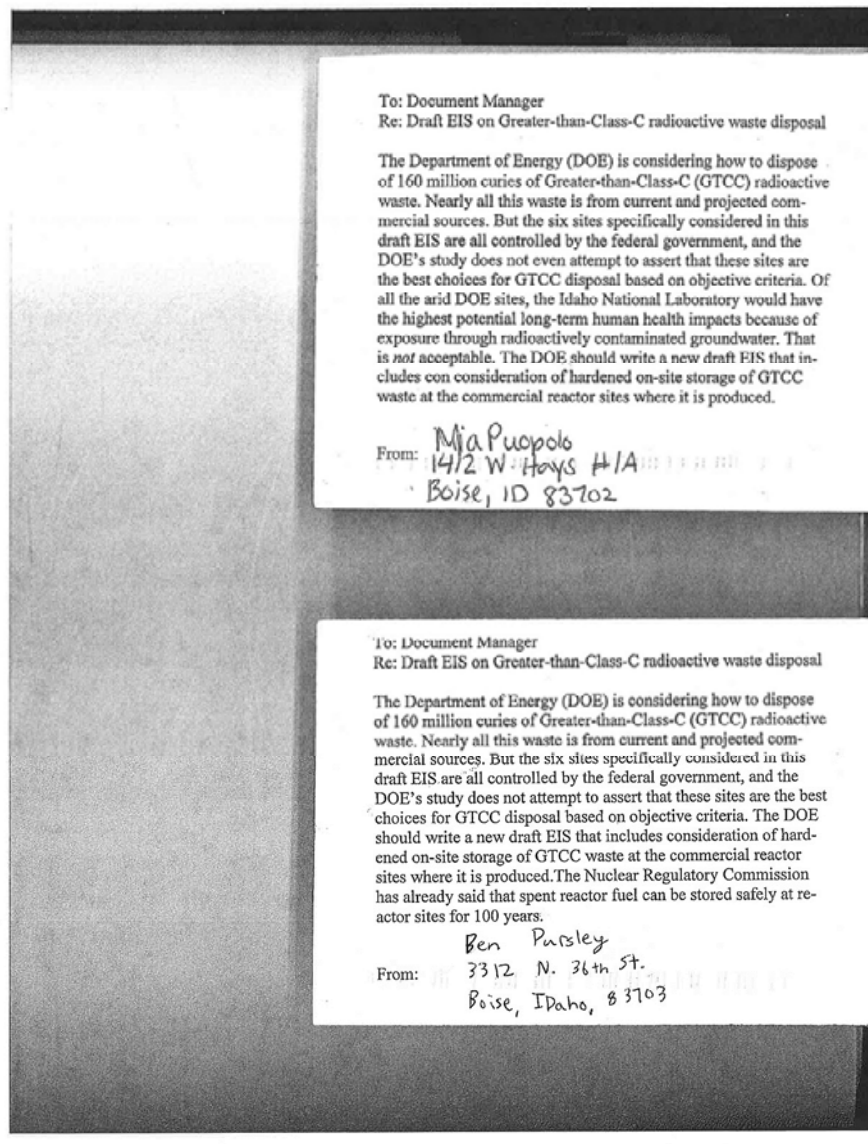
The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From: Bob Puckett
5025 MOHAWK
Pocatello Id 83204

Puckett, Bob – L179

Puckett, Su – L166

Snake River Alliance Campaign
Puopolo, Mia, Commenter ID No. L158
Pursley, Ben, Commenter ID No. L136



Puopolo, Mia – L158
Pursley, Ben – L136

Snake River Alliance Campaign
Reid, Heidi, Commenter ID No. L127
Reneay, Nava, Commenter ID No. L105

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Heidi Reid
5531 N. Lynwood Pl.
Boise, ID 83706

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Nava Reneay
193 Randolph Ave
Pocatello, ID 83201

Reid, Heidi – L127
Reneay, Nava – L105

Snake River Alliance Campaign
Reynolds, Anne, Commenter ID No. L160
Ritter, Stephen, Commenter ID No. L153

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: *Anne Reynolds*
252 E. Front St. #606
Bain, ID.
83702

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes WIPP in New Mexico. But WIPP was opened with a promise to the people of New Mexico that it would be used *solely* for waste from nuclear weapons production. Commercial waste is specifically prohibited. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced and does not consider legally barred disposal.

From: *Stephen Ritter*
1914 Dryden B7
Bain ID 83706

Reynolds, Anne – L160

Ritter, Stephen – L153

Snake River Alliance Campaign
Robinson, Pat, Commenter ID No. L145
Rule, Andrea, Commenter ID No. L191

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from *commercial* sources, current or projected. But the DOE is looking *only* at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

We were promised at one time -- that we would not have more -- before it was completely cleaned up.
 Pat Robinson
 1562 West Story
 Meridian, Idaho 83646

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

Andrea Skille
 Box 2454
 Ketchum, ID 83340

Robinson, Pat – L145
 Rule, Andrea – L191

Snake River Alliance Campaign
Rodie, Jan, Commenter ID No. L70
Rush, Irene, Commenter ID No. L132

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes is WIPP in New Mexico. But the people of New Mexico were promised that WIPP would be used *solely* for waste from nuclear weapons production. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: JAN RODIE
3928 MacCabe Dr
Pleasanton CA 94566

To: Document Manager
 Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Irene Rush
1107 N. 8th St.
Boise 83702

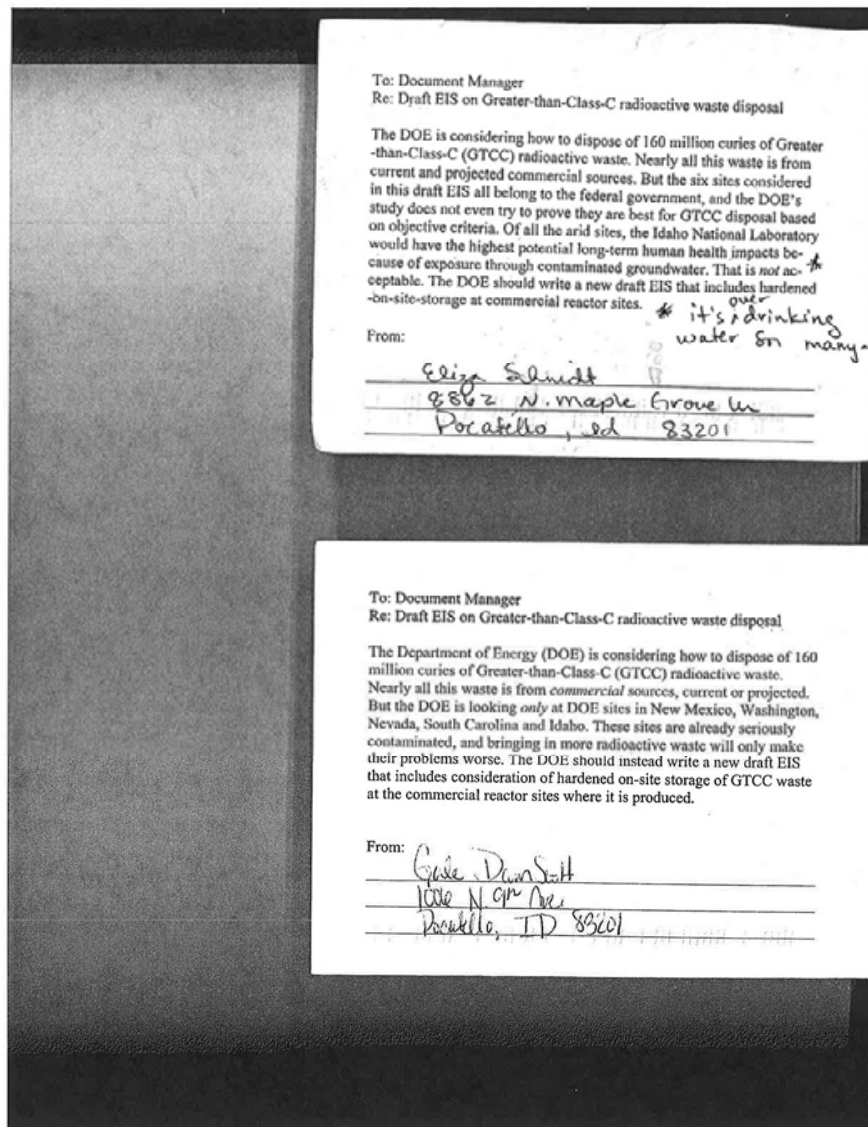
Rodie, Jan – L70
 Rush, Irene – L132

Snake River Alliance Campaign
Russell, Brennan, Commenter ID No. L115
Rydakh, Amanda, Commenter ID No. L60

	<p>To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal</p> <p>The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.</p> <p>From: Brennan Russell 1412 W Hays St APLA Boise, ID</p>
	<p>To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal</p> <p>The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes is WIPP in New Mexico. But the people of New Mexico were promised that WIPP would be used <i>solely</i> for waste from nuclear weapons production. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.</p> <p>From: Amanda Rydakh 873 Linda Ave Pocatello ID 83201</p>

Russell, Brennan – L115
Rydakh, Amanda – L60

Snake River Alliance Campaign
Schmidt, Eliza, Commenter ID No. L198
Scott, Gale Dawn, Commenter ID No. L74



Schmidt, Eliza – L198
 Scott, Gale Dawn – L74

Snake River Alliance Campaign
Scott, Linda, Commenter ID No. L173
Seward, Peggy, Commenter ID No. L75

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site-storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:

Linda Scott
1036 E Clark St
Pocatello Id 83201

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site-storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:

Peggy Seward
130 High Street
Milford, NH 03055

Scott, Linda – L173
Seward, Peggy – L75

Snake River Alliance Campaign
Seward, Michelle, Commenter ID No. L68
Seymour, Jan, Commenter ID No. L61

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes is WIPP in New Mexico. But the people of New Mexico were promised that WIPP would be used *solely* for waste from nuclear weapons production. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Michelle Seward
1825 High 2409 North Pink Creek Rd
Bozartello, ID 83204

