

**Matela, Nancy, Commenter ID No. E68**

---

**From:** Nancy Matela <nmatela@pacifier.com>  
**Sent:** Friday, May 20, 2011 9:12 AM  
**To:** gtccels@anl.gov  
**Subject:** Testimony against using Hanford as national radioactive waste repository

Dear Mr. Edelman,

Your presentation last evening in Portland was well done as presentations go. One suggestion is to not use the acronym for the extremely dangerous radioactive waste. The people new to the issue are bewildered and it clouds the issue.

In your opening remarks, you said you had never been here before and you were struck by the beauty of the Columbia River and the Gorge. This indicated to me that you have no idea what we have in the way of natural resources.

- The Columbia River is second only to the Mississippi River in size.
- Its watershed spans SEVEN states and British Columbia.
- Its watershed is the major spawning ground of salmon.
- It has SEVEN times the water volume of the beloved and resource-crucial Colorado River.
- It is home of the Grand Coulee Dam (the largest electricity generating dam in the U.S.) upriver from Hanford. If the dam broke in this earthquake-prone area, Hanford would be flooded as the 5 million acre-feet of water in Roosevelt Lake reservoir is unleashed.
- Hanford sits on an earthquake fault which stretches from the Puget Sound (Seattle) to the Wallowa Mountains in eastern Oregon.
- There are more than 1 million people who live on or near the Columbia down river from Hanford. While the cultural and habitat damage to the native grounds of the Indian tribes would be devastating, the impact would be even greater on all people who depend upon the Columbia River for livelihood and even life itself.

Please submit this document along with the testimonies taken last evening.

Nancy Matela  
6351 SE Morrison Ct  
Portland, OR 97215  
503-267-1401

E68-1

Comment noted with regards the suggestion of use of acronyms. The GTCC EIS (Chapter 7) includes a description of the affected environment at the Hanford Site. Note that a glossary is provided in Volume 1 of the EIS.

**McCagh, Mike, Commenter ID No. W150**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 9:32 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10150

Thank you for your comment, Mike McCagh.

The comment tracking number that has been assigned to your comment is GTCC10150. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 09:31:51PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10150

First Name: Mike  
Last Name: McCagh  
City: White Salmon  
State: WA  
Zip: 98672  
Country: USA  
Email: [mmcagh23@hotmail.com](mailto:mmcagh23@hotmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I am writing to voice my vote AGAINST RADIOACTIVE MATERIAL THROUGH THE COLUMBIA RIVER GORGE TO HANFORD SITE.

PLEASE AND THANK YOU  
VR,  
MM

P.S. A 2008 Department of Energy study predicts over 800 adult cancer deaths along the trucking routes as a result of radiation leaking from the trucks during normal operation, even if no accidents occur! And this "best case scenario" study only includes adults, excluding children who are even more susceptible to the dangers of radioactive waste.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W150-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

W150-1

**McClary, Jackie, Commenter ID No. T153**

Capital Reporting Company

27

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

MR. BROWN: Jackie will be followed by Esmeralda Flores.

MS. McCLARY: Hello. My name is Jackie McClary. I'm a third generation Portlander, a fourth generation Oregonian, and a mother of two, and that is why I care to be here tonight.

Hanford is a total failure as a waste containment facility. It does not contain; it leaks. Please, I beg of you, leave Hanford alone and out of consideration. Many, many people have put in countless hours to fight this fight and will, no doubt, put in countless more. So who is it that is

866.488.DEPO  
www.CapitalReportingCompany.com

T153-1 DOE shares the commenter's concern for the safe management of radioactive wastes such as the GTCC and GTCC-like wastes addressed in this EIS. DOE is required, under NEPA, to consider the full range of reasonable alternatives for a proposed action. Hanford has the climate, infrastructure, personnel expertise, and many other features that favor its inclusion for analysis. DOE nevertheless plans to keep its commitment to defer a decision regarding off site waste disposal at Hanford at least until the WTP is operational.

T153-1

McClary, Jackie - T153

**McClary, Jackie, Commenter ID No. T153 (cont'd)**

Capital Reporting Company

28

1       insisting on wasting these people's time by bringing  
2       up Hanford again?

3                You've heard the facts, you have seen budget  
4       cuts, you've seen past promises and deadlines go  
5       unfulfilled and unmet. So tell me, how can Hanford  
6       safely take on new waste? Hanford needs to be  
7       cleaned up, and they need to apologize to future  
8       generations and Native Americans whose land has been  
9       virtually destroyed for centuries to come. I once  
10      thought the beauty of our region meant something, but  
11      now I know it is not pristine; there is Hanford. It  
12      is a blight on our region, and it seems that it is in  
13      your plans to only make it worse. Thank you.

T153-2

T153-2   DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**McCulloch, Robert, Commenter ID No. W559**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 9:46 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10559

Thank you for your comment, Robert McCulloch.

The comment tracking number that has been assigned to your comment is GTCC10559. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 09:45:58PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10559

First Name: Robert  
Middle Initial: W  
Last Name: McCulloch  
Address: 3706 SE Lincoln St  
City: Portland  
State: OR  
Zip: 97214  
Country: USA  
Email: [alobar13@mac.com](mailto:alobar13@mac.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please keep radioactive waste outside our city limits and do not store them in the old Hanford plant. Stop this insanity now. Please.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W559-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W559-1

**McFarland, Angela, Commenter ID No. W502**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 4:52 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10502

Thank you for your comment, Angela McFarland.

The comment tracking number that has been assigned to your comment is GTCC10502. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 04:51:32PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10502

First Name: Angela  
Last Name: McFarland  
Address: 2920 se 76th ave  
City: Portland  
State: OR  
Zip: 97206  
Country: USA  
Email: [angimcfarland@yahoo.com](mailto:angimcfarland@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

1. Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.
2. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.
3. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.
4. USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W502-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W502-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W502-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W502-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

**McKinney, Maria, Commenter ID No. L316**

17 May 2011

Greater-Than-Class C Waste  
Office of Technical and Regulatory  
Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585-01198

To USDOE:

I urge you to consider better alternatives of dumping highly radioactive and long-lived wastes at Hanford. It is shameful to dump it all at Hanford. There are too many hazards for the people and to the land.

Indeed, alternative and safer forms of energy are available and would be better and safer.

Sincerely,

*Maria McKinney, DMA*

Maria McKinney  
13731 231<sup>st</sup> Lane N.E.  
Redmond, WA 98023

MAY 23 2011

received

L316-1

L316-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**McNaughton, Jim, Commenter ID No. T155**

Capital Reporting Company

29

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: James McNaughton. He'll be followed  
by Jiovani Guerrero.

MR. McNAUGHTON: I'm Jim McNaughton from  
Fairview. I'm a member of the Alliance for  
Democracy.

Now, the Columbia River is bordered for  
50 miles. In prior statements it has been said there  
is no contamination of the fish, it has never been  
found. However, in prior testimony, it has been  
stated, due to lack of funds, only around the McNary  
Dam have they been tested. What are the facts? I  
would like to ask you people, what are the facts? Is  
that river contaminated or not?

(Audience chorus of "yes." )

MR. McNAUGHTON: And I'm asking you. You're the  
Department of Energy. Can you give me an answer?

MR. BROWN: I think that's a question that will  
be responded to in the Final EIS.

MR. McNAUGHTON: Okay. Well, anyway, I'm 81  
years old, and I find this process (inaudible)  
engaging the people of this area, insanity, and I  
think you all agree with me.

866.488.DEPO  
www.CapitalReportingCompany.com

T155-1

T155-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.



**Meyerhoff, Joan, Commenter ID No. W183**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 11:56 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10183

Thank you for your comment, Joan Meyerhoff.

The comment tracking number that has been assigned to your comment is GTCC10183. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 11:55:59PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10183

First Name: Joan  
Middle Initial: E  
Last Name: Meyerhoff  
Address: 4425 NE 40th Ave  
City: Portland  
State: OR  
Zip: 97211  
Country: USA  
Email: [joan.meyerhoff@gmail.com](mailto:joan.meyerhoff@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I am opposed to greater than class C nuclear waste being transported in the Columbia River Gorge. The Gorge is a hub of important human, animal and plant activity. I enjoy it routinely, as do many of my friends hiking the various trails and otherwise enjoying its magnificent beauty. We can not move this dangerous material through such a special and life giving area. In fact we need to decrease our dependency on nuclear energy because as of now we have no really safe way to dispose of it.

W183-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W183-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Michaels, Brenda, Commenter ID No. W61**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, May 22, 2011 2:15 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10061

Thank you for your comment, Brenda Michaels.

The comment tracking number that has been assigned to your comment is GTCC10061. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 22, 2011 02:14:23PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10061

First Name: Brenda  
Middle Initial: P  
Last Name: Michaels  
Address: 15617 258th Pl. SE  
City: Issaquah  
State: WA  
Zip: 98027  
Country: USA  
Email: [brenda@conscioustalk.net](mailto:brenda@conscioustalk.net)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Radioactive material is not only harmful to our environment, but leathl to our health. As a resident of Seattle, I am against trucking this material through our area.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W61-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W61-1

**Midson, Kathryn, Commenter ID No. W142**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 8:54 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10142

Thank you for your comment, Kathryn Midson.

The comment tracking number that has been assigned to your comment is GTCC10142. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 08:53:36PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10142

First Name: Kathryn  
Last Name: Midson  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Please consider the environmental and health risks of shipping high level radioactive waste through the Columbia Gorge. Hanford poses more than enough of a problem for the gorge and the people who live there. Yes, what to do with nuclear waste is an issue deserving of serious attention. But shipping the waste through a scenic area - especially one prone to winter ice - is a bad idea. Say "no!"

W142-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W142-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Mierow, Luanne, Commenter ID No. W317**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 19, 2011 6:04 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10317

Thank you for your comment, Luanne Mierow.

The comment tracking number that has been assigned to your comment is GTCC10317. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 19, 2011 06:04:02PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10317

First Name: Luanne  
Middle Initial: E  
Last Name: Mierow  
State: OR  
Zip: 97004  
Country: USA  
Email: [Rm843575@hotmail.com](mailto:Rm843575@hotmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The Gorge is a national treasure. Let's not temp fate and allow radio active waste to be allowed anywhere near the Gorge!

W317-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W317-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Mijal, Martin, Commenter ID No. W417**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 12:08 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10417

Thank you for your comment, Martin Mijal.

The comment tracking number that has been assigned to your comment is GTCC10417. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 12:07:51AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10417

First Name: Martin  
Middle Initial: E  
Last Name: Mijal  
Organization: citizen USA & cancer recipient  
Address: 4527 NE Sumner St  
Address 3: 4527 NE Sumner St  
City: Portland  
State: OR  
Zip: 97218  
Country: USA  
Email: [martinmijal@yahoo.com](mailto:martinmijal@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

this plan to put more cancer/pollution radioactive wastes in Hanford is STUPID!!! Right now you have LIED to us: You have said the nuclear energy is safe' Why don't capitalistic normal insurance agencies insure nuke power? It is inherently unsafe with MASSIVE damages. You promised to clean up Hanford & you can't even do that. DON'T bring in more waste. You don't know this but it IS possible to use nuke for safe energy. However the stupid warmongers rejected that nuclear method since there would be less wepon grade materials for blowing up the planet. What part of FUKushima do you not understand? I'm disgusted with all this stupidity from highly trained and skilled and experienced geniuses to come up with this DANGEROUS & FOOLISH plan. You geniuses knew the waste was getting worse & now the "plan" IS TO NOT Worry about the existing Hanford wastes and add MORE in shallow trenches. The chickens are here coming to roost. Get all the CEO's and shareholders to live next to Hanford and drink the water, breathe the air and tell themselves lies about how safe it is. This is such a stupid idea I shouldn't even have to write this letter. YOU can figure out on your own that this is slow suicide..... I don't know what to say to you guys.... Use your brains!!!! m

W417-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W417-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Miller, Virginia, Commenter ID No. E84**

**From:** Virginia J Miller <vmjopus@cybermesa.com>  
**Sent:** Monday, June 27, 2011 3:53 AM  
**To:** gtccsis@anl.gov  
**Subject:** DOE DEIS comments for disposal of GTCC low-level radioactive waste in NM

Arnold Edelman  
Document Manager, DOE GTCC EIS

First, I strongly support an end to the production of new radioactive waste. This waste is a danger to human life for tens of thousands of years. We don't know how to safely dispose of it. It is irresponsible to produce more of it. We are destroying our planet's capacity to sustain life and human health.

Second, I call on DOE to develop a new DEIS that includes the alternative HOSS, "Hardened On-Site Storage", reducing the risks of accidents and terrorist attacks during transport and offering greater protection for human health and the environment until a scientifically sound and safer permanent solution is developed for existing radioactive waste. GTCC waste would increase WIPP's radioactivity by 30 times beyond original plans. HOSS is the best solution at this time for *Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste*. GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage where they would be monitored.

Third, the Nuclear Waste Policy Act of 1982 has required development of one or more geologic repositories for existing radioactive waste. WIPP was not designed or intended to receive GTCC or more highly radioactive waste. The location of the Los Alamos Lab in a seismic fault zone between a rift and a dormant volcano is no place for longterm storage of radioactive waste. Groundwater is already being contaminated by LANL and cleanup must be the Lab's priority.

