



Citizens Advisory Board  
Idaho National Engineering and Environmental Laboratory

**ISSUES FOR CONSIDERATION IN THE  
DRAFT SURPLUS PLUTONIUM DISPOSITION  
ENVIRONMENTAL IMPACT STATEMENT**

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**RECOMMENDATION**

The INEEL CAB acknowledges that the scoping period for the Surplus Plutonium Disposition EIS has ended. Our interest in the issue is ongoing, and we respectfully submit this list of concerns in hopes that they may be addressed in the Draft EIS when it is released. Board members have concerns regarding:

- The need for and safety related to transportation of the plutonium across the Fort Hall Indian Reservation and elsewhere in the nation,
- Comparative analyses of environmental impacts and costs at each of the four alternative sites,
- Safe handling, storage, and transportation of all materials,
- Disposition plans for any and all wastes that will result,
- Security plans,
- Plans for where and how the mixed-oxide fuel will be used (including a demonstration of marketability),
- Environmental protection,
- Worker and public health and safety,
- Operation of all related facilities in full compliance with all relevant environmental regulations, including the Idaho Settlement Agreement,
- Whether the mission would bring funding to Idaho (to help support the existing infrastructure) without detracting from the site's ability to meet compliance schedules, and
- The costs associated with handling spent mixed-oxide nuclear fuel (e.g., storage and disposal).

The Board feels that DOE could do a better job at demonstrating the rationale for its decision to pursue mixed-oxide fuel fabrication instead of vitrification. In particular, the Board feels DOE must offer a complete and sound comparison between mixed oxide fuel fabrication and vitrification that substantiates DOE's proposed path forward in the Programmatic EIS ROD, including whether:

- mixed-oxide fuel fabrication is superior to vitrification at achieving nonproliferation,
- mixed-oxide fuel fabrication can be implemented cost-effectively,
- mixed-oxide fuel fabrication renders the plutonium into a form that cannot be utilized in the future for weapons production.