



06-CAB-031

February 16, 2006

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Rick Provencher  
U.S. Department of Energy  
Idaho Operations Office  
1955 N. Fremont Ave., MS 1222  
Idaho Falls, ID 83415-1220

Dear Mr. Provencher,

The Idaho National Laboratory (INL) Site Environmental Management Citizens Advisory Board (CAB) End State Committee has reviewed the Engineering Evaluation/Cost Analysis (EE/CA) for the Loss-of-Fluid Test (LOFT) Area dated January, 2006. The document is well written and adequately addresses most areas of concern to the CAB.

As the scope of this document is limited to the analysis of alternatives for the decommissioning of TAN-630 and TAN-650, the EE/CA is relatively accessible to the general public reader. One area not reader-friendly is the information provided about remaining radionuclide inventories. Comparing total activity levels of curies in 2005 with those in 2095 does not give the general public a clear understanding of the situation. Using an everyday experience to relate the risk from the remaining radionuclide inventories would clarify the actual risk factor for the average person. One example the Committee suggests is comparing the radiation received in dental procedures or medical imaging procedures to the end-state curies at the project site.

Because of the history and continuing issues with waste management on the INL site, it would be beneficial if documents such as this EE/CA contained clear, unambiguous paths forward for waste generated by the proposed project. Chapters 6.2 - 6.4 do not give the reader adequate confidence that there will be a final repository/venue available for the generated waste. While the Committee recognizes that Waste Acceptance Criteria (WACs) are not "set in stone", that technological advances change how things are done, and that factors beyond the control of the Department of Energy (DOE) may come into play, the Committee suggests that those areas of this EE/CA dealing with the disposition of waste be clarified.

The End State Committee appreciates the willingness of Jim Cooper and Mark Shaw to provide information and answers to its questions. We recognize and appreciate the importance of on-going discussions.

It should be noted that this letter does not constitute a consensus-based recommendation from the full CAB, but rather a Committee generated response to a document assigned to it by the full board. The Public Comment period for this document ends on February 20, 2006. The next scheduled CAB meeting is not until the third week in March, thus it would be quite difficult for the full board to generate a consensus recommendation to this EE/CA. As the CAB instrument of choice for comment is the recommendation supported by full board consensus, it would be most helpful if the Public Comment Period for future documents include consideration of the CAB meeting cycle.

Sincerely,

*Annemarie Goldstein*  
*by LJA*

Annemarie Goldstein  
Chair, CAB End State Committee

cc: Jim Cooper, DOE-ID  
Mark. Shaw, DOE-ID  
Shannon Brennan, DOE-ID