Thank you for your careful attention.

Virginia J. Miller  
125 Calle Don Jose  
Santa Fe NM 87501

E84-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

E84-2 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

E84-3 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

LANL is analyzed as a candidate location for a new GTCC waste disposal facility. DOE is performing environmental restoration activities at LANL and ongoing cleanup efforts will continue. A GTCC waste disposal facility, would not affect ongoing cleanup activities at LANL. DOE analyzed and considered all relevant affected environmental resources including seismic and groundwater conditions at LANL in identifying the preferred alternative discussed in Section 2.10.

**Millhauser, Susan, Commenter ID No. W456**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 1:08 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10456

Thank you for your comment, Susan Millhauser.

The comment tracking number that has been assigned to your comment is GTCC10456. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 01:07:37AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10456

First Name: Susan  
Last Name: Millhauser  
City:  
State:  
Zip:  
Country: USA  
Email: [susanm@spiretech.com](mailto:susanm@spiretech.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
To Whom It May Concern:

Please consider my comments regarding the Draft GTCC LLRW EIS.

Do not further consider Hanford as a National Radioactive Waste Dump for extremely radioactive wastes. Protect the Columbia River and prevent cancer in the children who will drink the contaminated water.

If Hanford is chosen as the national radioactive waste dump for extremely radioactive (GTCC) wastes, the immediate and long-term potential for hazards from 12,600 truckloads of extremely radioactive waste coming through Oregon and Spokane to Hanford are unacceptable.

We can't cleanup Hanford and protect our Columbia River while more waste gets dumped at Hanford - Put Cleanup First!

1. Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.
2. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.
3. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.

4. USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental

W456-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W456-2 The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W456-3 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W456-1 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

W456-2 While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W456-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Millhauser, Susan, Commenter ID No. W456 (cont'd)**

impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Thank you,

Susan Millhauser

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W456-6  
(Cont.)

W456-6 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.



**Milner, Glen, Commenter ID No. W348**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 1:32 AM  
**To:** mail\_gtceisarchives; gtceiswebmaster@anl.gov; gtceis@anl.gov  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10348  
**Attachments:** EIS\_Hanford\_22\_JUN\_11\_GTCC10348.doc

Thank you for your comment, Glen Milner.

The comment tracking number that has been assigned to your comment is GTCC10348. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 01:32:08AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10348

First Name: Glen  
Last Name: Milner  
Address: 3227 NE 198th Place  
City: Seattle  
State: WA  
Zip: 98155  
Country: USA  
Email: [gkaajm@juno.com](mailto:gkaajm@juno.com)  
Privacy Preference: Don't withhold name or address from public record  
Attachment: EIS Hanford 22 JUN 11.doc

Comment Submitted:  
Glen Milner  
3227 NE 198th Place  
Seattle, WA 98155  
Phone (206) 365-7865  
[gk\\_milner@comcast.net](mailto:gk_milner@comcast.net)

June 22, 2011

Greater-Than-Class C Low-Level Radioactive Waste EIS  
Office of Technical and Regulatory Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW.  
Washington, DC 20585-0119

VIA DOE WEBSITE  
RE: Greater-Than-Class C Low-Level Radioactive Waste EIS

To whom it concerns

I am submitting my comment on the DOE's EIS for Greater-Than-Class C Low-Level Radioactive Waste.

W348-1

1

W348-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

DOE is performing environmental restoration activities at the Hanford Site, and the ongoing cleanup efforts will continue. As stated in the Hanford TC&WM EIS, the receipt of offsite waste streams (including GTCC LLRW) that contain specific amounts of certain isotopes, specifically iodine-129 and technetium-99, could cause an adverse impact on the environment. When the impacts of technetium-99 from past leaks and cribs are combined, DOE believes it may not be prudent to add significant additional technetium-99 to the existing environment. Therefore, one means of mitigating the impact would be for DOE to limit disposal of off-site waste streams containing iodine-129 or technetium-99 at Hanford. DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. These factors were considered in developing DOE's preferred alternative for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

Milner, Glen - W348

**Milner, Glen, Commenter ID No. W348 (cont'd)**

I have lived in Washington State since 1951. I often visit the eastern side of Washington State and have often traveled through the Richland, Washington area.

I am strongly opposed to this plan.

There should be no more radioactive material shipped to Hanford or anywhere else in Washington State.

The DOE has had years to clean up the Hanford facilities. It is common knowledge that the Hanford site is one of the most contaminated facilities in the nation. Residents are promised that the site will be made safe. However, the effort is slow and lacks purpose.

More radioactive waste would only add to the problems at Hanford and endanger citizens of Washington State.

If the DOE ships radioactive material anywhere, it should not do so until it develops a way of protecting citizens from radioactive material in the trucks. I have read that the DOE casks cannot shield all of the radiation. Citizens traveling on highways will not know of the exposure to radiation and harm from these trucks. I am sure that motorists will never be warned of the risks.

The DOE must find better ways to store the radioactive material than the ways proposed in the EIS for this program. There must be no chance for radioactive material to enter the groundwater.

I found the EIS at <http://www.gtceis.anl.gov> to be very difficult to follow. The graphics on the website are too intensive and created a problem for me while trying to move through the statement. I have commented on a number of EIS statements in the past and this statement was much more difficult to navigate than others I have seen.

Thank you for the opportunity to comment. I would like to learn more about this plan.

Sincerely

Glen Milner

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than Class C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W348-1  
(Cont.)

W348-2

W348-3

W348-4

W348-5

W348-2 See response to W348-1

W348-3 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W348-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W348-5 The EIS has been prepared using conventional software including that used to prepare the graphics presented in the document. The multiple sites and the various waste types being addressed in the EIS may have contributed to the numerous graphics and photographs needed to communicate the information in a visual manner. DOE will take the steps to improve the accessibility of the Final EIS on the website. Thank you for bringing this to our attention.

**Milner, Glen, Commenter ID No. W348 (cont'd)**

Glen Milner  
3227 NE 198th Place  
Seattle, WA 98155  
Phone (206) 365-7865  
[ek\\_milner@comcast.net](mailto:ek_milner@comcast.net)

June 22, 2011

Greater-Than-Class C Low-Level Radioactive Waste EIS  
Office of Technical and Regulatory Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW.  
Washington, DC 20585-0119

VIA DOE WEBSITE  
RE: Greater-Than-Class C Low-Level Radioactive Waste EIS

To whom it concerns

I am submitting my comment on the DOE's EIS for Greater-Than-Class C Low-Level Radioactive Waste.

I have lived in Washington State since 1951. I often visit the eastern side of Washington State and have often traveled through the Richland, Washington area.

I am strongly opposed to this plan.

There should be no more radioactive material shipped to Hanford or anywhere else in Washington State.

The DOE has had years to clean up the Hanford facilities. It is common knowledge that the Hanford site is one of the most contaminated facilities in the nation. Residents are promised that the site will be made safe. However, the effort is slow and lacks purpose.

More radioactive waste would only add to the problems at Hanford and endanger citizens of Washington State.

If the DOE ships radioactive material anywhere, it should not do so until it develops a way of protecting citizens from radioactive material in the trucks. I have read that the DOE casks cannot shield all of the radiation. Citizens traveling on highways will not know of the exposure to radiation and harm from these trucks. I am sure that motorists will never be warned of the risks.

The DOE must find better ways to store the radioactive material than the ways proposed in the EIS for this program. There must be no chance for radioactive material to enter the groundwater.

**Milner, Glen, Commenter ID No. W348 (cont'd)**

I found the EIS at <http://www.gtccjis.anl.gov> to be very difficult to follow. The graphics on the website are too intensive and created a problem for me while trying to move through the statement. I have commented on a number of EIS statements in the past and this statement was much more difficult to navigate than others I have seen.

Thank you for the opportunity to comment. I would like to learn more about this plan.

Sincerely

Glen Milner

**Mink, Ron, Commenter ID No. W378**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 4:29 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10378

Thank you for your comment, Ron Mink.

The comment tracking number that has been assigned to your comment is GTCC10378. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 04:29:07PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10378

First Name: Ron  
Last Name: Mink  
Organization: Natural Health  
Address: 8806 SW 54th Ave.  
Address 3: 8806 SW 54th Ave.  
City: Portland  
State: OR  
Zip: 97219  
Country: USA  
Email: [ron.mink@gmail.com](mailto:ron.mink@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
My family and I are totally opposed to using Hanford as a national dump site. The idea is insane and the people supporting it have no motive other than greed. If this includes you you should feel ashamed. Please stop this recklessness now.

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W378-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W378-1

Capital Reporting Company

66

1

2

3

4

5

6

7

8

9

10

11

12

13

14 MR. BROWN: Our next speaker is Henry

15 Misserville.

16 MR. MISSERVILLE: I'd like to Dave McCoy to go

17 along.

18 MR. BROWN: Okay, and then I guess, Dave --

19 MR. MISSERVILLE: That's all right.

20 MR. BROWN: Right, and then Dave McCoy's next.

21 MR. MISSERVILLE: Hi, my name is Henry

22 Misserville. I'm a citizen of Planet Earth, and I am

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Misserville, Henry, Commenter ID No. T72 (cont'd)**

**Capital Reporting Company**

67

1 an environmentalist, and a part-time resident of New  
2 Mexico as well. The speakers who spoke against nuclear  
3 waste, against the transportation, I agree totally with  
4 them. I feel empowered by what I have heard. The  
5 first speaker spoke about the lack of an impact  
6 statement. There needs to be one.

7 Another speaker spoke about negligence  
8 and lack of stewardship. And from what I can tell,  
9 there's a total lack of negligence and lack of  
10 stewardship on the part of the DOE, on the part of  
11 NMED, on the part of the regulatory agencies that  
12 aren't regulating. They're in bed with the nuclear  
13 industry, the arms and proliferation industry, Sandia  
14 Labs, with its radioactive and hazardous waste, its  
15 nuclear reactor that is totally unsafe, Kirtland Air  
16 Force Base with its jet fuel spill, 8 million gallons  
17 of jet fuel that is contaminating the water. New  
18 Mexico, I've heard it referred to as a toxic wasteland,  
19 and the DOE wants to contribute to that.

20 These regulatory agencies have no  
21 credibility. Their claims of safety are bogus.  
22 They're in collusion with the nuclear arms industry,

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T72-1 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

T72-2 DOE respectfully disagrees and cleanup efforts at LANL are ongoing.

T72-1

T72-2

**Misserville, Henry, Commenter ID No. T72 (cont'd)**

Capital Reporting Company

68

1 from what I can tell. And people are not being heard.  
2 They don't have regular public meetings where the  
3 public can comment. In fact, NMED in the past, has  
4 prevented public comment, and they have declared some  
5 of their minutes of their meeting executive privilege  
6 so that we cannot get access to their discussions with  
7 Sandia, with Los Alamos, with Kirtland Air Force Base.

8           The fact that they want to bring in mid-  
9 level radioactive waste, one of the speakers said, is a  
10 trial run. It is a trial run. It's a trial run for  
11 high-level radioactive waste. Just a matter of time.  
12 Our president, President Obama, has been bought by the  
13 nuclear power industry, unfortunately. They're the  
14 ones that contributed to his campaign, put him into  
15 office. We have defense and non-commercial waste  
16 supposedly that are going to go to WIPP. Another  
17 speaker mentioned that you can't have nuclear energy  
18 without a consideration of nuclear waste. That's the  
19 other part of the equation, and there is no permanent  
20 solution to nuclear waste.

21           You know, from what I can tell, the state  
22 of New Mexico is the dumping ground for nuclear waste.

866.488.DEPO  
www.CapitalReportingCompany.com

T72-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

T72-4 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

T72-3

T72-4



**Misserville, Henry, Commenter ID No. T72 (cont'd)**

Capital Reporting Company

69

1 I heard it stated in one of the public comment periods  
2 at another venue, that this is environmental racism.  
3 They take the poorest state, the least educated state,  
4 and they have these glossy scientists try to convince  
5 people that this is the right thing to do.

6 MR. BROWN: Okay, you've got one minute.

7 MR. MISSERVILLE: Okay. There was an accident  
8 in July of 2001, Baltimore rail tunnel fire --  
9 railroad. It was a fire that went on for six days, a  
10 chemical fire. And the temperatures of that fire in  
11 that tunnel were 1,500 degrees. These casks can  
12 withstand temperatures of 1,475 degrees for 30 minutes.  
13 If they had been transformed to nuclear waste, it would  
14 have been a Chernobyl in the making. The feds cannot  
15 force high-level nuclear waste dumping on a state that  
16 doesn't want it. Nevada stopped the Yucca Mountain  
17 dumping. We can stop that, too. And it seems like the  
18 people here want to stop that. And we can pass  
19 ordinances to prevent the transfer of radioactive  
20 waste. You can't move spent fuel without irradiating  
21 people along the routes. You just can't do it. There  
22 will be radiation, we will be impacted, and there is no

866.488.DEPO  
www.CapitalReportingCompany.com

T72-4  
(Cont.)