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

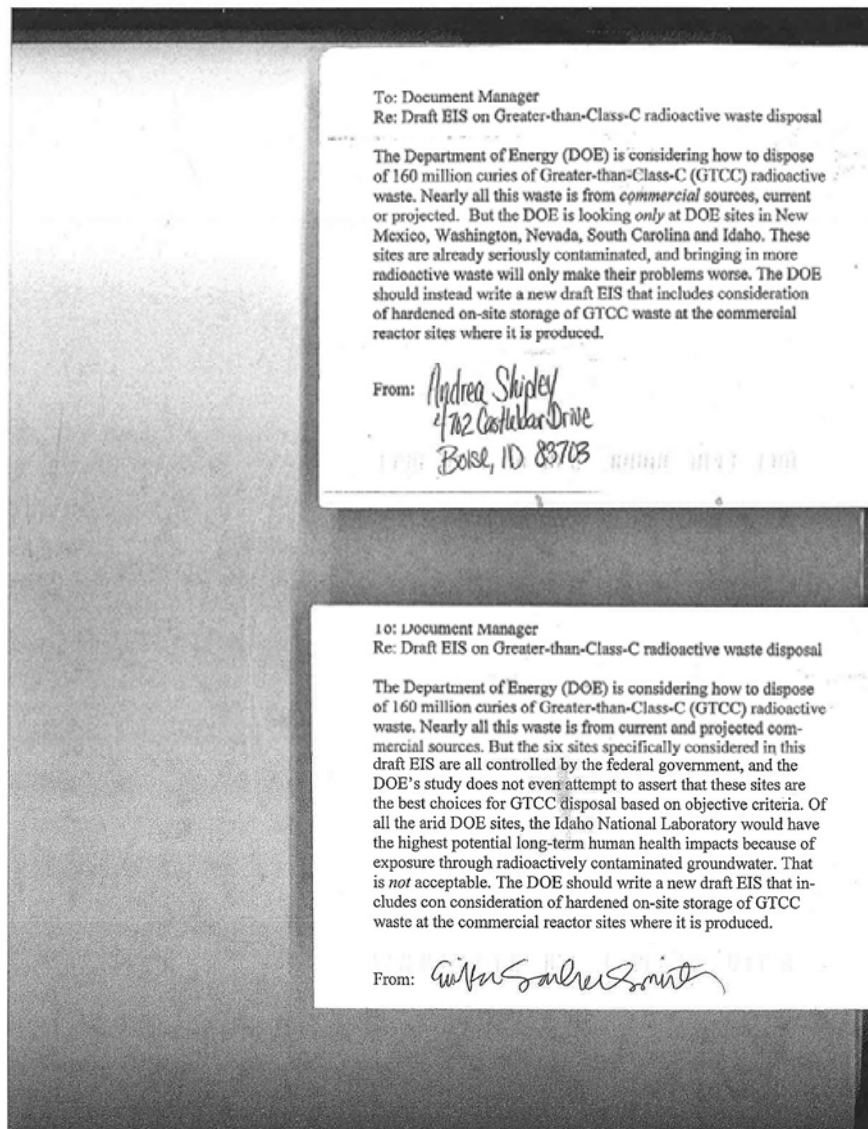
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From: Jan Seymour
6064 Fruitwood
Bozartello, ID 83204

Seward, Michelle – L68

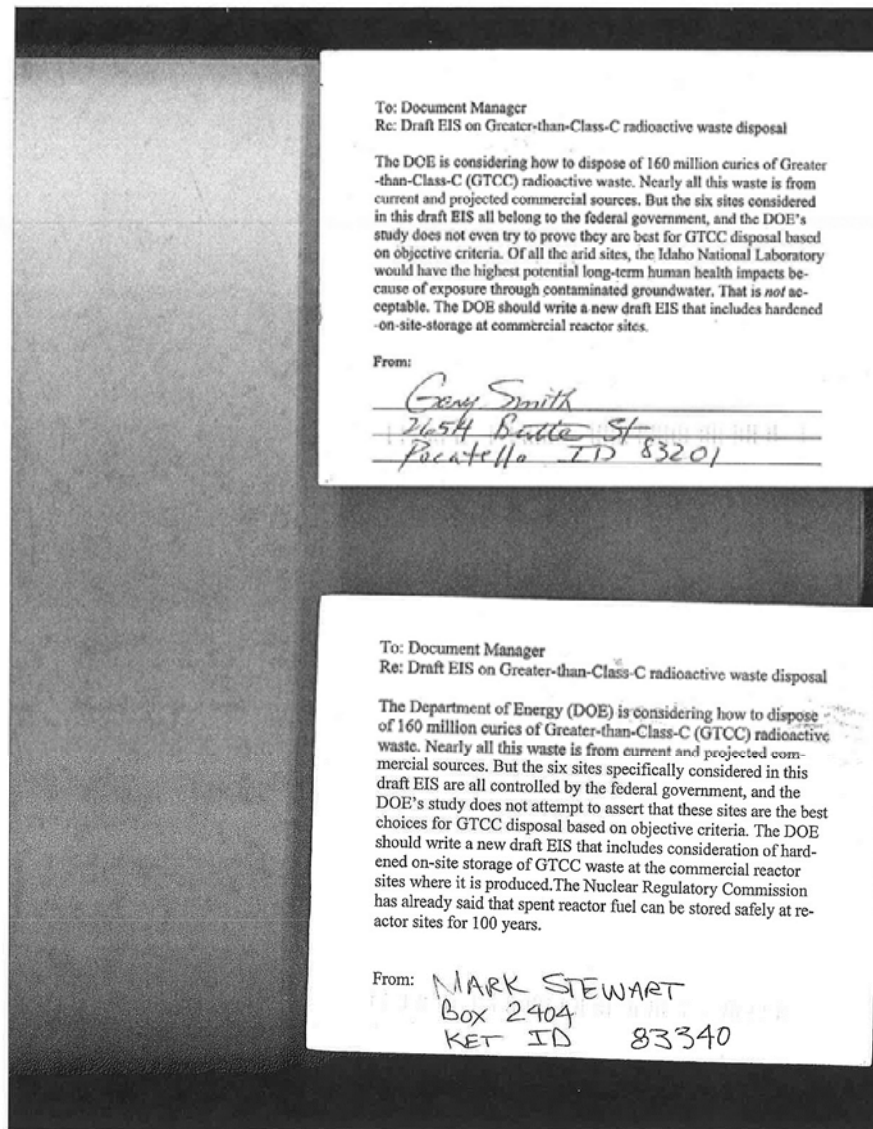
Seymour, Jan – L61

Snake River Alliance Campaign
Shipley, Andrea, Commenter ID No. L143
Smith, E. , Commenter ID No. L189



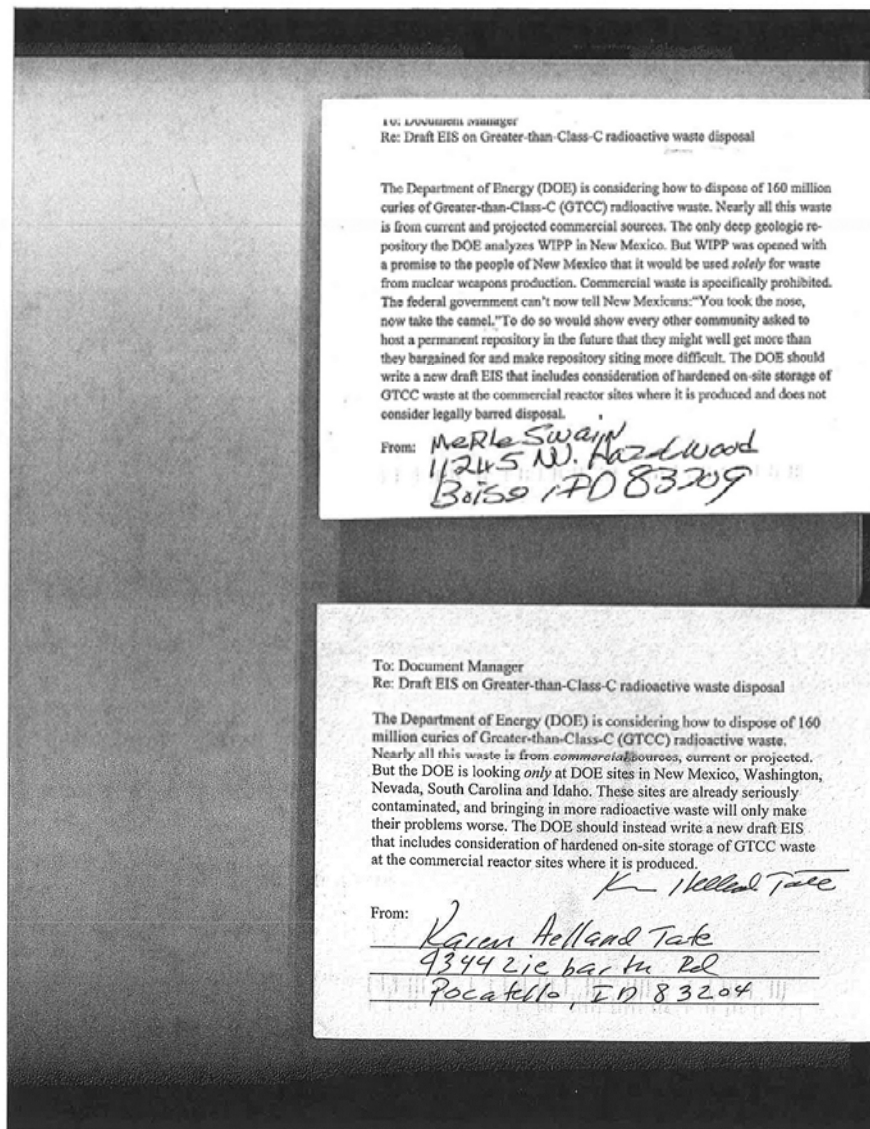
Shipley, Andrea – L143
Smith, E. – L189

Snake River Alliance Campaign
Smith, Gary, Commenter ID No. L171
Stewart, Mark, Commenter ID No. L131



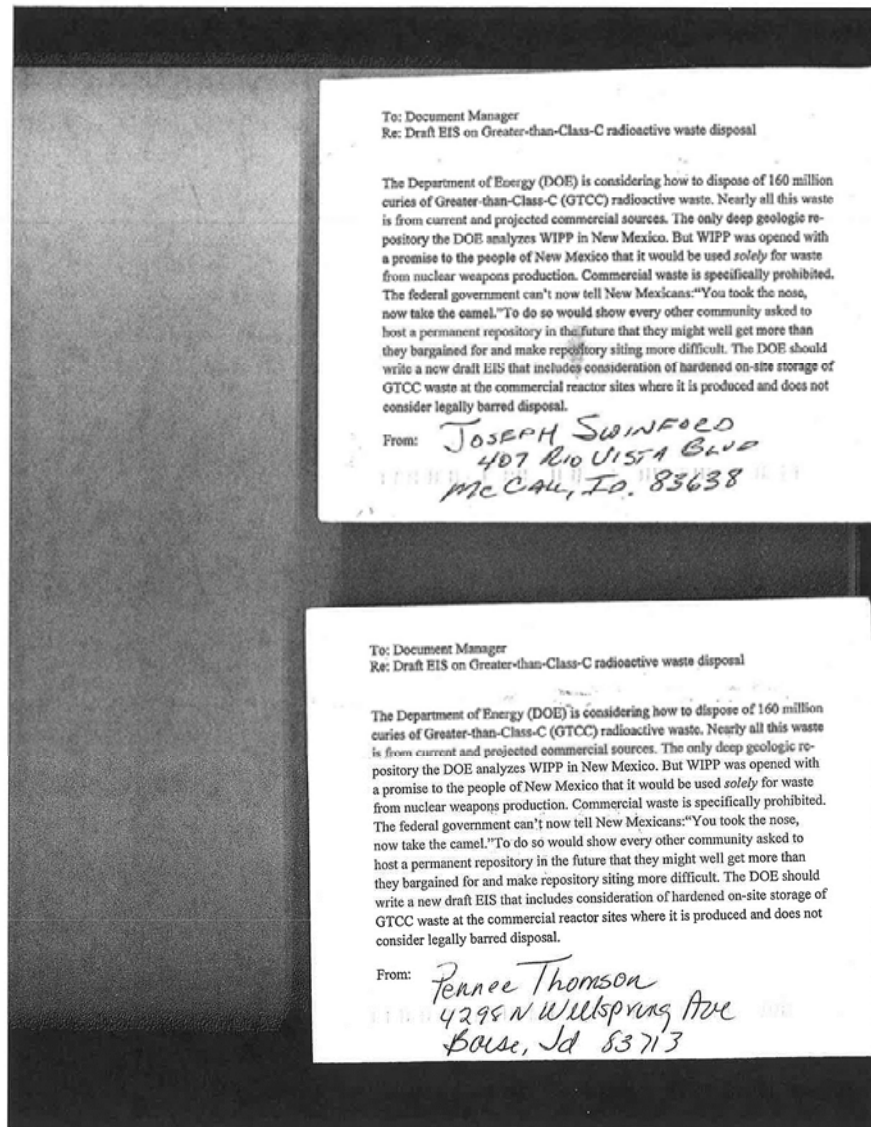
Smith, Gary – L171
Stewart, Mark – L131

Snake River Alliance Campaign
Swain, Merle, Commenter ID No. L159
Tate, Karen, Commenter ID No. L128



