



Citizens Advisory Board  
Idaho National Engineering and Environmental Laboratory

**DEPARTMENT OF ENERGY'S NOTICE OF INTENT**

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The INEEL CAB has reviewed the Notice of Intent to conduct an analysis of policy regarding disposal of LLW and MLLW at commercial facilities under DOE Order 5820.2A and offers the following comments.

The INEEL CAB is concerned about the absence of competition in the current situation of having a single commercial disposal facility and recognizes that the availability of multiple commercial disposal sites might offer advantages in cost savings, transportation alternatives and other considerations. Unfortunately, neither the Waste Control Specialists (WCS) nor the Laidlaw proposal offer appealing alternatives.

Two basic, and very important, factors compel the INEEL CAB to recommend against the WCS proposal:

1. It would involve federal overriding of state and local requirements for disposal permits, licenses and approvals.
2. It would be contrary to the established DOE goal of ending self-regulation of radioactive waste.

With regard to the Laidlaw proposal, the INEEL CAB recommends against "up-front" funding by DOE and suggests that private companies use their own resources to meet requirements for LLW and MLLW disposal. We note, however, that it would be informative to see how projected costs for disposal of two million cubic meters of LLW and MLLW under the Laidlaw proposal would compare to projected costs for such disposal at Envirocare of Utah.

The Notice of Intent stated that DOE "...is particularly interested in receiving comments on other types of options it should consider...." In response, the INEEL CAB re-emphasizes its strong support for finalizing the Low-Level Waste and Mixed Low-Level Waste Records of Decision for the Waste Management Programmatic Environmental Impact Statement instead of continued efforts to identify other options.