T72-5

T72-5

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

Misserville, Henry, Commenter ID No. T72 (cont'd)

Capital Reporting Company

70

I safe amount. Thank you.

**Mitchell, Joseph, Commenter ID No. L317**



**DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)  
U.S. Department of Energy**

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

**received**

Mr.  Mrs.  Ms.  Mr. & Mrs.  Dr.

Name: JOSEPH J. MITCHELL

Title: MENTAL HEALTH COUNSELOR

+ Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: 503 237 2310 E-Mail Address: jjmitch@comcast.net

Comment: \_\_\_\_\_

*We are absolutely opposed to dumping anymore waste at Hanford. And, as well, absolutely opposed to trucking nuclear waste on Oregon highways. The risk is too high.*

Thank you Joseph J. Mitchell  
Please use other side if more space is needed.

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.  
 Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gteceis@anl.gov](mailto:gteceis@anl.gov)

- L317-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.
- L317-2 See response to L317-1.

L317-1

L317-2

Mitchell, Joseph - L317

**Mitchell, Ottie, Commenter ID No. W480**

---

**From:** gtccseiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 4:35 PM  
**To:** gtccseiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10480

Thank you for your comment, Ottie Mitchell.

The comment tracking number that has been assigned to your comment is GTCC10480. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 04:34:50PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10480

First Name: Ottie  
Middle Initial: C  
Last Name: Mitchell  
Address: 3820 Colony Oaks Dr  
City: Eugene  
State: OR  
Zip: 97405  
Country: USA  
Email: [ocrmitch@comcast.net](mailto:ocrmitch@comcast.net)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Transporting toxic materials in the quantities contemplated will certainly result in accidents that will shut down freeways, towns, and cities for extended periods. People will be hurt. A national public vote should be taken to decide whether to proceed.

Questions about submitting comments over the Web? Contact us at: [gtccseiswebmaster@anl.gov](mailto:gtccseiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W480-1 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W480-1

**Mooney, John, Commenter ID No. W94**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 7:05 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10094

Thank you for your comment, john mooney.

The comment tracking number that has been assigned to your comment is GTCC10094. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 07:05:06PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10094

First Name: john  
Last Name: mooney  
City: White salmon  
State: WA  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
totally against shipping nuclear waste to Hanford

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W94-1

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W94-1

**Moore, Anne, Commenter ID No. W68**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Tuesday, May 24, 2011 6:40 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10068

Thank you for your comment, Anne Moore.

The comment tracking number that has been assigned to your comment is GTCC10068. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 24, 2011 06:40:07AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10068

First Name: Anne  
Middle Initial: M  
Last Name: Moore  
Address: P.O. Box 604  
City: Bingen  
State: WA  
Zip: 98605  
Country: USA  
Email: [moore@gorge.net](mailto:moore@gorge.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I oppose the USDOE's attempts to send more radioactive waste to Hanford, WA.  
Highly radioactive and long-lived wastes should be disposed of in deep, under- ground stable geologic formations, NOT in landfills, trenches, boreholes and vaults at Hanford, which threaten groundwater, the Columbia River, and the health of the people in the area and down river.  
The USDOE needs to clean up the mess already at Hanford, NOT add more to it!

W68-1

W68-2

W68-3

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W68-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W68-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W68-3 See response to W68-1.

**Moore, J. Robert, Commenter ID No. W402**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 7:53 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10402

Thank you for your comment, Dr. J. Robert Moore.

The comment tracking number that has been assigned to your comment is GTCC10402. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 07:53:11PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10402

First Name: Dr. J. Robert  
Last Name: Moore  
Address: 443 Brookside Dr.  
City: Eugene  
State: OR  
Zip: 97405  
Country: USA  
Email: [jrobertore@yahoo.com](mailto:jrobertore@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

If more citizens in Oregon and Washington were aware of how disastrous this situation is, surely there would be a great and appropriate response.

It is simply not acceptable to neglect the nuclear waste which is already at Hanford. Providing more to the same site, especially by roadway or rail is a risk which is hard to imagine. Who will say "I'm Sorry" should a mishap occur? And what could be done should it occur?

Very little. We deserve more consideration.

If you yourself have children or love your family, stop this madness before it is too late.

As if leaking radioactivity into the Columbia and out to sea isn't enough of a reason to halt this folly, then WHAT is?

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W402-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W402-2 Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W402-1

W402-2

**Moreno, Miguel, Commenter ID No. T102**

Capital Reporting Company

81

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

MR. BROWN: Okay. Miguel is next and Mary Green will follow.

MR. MORENO: Where to start, where to start, where to start. Thanks, everybody. (Speaking in foreign language.)

And you know, them talking about bringing in -- them talking about bringing any kind of a -- any more of this nuclear waste into our community is just -- you know, it's insane. Just for me to grasp, you

866.488.DEPO  
www.CapitalReportingCompany.com

T102-1

T102-1 LANL is analyzed as a candidate location for a new GTCC waste disposal facility. The ongoing cleanup efforts at LANL will continue. A GTCC waste disposal facility, would not affect ongoing cleanup activities.



**Moreno, Miguel, Commenter ID No. T102 (cont'd)**

Capital Reporting Company

82

1 know, the thought of it, you know, the fact that we  
2 have Los Alamos up there in the CMRR building and now  
3 them trying to propose to, you know, to put \$180  
4 billion into, you know, refurbishing the new CMRR  
5 building is just -- you know, it's -- it's insane, you  
6 know.

7 I get really overwhelmed whenever I think  
8 about, you know, my son and the future generations and  
9 our community, especially with them wanting to bring  
10 170 billion Curies of greater-than-Class-C nuclear  
11 waste to our communities, you know, with the fact that  
12 Los Alamos is at the top of our -- you know, at the top  
13 of our mountain and, you know, gravity flows downhill,  
14 and for the simple fact in Espanola they have already  
15 shut down four of nine wells because of uranium  
16 contamination. It is just outrageous.

17 You know, the Manhattan Project, they invested  
18 \$20 billion into the Manhattan Project, and we're  
19 already looking -- we're already looking at tripling  
20 that just with the -- just with the redevelopment of  
21 the new CMRR FN building, and you know, it's outrageous  
22 for us to even think about bringing these kind of

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T102-2 In identifying the preferred alternative discussed in Section 2.10, DOE considered the results of the EIS analyses on potential impacts to all relevant affected resources including groundwater at LANL. See Section 8.2.3 for potential impacts to water resources at LANL.

T102-2

**Moreno, Miguel, Commenter ID No. T102 (cont'd)**

Capital Reporting Company

83

1 devastations into our community.

2           Let's talk about WIPP, the waste isolation  
3 pilot plant. It only has the capacity to hold what, 50  
4 billion Curies of radioactive material? And they're  
5 talking about bringing three times that amount into our  
6 communities, and it's just, you know, it's outrageous,  
7 and I would like, you know, my voice to be heard and,  
8 you know, my community's voices to be heard because  
9 we're sick of the death and destruction of our  
10 communities, our children dying, our elders, you know,  
11 coming up with rare cancers and, you know, them just  
12 looking at us and saying, "Well, what is it that you  
13 want us to do?"

14           We want you guys to come into our communities  
15 and develop systems in order to -- in order to protect  
16 us. We need health surveys developed so that we're  
17 able to really find statistics and develop statistics  
18 around these -- around these health issues that are  
19 going on here in the community, especially here in  
20 northern New Mexico.

21           And, yeah, it's just -- it's chaos, death,  
22 destruction and profiteering.

866.488.DEPO  
www.CapitalReportingCompany.com

T102-3 DOE acknowledges that only defense-generated TRU waste is currently allowed by law for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently allowed by law. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

T102-4 The conduct of health surveys suggested for DOE consideration is considered outside the scope of the EIS and do not meet the purpose and need for agency action stated for this EIS.

Moreno, Miguel, Commenter ID No. T102 (cont'd)

Capital Reporting Company

84

- 1 MR. BROWN: Okay.
- 2 MR. MORENO: Thank you.
- 3 MR. BROWN:
- 4 Thank you.
- 5 (Applause.)

Capital Reporting Company

73

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18

MR. BROWN: Leona Morgan, and Shannon Mason  
will be next.

MS. MORGAN: Good evening. My name is Leona  
Morgan, and I am a resident of New Mexico. I am also  
from the Navajo Nation, where my ancestors and my

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Capital Reporting Company**

74

1 family has lived since time and memorial.

2                   And first of all, I'd like to say that I  
3 am opposed to the proposal for GTCC and GTCC-like waste  
4 to come to the WIPP site; also for the proposal to  
5 build more sites in the WIPP vicinity. As a young  
6 person, I'm going to speak for the generations who are  
7 not present here today. I am not so young, but I do  
8 remember growing up in Gallup, New Mexico. I went to  
9 high school there, and I never heard of uranium mining  
10 issues while I was growing up, and so I'm going to  
11 speak for the generations who have not grown up aware  
12 of the dangers of radioactive contamination and who  
13 have not lived during the time of the nuclear bomb  
14 drills when some of you might recall hiding under your  
15 desk or the issues with the Cold War.

16                   A lot of my generation and the younger  
17 generations' have no idea about the dangers of nuclear  
18 power and nuclear weapons, and so for that reason I  
19 have spent the last four years talking in public at  
20 gatherings, either doing presentations. I have spoken  
21 with hundreds of residents and a lot of young people  
22 younger than myself. I have spoken one-on-one,

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T74-1

T74-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Morgan, Leona, Commenter ID No. T74 (cont'd)**

Capital Reporting Company

75

1 explaining the nuclear fuel chain and talking about the  
2 history of uranium mining, especially how it has  
3 affected my people, the Dine. And for myself, I  
4 learned and I educated myself with the help from people  
5 like Don Hancock and Strick and a lot of people here  
6 today who have helped to educate me on the issues and  
7 therefore I see it as an oversight of the DOE to not be  
8 using modern forms of media to get this information  
9 out.

10 So that's one of the issues I'd like to  
11 address, is that the Department of Energy really needs  
12 to find new ways to give this information out,  
13 especially to young people. I do not see any here  
14 today, and I believe that is by design. So first of  
15 all, I'd like to just talk about the root of the  
16 problem of nuclear waste. Right now, if we allow  
17 nuclear power plant waste to come to the WIPP site, we  
18 are just opening the door to more nuclear power plants  
19 in the United States, something the Obama  
20 Administration favors, and that means opening the door  
21 to more uranium mining.

22 In my community -- my family is from  
866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T74-2 DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. Notices were placed in various local newspapers to announce the public hearings before and during the scheduled hearings.

T74-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

T74-2

T74-3

**Capital Reporting Company**

76

1 Crown Point, New Mexico, and today I was actually in  
2 Crown Point, New Mexico, attending a funeral. My aunt  
3 had died. I think she was 56. I believe a lot of her  
4 problems were the result of -- she had Parkinson's,  
5 which is not related, but she also had severe  
6 depression from the loss of her daughter, who died at  
7 30 because of kidney failure, which was compromised by  
8 other issues. But in the community of Crown Point,  
9 what I learned today is that there is a rise in  
10 leukemia among young people. My grandmother, who also  
11 died in 2005, she died of lung cancer, and she never  
12 smoked. She was a traditional grandmother. She --  
13 Crown Point is not heavily polluted by automobiles or  
14 that type of air pollution, and so I believe it is from  
15 the naturally occurring radon gas and the abandoned  
16 uranium mines in the area.

17                   And so that is the big issue. On Navajo  
18 Nation there have been identified over a thousand  
19 abandoned uranium mines. And so when we talk about  
20 nuclear waste coming to WIPP, I just think, well,  
21 there's nuclear waste in my family's background. In  
22 Crown Point, New Mexico, we're also facing ISL mining,

866.488.DEPO  
www.CapitalReportingCompany.com

T74-4

T74-4

Other concerns or programs suggested for DOE consideration are considered outside the scope of the EIS and do not meet the purpose and need for agency action stated for this EIS.

**Capital Reporting Company**

77

1 which is being proposed -- well, we've been dealing  
2 with this for a long time. HRI has a mine site which  
3 is within three miles of the water storage tanks in  
4 Crown Point and which is within a couple miles of the  
5 elementary school, the high school. There's four  
6 churches in that area where the ISL mining would occur.

7           And so these issues of uranium mining,  
8 they're not just in Crown Point, they're not just in  
9 Church Rock, they're also in areas like Grants and  
10 Mount Taylor, which is a sacred site to all the  
11 indigenous peoples of New Mexico. And so to talk about  
12 expanding the WIPP site to accept nuclear power plant  
13 waste, to me is like just increasing the amount of  
14 environmental racism that has already occurred. The  
15 reason I spend time talking to young people about these  
16 issues is because during the uranium boom of the last  
17 century, nobody spent the time to talk to my people  
18 about the dangers of uranium mining and radioactive  
19 waste, and so today, I'd just like to express my great  
20 concern that the DOE is again using our people and  
21 sacrificing human lives for private industry and for  
22 these commercial nuclear power plants and all these

866.488.DEPO  
www.CapitalReportingCompany.com

T74-4  
(Cont.)

T74-4  
(Cont.)

T74-5

T74-5    DOE respectfully disagrees and cleanup efforts at DOE sites are ongoing.