Swain, Merle – L159

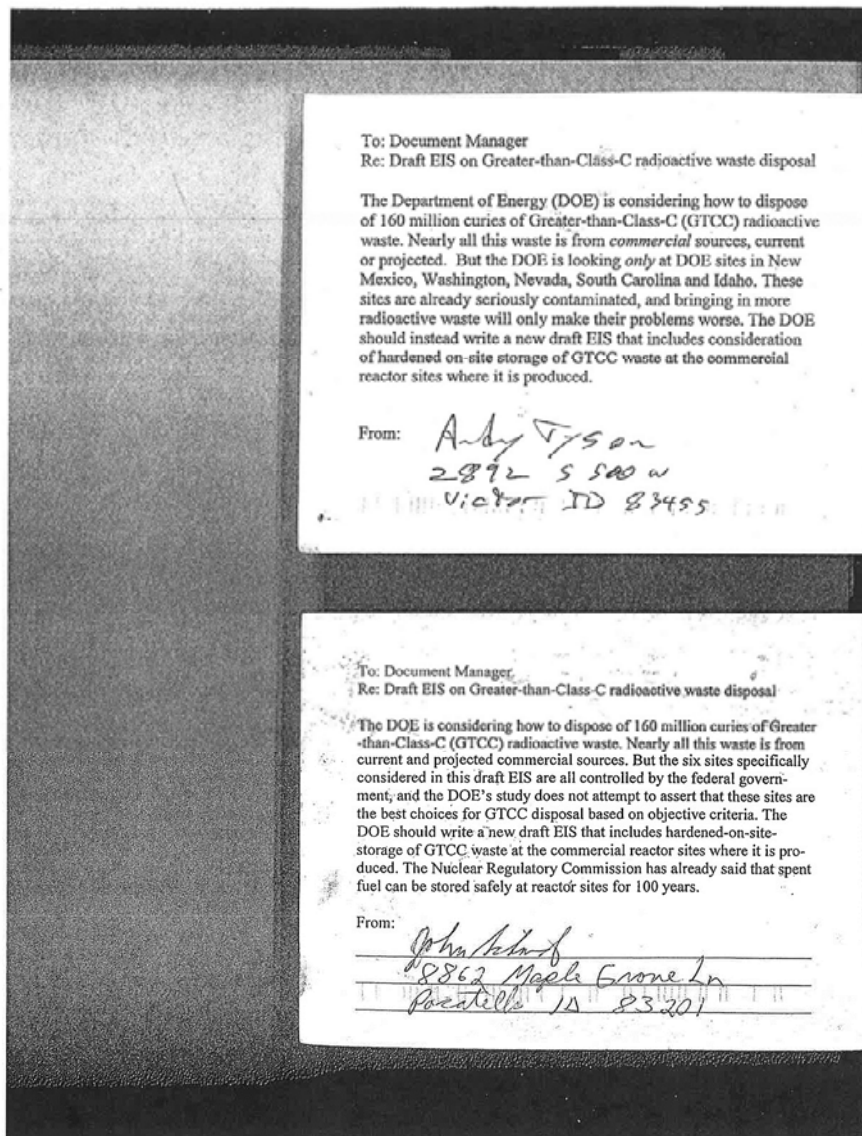
Tate, Karen – L128

Snake River Alliance CampaignSwinford, Joseph, Commenter ID No. L187Thompson, Pennee, Commenter ID No. L185

Swinford, Joseph – L187

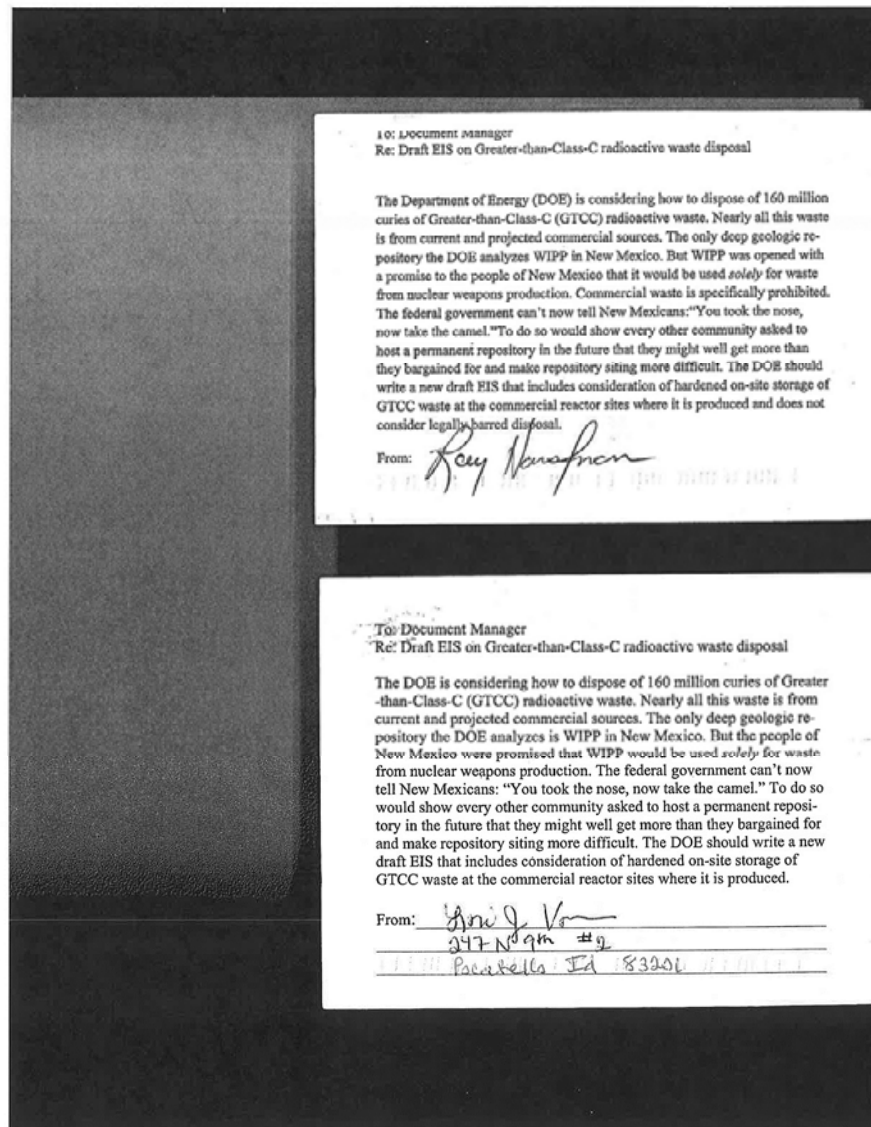
Thompson, Pennee – L185

Snake River Alliance Campaign
Tyson, Andy, Commenter ID No. L118
Unknown, John, Commenter ID No. L152



Tyson, Andy - L118
Unknown, John - L152

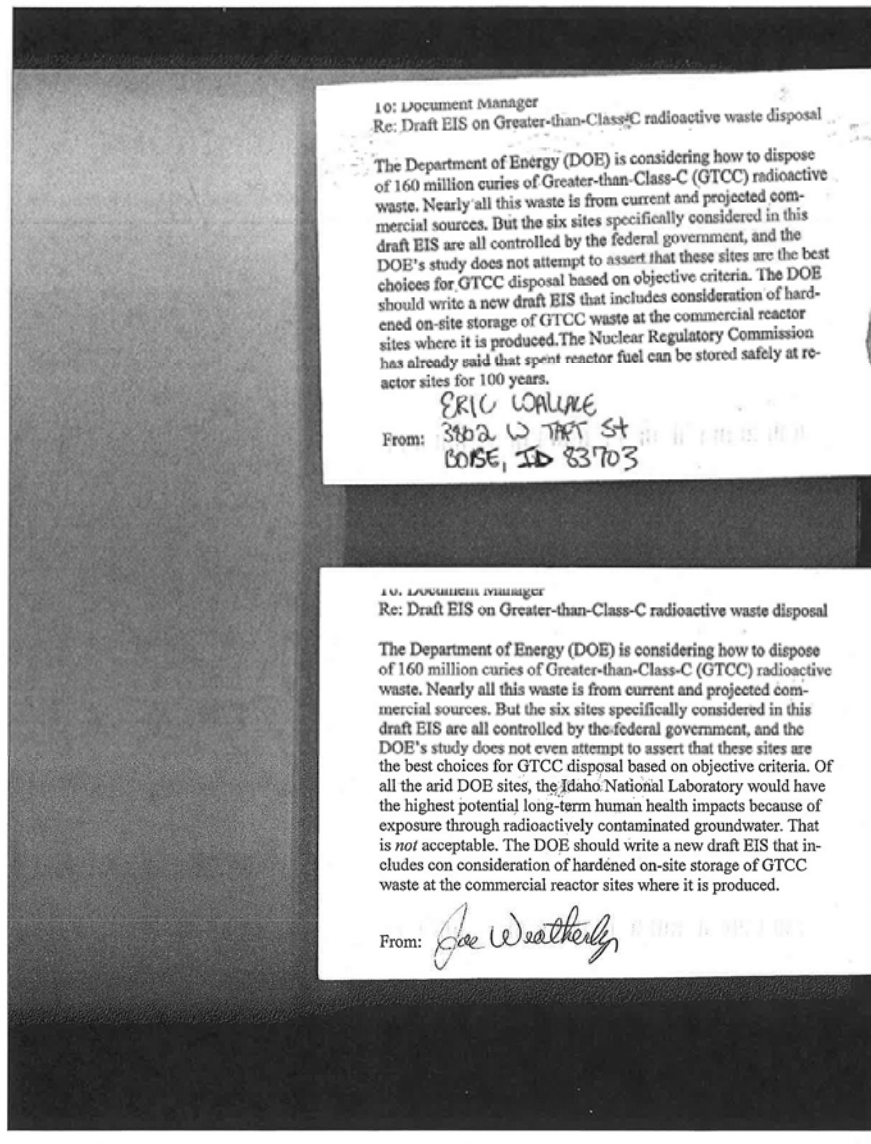
Snake River Alliance Campaign
Unknown, Ray, Commenter ID No. L120
Von, Lori, Commenter ID No. L63



