

Alliance for Nuclear Accountability
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Mr. Edelman:

I am writing to comment on the Department of Energy's Greater Than Class C Low Level Radioactive Waste (GTCC) Draft Environmental Impact Statement (DEIS). There are three critical elements missing from the GTCC DEIS. These elements are:

1. Defining and regulating Hardened on Site Storage (HOSS).
2. Developing an alternative Deep Geologic Repository for radioactive waste.
3. Legal and physical restrictions at existing DOE sites.

First, The Department of Energy must consider HOSS as an option for GTCC disposal. The DOE's rejection of HOSS as outside the scope of this DEIS is unacceptable, as HOSS is the current status of much of our nation's GTCC waste.

HOSS is a safe way to store waste until a permanent, scientifically sound, and publicly acceptable solution is found. Part of that future solution, of course, should be drastically minimizing our generation of GTCC waste. Decisions about final disposal sites and technologies are currently premature. Much of our nation's Greater Than Class C waste will be produced after 2030, and we should know more about that waste before deciding how to dispose of it.

DOE must create regulatory definitions and frameworks for HOSS. While some of our current GTCC waste is currently in HOSS, other GTCC waste is stored in ways that create environmental and public health risks. Defining and regulating HOSS would improve public safety until we find an acceptable permanent disposal site.

Next, I want to draw attention to the fact that there are legal, scientific, and ethical restrictions which obligate the DOE to develop a deep geologic repository for radioactive waste. This fact is completely ignored in the DOE's GTCC DEIS.

This DEIS's suggested alternatives to a deep geologic repository, including near-surface trenches, bore holes, and vaults, will all require billions of dollars and decades to remediate at some future point and should not be considered permanent disposal methods.

The Nuclear Waste Policy Act of 1982 requires the DOE to develop a deep geologic repository for permanent disposal of radioactive waste. The DOE's previous site, Yucca Mountain, was technically unsound and faced insurmountable public opposition. The DOE should not delay in developing an alternative deep geologic repository that will be both scientifically and politically acceptable. The GTCC EIS needs to take this mission into account.

Finally, GTCC should not be consolidated at existing DOE sites.

Many existing DOE sites are undergoing cleanup projects that have cost hundreds of billions of dollars over decades. It would be ridiculous to send new waste to remediated areas.

Some DOE sites being considered for GTCC consolidation, such as the Waste Isolation Processing Plant, have legal agreements in place that limit how much and what type of waste they can accept. Breaking these agreements would do irreparable harm to the DOE's relationships with host states and would likely result in costly litigation. Other DOE sites being considered for GTCC consolidation, such as Los Alamos National Laboratory, have seismic or other natural features that make them a dangerous place for waste disposal.

The DOE needs to take a long view and begin the technical and political work necessary to develop a new location for long-term disposal of GTCC waste.

The civil and scientific communities represented by the Alliance for Nuclear Accountability agree that moving ahead with HOSS as quickly as possible and developing a new permanent deep geologic repository for radioactive waste is the best possible way forward and we implore you to reconsider these options in a final GTCC EIS. Thank you for your consideration. I wish you the best of luck as you move forward with the challenging process of disposing of our nation's GTCC.

In Peace,

Katherine M. Fuchs
Program Director