



**Citizens Advisory Board**  
**Idaho National Engineering and Environmental Laboratory**  
**Final Idaho High-Level Waste and Facilities Disposition**  
**Environmental Impact Statement**

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The Idaho National Engineering and Environmental (INEEL) Citizens Advisory Board (CAB) reviewed the Final Idaho High-Level Waste (HLW) and Facilities Disposition Environmental Impact Statement (EIS). This recommendation addresses our comments to the U.S. Department of Energy's Idaho Operations Office (DOE-ID).

First, we applaud DOE for preparing a “reader-friendly” Summary document that is well written and presented, includes clear explanations, and is nicely illustrated. There is concern, however, that this EIS does not meet CAB members’ expectations and will not be well received by the public. The Draft EIS implied that potential treatments for the sodium bearing waste (SBW) would be evaluated and one would be identified in the Final EIS as the preferred treatment; this was to prepare the SBW for ultimate disposal at the National Geologic Repository (NGR). Now, over two and one-half years later, DOE's preferred alternative in the Final EIS is to evaluate potential treatments for the SBW so one can be selected for implementation—apparently *after* the Record of Decision has been issued. DOE's preferred alternative, with its shift away from vitrification to an as-yet-undecided technology and with disposal at WIPP rather than the NGR, will have to overcome numerous barriers in both technology and policy in order to become reality.

Similarly, the change from vitrification to direct packaging and disposal of calcine is of concern. Considerable time and expense have been committed to this EIS, so the lack of progress toward resolution of treatment and disposal of the waste addressed by this EIS is disappointing.

The INEEL CAB is dissatisfied with DOE's preferred alternatives for the SBW and calcine—to evaluate potential technologies and decide later. The CAB's expectation is that an EIS should identify alternatives and should identify one of these alternatives that will best satisfy the specific criteria. Instead of meeting that expectation, this EIS presents a menu with a promise to select an alternative at some future time. It also does not provide an adequate opportunity for public involvement in the process for selecting a technology to treat the waste.

**Therefore, the INEEL CAB recommends that a Record of Decision not be issued for this EIS until DOE pursues one of the following alternative courses of action:**

- **Reissue the Final EIS including a preferred alternative that describes the selected technology(ies) for the treatment and disposal of SBW and calcine and explains DOE's rationale for the selected technology(ies); OR**
- **Issue a Supplemental Environmental Impact Statement including a preferred alternative that describes the selected technology for treatment and disposal of the SBW and calcine and explains DOE's rationale for selecting that technology(ies).**

**Regardless of which course of action is pursued, we further recommend that DOE make immediate plans for providing meaningful opportunities for the public to review and comment on the selection of technologies for the SBW and the calcine at appropriate junctures in the decision-making process.**