Unknown, Ray – L120

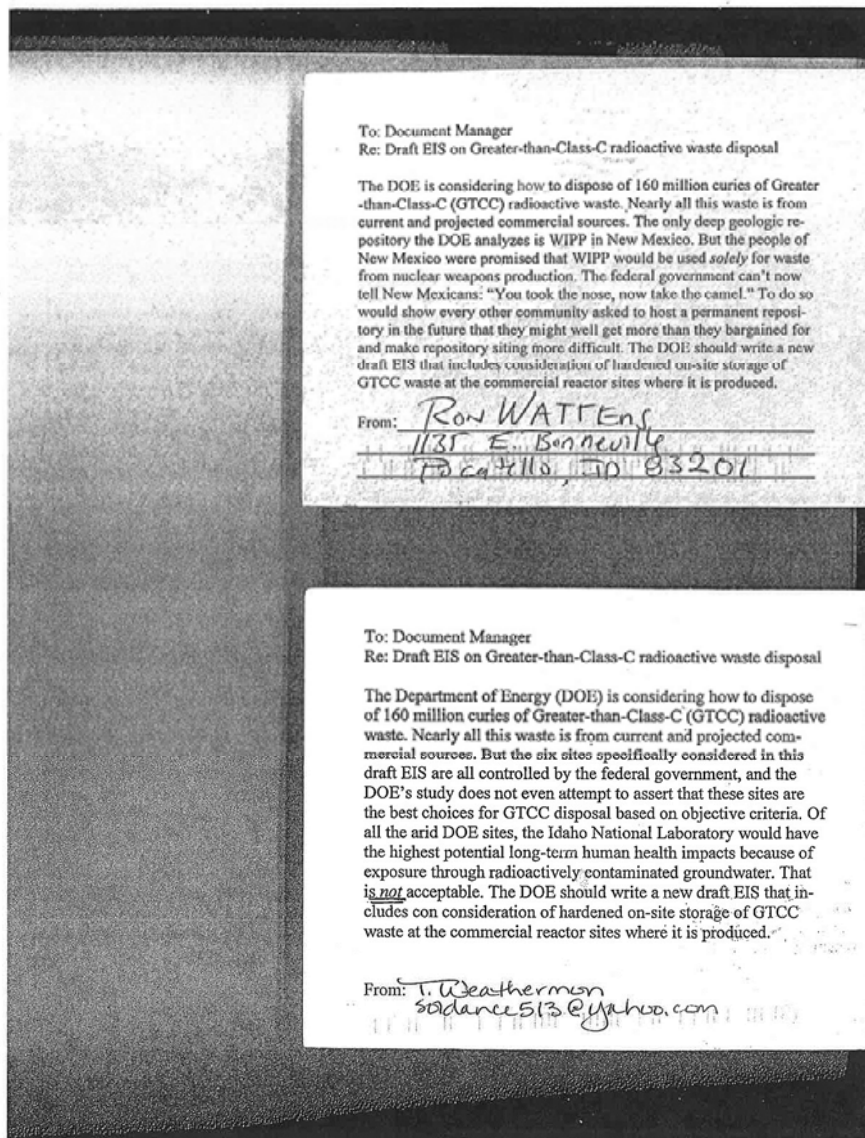
Von, Lori – L63

Snake River Alliance Campaign
Wallace, Eric, Commenter ID No. L125
Weatherly, Joe, Commenter ID No. L124



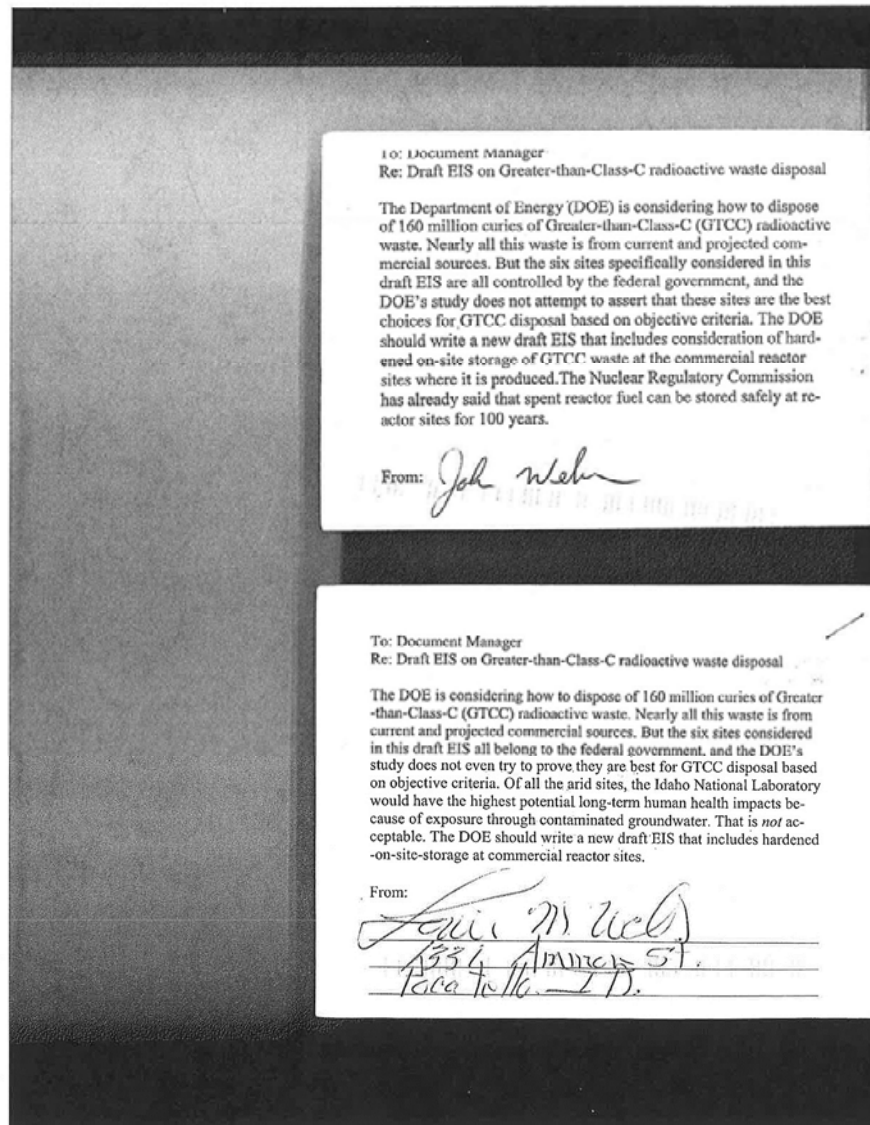
Wallace, Eric – L125
Weatherly, Joe – L124

Snake River Alliance Campaign
Wattens, Ron, Commenter ID No. L180
Weatherman, T., Commenter ID No. L194



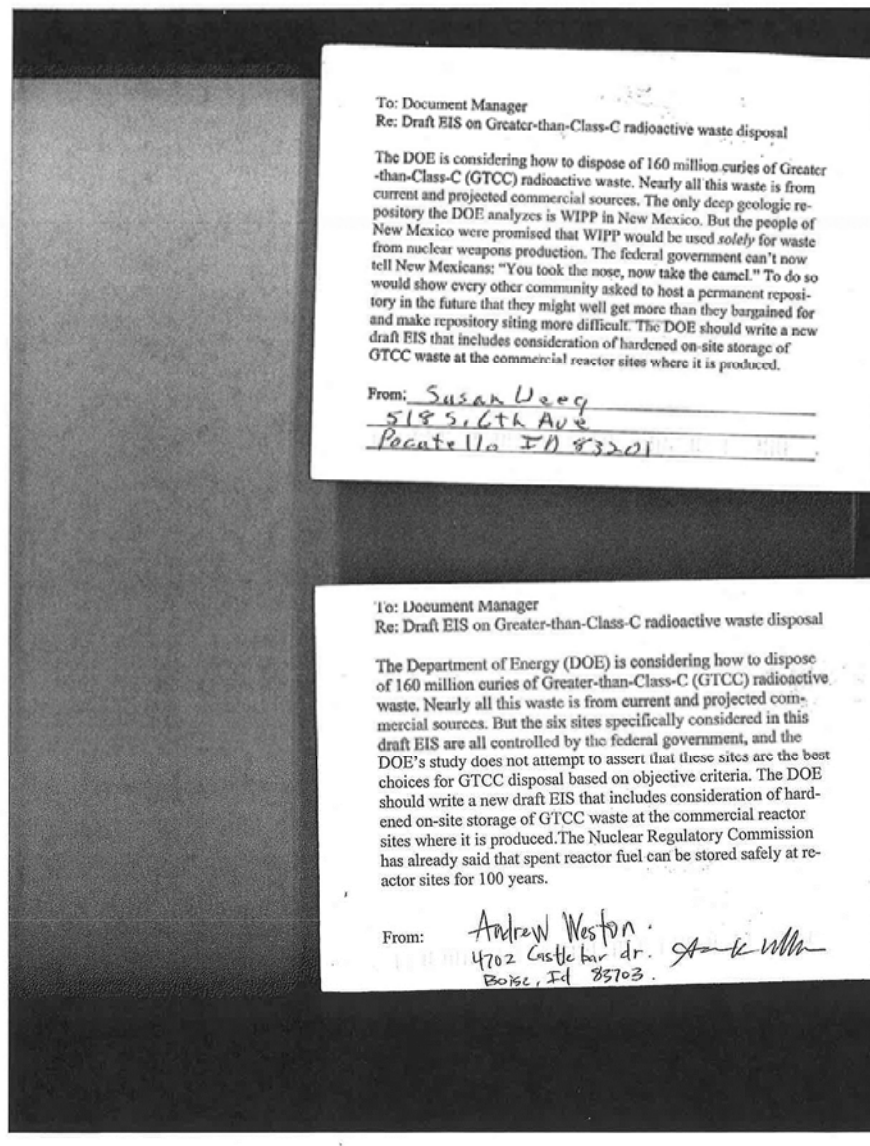
Wattens, Ron – L180
Weatherman, T. – L194

Snake River Alliance Campaign
Weber, John, Commenter ID No. L202
Webs, Lori, Commenter ID No. L104



Weber, John – L202
Webs, Lori – L104

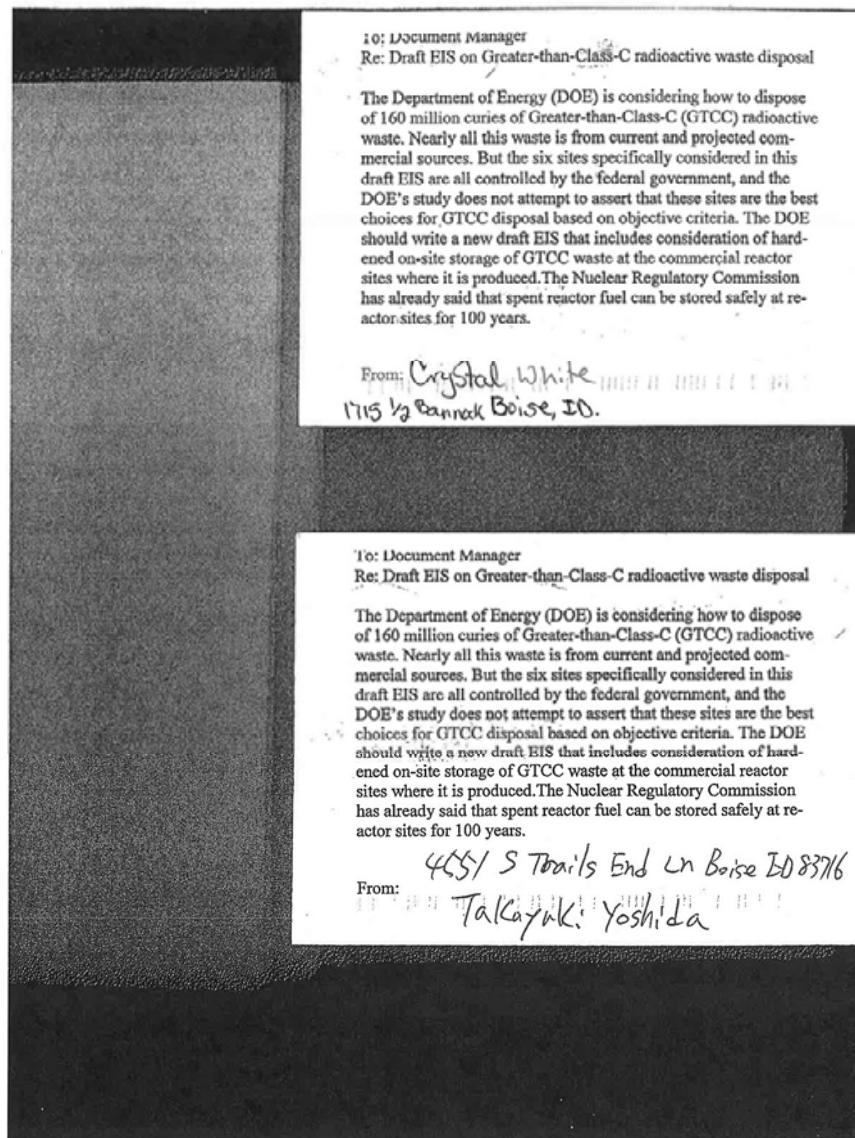
Snake River Alliance Campaign
Weeq, Susan, Commenter ID No. L76
Weston, Andrew, Commenter ID No. L204