Morgan, Leona, Commenter ID No. T74 (cont'd)

Capital Reporting Company

78

1 companies who don't even live here, and they don't have  
2 their family here. They don't understand the extent to  
3 which we have already suffered.

4                   And so as a Native person, as an  
5 indigenous person, I'd also like to just explain to the  
6 DOE and to everyone here that when we're talking about  
7 losing a life, in my culture it's not just losing a  
8 human; it's losing our language, it's killing our way  
9 of life, and that is going to affect our future for  
10 generations to come. So thank you, thank you for your  
11 time today, and again I'm opposed to the expansion of  
12 WIPP.

T74-5  
(Cont.)

T74-6

T74-6    See response to T74-1.

**Morris, Elizabeth, Commenter ID No. W513**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 9:15 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10513

Thank you for your comment, elizabeth morris.

The comment tracking number that has been assigned to your comment is GTCC10513. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 09:14:56PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10513

First Name: elizabeth  
Last Name: morris  
Address: 12370 SW 12th  
City: Beaverton  
State: OR  
Zip: 97005-3947  
Country: USA  
Email: [betmamo@yahoo.com](mailto:betmamo@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Protect our Columbia River and prevent cancer in the children who will drink the contaminated water from the Energy Dept's (USDOE's) latest plan to use Hanford as a National Radioactive Waste Dump for extremely radioactive wastes.

12,600 truckloads of highly radioactive waste would come through Oregon and Spokane, if Hanford is chosen as the national radioactive waste dump for extremely radioactive (GTCC) wastes.

This is in addition to the 17,000 truckloads with 3 million cu ft of other radioactive and radioactive chemical wastes which USDOE decided in 2004 to ship to Hanford for disposal - Heart of America Northwest continues legal efforts and organizing to overturn. This would total 4 trucks every day for 20 years.

Truck routes include a) I-5 through Eugene, Salem, Portland; b) I-84 over the Blue Mountains; and c) I-90 through Spokane.

In 2008, USDOE \*admitted that trucking similar highly radioactive wastes to Hanford would cause as many as 816 fatal cancers in the public exposed to the radiation from the trucks along the routes - even if there are no accidents or terrorist attacks.

This is due to the fact that the casks used for trucking cannot shield all of the radiation without being too heavy to truck.

- W513-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.
- W513-2 The transportation of radioactive waste will meet or exceed DOT and NRC regulatory requirements that promote the protection of human health and the environment. These regulations include requirements for radioactive materials packaging, marking, labeling, placarding, shipping papers, and highway routing. The waste shipments would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC LLRW and GTCC-like wastes would be shipped in approved waste packages and transportation casks. The robust nature of these casks limits the potential release of radioactive and chemically hazardous material under the severest of accident conditions. It is unlikely that the transportation of GTCC LLRW and GTCC-like wastes to any of the alternative sites evaluated in the EIS would cause an additional fatality as a result of radiation from either incident-free transportation or postulated transportation accidents. The EIS evaluated the transportation impacts from the shipments that would be required to dispose of all of the GTCC LLRW and GTCC-like wastes at the various disposal sites. The EIS addressed the collective population risks during routine conditions and accidents, the radiological risks to the highest exposed individuals during routine conditions, and the consequences to individuals and populations as a result of transportation accidents, including those that could release radioactive or hazardous chemical materials. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected LCFs (see Section 6.2.9.1).

W513-1

W513-2

**Morris, Elizabeth, Commenter ID No. W513 (cont'd)**

Highly radioactive Plutonium shipments are a prime target for terrorists - especially when the US government is trucking them through the center of cities such as Portland or Spokane.

W513-2  
(Cont.)

In the event of a foreseeable accident with fire or a terrorist attack on a truckload of highly radioactive Plutonium waste en route to Hanford on I-205, I-84 and I-5 or I-90, an independent analysis commissioned by Heart of America Northwest Research Center found that hundreds of square miles of either Portland or Spokane would be contaminated and over a thousand fatal cancers would result.

W513-3

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

W513-3 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

Details of the facility accident analysis can be found in Sections 5.3.4.2.1 and C.4.2. All information necessary to duplicate the transportation accident consequence assessment was available in Section 5.3.9.3 of the Draft EIS, with the exception of the source terms used for the contact-handled and remote-handled Other Waste. These latter source terms have been added to Section 5.3.9.3 of the Final EIS. The accident risk analysis (see Section C.9.3.1) is separate from the accident consequence analysis (see Section C.9.3.3). All relevant data for the accident risk analysis, with the exception of the shipment source terms and route information, are provided in Section C.9.3. Approximately 1,200 routes were considered in this analysis, so it was not considered practical to include this information in the EIS. Such information is readily available by using the TRAGIS routing model, as referenced in Appendix C. Shipment-specific source terms were determined by dividing the origin source inventory by the number of shipments from that site. Site inventories were published in Sandia (2007, 2008), as referenced in Appendix B, which also contains the per-shipment packaging assumptions for each waste type. The shipment-specific source terms were omitted from the EIS for brevity and because of the low estimated impacts.

**Murphy, Elaine, Commenter ID No. W441**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 4:12 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10441

Thank you for your comment, Elaine Murphy.

The comment tracking number that has been assigned to your comment is GTCC10441. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 04:12:18PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10441

First Name: Elaine  
Middle Initial: M  
Last Name: Murphy  
Address: :  
City: :  
State: :  
Zip: :  
Country: USA  
Email: [EMMardnwd@aol.com](mailto:EMMardnwd@aol.com)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I am adamantly opposed to the use of the Hanford site for the disposal of Greater-Than-Class C Radioactive waste. The 53 million gallons of radioactive waste already at the site make it the most contaminated site in the United States. Cleaning up this waste has already cost more than 30 billion taxpayer dollars and will cost billions more over many decades. The site should be completely decontaminated before more waste is dumped there, especially the long-lived and highly radioactive GTCC waste that the U.S. Department of Energy is proposing to ship here from all over the country.

The U.S. Department of Energy's own study predicts that hundreds of adult cancer deaths will be caused by 12,000 truckloads of radioactive waste being shipped through Oregon and Washington. Cancer deaths in children were not even addressed. This is assuming that there are no accidents or acts of terrorism, which is an unreasonable assumption. Fukushima can happen here. The U.S. Department of Energy was ordered to consider the route-specific impacts of shipping these wastes to Hanford, something that the current draft EIS does not disclose. The USDOE should issue one environmental impact statement that discloses all the cumulative risks of its proposals and includes the truck routes.

It has recently been revealed in a report by the Defense Nuclear Facilities Safety Board that the safety culture at the Hanford site was "flawed" and that "individuals who question current practices or provide alternative points of view are not considered team players and will be dealt with harshly." Walt Tamosaitis was demoted one day after raising doubts about the safe functioning of a waste-materials system at the site. Site workers and outside observers have made the case that shortcomings in the safety mechanisms of the site risk explosions or an uncontrolled nuclear chain reaction. I am appalled that the USDOE is proposing to ship more highly radioactive wastes to this site where safety issues are being ignored.

W441-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W441-2 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

Calculation of the collective population risk (under routine and accident conditions) is provided in the EIS. While these estimates are conservative, the calculations used expected values where practical (e.g., external shipment dose rates) and provide a reasonable measure for comparison among alternatives, as summarized in Tables 2.7 5 and 2.7 6, and the estimates show that the transportation risks would be small. All alternatives involve routes of hundreds of miles through similar types of rural, suburban, and urban areas. For specific local impacts, Section 5.3.9.2 provides information on potential human health impacts on individuals during normal waste transport along a route. However, the consideration of specific local stakeholder concerns is more appropriate during the final planning stages of a project when actual route selections are finalized, not at the level addressed in this EIS. A generic accident consequence assessment was performed because there is no way to predict the exact location and conditions of an accident, as discussed in C.9.3.3 of the EIS. For all alternatives, potential accidents, even those at the same location, could have impacts that range from negligible to significant depending on the waste involved, the accident severity, and weather conditions. Such an analysis would not help distinguish between alternatives because all alternatives involve routes through or near major population centers.

The additional human health impacts from intermodal transfer and transport of waste from the nearest rail access point to those disposal sites without direct rail access is generally a small percentage of the total risk discussed in Section C.9.5.5 of the EIS. Costs involved in either building a rail spur to a site or the additional cost of intermodal operations would need to be considered if that option was considered further. For the rail option, the use of dedicated trains, if sufficient waste is available for transport at the same time, could reduce transportation risks and costs by minimizing transit times. The current rail analysis therefore bounds what might be expected if dedicated trains were used. In general, transportation costs would be similar across all disposal alternatives. The primary difference would be related to the distances traveled in each case. Thus, the transportation costs will scale with the shipment distances travelled as presented in the EIS. Any decisions made by DOE would take these factors into account during implementation.

Once an alternative is selected in a ROD for this EIS for implementation, site-specific NEPA reviews would be conducted as needed, including an assessment of specific routing and an accident analysis, including dedicated trains and the potential for multiple railcar accidents if applicable. This process will include planning that involves transportation stakeholders.

**Murphy, Elaine, Commenter ID No. W441 (cont'd)**

I attended the U.S. Department of Energy's hearing in Portland on May 19, 2011. It is clear to me that the USDOE and its contractors put cost considerations ahead of safety concerns. I urge you to consider a safer method of disposing of these wastes (e.g. a deep geologic depository) rather than trucking them through populated areas to Hanford and dumping them in trenches where they will add to the contamination of the groundwater and the Columbia River. It is time to stop asking taxpayers to assume the risks and costs of the nuclear industry while major corporations reap the profits.

Questions about submitting comments over the Web? Contact us at: [gtccelswebmaster@anl.gov](mailto:gtccelswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W441-4

W441-3 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

W441-4 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

**Murphy, Lauren, Commenter ID No. W240**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 11:27 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10240

Thank you for your comment, Lauren Murphy.

The comment tracking number that has been assigned to your comment is GTCC10240. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 11:26:41AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10240

First Name: Lauren  
Last Name: Murphy  
City: Portland  
State: OR  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Trucking radioactive waste through the Columbia River Gorge is not a healthy solution to dealing with the problem at hand. Trucking this waste could result in 800 cancer deaths from radioactive waste leaking-and that's only talking about humans. The affect this could have on the wildlife in the area would be hugely detrimental. The Columbia River Gorge is a national treasure, and should be upheld and maintained as such.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W240-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017). The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers (see Section 6.2.9.1).

The transportation of radioactive waste will meet or exceed DOT and NRC regulatory requirements that promote the protection of human health and the environment.

The EIS evaluated the transportation impacts from the shipments that would be required to dispose of all of the GTCC LLRW and GTCC-like wastes at the various disposal sites. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected LCFs (see Section 6.2.9.1).

W240-1

**Murray, Tammie, Commenter ID No. W307**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 17, 2011 11:50 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10307

Thank you for your comment, Tammie Murray.

The comment tracking number that has been assigned to your comment is GTCC10307. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 17, 2011 11:49:30PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10307

First Name: Tammie  
Last Name: Murray  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please clean up the mess at Hanford and do not consider bringing in more radioactive waste until the leaks that probably have already reached the Columbia River are fixed.

W307-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W307-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Mvers, Blavnev, Commenter ID No. W229**

**From:** gtccsiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 10:54 AM  
**To:** gtccsiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10229

Thank you for your comment, blavnev myers.

The comment tracking number that has been assigned to your comment is GTCC10229. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 10:54:12AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10229

First Name: blavnev  
Last Name: myers  
Country: USA  
Privacy Preference: Withhold address only from public record

Comment Submitted:

Stop High Level Radioactive Waste Trucking through the Gorge The US Department of Energy has recently proposed trucking highly radioactive waste (Greater Than Class C or GTCC waste) to the Hanford site in Washington state -- and 10-20% of the 12,600 toxic shipments would travel through the Columbia River Gorge. That's 1,260 to 2,520 trucks of radioactive waste passing through the Gorge near homes, schools, critical wildlife habitat and the Columbia River.

GTCC waste is dangerous to human health and the environment for more than 500 years. A 2008 Department of Energy study predicts over 800 adult cancer deaths along the trucking routes as a result of radiation leaking from the trucks during normal operation, even if no accidents occur! And this "best case scenario" study only includes adults, excluding children who are even more susceptible to the dangers of radioactive waste. An accident resulting in the spillage of highly radioactive waste would be catastrophic for the Columbia River Gorge and its residents. (Photo: This truck carrying low level radioactive waste jackknifed on I-84 near La Grande in 2008 during icy conditions.)

Hanford is already the most polluted area in the Western Hemisphere, with 53 million gallons of high level nuclear and chemical waste stored in aging, leaky tanks near the Columbia River. This deadly waste is currently leaking underground and flowing slowly into the Columbia. The number one priority should be to stop more waste from leaking into the river and clean up the existing waste and contaminated soil.

Questions about submitting comments over the Web? Contact us at: [gtccsiswebmaster@anl.gov](mailto:gtccsiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W229-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The EIS evaluated the transportation impacts from the shipments that would be required to dispose of all of the GTCC LLRW and GTCC-like wastes at the various disposal sites. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected LCFs.

A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

DOE is cleaning up the Hanford Site and those activities will continue.

