



Citizens Advisory Board  
Idaho National Engineering Laboratory

## WASTE ISOLATION PILOT PLANT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

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### INTRODUCTION

The Citizens Advisory Board to the Idaho National Engineering Laboratory met with Department of Energy, Carlsbad Area Office personnel during its November 19-20, 1996 meeting and received a presentation on the *Waste Isolation Pilot Plant Supplemental Environmental Impact Statement (SEIS-II)*, which focuses on the Implementation Phase of operations at WIPP. After consideration of the presentation and subsequent analysis of the document, the Board discussed and finalized the following recommendation at its January 20-21, 1997 meeting.

### RECOMMENDATION

The INEL CAB endorses the concept of WIPP and recommends DOE continue with plans to open the facility for disposal of transuranic waste. In addition, the Board supports urgent activity by the U.S. Environmental Protection Agency to complete the certification procedures to allow the facility to become fully operational as soon as possible.

There is concern, however, that NONE of the alternatives proposed in the document fully comply with the terms and commitments contained in the Settlement Agreement between the State of Idaho, the Department of Energy, and the U.S. Navy. The Board recommends that this draft SEIS only go forward to the final stages when the proposed actions and a preponderance of alternatives are found that allow conformance with that agreement. For example, the Settlement Agreement states that all transuranic waste now located at the INEL, estimated at 65,000 cubic meters in volume, shall be shipped to WIPP or a similar facility by 2018. The proposed action acknowledges less than half of the amount in the INEL TRU waste inventory. Similarly, the volumes given in the SEIS are not consistent with the site generated numbers provided and available in BIR Revision 3. In addition, the timeline estimated in the WIPP SEIS fails to meet the deadline committed to in the Settlement Agreement to begin shipping TRU waste out of Idaho by April 30, 1999. The TRU waste volumes (and other waste stream volumes) negotiated by the three parties and jointly acknowledged in the legally binding Settlement Agreement must be adequately addressed in the SEIS and all subsequent DOE documents.

Many of the alternatives also assume renegotiation of the Federal Facility Compliance Act and INEL Site Treatment Plan. There is also concern that the costs given in the EIS are extreme and should be reexamined to determine how cost savings can occur.

The Board also recommends the final SEIS include:

- Consistent discussion about the waste inventory being considered. The proposed action discusses "basic inventory," while the action alternatives address "basic and additional inventory." These volumes should be clearly identified and consistently referred to in each examined alternative. Additional confusion arises because the proposed action is concerned with only 35 years of waste; the others assume much longer periods, making comparisons difficult.

- A clearer discussion of the assumptions used to complete the risk calculations. The results included in the draft SEIS are not well explained and can easily be misinterpreted. Therefore, correct the unreasonable conservatism in the risk assessment of the Proposed Action and Alternatives that results in unrealistic estimates of risk to the general public. Examples of the risk assessment conservatism include: the 30-minute traffic jam, 30 minutes at 1 meter of the TRUPACT for the truck inspector, state safety inspector spending 60 minutes within 1 meter, one person exposed to every shipment at a distance of 30 meters for 70 years, and the rest stop employee exposure assumption.

In the truck accident scenarios the overly conservative assumptions were that every TRUPACT is filled with the highest level of radioactive and hazardous material that meets WIPP WAC. Other examples include: the statement that “a more realistic release fraction for thermally treated waste would have resulted in estimated accident impacts that were 1000 times lower;” “average inventories per drum for Savannah River and Hanford were increased by approximately a factor of four” without technical or logical justification; the Bounding Case accidents occur in metropolitan areas with a population of 1 million or greater; 3 TRUPACTs fully loaded to WAC planning basis with one breached and engulfed in fire for 2 hours, and a total population dose of 6,730 person-rem was estimated not calculated.

- Explanations of the probabilities associated with the accident scenarios. There is no discussion in the Executive Summary of the probabilities of the bounding accidents presented; it appears that they are probable or possibly inevitable. Risks associated with very low probability events must be presented carefully and concisely.
- A more complete discussion of the volume of waste allowed at WIPP, along with a listing of the sites and corresponding amounts of waste to be sent to WIPP. This must include discussion of waste resulting from treatment and “consolidation” alternatives occurring at each affected site. As previously stated, the estimated 28,000 cubic meters addresses less than half of the 65,000 cubic meters estimated in the Settlement Agreement.
- A clearer discussion of the comparison of alternatives based on cost. First, it is unclear how costs were calculated if waste is consolidated and stored at sites “until its disposal.” Second, the total inventory cost was calculated assuming it would take 150 years to handle the total inventory of waste. Depending on the treatment, consolidation, and interim storage options, these costs could be dramatically reduced.
- Clarification of the radiological impacts. Consider discussing the impacts associated with each alternative separately, rather than comparing them by transport vehicle type (see Executive Summary, page S-39). Additionally, clarify the relationship between numerical latent cancer fatalities and the percentage chances for latent cancer fatalities.