Weeq, Susan - L76

Weston, Andrew - L204

Snake River Alliance Campaign
White, Crystal, Commenter ID No. L150
Yoshida, Takayuki, Commenter ID No. L184



White, Crystal – L150
Yoshida, Takayuki – L184

Snake River Alliance Campaign
Yeatts, Carole, Commenter ID No. L161

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is *not* acceptable. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: *Carole C. Yeatts*
1674 W. Hill Rd #10 Boise, ID 83702

Yeatts, Carole – L161

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J.3.6 Nuclear Watch Campaign Form Letters

Table J.3-6 tabulates all individuals who submitted comments via the Nuclear Watch Campaign form letter along with the comment document identifiers assigned to each. There were three versions of the form letter, identified as version “a”, version “b”, and version “c”. One representative of each version of the letter (Anderson, Mary Lou, Comment Document ID No. E65 for version a; Mills, Lorene, Comment Document ID No. E56 for version b; and Gordon, Susan, Comment Document ID No. E95 for version c) was used to identify the comments. The comments are identified in brackets on the left side of the page, and the corresponding responses are shown on the right side of the page. All other comment letters resemble the representative version “a”, “b”, or “c” letter. The representative letters, comments identified in the letters, responses, and all other comment documents received for this campaign are presented here in Section J.3.6 on pages J-1957 through J-2073, as indicated in the table.

TABLE J.3-6 Individuals Who Submitted Comments via the Nuclear Watch Campaign Form Letters

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.
Anderson, Mary Lou*	a	E65	J-1957
Baley, Patricia McRae	b	E75	J-1965
Brown, John	a	E17	J-1968
Busch, Dorothy	a	E30	J-1970
Cardwell, Stephanie	a	E18	J-1972
Childers, Dee	a	E25	J-1974
Cole, Corrine	a	E13	J-1976
Colip, Carol	a	E16	J-1978
Crawford, Teresa	a	E91	J-1980
Cronin, Thomas	a	E88	J-1982
Drucker, Linda	a	E98	J-1984
Fanning, Don	a	E86	J-1986
Ford, Peter	a	E78	J-1988
Gordon, Susan*	c	E95	J-1963
Haber, Ruth	a	E79	J-1990
Hall, Frederica	b	E38	J-1992
Halsey-Hoover, Sharon	a	E99	J-1995
Hartsough, David	a	E24	J-1997
Hoffman, Jim	a	E44	J-1999
Intino, Mario	a	E87	J-2001
Jones, Barbara	a	E62	J-2003
Jones, Jeremiah	a	E42	J-2005
Knutsen, Reinard	a	E81	J-2007
Kovac, Scott	c	E101	J-2009
Lai, R	a	E83	J-2011
Larson, David	a	E22	J-2013
Levee, Penny	a	E104	J-2015
Levine, Julie	a	E49	J-2017
Louis, Cynthia	b	E19	J-2019

TABLE J.3-6 (Cont.)

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.
Lynn, Michele	a	E63	J-2022
Mills, Lorene*	b	E56	J-1960
Model, Betsy	b	E6	J-2024
Moon, Otter C.	a	E74	J-2027
Mullin, Charles	a	E14	J-2029
Pringle, Mark	a	E66	J-2031
Rankin, Douglass	b	E31	J-2033
Rice, Megan	a	E64	J-2036
Riegle, Rosalie	a	E82	J-2038
Rockefeller, Terry Kay	a	E89	J-2040
Schmidt, Laurel Lambert	a	E55	J-2042
Shiroky, Cynthia	a	E20	J-2044
Simon, Madeline	a	E57	J-2046
Sorgen, Phoebe	a	E77	J-2048
Tatro-Medlin, April	a	E37	J-2050
Thawley, Bob	a	E8	J-2052
Thomas, Ellen	a	E36	J-2054
Turk, Lawrence	a	E9	J-2056
Ventura, Maxina	a	E5	J-2058
Wale, Lisa	b	E52	J-2061
Welsh, Anne	a	E85	J-2064
Welsh, Myron	a	E67	J-2066
Yoshida, Takayuki	a	E39	J-2068
Young, Lisa	a	E54	J-2070
Ziglar, Randy	a	E80	J-2072

* Anderson, Mary Lou (Comment Document ID No. E65) is representative letter version a; Mills, Lorene (Comment Document ID No. E56) is representative letter version b; and Gordon, Susan (Comment Document ID No. E95) is representative letter version c.

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Nuclear Watch Campaign, Commenter
Anderson, Mary Lou, ID No. E65
(Representative Letter version a)

From: mlavegas@yahoo.com
Sent: Wednesday, June 08, 2011 1:23 PM
To: gtccsis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

E65-1 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

E65-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

E65-3 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS. DOE did not evaluate developing a repository exclusively for disposal of GTCC LLRW and GTCC-like wastes because DOE determined that such an alternative is unreasonable due to the time and cost associated with siting another deep geologic repository and the relatively small volume of GTCC LLRW and GTCC-like waste identified in the GTCC EIS. DOE believes that the results presented in this EIS for the WIPP geologic repository alternative are indicative of the high degree of waste isolation that would be provided by the use of this disposal method.

DOE recognizes that the use of WIPP for disposal of GTCC waste would require federal legislation to modify the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240). In addition, it may be necessary to revise the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, the WIPP compliance certification with the EPA, and the WIPP Hazardous Waste Facility Permit.

E65-4 The No Action Alternative is evaluated in Chapter 3 of the EIS, and under this alternative, current practices for storing GTCC LLRW and GTCC-like waste would continue. These practices are described in Sections 3.2 (GTCC LLRW) and 3.3 (GTCC-like wastes) in the Final EIS. It was necessary to make a number of simplifying assumptions to address the long-term impacts of this alternative, and these are described in Section 3.5. As part of this assessment, it was assumed that these wastes would remain in long-term storage indefinitely, and that no maintenance of either the storage facility or waste packages would occur after 100 years. These results indicate that very high radiation doses and cancer risks could occur under this alternative in the long term.

The No Action Alternative is evaluated in sufficient detail in the EIS as required by NEPA. Comparatively high potential radiation doses and cancer risks could occur should this alternative be selected. While a more detailed analysis could reduce the uncertainties associated with estimating these doses and risks, the conclusion of comparatively high impacts would not change for this alternative.

Nuclear Watch Campaign
Anderson, Mary Lou, Commenter ID No. E65 (cont'd)
(Representative Letter version a)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Finally, suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Mary Lou Anderson
 4584 CASA MIA CIR
 LAS VEGAS, NV 89121-5407
 7025727249

- E65-5 DOE initiated consultation and communication with the 14 participating American Indian tribes that have cultural or historical ties to the DOE sites analyzed in the EIS. These interactions are summarized in Section 1.8 of the EIS, and they included several meetings, workshops, and the development of tribal narratives that were included in the EIS. In addition to including tribal narratives related to the four sites in the EIS, DOE inquired about tribal interest with regard to the WIPP/WIPP Vicinity and SRS. No tribes came forward in response to the inquiries regarding these two locations. It was not necessary to consult with American Indian tribes with regard to the generic regional locations, since the specific locations of the potential disposal facilities (and the affected tribes) were not known.
- E65-6 The Low-Level Radioactive Waste Policy Amendments Act (LLRWPA, P.L. 99-240) assigns DOE responsibility for the disposal of GTCC LLRW generated by NRC and Agreement State licensees. The LLRWPA (P.L. 99-240) does not limit DOE to using only non-DOE facilities or sites for GTCC LLRW disposal.
- E65-7 The LLRWPA (P.L. 99-240) specifies that GTCC LLRW is to be disposed of in an NRC-licensed facility that has been determined to be adequate to protect public health and safety. There are currently no NRC-licensed facilities that are authorized to dispose of GTCC LLRW. Unless specifically provided by law, the NRC does not have authority to license and regulate facilities operated by or on behalf of DOE. While DOE does not believe the LLRWPA (P.L. 99-240) requires DOE to only consider commercial disposal alternatives, DOE does recognize that legislation may be needed to clarify whether a GTCC LLRW disposal facility owned or operated by or on behalf of DOE must be licensed by the NRC, and if so, to authorize the NRC to license such a facility.
- E65-7 DOE/NSA analyzed various radioactive waste shipping routes through and around metropolitan Las Vegas, Nevada, in the Draft NNSS SWEIS. DOE/NSA continued discussions with the State of Nevada on routing options throughout the preparation of the Final NNSS SWEIS. After taking into consideration the comments and concerns expressed by State, county, and local government officials and the public in general during the review and comment period for the Draft NNSS SWEIS, DOE/NSA decided to maintain the current highway routing restrictions for shipments of low-level radioactive waste (LLW) and mixed-low level radioactive waste (MLLW), as described in the Waste Acceptance Criteria (WAC) for the site. DOE/NSA explained this decision in the Final NNSS SWEIS. The unchanged WAC restrictions are to avoid (1) crossing the Colorado River near Hoover Dam and (2) the greater metropolitan Las Vegas interstate system. DOE/NSA is not considering, nor is it making, changes to the NNSS WAC with regard to routing.
- E65-8 The scope of this EIS is adequate to inform decision making for the disposal of GTCC LLRW and GTCC-like waste. Sufficient information is available to support the current decision-making process to identify (an) appropriate site(s) and method(s) to dispose of the limited amount of GTCC wastes identified in the EIS.

DOE believes that this EIS process is not premature and is in compliance with NEPA. On the basis of an assumed starting date of 2019 for disposal operations, more than half (about 6,700 m³ [240,000 ft³] of the total GTCC waste inventory of 12,000 m³ [420,000 ft³]) is projected to be available for disposal between 2019 and 2030. An additional 2,000 m³ (71,000 ft³) would become available for disposal between 2031 and 2035. This information is

presented in Figure 3.4.2-1. DOE believes this EIS is timely, especially given the length of time necessary to select, design, and build a GTCC waste disposal facility.