W229-2 See response to W229-1.

W229-1

W229-2

W229-1

(Cont.)



**Namba, Joyce, Commenter ID No. W26**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, May 15, 2011 7:13 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10026

Thank you for your comment, Joyce Namba.

The comment tracking number that has been assigned to your comment is GTCC10026. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 15, 2011 07:13:16PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10026

First Name: Joyce  
Last Name: Namba  
State: OR  
Country: USA  
Email: [mlonamba@msn.com](mailto:mlonamba@msn.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Greater-Than-Class C Low-level radioactive Waste EIS Office of Technical and Regulatory support (EM-43) U.S.  
Department of Energy  
1000 Independence Avenue SW  
Washington DC 20585-0119

To: U.S. Department of Energy:

In regards to the Hanford Nuclear proposed Greater Than Class C Low-level radioactive waste.

I am very opposed to seeing more nuclear waste deposited at Hanford when the current waste removal has been many years delayed in its completion. I reviewed the "60 Minutes" follow-up program titled "Lethal and Leaking" and to see that 2018 is the start date for making the glass logs to house the waste. It is ludicrous to accept more waste.

It was obvious that the investigative reporter from CBS was amazed at the delay and the multi-million dollar errors made at tax payers' expense.

Please review the attached link to the full coverage.

Thank you,

Joyce Namba  
Portland OR

W26-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W26-1

**Namba, Joyce, Commenter ID No. W26 (cont'd)**

Five years ago, 60 Minutes was assured the government had learned from its mistakes and things were finally under control. And yet, three more waste have gone through the roof, up more than 150 percent, and the start date for making those glass logs has slipped seven years, to 2018. The seismic error was only one of several snafus.

W26-1  
(Cont.)

Read more: <http://www.cbsnews.com/stories/2006/04/27/60minutes/main1553896.shtml#ixzz1MScREAQF>

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**Nelson, Barbara M., Commenter ID No. W425**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 10:32 AM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10425

Thank you for your comment, barbara nelson.

The comment tracking number that has been assigned to your comment is GTCC10425. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 10:31:47AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10425

First Name: barbara  
Middle Initial: m  
Last Name: nelson  
Address: 520 highline rd  
City: hood river  
State: OR  
Zip: 97210  
Country: USA  
Email: [bnelson@tenthwave.net](mailto:bnelson@tenthwave.net)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Trucking radio active waste should not be allowed.

W425-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W425-1 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

**Newell, Nancy, Commenter ID No. T157**

T157-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Capital Reporting Company

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. NEWELL: Is it my turn?

MR. BROWN: It is.

MS. NEWELL: Well, what do you know?

MR. BROWN: Without much warning.

MS. NEWELL: I guess, you know, we know a lot in this part of the country. Oh boy, do we do our homework. I am a survivor of the Three Mile Island accident. How many people know about Three Mile Island in the '70s? I am 63 years old, and I have made it this far. I have been able to testify before many committees and do a lot of activism, and it's a pleasure to be refreshing these people's minds take back our message, as this young woman said, we don't need this anymore, we don't want anymore. You haven't taken care of the problems at Hanford, you haven't shown that it's solvable. Why do we keep producing it?

I closed -- not only helped close Trojan Nuclear Plant but also, as a result of Three Mile Island, people got together, and where I lived on Long Island they were building another massive project. And they came in and said, you know, if you don't have this plant, you won't have any lights on Long Island.

866.488.DEPO  
www.CapitalReportingCompany.com

T157-1

Newell, Nancy - T157

Newell, Nancy, Commenter ID No. T157 (cont'd)

T157-2 See response to T157-1.

Capital Reporting Company

1 You'll be out of electricity, and you'll be dark and  
2 cold. And we looked at all the guys in suits and  
3 said "Okay."

4 So, you know, when it gets ludicrous, which this  
5 is, how do you respond as a human being? Well, we  
6 responded there, and it never opened. We never  
7 opened this massive billion-dollar plant. Isn't that  
8 a phenomenal accomplishment? So I think this will  
9 happen here, because the wisdom of the people has so  
10 carried through to everyone that the messages you're  
11 going to get is that we're going to continue to fight  
12 this and change this.

13 We were uninhabitable, what, how many millions  
14 of years ago, because of the radiation that was on  
15 this planet? We were given the life that we have,  
16 the joy, the gifts, the beauty, the magnificence.  
17 You've been in Oregon. You can see this is a  
18 cherished state for everything that it offers. So  
19 why in the world would we want to contaminate with  
20 something that proved life can't keep surviving? I  
21 mean, we've been given a gift. This is so odd and so  
22 hard to comprehend. And how do you pass that message  
23 on to your children except by saying, Enough.

24 And whoever convinced someone to start this  
25 thing -- I don't know how it ever got started, but

866.488.DEPO  
www.CapitalReportingCompany.com

T157-2

Newell, Nancy, Commenter ID No. T157 (cont'd)

~~Capital Reporting Company~~

~~101~~

1 we've got to stop it, and we're going to stop it  
2 right here, right now, and you're going to take that  
3 message back, and we're not going to see any more  
4 discussion about more of this at Hanford. We're  
5 going to try to solve the problems. I don't like to  
6 use the word clean up. This stuff you don't clean  
7 up. It's in existence. You hope to God you can at  
8 least contain it in some way. Thank you.

**Nippolt, Sharon, Commenter ID No. W530**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 10:58 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10530

Thank you for your comment, Sharon nippolt.

The comment tracking number that has been assigned to your comment is GTCC10530. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 10:57:34AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10530

First Name: Sharon  
Middle Initial: k  
Last Name: nippolt  
Address: 1635 Tucker Road  
State: OR  
Zip: 97031  
Country: USA  
Email: [toninippolt@gmail.com](mailto:toninippolt@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Save our Columbia River Gorge, a National Treasure! No dumping at Hanford!

W530-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W530-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**North, Roz, Commenter ID No. T81**

Capital Reporting Company

15

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22

MS. NORTH: Hi. I'm Roz North. I live in  
866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

North, Roz - T81



**North, Roz, Commenter ID No. T81 (cont'd)**

Capital Reporting Company

1 Dixon, New Mexico.  
2 I moved from Santa Fe because I wanted to be  
3 upstream from LANL. Then when they had the big Cerro  
4 Grande fire up there, I found that I was downwind from  
5 Los Alamos. So I felt like I couldn't win.  
6 But I want to echo everything that Dee said  
7 because she's seen it first hand, the people there in  
8 our little village many of whom have worked at the lab  
9 for years and year. I think that this waste from the  
10 lab and everywhere else needs to go somewhere outside  
11 of New Mexico, maybe Alaska which has a far smaller  
12 population and a larger area. And if BP and Exxon can  
13 drill up there, we can surely make holes in the ground  
14 to safely contain all of this horrible waste that we've  
15 created.

T81-1

T81-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

DOE also conducted a generic evaluation of commercial disposal facilities on nonfederal lands in the EIS to order to provide, to the extent possible, information regarding the potential long-term performance of other (nonfederal) locations for siting a GTCC waste land disposal facility.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Nusser, Frank & Bonnie, Commenter ID No. L208**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)**

U.S. Department of Energy



**WRITTEN COMMENT FORM**  
Must be received on or before June 27, 2011

Mr.  Mrs.  Ms.  Mr. & Mrs.  Dr.   
 Name: Frank & Bonnie Nusser  
 Title: Nuclear Medicine Imaging Manager  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ p Code: \_\_\_\_\_  
 Phone: 503-571-4974 E-Mail Address: fanusser@comcast.net

*Comment: Hanford already stores enough of the countries radioactive waste. Most of the storage tanks are already leaking and contaminating the groundwater & flowing into the Columbia River. It is too unsafe to handle transport more waste to Hanford & try to store more without serious health risks. The US needs to finish the work being done on the yucca mountain site since it is the safest place to store the material for the 1000's of years it will need to be stored.*

L208-1

L208-2

*Hanford is already the most contaminated site in the US!!*

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

Withhold my name and address from the public record.  
 Withhold only my address from the public record

Comment forms may be mailed to:  
 Mr. Arnold Edelman  
 Document Manager  
 Office of Regulatory Compliance (EM-43)  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0119

Comment form may be faxed to:  
 (301) 903-4303

or sent by electronic mail to:  
 gtccis@eol.gov

L208-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

L208-2 The EIS considered the range of reasonable alternatives for the disposal of the GTCC waste inventory, including disposal in a deep geologic repository. The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS.

J-1360

January 2016

Nusser, Frank & Bonnie - L208

Final GTCC EIS

Appendix I: Comment Response Document

**O'Brien, Michael and Vana, Commenter ID No. W355**

**From:** gtccsewebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 2:18 PM  
**To:** gtccsewebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10355

Thank you for your comment, Michael O'Brien.

The comment tracking number that has been assigned to your comment is GTCC10355. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 02:18:04PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10355

First Name: Michael  
Last Name: O'Brien  
Address: 1905 N Alberta  
City: Portland  
State: OR  
Zip: 97217  
Country: USA  
Email: [obrien@hevanet.com](mailto:obrien@hevanet.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Dear DOE staff,

We are writing to express our strong opposition to the planned trucking shipments of radioactive waste through Northwest communities to Hanford.

We appreciate the challenge that safe handling of nuclear wastes represents for your agency. We believe you can do better than this plan, to reduce the risks of transfer and storage and avoid endangering our health and safety.

Also, Hanford already has a long track record of failures in storing radioactive materials, and there is already a plume of contaminated groundwater moving toward the Columbia River. So the storage plan also needs changes to make it safe.

To protect groundwater and the Columbia River, USDOE should not add any more waste to be buried in landfills or boreholes and the wastes in existing soil trenches and ditches and from tank leaks need to be removed.

Extremely radioactive wastes belong in safer deep underground repositories, not in landfills, boreholes or vaults.

USDOE should disclose and consider the total cumulative impacts of both separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

W355-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W355-2 See response to W355-1.

W355-3 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W355-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

W355-1

W355-2

W355-3

W355-4

**O'Brien, Michael and Vana, Commenter ID No. W355 (cont'd)**

We are copying our Congressional representative and senators on this email.

Thank you for your attention,

Mike and Vana O'Brien

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**O'Brien, William, Commenter ID No. W115**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 7:26 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10115

Thank you for your comment, William O'Brien.

The comment tracking number that has been assigned to your comment is GTCC10115. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 07:26:16PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10115

First Name: William  
Middle Initial: A  
Last Name: O'Brien  
Address: 12520 SW Gem Lane #202  
City: Beaverton  
State: OR  
Zip: 97005  
Country: USA  
Email: [wobobr123@yahoo.com](mailto:wobobr123@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please stop the proliferation of nuclear waste in the Hanford, Washington area that is leaking into the Columbia river. The nuclear waste is dangerous to human health and must be stopped.

W115-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W115-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**O'Brien, William, Commenter ID No. W443**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 4:25 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10443

Thank you for your comment, William O'Brien.

The comment tracking number that has been assigned to your comment is GTCC10443. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 04:24:36PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10443

First Name: William  
Middle Initial: A  
Last Name: O'Brien  
Address: 12520 SW Gem Lane #202  
City: Beaverton  
State: OR  
Zip: 97005  
Country: USA  
Email: [wobobr123@yahoo.com](mailto:wobobr123@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The nuclear radiation leaking from storage tanks at the Hanover WA facility are unexcetable and must stop now. We cannot continue to pollute Washington and the Columbia River with radioactive radiation.

Bill O'Brien

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W443-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W443-1

**O'Connell, Rita, Commenter ID No. E73**

---

**From:** O'Connell Rita <roconnell@taoshospital.org>  
**Sent:** Thursday, April 28, 2011 1:29 PM  
**To:** 'gtcceis@anl.gov'  
**Subject:** comments on

Concerning the draft Environmental Impact Statement (EIS) for the disposal of Greater-Than-Class C (GTCC) low-level radioactive waste and "GTCC-Like" waste:

As a citizen of New Mexico and the world, I strongly believe that the current DEIS is both inadequate and short-sighted when considering the long-term question of how to handle nuclear waste in this country. Temporary and flawed stop-gap measures are NOT an answer – all we are doing, by the current DOE standards, is pushing the problem off onto future generations, which is both cowardly and idiotic.

We need to see a new DEIS that includes a wider variety of solutions, including temporary solutions such as HOSS that will provide safe intermediate solutions while more permanent solutions are developed. We also need to see an expansion in DOE plans to continue improving and monitoring waste-disposal options, and specific, reasonable alternatives need to be determined for disposal of ALL types of waste.

Thank you for your time. I look forward to learning that the DOE has done the right thing – for our current environment and for the future of our world.

*Rita O'Connell*

1

O'Connell, Rita - E73

E73-1

The scope of this EIS is adequate to inform decision-making for the disposal of GTCC LLRW and GTCC-like waste. Sufficient information is available to support the current decision-making process to identify (an) appropriate site(s) and method(s) to dispose of the limited amount of GTCC LLRW and GTCC-like waste identified in the EIS.

