



Fiscal Year 2011 Budget Request

The Citizens Advisory Board (CAB) appreciates the opportunity to comment on the draft 2011 Environmental Management (EM) budget request for the Idaho Cleanup Project (ICP). We have reviewed the baseline data used to compile the draft budget request and find it to be in accord with priority needs. We strongly support the budget request and emphasize our concern that the EM program remain on schedule and be cost effective.

We would like to highlight one concern, a national repository for spent nuclear fuel and high-level waste (HLW). While a national repository (i.e., Yucca Mountain) is not under EM scope, a national repository is critical to meeting the Idaho settlement agreement and removing spent nuclear fuel (SNF) by 2035, and determining treatment to make the calcine road ready by 2035. DOE began studying Yucca Mountain in 1978; more than 30 years have passed without a solution to SNF/HLW that is currently being stored in at least 126 locations across the country costing tax payers billions of dollars annually. Another possible solution to SNF and closing the fuel cycle is recycling; recovering and reusing a valuable energy resource, thus reducing/eliminating SNF from interim storage in Idaho. No action is not an option.

The CAB recognizes that the spent nuclear fuel and calcine are in a stable and secure storage configuration at the Idaho site. The EM SNF is approaching completion of transfer to dry storage which provides safe long term storage of this material that is protective of the Snake River Plain Aquifer. The calcine is also in a stable, solid storage configuration and located in bin sets that are designed for a 500 year storage life. The CAB recognizes that the Idaho Settlement Agreement contains some upcoming milestones relative to the disposition of the calcine that are affected by the decision on a deep geologic repository. The CAB believes the ICP can afford to wait a couple years to gain more clarity on the national policy on high level waste and spent nuclear fuel, before making an uninformed decision on the treatment requirements for the calcine and its acceptability at a deep geologic repository. The CAB also recognizes this would require the consent of the State of Idaho to avoid impacts and penalties under the settlement agreement. The CAB recommends that DOE and the State of Idaho work together in extending the near term calcine milestones under the Settlement Agreement until more clarity can be provided on the National policy regarding deep geologic disposal.

We, the members of the CAB recognize there have been and will continue to be efficiencies at the ICP. Assuming these efficiencies continue, particularly in the D&D area, we support a full baseline funding request of \$460–\$470 million. Any reductions to this amount per the integrated priority listing will quickly begin to affect critical work in the areas of environmental remediation and buried waste exhumation that are necessary to achieve footprint reductions and will also result in “no compliance” issues for the Idaho site. The full baseline funding will enable the project baselines and cleanup contracts to continue to be supported and

will allow the footprint and mortgage reductions being pursued under the *American Recovery and Reinvestment Act* to be sustained.