



**Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory**

Cleanup and Closure of the Radioactive Waste Management Complex

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) focused its November 2004 meeting on the cleanup and closure of the Radioactive Waste Management Complex (RWMC). After receiving numerous presentations and participating in a full Board discussion, the CAB agreed to submit the following comments to the U.S. Department of Energy regarding the material that was presented.

The INEEL CAB recommends a measured balance between a bias for action and the sufficiency of information supporting selection of the final remedy for the buried waste.

- The INEEL CAB supports DOE's stated "bias for action," particularly as it relates to the reduction of risks to humans and the environment. It appears that there may be adequate information to support some actions, and DOE should not delay taking those actions until after the Record of Decision for the overall cleanup.
- The INEEL CAB believes it may be appropriate for DOE and the regulators (Region 10 of the U.S. Environmental Protection Agency and the Idaho Department of Environmental Quality) to agree to a less aggressive schedule for the Comprehensive Record of Decision (ROD) for the cleanup at the RWMC. There should be no rush to complete the Comprehensive ROD until DOE and its regulators are more confident in their understanding of the contents and characteristics of the buried waste at the RWMC and the risks that are posed by that waste.
- This combined approach would allow for selected interim remedial actions taken to provide immediate protection for human health and safety and the environment, with a more measured approach to determining the ultimate remedy for the site.

The INEEL CAB recommends that DOE complete a rigorous risk assessment addressing risks associated with possible remedies before selecting the final remedy.

- The INEEL CAB understands that the risk assessments conducted to date are not complete. Further, it appears that the risks associated with leaving much of the waste in place may not be higher than the risks associated with removing the waste. Therefore, DOE and the public need more thorough analysis of the risks to the workers versus the long-term risks to the public and the environment to support sustainable decisions.
- The INEEL CAB does not want to see anything left behind that could cause unacceptable risks to humans and the environment.

The extent to which the excavated materials confirm the accuracy of the shipping and disposal records regarding what was buried in the RWMC correlates with the degree of public confidence in those records. If excavation efforts repeatedly confirm what is documented in the records, greater public confidence can be expected in decision-making based on the records. If further excavation efforts fail to confirm what is known from the records, then confidence in the records will decrease.

The INEEL CAB recommends that DOE continue to rigorously confirm its records before expecting the public to accept decisions based on those records.

The Accelerated Retrieval Project (Pit 4) samples targeted waste, untargeted waste, and the underburden. **The INEEL CAB recommends that the sampling program be applied to future excavations, which could raise public confidence in DOE's decision-making.** Additional sampling may also support subsequent decisions related to cleanup if/when new technologies emerge.