DOE believes that this EIS process is not premature and is in compliance with NEPA. On the basis of an assumed starting date of 2019 for disposal operations, more than half (about 6,700 m<sup>3</sup> [240,000 ft<sup>3</sup>] of the total GTCC LLRW and GTCC-like waste inventory of 12,000 m<sup>3</sup> [420,000 ft<sup>3</sup>]) is projected to be available for disposal between 2019 and 2030. An additional 2,000 m<sup>3</sup> (71,000 ft<sup>3</sup>) would become available for disposal between 2031 and 2035. This information is presented in Figure 3.4.2-1. DOE believes this EIS is timely, especially given the length of time necessary to develop a GTCC waste disposal facility.

DOE developed this EIS to support a decision on selecting a disposal facility or facilities for GTCC LLRW and GTCC-like waste, to address legislative requirements, to address national security concerns (especially for sealed sources), and to protect public health and safety. The purpose and need for the proposed action, as discussed above, is stated in the EIS (Section 1.1). The scope of the EIS is focused on addressing the need for developing a disposal capability for the identified inventory of GTCC LLRW and GTCC-like wastes. DOE plans a tiered decision-making process, in which DOE would conduct further site-specific NEPA reviews before implementing an alternative ultimately selected on the basis of this EIS.

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

**Odegard, Corinne, Commenter ID No. W419**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 12:35 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10419

Thank you for your comment, Corinne Odegard.

The comment tracking number that has been assigned to your comment is GTCC10419. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 12:35:20AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10419

First Name: Corinne  
Middle Initial: J  
Last Name: Odegard  
State: WA  
Zip: 98117  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The lack of foresight and common sense shown by even considering a nuclear waste dumping ground of any size near the Columbia River is horrifying and unconscionable. To truck in so much more nuclear waste to this already seriously contaminated site along with all the inherent dangers of the transport itself simply boggles my mind.

PLEASE DON'T DO THIS!

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W419-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W419-1



**Okulam, Frodo, Commenter ID No. W195**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 2:31 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10195

Thank you for your comment, Frodo Okulam.

The comment tracking number that has been assigned to your comment is GTCC10195. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 02:31:28AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10195

First Name: Frodo  
Last Name: Okulam  
Address: 2804 NE 42nd  
City: Portland  
State: OR  
Zip: 97213  
Country: USA  
Email: [frodookulam@hotmail.com](mailto:frodookulam@hotmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Please do not allow transport of more nuclear waste to Hanford Nuclear Reservation. The waste already there is dangerously close to the Columbia River, and cleanup is behind schedule.

The Northwest is due for a major earthquake in the near future, which threatens to compromise present storage sites. A breach caused by an earthquake this close to the Columbia River could be disastrous.

The possibilities for accidents in transport, also right along the river, are far too great to risk.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W195-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Details of the facility accident analysis can be found in Sections 5.3.4.2.1 and C.4.2. All information necessary to duplicate the transportation accident consequence assessment was available in Section 5.3.9.3 of the Draft EIS, with the exception of the source terms used for the contact-handled and remote-handled Other Waste. These latter source terms have been added to Section 5.3.9.3 of the Final EIS.

The accident risk analysis (see Section C.9.3.1) is separate from the accident consequence analysis (see Section C.9.3.3). All relevant data for the accident risk analysis, with the exception of the shipment source terms and route information, are provided in Section C.9.3. Approximately 1,200 routes were considered in this analysis, so it was not considered practical to include this information in the EIS. Such information is readily available by using the TRAGIS routing model, as referenced in Appendix C.

Shipment-specific source terms were determined by dividing the origin source inventory by the number of shipments from that site. Site inventories were published in Sandia (2007, 2008), as referenced in Appendix B, which also contains the per-shipment packaging assumptions for each waste type. The shipment-specific source terms were omitted from the EIS for brevity and because of the low estimated impacts.

W195-1

Ortega, Rebecca, Commenter ID No. T109

Capital Reporting Company

106

1

2

3

4

5

6

7 MR. BROWN: Okay. Rebecca and David Garcia  
8 will be after you.

9 MS. ORTEGA: My name is Rebecca Ortega, and I  
10 am a tribal member from --

11 MR. BROWN: Can you move the mic down just a  
12 little?

13 MS. ORTEGA: Oh.

14 MR. BROWN: That's good. Thank you.

15 MS. ORTEGA: I'll start again. (Speaking in  
16 foreign language.) Can you hear me? (Speaking in  
17 foreign language.)

18 My name is Rebecca Ortega, and I am from Santa  
19 Clara Pueblo. I'm a tribal member from Santa Clara  
20 Pueblo, and I come today here to speak with all of you  
21 out of respect for our Mother Earth and for all of us  
22 here because here in New Mexico we as Native Americans

866.488.DEPO  
www.CapitalReportingCompany.com

Ortega, Rebecca - T109

**Ortega, Rebecca, Commenter ID No. T109 (cont'd)**

Capital Reporting Company

107

1 and as Spanish people and all the people that are here,  
2 we are indigenous people to our country here in the  
3 United States of America and particularly here in New  
4 Mexico.

5 Let's see. Where am I?

6 My -- my -- my question is: did we not learn  
7 from what we've been watching on TV what happened in  
8 Japan? Did we not learn; did we not see all these  
9 people destroyed, torn away from their homes, from  
10 their homeland? Because to me northern New Mexico,  
11 this is our homeland. Where else are we going to go?

12 Are we all going to move to Connecticut if New Mexico  
13 is condemned? Do you think we can all move to Texas or  
14 maybe to -- I don't know -- Montana or I don't know.  
15 Where would we go, you know?

16 If we do not stand up for ourselves, if we do  
17 not protect our homeland, then who do we have to blame?  
18 What are we going to say when our children and our  
19 grandchildren are born in the coming generations, in  
20 the decades that we're talking about, when, oh, well,  
21 none of this stuff will show up for decades?

22 Okay. Well, who's going to be here then?

866.488.DEPO  
www.CapitalReportingCompany.com

T109-1

T109-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

J-1369

January 2016

Final GTCC EIS

Appendix I: Comment Response Document

Ortega, Rebecca, Commenter ID No. T109 (cont'd)

T109-2 See response to T109-1.

Capital Reporting Company

108

1 Probably we're going to be in our 80s and 90s maybe.  
2 Our grandchildren will be here, and what are they going  
3 to say to us? "Mom, Dad, Grandma, Grandpa, how come  
4 you didn't take care of our -- our -- our land? Why  
5 are we sick? Why is it that we have no money to go for  
6 medical care? How come the government cut back all  
7 Indian Health Service? How come the government cut  
8 back Medicare and all the health programs?"

9           And what are we going to say? What's going to  
10 happen? The government people, do you know where  
11 they've all gone with their big money? They've all  
12 moved to Dubai. They're all living in heaven over  
13 there. And what about us?

14           You know, I really think that this just not --  
15 no common sense to this whole thing. It's so  
16 ridiculous, and for myself, I say absolutely no. We do  
17 not accept anybody else's waste from another state. We  
18 shouldn't even be having to deal with the waste from  
19 Los Alamos. Why should we?

20           (Applause.)

21           MS. ORTEGA: You know, you talk about  
22 promises. You talk about the government will take care

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T109-2

Ortega, Rebecca, Commenter ID No. T109 (cont'd)

T109-3 See response to T109-1.

Capital Reporting Company

109

1 of it. Guess what. They haven't. We have so many  
2 broken promises.

3 On top of that, have you guys been watching  
4 World News with Diane Sawyer? What's happening? We're  
5 all suffering, oh, \$3.56, maybe some parts of New  
6 Mexico \$4.00 per gallon, but guess what. A small two  
7 second blurb on World News. Oh, the oil companies are  
8 making a \$2.5 billion profit, up to \$5 billion profit.  
9 What about the rest of us? We're suffering.

10 How many people are afraid right now. We  
11 can't go anywhere; we can't do anything. They can  
12 barely make it to work, maybe on fumes, but guess what.  
13 The oil companies are making good money. They have a  
14 \$2.5 billion profit. If you don't believe me, go to  
15 World News. Check out Diane Sawyer. I think it was  
16 just this past week.

17 So tell me how much can we really trust the  
18 government when they say, "Oh, we're bringing in this,  
19 this waste and don't worry. We've taken care of it.  
20 It's not going to affect you." I don't have that trust  
21 in them, and I'm saying absolutely not. We do not  
22 accept anybody else's waste. Let them take care of it

T109-3

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

Ortega, Rebecca, Commenter ID No. T109 (cont'd)

~~Capital Reporting Company~~

110

1 in their own state or wherever they processed it,  
2 wherever they made their money. Let them deal with it.  
3 I don't want any part of it.

4 I don't want it for myself. I don't want it  
5 for my tribe. I don't want it for my kids. I don't  
6 want it for my grandchildren, my great grandchildren or  
7 even future generations.

8 The other --

9 MR. BROWN: You've got a little less than a  
10 minute.

11 MS. ORTEGA: The other most important thing  
12 that I want to talk about is being that I am from Santa  
13 Clara Pueblo, we live together and we speak our  
14 language and we sing our songs and we have our dances.  
15 We have our traditions. We have our culture.

16 Now, if Los Alamos says, "Okay. You know  
17 what? All you people from Santa Clara, sorry to tell  
18 you but your land is condemned, and for your own safety  
19 you're going to have to move on to other places," who  
20 is going to accept two to 3,000 of us to come together  
21 so that we can continue our traditions, our culture,  
22 our dances and our language? Where are we going to go?

866.488.DEPO  
www.CapitalReportingCompany.com

T109-3  
(Cont.)

1           So I think there's a lot at stake for all of  
2 us here, and what I would like to say is respect for  
3 life is above and beyond. Respect for each other,  
4 absolutely necessary. Respect for our children, we are  
5 the mothers. We are the fathers. We are the  
6 caretakers. Absolutely respect for our children, and  
7 respect for our Mother Earth because she sustains us,  
8 and above and beyond everything, respect for what our  
9 Lord has given us. He has given us this to cherish, to  
10 use, and to respect.

11           So you know what? We all need to think about  
12 that. Is it the almighty dollar or is it respect for  
13 our families, our future generations, and respect for  
14 what our beautiful Lord has given us and blessed us  
15 with?

16           MR. BROWN: Okay.

17           MS. ORTEGA: Thank you.

**Osterman, Norm L., Commenter ID No. W420**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 12:59 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10420

Thank you for your comment, Norm Osterman.

The comment tracking number that has been assigned to your comment is GTCC10420. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 12:58:29AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10420

First Name: Norm  
Middle Initial: L  
Last Name: Osterman  
Address: PO Box 1535  
City: Walla Walla  
State: WA  
Zip: 99362  
Country: USA  
Email: [nosterman@hotmail.com](mailto:nosterman@hotmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

1. Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed. Radioactive waste is already moving toward the Columbia River. You would be putting the whole area and all the towns and cities from Hanford to the Pacific, including Portland and Vancouver, in jeopardy. W420-1
2. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults. W420-2
3. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes. W420-3

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W420-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W420-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W420-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.



**Panfilio, Carol, Commenter ID No. W344**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Wednesday, June 22, 2011 11:06 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10344

Thank you for your comment, Carol Panfilio.

The comment tracking number that has been assigned to your comment is GTCC10344. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 22, 2011 11:05:58PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10344

First Name: Carol  
Last Name: Panfilio  
Address:  
City:  
State: ^  
Zip:  
Country: USA  
Email: [madyapan@yahoo.com](mailto:madyapan@yahoo.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
Regarding: Greater-Than-Class C Low-Level Radioactive Waste (GTCC LLRW) EIS process

Just what is it going to take for the citizens of the Northwest to have safe water, when the government agencies that are to protect us completely ignore the urgency of the clean-up of Hanford Waste?  
Where is the Spirit of America?  
We must have agencies that want to move forward with the most expedient cleanup.

W344-1

We need the Disposal of Radioactive & Hazardous Waste to be disposed into lined trenches.  
Hanford agencies have been given Billions of dollars for clean-up by the citizens of the United States of America. These citizens expect these funds to be used effectively and wisely....not squandered on frivolous experiments.

W344-2

To abandon the contamination which leaked from the High-Level Nuclear Waste Tanks would be criminal because it is shown to be flowing rapidly towards the Columbia River and has been for decades.

I want to see the closure of the SST system, do NOT bring more nuclear waste to Hanford, and absolutely NO transporting of NUCLEAR WASTE along our highways.

W344-3

Carol Panfilio

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

- W344-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.
- W344-2 See response to W344-1.
- W344-3 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

MR. BROWN: Thank you. Our next speaker is

24

Carol Panfilio, and Ethan Scarl will be after Carol.

25

MS. PANFILIO: I'm from Vancouver, Washington.

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Panfilio, Carol, Commenter ID No. T156 (cont'd)**

Capital Reporting Company

87

1 The Department of Energy has a long history of  
2 careless irresponsibility with regards to toxic and  
3 hazardous waste disposal. What are the number of  
4 lives that you feel are expendable through death or  
5 illness in carrying hazardous loads of highly  
6 radioactive waste on roads greatly populated in  
7 Washington, Oregon, and the rest of the country?  
8 I say no lives should be lost or illness given  
9 with the negligent and unnecessary movement of  
10 nuclear waste and extra storage of toxic materials.  
11 Tesla, come back. Where are you?