DOE developed this EIS to support a decision on selecting a disposal facility or facilities for GTCC LLRW and GTCC-like waste, to address legislative requirements, to address national security concerns (especially for sealed sources), and to protect public health and safety. The purpose and need for the proposed action, as discussed above, is stated in the EIS (Section 1.1). The scope of the EIS is focused on addressing the need for developing a disposal capability for the identified inventory of GTCC LLRW and GTCC-like waste. DOE plans a tiered decision-making process in which DOE would conduct further site-specific NEPA reviews before implementing an alternative ultimately selected on the basis of this EIS.

Nuclear Watch Campaign
Anderson, Mary Lou, Commenter ID No. E65 (cont'd)
(Representative Letter version a)

Nuclear Watch Campaign
Mills, Lorene, Commenter ID No. E56
(Representative Letter version b)

From: Lorene Mills <LCarpMills@aol.com>
Sent: Monday, June 27, 2011 11:05 PM
To: Arnold Edelman
Cc: Lorene Mills
Subject: Greater than Class C Comments

June 27, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
 Independence Avenue, SW., Washington, DC 20585

Please do not send all that waste to WIPP. Wipp is only for Low Level waste! Thank you.

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
 - o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.
 - o Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
 - o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
 - o Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.

E56-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

E56-2 The EIS considered the range of reasonable alternatives for the disposal of the GTCC waste inventory identified in the EIS. The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS.

DOE did not evaluate developing a geologic repository exclusively for disposal of GTCC LLRW and GTCC-like wastes because DOE determined that such an alternative is unreasonable due to the time and cost associated with siting another deep geologic repository and the relatively small volume of GTCC LLRW and GTCC-like waste identified in the GTCC EIS. DOE believes that the results presented in this EIS for the WIPP geologic repository alternative are indicative of the high degree of waste isolation that would be provided by the use of this disposal method.

DOE recognizes that the use of WIPP for disposal of GTCC waste would require federal legislation to modify the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240). In addition, it may be necessary to revise the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, the WIPP compliance certification with the EPA, and the WIPP Hazardous Waste Facility Permit.

Nuclear Watch Campaign
Mills, Lorene, Commenter ID No. E56 (cont'd)
(Representative Letter version b)

o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.

o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.

o The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.

• DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

WIPP Recommendations

• The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.

• The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.

• Finish the original mission at WIPP.

o Safely operate WIPP to meet the "start clean, stay clean" standard

o Meet commitments to clean up about 20 DOE nuclear weapons sites

o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

Los Alamos Recommendations

• The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.

• LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.

o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.

o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.

E56-3 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

E56-4 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

E56-5 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

E56-6 Text prepared by potentially affected American Indian tribes is included in this EIS. DOE considered this text for Hanford, INL, LANL, and NNSS; however, DOE also needed to ensure consistency in the EIS analyses between the various sites, so that an even comparison could be made between alternatives as required by NEPA. Because of this, it was not possible to fully utilize all of the information provided by the tribal governments in order to perform specific analyses associated with exposure events unique to a given American Indian tribe (such as greater intakes of fish, game, and plants; the use of sweat lodges; and the use of natural pigment paints for traditional ceremonies). Once a decision is made on a specific site location and method, site-specific NEPA reviews would be conducted as needed, including appropriate analysis of exposure events unique to the impacted local American Indian tribes.

However, the information provided in these narratives was considered in the identification of the preferred alternative presented in this EIS. The information provided in the narratives for Hanford, INL, LANL, and NNSS was very useful, and DOE appreciates the time and effort expended by the various tribes in supporting this EIS process.

Nuclear Watch Campaign
Mills, Lorene, Commenter ID No. E56 (cont'd)
(Representative Letter version b)

- o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.
- o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

E56-5
(Cont.)

E56-6

Lorene Mills
87502

Nuclear Watch Campaign
Gordon, Susan, Commenter ID No. E95
(Representative Letter version c)

From: Susan Gordon <sgordon@ananuclear.org>
Sent: Friday, June 10, 2011 11:38 AM
To: Arnold Edelman
Cc: Susan Gordon
Subject: Greater than Class C Comments

Letter b

June 10, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000

Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Hardened On-site Storage (HOSS) must be considered as an alternative.
 - o GTCC waste and irradiated spent fuel would remain on-site at commercial nuclear power plants in long-term storage so that they can be monitored and are protected in hardened storage facilities from aircraft crashes or terrorist attacks. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS.
 - The DOE rejection of the HOSS alternative is unacceptable because GTCC LLW at present and for decades in the future will be in on-site storage, so the actual status is not outside the scope of alternatives that should be considered for an EIS.
 - o The DEIS rejected the HOSS alternative that many people from around the country advocated at DOE's GTCC scoping meetings in 2007.
 - o HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found. Part of that future solution, of course, should be drastically minimizing the generation of those wastes.
 - o DOE's reason for rejecting HOSS is that it is "not a permanent disposal facility." Yet, most of the GTCC waste will not be generated for many decades.
 - o At least 85 percent of existing reactors and any new ones are expected to operate beyond 2030, which means GTCC waste disposal could not begin for years after that.
 - o Decisions now about disposal sites and technologies are premature. There is time to learn from experience.
 - o DOE must create a regulatory definition of HOSS.

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E95-1

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

The development of a regulatory framework for the use of HOSS at commercial nuclear power plants is outside the scope of the GTCC EIS. DOE does not have authority to regulate the storage of radioactive wastes at commercial facilities, including nuclear power plants. Under the Atomic Energy Act of 1954 as amended (AEA) (see United States Code: 42 USC § 2011), NRC is responsible for regulating storage of such wastes. Radioactive waste storage requirements can be found in 10 CFR Part 30 (Rule of General Applicability to Domestic Licensing of Byproduct Material), 10 CFR Part 70 (Domestic Licensing of Special Nuclear Material), and 10 CFR Part 72 (Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste). In addition, NRC has provided guidance for the storage of LLRW in SECY-94-198, Review of Existing Guidance Concerning the Extended Storage of Low-Level Radioactive Waste, which was issued on August 1, 1994.

E95-1

Gordon, Susan – E95

J-1963

January 2016

Final GTCC EIS

Appendix J: Comment Response Document

Nuclear Watch Campaign
Gordon, Susan, Commenter ID No. E95 (cont'd)
(Representative Letter version c)

- o DOE must create a regulatory framework for HOSS.
- o HOSS is not a "no action" alternative.
- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- DOE is considering WIPP for GTCC disposal only because WIPP is currently the only hole in the ground. DOE must expand its horizons.
- o Section 1.4.3 of the EIS states, "For deep geologic disposal, WIPP in New Mexico was included for evaluation in this EIS because of its characteristics as a geologic repository."
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- The location of LANL in a seismic fault zone between a rift valley and a dormant volcano is not the place for radioactive waste that is dangerous for tens of thousands of years.

Susan Gordon
 903 W Alameda St #740
 Santa Fe, NM 87501
 505-555-5555

- E95-2 DOE is performing environmental restoration activities at the Hanford Site, INL, LANL, NNSS, and SRS. The ongoing cleanup efforts at these sites will continue. A GTCC waste disposal facility would be located in an area removed from ongoing cleanup activities, so disposal of the GTCC wastes would not affect ongoing cleanup activities at these sites.
- E95-3 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."
- DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.
- E95-4 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Nuclear Watch Campaign
Baley, Patricia McRae, Commenter ID No. E75

From: Patricia McRae Baley <patricia.mcrae@unlv.edu>
Sent: Friday, June 24, 2011 2:57 PM
To: Arnold Edelman
Cc: Patricia McRae Baley
Subject: Greater than Class C Comments

6/24/11

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
 - o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.
 - o Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
 - o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
 - o Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.

Nuclear Watch Campaign
Baley, Patricia McRae, Commenter ID No. E75 (cont'd)

- o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.
- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- o The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- o Safely operate WIPP to meet the "start clean, stay clean" standard
- o Meet commitments to clean up about 20 DOE nuclear weapons sites
- o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.

Nuclear Watch Campaign
Baley, Patricia McRae, Commenter ID No. E75 (cont'd)

- o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.
- o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Patricia McRae Baley
Las Vegas, NV 89121

Nuclear Watch Campaign
Brown, John, Commenter ID No. E17

From: compostjohn2@yahoo.com
Sent: Friday, June 24, 2011 4:02 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

1

Brown, John – E17

Nuclear Watch Campaign
Brown, John, Commenter ID No. E17 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

John Brown
932 E Edgeware Rd
Los Angeles, CA 90026-5781

Nuclear Watch Campaign
Busch, Dorothy, Commenter ID No. E30

From: dorothebusch@aol.com
Sent: Thursday, June 23, 2011 6:06 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

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The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

Nuclear Watch Campaign
Busch, Dorothy, Commenter ID No. E30 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

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There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Dorothy Busch
POB 16567
Missoula, MT 59808-6567

Nuclear Watch Campaign
Cardwell, Stephanie, Commenter ID No. E18

From: cscardwell@hotmail.com
Sent: Thursday, June 16, 2011 5:20 PM
To: gtcceis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Cardwell, Stephanie, Commenter ID No. E18 (cont'd)

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Sincerely,

Stephanie Cardwell
4621 Merced St
Des moines, IA 50310-2910

Nuclear Watch Campaign
Childers, Dee, Commenter ID No. E25

From: deechilders@msn.com
Sent: Tuesday, June 28, 2011 11:32 AM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Childers, Dee, Commenter ID No. E25 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

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Sincerely,

Dee Childers
671 N Harvey Ln
Eagle, ID 83616
2088304455

Nuclear Watch Campaign
Cole, Corrine, Commenter ID No. E13

From: caronkoreen@gmail.com
Sent: Friday, June 17, 2011 11:13 AM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Cole, Corrine, Commenter ID No. E13 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNS or any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Corrine Cole
P.O. Box 476
Markleeville, CA 96120-0476

Nuclear Watch Campaign
Colip, Carol, Commenter ID No. E16

From: colipso@charter.net
Sent: Tuesday, June 21, 2011 6:08 PM
To: gtccsis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

Colip, Carol – E16

Nuclear Watch Campaign
Colip, Carol, Commenter ID No. E16 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Carol Colip
255 Drumm Lane
Fallon, NV 89406-7131

Nuclear Watch Campaign
Crawford, Teresa, Commenter ID No. E91

From: tailsinterry@hotmail.com
Sent: Thursday, June 16, 2011 6:36 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Crawford, Teresa, Commenter ID No. E91 (cont'd)

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Sincerely,

Teresa Crawford
476 Hidden Garden Place
Henderson, NV 89012

Nuclear Watch Campaign
Cronin, Thomas, Commenter ID No. E88

From: tompainecronin@comcast.net
Sent: Friday, June 17, 2011 12:13 PM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Cronin, Thomas, Commenter ID No. E88 (cont'd)

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Sincerely,

Thomas Cronin
100 Rochelle Ave.
Phila., PA 19128
215-482-5531

Nuclear Watch Campaign
Drucker, Linda, Commenter ID No. E98

From: shantilin@cox.net
Sent: Thursday, June 23, 2011 5:03 PM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Drucker, Linda - E98

Nuclear Watch Campaign
Drucker, Linda, Commenter ID No. E98 (cont'd)

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Sincerely,

Linda Drucker
2832 Summer Lake Dr.
Las Vegas, NV 89128-7706

Nuclear Watch Campaign
Fanning, Don, Commenter ID No. E86

From: unclledon@well.com
Sent: Thursday, June 23, 2011 8:05 PM
To: gtccsis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Fanning, Don, Commenter ID No. E86 (cont'd)

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Sincerely,

Don Fanning
PO Box 128
Flagstaff, AZ 86002-0128

Nuclear Watch Campaign
Ford, Peter, Commenter ID No. E78

From: quartermarjack@gmail.com
Sent: Monday, June 27, 2011 3:17 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Ford, Peter, Commenter ID No. E78 (cont'd)

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Sincerely,

Peter Ford
2021 Burma Road
Baker, NV 89311-0140
775-234-8808

Nuclear Watch Campaign
Haber, Ruth, Commenter ID No. E79

From: r.haber@sbcglobal.net
Sent: Friday, June 24, 2011 3:36 PM
To: gtccels@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

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Nuclear Watch Campaign
Haber, Ruth, Commenter ID No. E79 (cont'd)

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I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Ruth Haber
3040 Flora Court
Pleasanton, CA 94588-7706

Nuclear Watch Campaign
Hall, Frederica, Commenter ID No. E38

From: Frederica Hall <rik3@mindspring.com>
Sent: Saturday, June 25, 2011 2:59 PM
To: Arnold Edelman
Cc: Frederica Hall
Subject: Greater than Class C Comments

06/25/2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
 - o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.
 - o Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
 - o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
 - o Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.
 - o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.

