



## INEL SPENT NUCLEAR FUEL MANAGEMENT PLAN DOCUMENT

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### INTRODUCTION

The Environmental Management Site Specific Advisory Board to the Idaho National Engineering Laboratory (EM SSAB-INEL) met with Department of Energy (DOE) and Lockheed Martin Idaho Technologies (LMITCO) personnel during its July 16-17, 1996, meeting of the Board in Idaho Falls. Following detailed presentation and discussion, the EM SSAB-INEL developed the following recommendation to the DOE and LMITCO. The recommendation was consensus-based and it was reached unanimously.

### OVERVIEW

The EM SSAB-INEL has made recommendations and/or studied numerous documents and issues regarding the management and disposition of spent nuclear fuel over the past 21 months. During that time individual Board members and the Board as a whole have questioned how all these planning documents and related agreements (such as the SNF and INEL ER/WM EIS/ROD, WM Programmatic EIS/ROD, Foreign Research Reactor EIS/ROD, Electrometallurgical Treatment EA, Settlement Agreement, etc.) are integrated to provide a description of a program to manage spent nuclear fuel throughout the United States and specifically in Idaho.

The *INEL Spent Nuclear Fuel Management Plan* document should be viewed as a positive attempt to provide for Idahoans and others one document that captures the programmatic path forward and outstanding issues for managing spent nuclear fuel at the INEL based on decisions made in other documents, including those already subject to or currently undergoing National Environmental Policy Act (NEPA) public processes.

Recognizing the difficulty in developing an integrated document, the Board appreciates DOE's and LMITCO's efforts to produce this document and communicate its objectives to this Board and to the public at large. The following recommendations are in response to questions asked by Al Hoskins, LMITCO, of the Board at its May 21-22, 1996, meeting. These questions are:

- Is the INEL Spent Nuclear Fuel Management Plan providing the level of detail necessary to facilitate informed reviews by stakeholders?
- Are there any recommended improvements the INEL Spent Nuclear Fuel Program can make to further define or convey the programmatic path forward?
- What level of public input is appropriate for the INEL Spent Nuclear Fuel Management Plan?
- What avenues would be most effective in working with the public?

### RECOMMENDATION

*(Related Board comments from the May meeting follow each statement in italics.)*

1. While the Board members found this to be a difficult document to read, follow, and understand, the presentation made to the Board clarified many items of the Plan and should be incorporated in future drafts. In addition to following the specific suggestions made in 2-5 below, other simplifications to the document will enable citizens to better comprehend its scope and function. One suggestion is to develop a simplified version based on the suggestions made above for public distribution, leaving the full document as one that is available upon request. Another is to revise the document in order to simplify and clarify information. For example, the Board found the May meeting presentation to be much more effective in creating understanding regarding document scope and objectives than any review of the document itself. DOE might consider capitalizing on that information and approach in sharing plan-related information with the public.

*Board member comments:*

- *Watch color mix in illustrations for those who are color-blind.*
- *Reduce acronyms.*

2. Provide a clear, simple statement of purpose at the start of the document, pointing out that the path forward is guided by decisions made in other documents (Records of Decision, Settlement Agreement, etc.). Specify those areas where questions remain and future decisions are subject to public input, involvement, and agency decision-making (multipurpose containers, final disposition, etc.).

The scope of the issue and the document has been best described and put into context by the flow charts and graphs included in the presentation to the Board. Similar visual materials should be incorporated to put the document and its issues into a national and local context.

*Board member comments:*

- *Need "whole" picture*
- *User friendly*
- *Nationwide vs. site specific.*

3. The introduction should include a graph/chart showing quantities and types of spent nuclear fuel, coupled with a similar graphic indicating associated vulnerabilities to provide a visual orientation to the scope of the program at the INEL. Quantities listed in a user friendly format, as depicted in the presentation to the Board, are more useful to the general reader.

*Board member comments:*

- *Need commonplace comparisons*
- *SNF comparisons*
- *Entire INEL*
- *Pictures of typical types of fuel with "man" for size perspective*
- *Dry/wet storage pictures*
- *Simplification of charts*
- *Volume of each SNF stream.*

4. The SNF quantities, types and vulnerabilities and how they are managed need to be addressed. Flow charts can help readers visualize the path forward for these materials. DOE should consider using a

key to link activities to decision-making documents (Settlement Agreement, for example), regulations, and/or regulating agencies.

*Board member comments:*

- *Clear lines of accountable implementation*
- *Licensing concerns NRC/DOE*
- *Time line - especially with flow charts*
- *Show INEL total system analysis*
- *Relationship between NRC & DOE & DNFSB*
- *Milestone dates emphasized*
- *Relationship between different agencies/programs/governments*
- *Promote working relationship between different agencies/programs/governments*
- *Complexity of various SNF stream treatments.*

5. Clearly identify impediments to achieving the ultimate objective for spent nuclear fuel. Identification of these impediments, both on a flowchart and simply listed in the text, provides the reader instant identification of potential pitfalls and guides the reader to areas where DOE requires additional public involvement.

*Board member comments:*

- *Cost trade-offs and major cost drivers by stream*
- *Shipping route considerations up from port to Lewiston*
- *Reassessment of how (and why) pay for return of FRR from countries known to have*
- *(officially or unofficially) nuclear weapons capability*
- *Don't need any more details in order to make a decision*

Other Board member comments not tied to 1-5 above include:

- *State-wide and regional public meetings*
- *Encourage open-house meetings*
- *Consider Board involvement in briefings to explain basis for recommendations (community forum)*
- *Use more graphs, pie charts, pictures*
- *Don't need any more details in order to make a decision.*