T156-1

T156-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

**Parker, Michael D., Commenter ID No. W138**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 8:34 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10138

Thank you for your comment, Michael Parker.

The comment tracking number that has been assigned to your comment is GTCC10138. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 08:33:50PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10138

First Name: Michael  
Middle Initial: D  
Last Name: Parker  
Address: PO Box 56  
City: Oysterville  
State: WA  
Zip: 98641  
Country: USA  
Email: [michaelparkerovsterville@yahoo.com](mailto:michaelparkerovsterville@yahoo.com) Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please do not permit radioactive waste to be transported through the Columbia River Gorge. I've been driving and flying through the Gorge since 1937 and have witnessed the evolving degradation of this national treasure.

Please make a wise and responsible decision and do not permit this material within the Gorge. If allowed it will eventually cause a tragic event.

Thank you,

Michael Parker

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

1

W138-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

W138-1

Parker, Michael D. -- W138

**Parker, Michael D., Commenter ID No. W374**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 4:05 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10374

Thank you for your comment, Michael Parker.

The comment tracking number that has been assigned to your comment is GTCC10374. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 04:04:57PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10374

First Name: Michael  
Middle Initial: D  
Last Name: Parker  
Address: PO Box 56  
City: Oysterville  
State: WA  
Zip: 98641  
Country: USA  
Email: [michaelparkeroysterville@yahoo.com](mailto:michaelparkeroysterville@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Please no trucking of nuclear waste through the Gorge. Surely in the future an accident will occur with tragic results.

Stop any further consideration for shipping this dangerous waste. I've been traveling through the Gorge since 1937 both as a pilot and driving. Over the years I've witness the slow destruction of this incredible naturl feature.

Thank you.

Michael Parker - Oysterville, WA 98641

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

1

W374-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Patten, Colleen, Commenter ID No. W520**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 1:21 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10520

Thank you for your comment, Colleen Patten.

The comment tracking number that has been assigned to your comment is GTCC10520. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 01:21:00AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10520

First Name: Colleen  
Middle Initial: C  
Last Name: Patten  
Address: 720 June Street  
City: Hood River  
State: OR  
Zip: 97031  
Country: USA  
Email: [colleenpatten@gmail.com](mailto:colleenpatten@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
The risks are too high!!

W520-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W520-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Paulson, Lauren, Commenter ID No. T180**

Capital Reporting Company

36

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

MR. BROWN: Lauren Paulson, and then Jan Castle.

MR. PAULSON: My name is Lauren Paulson, and I'm

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

Paulson, Lauren - T180

**Paulson, Lauren, Commenter ID No. T180 (cont'd)**

Capital Reporting Company

37

1 from Aloha. My story is going to make you cry. It's  
2 about a love story. It's a love story about the  
3 Columbia River. I first got acquainted with the  
4 Columbia River in 1965 and hung out with somebody  
5 that rented a houseboat. 1970 I bought my houseboat  
6 and faced a group like this with the League of Women  
7 Voters when the government and the Port of Portland  
8 wanted to expand the airport into the Columbia River.  
9 The League of Women Voters won that fight. In 1995 I  
10 bought the home of my dreams on the Columbia River  
11 out by St. Helens across the river from Woodland.  
12 And I'm sitting on my deck one day, and I noticed a  
13 rather sinister looking barge coming up the Columbia  
14 River towing a platform with a tarp over it and a  
15 gunboat lurking close by. What do you suppose that  
16 was? A nuclear reactor from a submarine. It took me  
17 a while to find out what that was.

18 So I started coming to meetings like this and  
19 learned something else. There's a plume coming close  
20 to my river. And the more I looked into it, the more  
21 I couldn't find out how close it was coming. So I  
22 don't know if anybody here knows the answer to that,  
23 but I would love to find out how close that nuclear  
24 plume is coming to the Columbia River.

25 A couple more things. After 9/11 something even

866.488.DEPO  
www.CapitalReportingCompany.com

T180-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

T180-1



**Paulson, Lauren, Commenter ID No. T180 (cont'd)**

Capital Reporting Company

1 more sinister was occurring around these gunboats and  
2 barges coming up the Columbia River by St. Helens.  
3 They were having commando exercises, apparently, to  
4 protect homeland security against anybody raiding  
5 these nuclear -- it didn't say anything about that in  
6 the Oregonian. I finally decided it was time to  
7 leave the Columbia River, and I did.  
8 A couple more things. This is a story of  
9 surprises. A couple months ago I'm dropping off a  
10 radical newspaper at Reed College, and I picked up  
11 their school newspaper. How many of you know that  
12 Reed College has a nuclear reactor? I didn't. How  
13 many of you know they got a delivery just a couple  
14 months ago? So that's my story. It's a story of a  
15 love of the Columbia River, and I hope we can keep it  
16 unradioactive.

T180-2

T180-2 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Peck, Susan, Commenter ID No. E94**

**From:** Susan Peck <speek@peak.org>  
**Sent:** Monday, June 27, 2011 3:40 PM  
**To:** gtccsis@anl.gov; gtccsis@anl.gov  
**Subject:** proposal for Hanford nuclear dump

To whom it may concern:

Hanford is already the site of too much radioactive waste, and it sits dangerously close to the Columbia River, upstream of several towns and cities, including Portland OR and Vancouver WA. I strongly oppose the plan to send 12,600 truckloads of radioactive waste to Hanford, via highways and interstates running through Oregon and Washington.

E94-1

US-DOE should consider locating all radioactive wastes in deep underground repositories in geologically stable formations. US-DOE should phase out any nuclear programs that will generate additional waste, there is already enough waste around the world to endanger the environment and all life for thousands and thousands of years. The ongoing disaster at Fukushima, the past disasters at Three Mile Island and Chernobyl, and the potential disasters at Ft. Calhoun, Diablo Canyon, and Indian Point plants should be enough to warrant the phasing out of all uses of nuclear energy generation. There is no economic reason to generate power with nuclear fission; no plant runs without subsidies, and all plants are uninsurable due to the extreme dangers posed by natural phenomena as well as terrorist threats.

E94-2

Sincerely  
Susan E. Peck  
2728 SE 52nd Ave, apt C  
Portland, OR 97206

Please withhold my address from the public record. Thank you

E94-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

E94-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.



DRAFT ENVIRONMENTAL IMPACT STATEMENT for the DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL RADIOACTIVE WASTE AND GTCC-LIKE WASTE (DOE/EIS-0375-D) U.S. Department of Energy

received DEC 9 - 2011

WRITTEN COMMENT FORM Must be received on or before June 27, 2011

Mr. Mrs. Ms. X Mr. & Mrs. Dr. Name: MARTHA ORINA SCHONICHIN PEREZ Title: ENROLLED LEADER MEMBER OF THE KUMATH TRIBES OF OREGON? Organization: GENERAL POLITICAL ACTIVIST Address: 920 NW KEARNEY ST # 110 City: PORTLAND State: OR Zip Code: 97209-3455

Phone: (503) 954-8653 E-Mail Address: MARTHAOPEREZ@YAHOO.COM Comment: I speak for 40K urban Indians, who already suffer from air pollution & obesity. CONCERN FOR THREE NATIVE AMERICAN TRIBES THAT WOULD BE IMPACTED BY ADDITIONAL DISPOSAL OF ANY CLASS MATERIAL ADDITIONALLY IMPOSED AS A RESULT (AND AS A CONSEQUENCE OF) DISPOSAL OF MATERIALS ON HANFORD SITE. NEED TO ADD CONSIDER TO BEST ADDITIONAL PUNING TO PROVIDE FOR WILD GOVERN PROTECTIVE EFFORTS. I SUPPORT NO ACTION PROPOSAL. EIS NEED TO IMPROVE ANALYSIS ON IMPACT ON Salmon & other anadromous fish population adjacent to Hanford Dam. (granite shield) (kale bones of those million ton Refracts or granite shield)

WITHHOLDING OF PERSONAL INFORMATION: Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record. Withhold only my address from the public record

Comment forms may be mailed to: Mr. Arnold Edelman, Document Manager, Office of Regulatory Compliance (EM-43), U.S. Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585-0119. Comment form may be faxed to: (301) 903-4303. or sent by electronic mail to: gtceis@anl.gov

L277-1 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

L277-2 All relevant potential exposure pathways were considered in the analyses presented in the EIS, including impacts to ecological resources (see Section 6.2.5).

J-1385

January 2016

**Perez, Martha, Commenter ID No. L277 (cont'd)**

In addition, I suspect that these matters of national, and security ~~requirements~~, shall need to continue to be referred via legal means, not excluding the following actions be taken:

(State or Federal) Court imposed injunction on any trucks containing any and all class materials (including, and not limited to: class A, B, and C hazardous materials); (U)

(Draft) EIS need additional analysis re: impact on all anadromous fish populations, including salmon (wild) populations;

EIS need additional analysis re: impact on all surrounding vegetation, flora, and fauna (aquatic/land based) plant based habitat;

EIS needs additional analysis re: impact, or potential impact, thereof, on Commerce Considerations (impact and safety of highway transportation systems, including both State + Federal);

EIS needs additional analysis re: impact on animal habitations or ecosystems and <sup>economic</sup> costs associated with relocation, and/or loss of animal species habitat ecosystems associated therein.

State of WA can challenge permit process that will keep additional shipments of class hazardous material to be sent to Hanford site. (U)

I am a former employee of BPA-Pak district (EE) and while I am proud of my civil services, I learned about our successes, but also where we are having significant limitations on how to be responsible stewards of our existing resources (nuclear waste).

L277-3 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations.

L277-4 All relevant potential exposure pathways were considered in the analyses presented in the EIS, including impacts to ecological resources (see Section 6.2.5). These analyses addressed a range of reasonable scenarios and estimated the potential impacts on all environmental resources consistent with NEPA requirements.

L277-5 NEPA review to support any final siting of a GTCC waste disposal facility would have to address all applicable Federal, state, and local regulations.

L277-3

L277-4

L277-5

J-1386

January 2016

**Perez, Martha, Commenter ID No. W42**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, May 19, 2011 2:48 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10042

Thank you for your comment, Martha Perez.

The comment tracking number that has been assigned to your comment is GTCC10042. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 19, 2011 02:47:56PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10042

First Name: Martha  
Middle Initial: O  
Last Name: Perez  
Organization: General Political Activists  
Address: 920 NW Kearney ST APT # 110  
City: Portland  
State: OR  
Zip: 97209  
Country: USA  
Email: [marthaoperez@yahoo.com](mailto:marthaoperez@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I will be at the hearing on Thursday, May 19th at the Doubletree Lloyd Center in Portland, Oregon.

When I found out about the Japan earthquake and subsequent nuclear crisis unfolding, I was terrified. My co-worker has a son who is stationed in the areas near Japan (Navy) where the disasters are still taking place.

W42-1

Here in the greater Pacific NW, I am concerned that a similar event could take place, because our region is included in the "ring of fire" and while it is rare for strong earthquakes to occur here, it is still a potential concern.

W42-2

Our highways are an important transportation commerce system, and if they were to be shut down, due to a significant disaster (chemical or otherwise) our economy would definitely be affected. We must do all we can, to take precautions, and to heed the lessons of Japan. Thank you.

W42-1  
(Cont.)

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W42-1 Seismicity was a factor considered in identification of the preferred alternative in the EIS. A description of the seismicity of the Hanford site can be found in Section 6.1.2.1.4 of the EIS.

W42-2 See response to W42-1.

1

2

3

MR. BROWN: Robert Weisman will follow you.

4

MS. PEREZ: Okay. Thank you. My name is Martha

5

Orta Schonchin Perez. I'm a descendant of Chief

6

Schonchin of the Klamath Tribes of Southern Oregon.

7

I'm a general political activist. I'm a former

8

employee of Bonneville Power Administration Energy

9

Efficiency Office of the Portland branch.

10

I am here to speak on behalf of 40,000-plus

11

urban Indians who already suffer disproportionate

12

rates of diabetes and obesity. Hence, my concern for

13

the three Native American tribes that would be

14

impacted by additional disposal of any class

15

materials additionally imposed as a result, and as a

16

consequence, of disposal of materials on the Hanford

17

site or any site. We need to insist to Congress to

18

secure additional funding for the granite shield and

19

reallocate nuclear tax refunds and invest in the

20

north granite shield now.

21

The Draft EIS and the Final EIS is inadequate.

22

And pretty much, when I'm talking about fish

23

populations, when I talk about impact on surrounding

24

vegetative, flora and fauna, aquatic and

25

land-based/plant-based habitat, the EIS is

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T158-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

T158-2 All relevant potential exposure pathways were considered in the analyses presented in the EIS, including impacts to ecological resources (see Section 6.2.5).

T158-1

T158-2

**Perez, Martha, Commenter ID No. T158 (cont'd)**

Capital Reporting Company

1 inadequate. In addition to how it's impacting our  
2 commerce considerations, impacting safety of highway  
3 transportation systems, including both state and  
4 federal. The impact on animal habitations and  
5 ecosystems and economic costs associated with  
6 relocation, destruction, and our loss of animal  
7 species, habitat, ecosystems, associated areas, per  
8 EPA law.

