



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

**PROPOSED PLAN FOR
WASTE AREA GROUP 1XTEST AREA NORTH
IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL
LABORATORY**

The following recommendation is submitted to the Department of Energy's Idaho Operations Office (DOE-ID); Region X of the U.S. Environmental Protection Agency; and the State of Idaho as the Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board's (CAB) comments on the Proposed Plan for Waste Area Group 1 (WAG 1)XTest Area North (TAN) at the INEEL.

After careful review of the Proposed Plan for WAG 1, the INEEL CAB concluded that the document is too flawed for public review and the apparent errors preclude reasoned review of the document. In addition, we cannot provide comment on the selection of preferred alternatives because we do not have confidence in the conclusions that were drawn based on the analysis the Proposed Plan reports. The only meaningful recommendation we can make at this time is that the entire document needs to be done over again in order for the public to review it and provide comment on the decisions it will support.

Rationale

The following is a partial list of errors and problems that precluded reasoned review on our part.

- X The middle of page 4 notes nine radionuclides, four metals, four organic contaminants, and PCBs. A reference is made to Table 1 for listing. The table list two radionuclides, two metals, two organics, and PCBs. At best, this is confusing.
- X The Table on page 15 presents cost estimates for the remedial alternatives for TSF-07. The estimate for operation and maintenance costs per year for Alternative 2b "Engineered Barrier" alternative are one and a half times higher than the operation and maintenance costs for the Alternative 1 "Limited Action" alternative. This does not make good sense.
- X The bottom of page 22 notes the use of grouting. When asked, the presenter said the grouting material would be concrete, a substance which is not well known for its stability. We have had discussions of other types of grout (plastic or ceramic) which would appear to be more logical.
- X Table 1 on Page 7 lists spilled mercury as having a total cancer risk in humans of 1 in 10,000. There is no known cancer risk in humans from mercury.

- X Page 32, TSF-26, Alternative 2a and Alternative 3a are identified by the same name, yet cost estimates are different.
- X The Table on page 38 presents comments with double negatives. This use of the language makes understanding very difficult.
- X Radium-226 levels at the Test Area North Disposal Pond are described as being Abelow background,≡ yet the background levels are not presented. The description is meaningless unless more information is provided.
- X The preferred alternative for the V-Tanks (TSF-09/18) is not supported by the decision logic presented in Table 5 (which appears to contradict the text).