Nuclear Watch Campaign
Hall, Frederica, Commenter ID No. E38 (cont'd)

- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- o The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- o Safely operate WIPP to meet the "start clean, stay clean" standard
- o Meet commitments to clean up about 20 DOE nuclear weapons sites
- o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.
- o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.

Nuclear Watch Campaign
Hall, Frederica, Commenter ID No. E38 (cont'd)

o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.

• Heed the American Indian Text

o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.

o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Lastly Do not continue development of new nuclear waste

Stop all new development of Nuclear power .

Frederica Hall
Flagstaff AZ 86002

Nuclear Watch Campaign
Halsey-Hoover, Sharon, Commenter ID No. E99

From: shalseyhoover@gmail.com
Sent: Saturday, June 25, 2011 6:13 PM
To: gtcceis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Halsey-Hoover, Sharon, Commenter ID No. E99 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Sharon Halsey-Hoover
2209 Via Marioposa E
Laguna Woods, CA 92637

Nuclear Watch Campaign
Hartsough, David, Commenter ID No. E24

From: davidhartsough@igc.org
Sent: Friday, June 24, 2011 4:12 PM
To: gtcceis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
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Sincerely,

David Hartsough
721 Shrader St.
San Francisco, CA 94117-2721

Nuclear Watch Campaign
Hoffman, Jim, Commenter ID No. E44

From: jimofmhoffman@yahoo.com
Sent: Saturday, June 11, 2011 8:37 PM
To: gtccsis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
Hoffman, Jim, Commenter ID No. E44 (cont'd)

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Sincerely,

Fr. Jim Hoffman OFM
110 W. Madison St.
Chicago, IL 60602-4102

Nuclear Watch Campaign
Intino, Mario, Commenter ID No. E87

From: trytrytry@netzero.net
Sent: Thursday, June 23, 2011 12:53 PM
To: gtcc@eis.anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
Intino, Mario, Commenter ID No. E87 (cont'd)

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Sincerely,

Mario Intino
1624 Palm St Unit 78
Las Vegas, NV 89104-4709

Nuclear Watch Campaign
Jones, Barbara, Commenter ID No. E62

From: maya_angelofsorts@yahoo.com
Sent: Friday, June 24, 2011 7:05 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
Jones, Barbara, Commenter ID No. E62 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Barbara Jones
PO Box 26935
Tempe, AZ 85285-6935

Nuclear Watch Campaign
Jones, Jeremiah, Commenter ID No. E42

From: jeremiah.jones20@yahoo.com
Sent: Wednesday, June 08, 2011 2:06 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

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Nuclear Watch Campaign
Jones, Jeremiah, Commenter ID No. E42 (cont'd)

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There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Jeremiah Jones
1462 Feather Way
Elko, NV 89801
7557380403

Nuclear Watch Campaign
Knutsen, Reinard, Commenter ID No. E81

From: reinardk@yahoo.com
Sent: Thursday, June 16, 2011 4:56 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Knutsen, Reinard, Commenter ID No. E81 (cont'd)

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There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSC is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Reinard Knutsen
174 A Street
Salt Lake City, UT 84103

Nuclear Watch Campaign
Kovac, Scott, Commenter ID No. E101

From: Scott Kovac <scott@nukewatch.org>
Sent: Tuesday, June 21, 2011 2:52 PM
To: Arnold Edelman
Cc: Scott Kovac
Subject: Greater than Class C Comments

June 21, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Hardened On-site Storage (HOSS) must be considered as an alternative.
 - o GTCC waste and irradiated spent fuel would remain on-site at commercial nuclear power plants in long-term storage so that they can be monitored and are protected in hardened storage facilities from aircraft crashes or terrorist attacks. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS.
 - The DOE rejection of the HOSS alternative is unacceptable because GTCC LLW at present and for decades in the future will be in on-site storage, so the actual status is not outside the scope of alternatives that should be considered for an EIS.
 - o The DEIS rejected the HOSS alternative that many people from around the country advocated at DOE's GTCC scoping meetings in 2007.
 - o HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found. Part of that future solution, of course, should be drastically minimizing the generation of those wastes.
 - o DOE's reason for rejecting HOSS is that it is "not a permanent disposal facility." Yet, most of the GTCC waste will not be generated for many decades.
 - o At least 85 percent of existing reactors and any new ones are expected to operate beyond 2030, which means GTCC waste disposal could not begin for years after that.
 - o Decisions now about disposal sites and technologies are premature. There is time to learn from experience.
 - o DOE must create a regulatory definition of HOSS.

Nuclear Watch Campaign
Kovac, Scott, Commenter ID No. E101 (cont'd)

- o DOE must create a regulatory framework for HOSS.
- o HOSS is not a "no action" alternative.
- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- DOE is considering WIPP for GTCC disposal only because WIPP is currently the only hole in the ground. DOE must expand its horizons.
- o Section 1.4.3 of the EIS states, "For deep geologic disposal, WIPP in New Mexico was included for evaluation in this EIS because of its characteristics as a geologic repository."
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- The location of LANL in a seismic fault zone between a rift valley and a dormant volcano is not the place for radioactive waste that is dangerous for tens of thousands of years.

Scott Kovac
Santa Fe, NM, 87505

Nuclear Watch Campaign
Lai, R, Commenter ID No. E83

From: rkmlai@yahoo.com
Sent: Friday, June 24, 2011 3:56 AM
To: gtccsis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

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Nuclear Watch Campaign
Lai, R, Commenter ID No. E83 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

R Lai RN
1400 Q St.
Sacramento, CA 95811

Nuclear Watch Campaign
Larson, David, Commenter ID No. E22

From: dave@pjep.org
Sent: Wednesday, June 08, 2011 12:21 PM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Larson, David, Commenter ID No. E22 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand; ensure the leaders of the Western Shoshone Nation are formally engaged with the opportunity to provide an official response. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

David Larson
1140 Marion
Denver, CO 80218

Nuclear Watch Campaign
Levee, Penny, Commenter ID No. E104

From: rplevee@gmail.com
Sent: Tuesday, June 21, 2011 11:01 AM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Levee, Pennv, Commenter ID No. E104 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Penny LeVee
1755 Empire Rd.
Reno, NV 89521

Nuclear Watch Campaign
Levine, Julie, Commenter ID No. E49

From: juliemagic2010@gmail.com
Sent: Sunday, June 12, 2011 12:52 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

Nuclear Watch Campaign
Levine, Julie, Commenter ID No. E49 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Julie Levine
20569 Cheney Drive
Topanga, CA 90290-3715

Nuclear Watch Campaign
Louis, Cynthia, Commenter ID No. E19

From: Cynthia Louis <ceanna999@yahoo.com>
Sent: Tuesday, June 28, 2011 12:21 PM
To: Arnold Edelman
Cc: Cynthia Louis
Subject: Greater than Class C Comments

June 28

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

Just please DO NOT expand radioactive/plutonium activity in Los Alamos. Just because you arrived during WW 11 doesn't mean you have the right to continue forcing this on NM residents.

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
 - o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.
 - o Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
 - o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.

Louis, Cynthia – E19

Nuclear Watch Campaign
Louis, Cynthia, Commenter ID No. E19 (cont'd)

- o Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.
- o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.
- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- o The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- o Safely operate WIPP to meet the "start clean, stay clean" standard
- o Meet commitments to clean up about 20 DOE nuclear weapons sites
- o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.

Nuclear Watch Campaign
Louis, Cynthia, Commenter ID No. E19 (cont'd)

- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.
- o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.
- o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Cynthia Louis
Santa Fe, NM, 87505

Nuclear Watch Campaign
Lynn, Michele, Commenter ID No. E63

From: mnd4perfworke@hotmail.com
Sent: Friday, June 24, 2011 5:03 PM
To: gtcc@nrl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Lynn, Michele, Commenter ID No. E63 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

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Sincerely,

Michele Lynn
1404 Jessica Ave
Las Vegas, NV 89104-1712

Nuclear Watch Campaign
Model, Betsy, Commenter ID No. E6

From: Betsy Model <bmodel@betsymodel.com>
Sent: Monday, June 27, 2011 11:36 PM
To: Arnold Edelman
Cc: Betsy Model
Subject: Greater than Class C Comments

June 27, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
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Model, Betsy – E6

Nuclear Watch Campaign
Model, Betsy, Commenter ID No. E6 (cont'd)

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Nuclear Watch Campaign
Model, Betsy, Commenter ID No. E6 (cont'd)

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- o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Betsy Model
Albuquerque, NM 87110

Nuclear Watch Campaign
Moon, Otter C., Commenter ID No. E74

From: otterndawater@yahoo.com
Sent: Sunday, June 26, 2011 11:36 AM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Moon, Otter C., Commenter ID No. E74 (cont'd)

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Sincerely,

Otter C. Moon
9208 Swinton Ave
North Hills, CA 91343

Nuclear Watch Campaign
Mullin, Charles, Commenter ID No. E14

From: chuck.a.mullin@gmail.com
Sent: Friday, June 17, 2011 8:46 AM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Mullin, Charles, Commenter ID No. E14 (cont'd)

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Sincerely,

Charles Mullin
930 E Evans Ave
Pueblo, CO 81004-2537

Nuclear Watch Campaign
Pringle, Mark, Commenter ID No. E66

From: mpringle@humboldt1.com
Sent: Friday, June 24, 2011 8:56 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
Pringle, Mark, Commenter ID No. E66 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Mark Pringle
P.O. Box 2085
Trinidad, CA 95570

Nuclear Watch Campaign
Rankin, Douglass, Commenter ID No. E31

From: Douglass Rankin <scrubjay@rockcreekpottery.com>
Sent: Monday, June 27, 2011 5:18 PM
To: Arnold Edelman
Cc: Douglass Rankin
Subject: Greater than Class C Comments

June 26 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
 - o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.
 - o Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
 - o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
 - o Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.

Nuclear Watch Campaign
Rankin, Douglass, Commenter ID No. E31 (cont'd)

- o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.
- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- o The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- o Safely operate WIPP to meet the "start clean, stay clean" standard
- o Meet commitments to clean up about 20 DOE nuclear weapons sites
- o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.

Nuclear Watch Campaign
Rankin, Douglass, Commenter ID No. E31 (cont'd)

- o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.
- o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Today it is particularly disturbing to think about bringing more radioactive waste to LANL as the Las Conchas fire burning there has burned more than 44,000 acres in just over one day. The town of Los Alamos has just been placed under mandatory evacuation orders. This is not a place that is safe for radioactive waste burial due to this one factor if no other.

