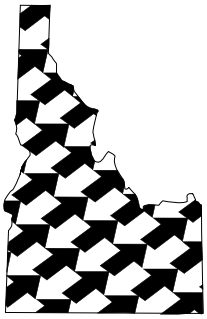

Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED RELOCATION OF THE LOS ALAMOS NATIONAL LABORATORY TECHNICAL AREA 18 MISSIONS

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) reviewed the Notice of Intent for the Environmental Impact Statement (EIS) for the Proposed Relocation of the Los Alamos National Laboratory (LANL) Technical Area 18 (TA-18) Missions. We noted that it appears that the Argonne National Laboratory - West (ANL-West) is a viable option for conducting the missions presently conducted at TA-18.

The INEEL CAB submits the following recommendations for consideration during the scoping period for the TA-18 EIS.

1. In order to support public review of the EIS, the INEEL CAB recommends that the EIS include a clear and understandable explanation of:

   - The **current and ongoing missions** currently conducted at TA-18,
   - All of the **processes involved** in achieving those missions, and
   - The **purpose and need for relocation** of related activities from TA-18.

2. The INEEL CAB understands that some of the information relevant to the TA-18 EIS may be classified in nature and therefore exempt from public review in the Draft and Final EIS. In the spirit of the National Environmental Policy Act's emphasis on public participation, the INEEL CAB recommends DOE present as much information as possible in the TA-18 EIS. **In addition, the EIS should clearly state what information is classified** and **explain how classified information will be addressed** in the decision-making process.

3. In order to accurately and completely estimate all impacts associated with relocation of missions from TA-18, the INEEL CAB recommends that the EIS include **complete and detailed descriptions of each alternative** considered, including:

   - Detailed descriptions of how each alternative would be implemented,
   - Detailed timelines and schedules for each major milestone associated with relocation under each alternative,
   - Detailed descriptions of how DOE would continue to accomplish the TA-18 missions before, during, and after relocation under each alternative, and
   - Coherent explanations of any alternatives dismissed from further evaluation and DOE's rationale for determination that each is unworthy of further consideration.

4. In order to support informed public participation in decisions related to the pending EIS, the INEEL CAB recommends that the TA-18 EIS include objective discussion regarding the:

   - Compatibility of the TA-18 missions with existing missions at non-LANL alternatives,
   - Compatibility of TA-18 funding sources with existing funding sources at non-LANL alternatives, and
   - Compatibility with existing human infrastructure (i.e., technical capabilities, core competencies, and requisite security clearances) with existing human infrastructure for non-LANL alternatives.

5. In order to accurately and completely estimate all **impacts associated with relocation of materials** to support relocation of the missions from TA-18 to ANL-W, the INEEL CAB recommends that the EIS include:

   - Complete and accurate descriptions of how the possible relocation would affect DOE's ability to remain in compliance with all federal and state regulations and all court-enforceable and legally-binding requirements (including the Idaho Settlement Agreement under realistic budget assumptions and
   - Complete and accurate descriptions of any impacts that would result from non-compliance with any federal and state regulations and all court-enforceable and legally binding requirements.

6. In order to accurately and completely describe the **cost implications** of the proposed relocation, the INEEL CAB recommends that the TA-18 EIS include:

   - Full and complete estimates of the costs of necessary upgrades to existing facilities,
   - Full and complete estimates of the costs of necessary new construction,
   - Full and complete estimates of the costs of increased security and safeguards (at the site and during transportation events) necessitated by the proposed relocation,
   - Full and complete estimates of the funding sources for all upgrades, new construction, and security and safeguards and potential impacts on other projects funded by the same funding source,
   - Full and complete estimates of all costs associated with transportation to and from ANL-W, packaging for shipment, interim storage, and final disposal of all radioactive and hazardous materials and wastes resulting from implementation of these missions at ANL-W, and
   - Full and complete cost and schedule impacts on other ANL-W customers.

7. In order to accurately and completely describe the **human and social impacts** of the proposed relocation, the INEEL CAB recommends that the TA-18 EIS include:

- Quantitative and qualitative discussions of the likelihood of relocating the current workforce,

- The feasibility (and costs) of acquiring appropriate capacity if the current workforce does not relocate,

- The impacts on those individuals if they choose not to relocate, and

- The impacts on DOE's ability to fulfill the TA-18 mission under the various possible workforce-retention scenarios.

8. In order to accurately and completely portray all **impacts associated with receiving, handling, storage, and treatment of all relocated materials** (including all radioactive and hazardous materials and waste) related to the relocation of missions now being conducted at TA-18, INEEL CAB recommends that the EIS include:

    - Bounding estimates of the volumes and characteristics of all radioactive and hazardous materials and wastes that would be relocated to ANL-W;

    - Complete descriptions of all activities that would be conducted at ANL-W involving those materials;

    - Estimates of the duration of time those materials would remain in Idaho;

    - Complete descriptions of the on-site storage required for responsible management of those materials while they remain in Idaho; and

    - Complete descriptions of ultimate disposal for all those materials.

9. In order to accurately and completely portray the **impacts associated with transportation** for all radioactive and hazardous materials and waste to and from ANL-W that would result from relocation of missions now being conducted at TA-18, the INEEL CAB recommends that the EIS provide bounding estimates of the:

    - Size, frequency, and number of expected shipments of all nuclear and hazardous materials and waste coming into Idaho during relocation;

    - Size, frequency, and number of expected shipments of all nuclear and hazardous materials and waste coming into and leaving Idaho on an annual basis;

    - Availability of approved shipping containers and plans for acquiring shipping containers if not already available; and

    - Requirements for safeguards and securities needed to protect shipments and the populations that live along transportation routes.

10. In order to accurately and completely estimate **the impacts associated with all processes used and management of any newly-generated materials** (including radioactive and hazardous materials and waste) that would be produced at ANL-W as a result of implementation of the TA-18 missions at ANL-W following relocation, the INEEL CAB recommends that the EIS provide:

- Bounding estimates of the volumes and characteristics of all radioactive and hazardous materials and wastes that would be produced at ANL-W;

- Complete descriptions of all activities that would be conducted at ANL-W involving those materials;

- Estimates of the duration of time those materials would remain in Idaho;

- Complete descriptions of the on-site storage required for responsible management of those materials while they remain in Idaho; and

- Complete descriptions of ultimate disposal for all those materials.

11. In order to estimate the duration of time over which impacts of the relocation should be evaluated, the INEEL CAB recommends that the EIS **provide sound estimates of the duration of the future need for continuation of the TA-18 missions**. Those estimates of the expected timeframe should form the basis for analysis of all impacts under the various alternatives.