Please consider this.

Thank you,

Douglass Rankin

Douglass Rankin
Santa Fe, NM 87506

Nuclear Watch Campaign
Rice, Megan, Commenter ID No. E64

From: mrice12@gmail.com on behalf of Megan Rice <megan@nevadadesertexperience.org>
Sent: Sunday, June 12, 2011 3:57 PM
To: gtccels@nrl.gov
Subject: Re: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

1

Rice, Megan – E64

Nuclear Watch Campaign
Rice, Megan, Commenter ID No. E64 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

--
Megan Rice shcj
Nevada Desert Experience
1420 W. Bartlett Ave, Las Vegas, NV 89106-2226 www.NevadaDesertExperience.org
702 646 4814

PHILIP BERRIGAN in 2002 : We (U.S.) are number one in war, and war is our number one business. We're number one in poisoning the planet with radioactive garbage. And I recently received a report from Afghanistan: we have poisoned that land with 3,000 tons of depleted uranium, —these huge bombs we have manufactured, earth-penetrating and rock-penetrating, and we (U.S.) have left it as a legacy to that unfortunate land.

Nuclear Watch Campaign
Riegle, Rosalie, Commenter ID No. E82

From: riegler@svsu.edu
Sent: Wednesday, June 08, 2011 12:55 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D).

The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative.

The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories.

The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the

Nuclear Watch Campaign
Riegle, Rosalie, Commenter ID No. E82 (cont'd)

DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand; ensure the leaders of the Western Shoshone Nation are formally engaged with the opportunity to provide an official response. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Rosalie Riegle
1585 Ridge Ave.
Evanston, IL 60201-4157

Nuclear Watch Campaign
Rockefeller, Terry Kay, Commenter ID No. E89

From: terry.rockefeller@rcn.com
Sent: Monday, June 13, 2011 11:51 AM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

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Nuclear Watch Campaign
Rockefeller, Terry Kay, Commenter ID No. E89 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Terry Kay Rockefeller
246 Park Avenue
Arlington, MA 02476-7441

Nuclear Watch Campaign
Schmidt, Laurel Lambert, Commenter ID No. E55

From: llambertschmidt@yahoo.com
Sent: Thursday, June 09, 2011 11:58 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points (I support HOSS and with that we end the generation of new nuclear waste) concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D).

I hope that if any comments are considered outside the scope of this EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Schmidt, Laurel Lambert, Commenter ID No. E55 (cont'd)

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most pressing matters of short and intermediate storage are adequately addressed.

Sincerely,

Laurel Lambert Schmidt
203 Parkview Rd.
Riverside, IL 60546

Nuclear Watch Campaign
Shiroky, Cynthia, Commenter ID No. E20

From: cynthiaks@embarqmail.com
Sent: Friday, June 24, 2011 7:59 PM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Shiroky, Cynthia, Commenter ID No. E20 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Cynthia Shiroky
5025 W. Agate AV
Las Vegas, NV 89139-7527

Nuclear Watch Campaign
Simon, Madeline, Commenter ID No. E57

From: madeline-mpls@msn.com
Sent: Sunday, June 26, 2011 10:57 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

Nuclear Watch Campaign
Simon, Madeline, Commenter ID No. E57 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Madeline Simon
8915 River Ridge Rd
Bloomington, MN 55425

Nuclear Watch Campaign
Sorgen, Phoebe, Commenter ID No. E77

From: phoebes0@earthlink.net
Sent: Friday, June 24, 2011 12:04 AM
To: gtcceis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Re the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D), the public has repeatedly raised serious issues that were excluded from the DEIS. They need to be in the record!

Because there are both broad issues and specific options not included in the DEIS, I urge "No Action." The DEIS excludes the most reasonable option that many advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way to store deadly radioactive waste until an improved, scientifically sound, publicly acceptable solution is found. Meanwhile, HOSS is the only sane solution.

Part of the eventual solution is to drastically minimize, even eliminate, waste generation. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph unrealistically make "No Action" and "Vault Method" appear more toxic than other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS is unacceptably biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the

Nuclear Watch Campaign
Sorgen, Phoebe, Commenter ID No. E77 (cont'd)

conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

Transportation of the waste to Nevada would be a major problem, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site. Surely you don't want truckloads of this highly toxic waste sent thru a city. What madness!

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Thank you for reading my comment and considering my opinion. I'd appreciate a response.

Sincerely,

Phoebe Sorgen
po box 2
berkeley, CA 94701-1445

Nuclear Watch Campaign
Tatro-Medlin, April, Commenter ID No. E37

From: ezr2c@aol.com
Sent: Monday, June 20, 2011 12:56 PM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)
Importance: High

Document Manager Arnold Edelman,

My comment contains views shared by myself & others. I have not been paid to participate. I am a citizen of NV & these decisions effect my family.

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

Nuclear Watch Campaign
Tatro-Medlin, April, Commenter ID No. E37 (cont'd)

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

April Tatro-Medlin
3941 Hudson Bay
Las Vegas, NV 89110-3012

Nuclear Watch Campaign
Thawley, Bob, Commenter ID No. E8

From: bthawley@mindspring.com
Sent: Friday, June 24, 2011 4:54 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

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Thawley, Bob – E8

Nuclear Watch Campaign
Thawley, Bob, Commenter ID No. E8 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Bob Thawley
15 Mirabel ave
San Francisco, CA 94110-4614

Nuclear Watch Campaign
Thomas, Ellen, Commenter ID No. E36

From: et@propl.org
Sent: Thursday, June 16, 2011 5:22 PM
To: gtcceis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Thomas, Ellen, Commenter ID No. E36 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Ellen Thomas
401 Wilcox Road
Tryon, NC 28782

Nuclear Watch Campaign
Turk, Lawrence, Commenter ID No. E9

From: butch@wildrockies.org
Sent: Friday, June 17, 2011 12:01 AM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

Nuclear Watch Campaign
Turk, Lawrence, Commenter ID No. E9 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Lawrence Turk RN
POB 203
Hendersonville, NC 28793

Nuclear Watch Campaign
Ventura, Maxina, Commenter ID No. E5

From: beneficialbug@netzero.net
Sent: Monday, June 27, 2011 12:07 AM
To: gtccis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

AS YOU consider what shows up in the dEIR, please consider my family's experience in Beatty, NV, in the summer of 2006. As I had been very involved for years right in Nevada working to stop nuclear testing at the NTS, and to stop plans for dumping at Yucca Mountain, I felt it was important to bring my kids out there to see the beauty of the area, and to consider the desecration of the land Shoshone peoples had stewarded long before the U.S. defiled it.

We stopped at the entrance to Mercury, and I showed them other areas where I had gone backcountry with many activists over the years, then we moved along and reached Beatty. We stopped at a general store on a very hot day to get some cool drinks and to get out of the direct heat. The woman behind the counter asked where we lived and why we had come to the area. When I told her about my history in the area, her eyes welled up with tears and she turned to my kids to tell them how important our community's actions have always been to the people who live out there. She said that when she's washing dishes, she looks out over Yucca Mountain and said that out there it's not a question of whether you'll get cancer, but when. She told us that they all had felt forgotten until we started the organizing in the 80's we were doing to stop the insanity of the nuclear program. She felt such gratitude for us all, and expressed that people in the area knew we cared about them, that we were doing what we were doing to help everyone. So completely true.

Yucca Mountain is a sacred place for the Shoshone and others in the vicinity, and for those of us who have been in its midst.

There is no excuse for a nuclear world. My family has lived in voluntary simplicity and successfully. We rarely have more than 2 lights on in the evenings, often one with a 100-watt bulb but another a 60-watt bulb. Often we have only one light on for 4 of us. We do not need more. Our walls are white to reflect light, and our light fixtures were chosen and placed to maximize the spread of the light. I could of course list many ways we have chosen to live using much less energy than what is common, but the point is that we think about our usage of resources, starting with the home in which we live. Four of us share a bedroom, though there is another bedroom available. In the winter body heat keeps us warm without an added heater more than for an occasional hour on the coldest days. We're in California's Bay Area, for godsakes. When it's hot, we open doors and windows.

The consumer ways of Americans and those who have followed this Capitalist way are devastating the earth. It must stop, and it must stop first with ending our relationship with the nuclear world. DO NOT DUMP MORE ON NEVADANS, or anyone.

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for

Nuclear Watch Campaign
Ventura, Maxina, Commenter ID No. E5 (cont'd)

the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

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There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Nuclear Watch Campaign
Ventura, Maxina, Commenter ID No. E5 (cont'd)

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Maxina Ventura
2399 East 14th St. #24
San Leandro, CA 94577

Nuclear Watch Campaign
Wale, Lisa, Commenter ID No. E52

From: Liisa Wale <lwale@yahoo.com>
Sent: Friday, June 24, 2011 9:58 PM
To: Arnold Edelman
Cc: Liisa Wale
Subject: Greater than Class C Comments

6/24/11

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000
Independence Avenue, SW., Washington, DC 20585

General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
 - o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.
 - o Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
 - o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
 - o Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.

Nuclear Watch Campaign
Wale, Lisa, Commenter ID No. E52 (cont'd)

- o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.
- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- o The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- o Safely operate WIPP to meet the "start clean, stay clean" standard
- o Meet commitments to clean up about 20 DOE nuclear weapons sites
- o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.

Nuclear Watch Campaign
Wale, Lisa, Commenter ID No. E52 (cont'd)

- o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.
- o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Lisa Wale
Ashland, Oregon 97520

Nuclear Watch Campaign
Welsh, Anne, Commenter ID No. E85

From: vegasranch@gmail.com
Sent: Friday, June 24, 2011 7:23 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

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Nuclear Watch Campaign
Welsh, Anne, Commenter ID No. E85 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Anne Welsh
4405 S SANDHILL RD
Las Vegas, NV 89121-6212

Nuclear Watch Campaign
Welsh, Myron, Commenter ID No. E67

From: myronreed@gmail.com
Sent: Friday, June 24, 2011 9:36 PM
To: gtcc@eis.anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
Welsh, Myron, Commenter ID No. E67 (cont'd)

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Myron Welsh
4405 So. Sandhill Rd.
Las Vegas, NV 89121-6212

Nuclear Watch Campaign
Yoshida, Takayuki, Commenter ID No. E39

From: gahanyoshida1@msn.com
Sent: Tuesday, June 28, 2011 12:33 AM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Nuclear Watch Campaign
Yoshida, Takayuki, Commenter ID No. E39 (cont'd)

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Sincerely,

Takayuki Yoshida
4551 S Trails End Ln
Boise, ID 83716

Nuclear Watch Campaign
Young, Lisa, Commenter ID No. E54

From: lisagreenyoung@gmail.com
Sent: Monday, June 27, 2011 6:01 PM
To: gtcceis@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

Document Manager Arnold Edelman,

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Nuclear Watch Campaign
Young, Lisa, Commenter ID No. E54 (cont'd)

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Sincerely,

Lisa Young
1601 N. 16th St. Apt. A
Boise, ID 83702

Nuclear Watch Campaign
Ziglar, Randy, Commenter ID No. E80

From: randyziglar@hotmail.com
Sent: Friday, June 24, 2011 4:29 PM
To: gtcc@anl.gov
Subject: Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance: High

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Ziglar, Randy – E80

Nuclear Watch Campaign
Ziglar, Randy, Commenter ID No. E80 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

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