9 I am a former employee and want you to know that  
10 while I'm proud of my civil service, I learned about  
11 where we are having significant limitations on how to  
12 be responsible stewards of our existing resources,  
13 which includes nuclear waste, and how to be good  
14 stewards and proper stewards in dealing with that  
15 mess.

16 You know, the state of Washington can challenge  
17 the permit process that will keep additional  
18 shipments of class hazardous materials to be sent to  
19 Hanford site. In addition, I would advocate and  
20 argue that these matters of national and regional  
21 security shall need to continue to be referred via  
22 legal means, not excluding the following actions be  
23 taken. And there's so many, but I'll just talk about  
24 one.

25 A state or federal court imposed injunction on

866.488.DEPO  
www.CapitalReportingCompany.com

T158-2  
(Cont.)

T158-3

T158-3 NEPA review to support any final siting of a GTCC waste disposal facility would have to address all applicable Federal, state, and local regulations.

**Perez, Martha, Commenter ID No. T158 (cont'd)**

**Capital Reporting Company**

60

- 1 any trucks containing any and all class material,
- 2 including, but not limited to, class A, B, and C
- 3 hazardous material. Thank you.



**Perla, Andrew, Commenter ID No. W1**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, March 17, 2011 12:21 AM  
**To:** mail\_gtceisarchives  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10001

Thank you for your comment, Andrew Perla.

The comment tracking number that has been assigned to your comment is GTCC10001. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: March 17, 2011 12:20:46AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10001

First Name: Andrew  
Middle Initial: J  
Last Name: Perla  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [aperla@yahoo.com](mailto:aperla@yahoo.com)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I think that the EIS should include an economic assessment, such as the potential for local job creation, new business opportunities related to waste handling, demand for skilled and semi-skilled labor, etc.

W1-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W1-1

The estimated costs associated with the construction and operation of GTCC waste disposal facilities at each of the sites – including costs for direct and indirect labor, equipment, materials, services, and subcontracts – are included in the assessment of each waste management alternative in the EIS. The cost estimates for the land disposal methods are based on a conceptual design of the disposal facility and could increase with actual implementation. Costs shown for WIPP are based on actual costs experienced to date and reflect construction and operation costs of an operating geologic repository. The economic analysis in the EIS addresses the potential economic impacts, including potential impacts resulting from migration of workers or their families during the construction period, and any consequent impacts on housing, public finances, public service employment, and traffic.

**Perslin, Clemence, Commenter ID No. W130**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 8:10 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10130

Thank you for your comment, Clemence Perslin.

The comment tracking number that has been assigned to your comment is GTCC10130. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 08:09:34PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10130

First Name: Clemence  
Middle Initial: C  
Last Name: Perslin  
City: Vancouver  
State: WA  
Zip: 98686  
Country: USA  
Email: [Wayneperslin@aol.com](mailto:Wayneperslin@aol.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Please do not bring MORE nuclear waste into my state. The existing waste at Hanford is already a threat to the Columbia River and to "downwinders." Hanford is already the most contaminated site in the Western hemisphere. The Department of Energy is considering a proposal to bring more radioactive waste in. I'm told 12,600 truckloads of "extremely radioactive waste" would come through Oregon and Spokane to Hanford, if Hanford is chosen. This is "more than 4 trucks a day, every day, for over twenty years."

W130-1

We should NOT have to be exposed to this dangerous material. It should NOT be sent to Hanford.

Thank you.

Sincerely,  
Clemence Perslin

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W130-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Peters, Douglas, Commenter ID No. W246**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 12:06 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10246

Thank you for your comment, DOUGLAS PETERS.

The comment tracking number that has been assigned to your comment is GTCC10246. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 12:06:24PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10246

First Name: DOUGLAS  
Middle Initial: D  
Last Name: PETERS  
State: WA  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
THE COLUMBIA RIVER GORGE needs protection in many ways. One important way is to prohibit the transportation of nuclear waste within the Gorge. I support that prohibition.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W246-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

W246-1

Peters, Rod, Commenter ID No. T55

Capital Reporting Company

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

MR. BROWN: Rod Peterson -- and he will be followed by Niyol Tsinhanhjinnie.

MR. PETERSON: My name is Rod Peters and I've been a resident here in the Albuquerque area since 1950. My background is in engineering and geology. I attended school in -- geology at New Mexico School of Mines, the Colorado of Mines, the University of Wisconsin. I worked at a WIPP site. I've worked all over the Nevada test site under various contracts for the AEC. The consulting engineering firm I was with

866.488.DEPO  
www.CapitalReportingCompany.com

Peters, Rod - T55

**Peters, Rod, Commenter ID No. T55 (cont'd)**

Capital Reporting Company

21

1 had the contracts and I was the project engineer in the  
2 field.

3 And, I'm here tonight to -- kind of wondering  
4 what -- why we spent all this additional money looking  
5 at new sites when since -- in 19 -- in 2002, Congress  
6 designated the Yucca Mountain site as the permanent  
7 storage site for highly radioactive nuclear power plant  
8 waste. And, in the past two decades, more than \$13  
9 billion was spent on -- on the Yucca Mountain project.

10 And, since 1983, that's 28 years more or less,  
11 portions of most of our electric bills have gone into a  
12 fund to build and operate a permanent storage site for  
13 the nuclear power plant waste, which could include all  
14 this other waste we're talking about tonight. And, in  
15 March 2009, it leaked out at a Senate Energy Commission  
16 hearing, I believe, that no more funds would be spent  
17 on the Yucca Mountain site. And, what's wrong with the  
18 Yucca Mountain site, Mr. Chu -- Senator John McCain  
19 asked -- asked the Energy Secretary. Chu's answer was,  
20 "We have nothing concrete in mind, just a new  
21 comprehensive study, some kind of new strategy." Well,  
22 that's what's being presented here tonight I believe.

866.488.DEPO  
www.CapitalReportingCompany.com

T55-1

T55-1

The EIS considered the range of reasonable alternatives for the disposal of the GTCC waste inventory, including disposal in a deep geologic repository. The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS.

**Peters, Rod, Commenter ID No. T55 (cont'd)**

Capital Reporting Company

22

1 I pulled up on the Internet about 21  
2 publications by the U.S. Geological Survey relating to  
3 the Yucca Mountain radioactive waste storage project.  
4 Reports covering the span from 1968 through 2008, and  
5 they'd probably fill half this room. And, most of the  
6 geologists that worked over that long span of years, on  
7 the Yucca Mountain project, were in favor of that being  
8 a permanent storage site for high radioactive nuclear  
9 fuels.

10 And -- I'm going through my notes here.  
11 Giving up the Yucca Mountain site is a threat to public  
12 health and the environment. Nearly 60,000 tons of used  
13 radioactive fuel will allow -- continue to be stored in  
14 pools of water at reactor sites all over the country.  
15 And, I have an editorial here that appeared in the  
16 Albuquerque Journal on March 7, 2009, regarding storage  
17 of nuclear waste, and I'll give that to the person  
18 here.

19 And, I've heard reference to nuclear power --  
20 building nuclear power plants and using nuclear power  
21 is going to kill everybody on earth. We've had nuclear  
22 power plants on submarines in our Navy for 60 years and

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T55-2 See response to T55-1.

T55-3 Comment noted.

T55-2

T55-3

**Peters, Rod, Commenter ID No. T55 (cont'd)**

T55-4      Comment noted.

Capital Reporting Company

1 there's never been a single fatality on these nuclear  
2 submarines that have been roaming the planet's oceans  
3 in that long period of time.  
4            Los Alamos is currently working on small  
5 nuclear power plants, small units that can be used by  
6 our military in remote areas and could be sited  
7 anywhere in the country or anywhere in the world for  
8 energy, electrical energy for small communities. And,  
9 I just believe that we've got to continue developing  
10 our nuclear power. Wind and solar are not going to --  
11 are not going to do the job. And, that's about all I  
12 have to say. I'm glad to have been here.

T55-3  
(Cont.)

T55-4

**Peterson, Andrew, Commenter ID No. W171**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 10:53 PM  
**To:** mail\_gtccisarchives; gtcciswebmaster@anl.gov; gtccis@anl.gov  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10171  
**Attachments:** nuke\_waste\_GTCC10171.txt

Thank you for your comment, Andrew Peterson.

The comment tracking number that has been assigned to your comment is GTCC10171. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 10:52:58PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10171

First Name: Andrew  
Last Name: Peterson  
Address: 3146 SE 54th Ave  
City: Portland  
State: OR  
Zip: 97206  
Country: USA  
Email: [adpete@xpirt.net](mailto:adpete@xpirt.net)  
Privacy Preference: Don't withhold name or address from public record  
Attachment: nuke\_waste.txt

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.



**Peterson, Andrew, Commenter ID No. W171 (cont'd)**

A problem that has been plaguing the United States for decades is where to store all that nuclear waste, from our reactors and weapons program, in a safe place where it won't destroy the lives of many people if it springs a leak. The fact is, there is nowhere that we can put it that is really safe.

Obviously, Hanford already has serious problems, and I don't believe they need any more. I think it is a bad location, primarily because of the proximity to a major river, and the fact that leaking waste is already heading toward the river.

Sometime before he died, my father told me about a phone call one late afternoon at his office (he worked for ETAC ... part of the Air Force weather arm ... at the Navy Yard in Washington DC). He was the only person still in the office, when the call came in. The caller wanted to know what he could tell him about the seismic activity in the Washington Cascades. It turned out that they were looking for a place for long term storage of nuclear waste ... a search that eventually settled on Yucca Mountain, in Nevada. That idea seems to have (finally) ultimately died, because of the resistance to placing the waste site that close to a large city.

The idea of the Cascades never made much sense to me, because they're on the "rim of fire", with several active volcanoes. But it seems to me that there are places that would be better suited, simply because they are a long way from population centers, and not located along any fault lines, as far as I know.

What about the center of Nevada, away from population areas, or that big basin in Wyoming, where I-80 crosses the Continental Divide twice, because the basin doesn't drain to anywhere. These areas have very low population density. If you look at a map of the United States at night, you can see where there is a very low density of population. SE Oregon and northern Nevada stand out for the lack of lights, as do some others. Texas has a lot of wide-open spaces ... maybe you could bury it in George Bush's back yard.

Looking at a population density map, there are lots of areas east of the Mississippi River that have less than 4 people per square mile ... less than you'll find around Hanford. Surely you can find one that doesn't have a major river beside it.

Andrew Peterson  
Portland OR

W171-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W171-2 Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

W171-1

W171-2



DRAFT ENVIRONMENTAL IMPACT STATEMENT for the DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL RADIOACTIVE WASTE AND GTCC-LIKE WASTE (DOE/EIS-0375-D)

U.S. Department of Energy

WRITTEN COMMENT FORM Must be received on or before June 27, 2011

Mr. X Mrs. Ms. Mr. & Mrs. Dr. Name: Ralph L. Phelps Title: Private citizen Organization: Retired Address: 119 Piedra Loop City: Los Alamos State: NM Zip Code: 87544 Phone: 505 672 9154 E-Mail Address: phelpsqst@earthlink.net

Comment: The EIS assumes a volume of 2,000 m^3 for activated metals. In fact, this volume may be much greater. Currently, many nuclear power plants have replaced steam generators and pressurizers, which are stored on-site in vaults. To comply with ALARA, it will not be possible to separate the high activity tubes and tubesheet from the shell. I estimate between 70 and 100 of these SG in storage, and based on their size, could represent 5 million m^3 of waste. This has the potential to <over>

WITHHOLDING OF PERSONAL INFORMATION: Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record. Withhold only my address from the public record

Comment forms may be mailed to: Mr. Arnold Edelman Document Manager Office of Regulatory Compliance (EM-43) U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585-0119

Comment form may be faxed to: (301) 903-4303 or sent by electronic mail to: gtceis@anl.gov

L418-1 Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

The estimated costs associated with the construction and operation of GTCC waste management facilities at each of the sites - including direct and indirect labor, equipment, materials, services, and subcontracts - are included in the assessment of each waste management alternative in the EIS. The economic analysis in the EIS addresses the potential economic impacts, including potential impacts resulting from migration of workers or their families during the construction period, and any consequent impacts on housing, public finances, public service employment, and traffic.

L418-1

Phelps, Ralph L., Commenter ID No. L418 (cont'd)

affect a decision on GTCC disposal location. Conversely, in the evaluation of cost impact for disposal, the costs associated with separation of tubes and tubesheet from shell in SG must be factored in, including the cost in ALARA to workers and development of required remote tooling. This may also affect a site decision.

Recommendation: modify the EIS for GTCC waste to anticipate the need for sufficient storage area to accommodate over 5 million m<sup>3</sup> and reevaluate the expected activated metal waste from future decommissioning of nuclear plants to anticipate the quantity and costs of ~~the~~ methods for compliance with ALARA requirements.

Recommendation: Do not plan to leave these components (SG) in place and do nothing. The Federal Government is obligated to take and dispose of this waste.

L418-1  
(Cont.)

**Philips, Sally, Commenter ID No. W461**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 8:17 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10461

Thank you for your comment, Sally Phillips.

The comment tracking number that has been assigned to your comment is GTCC10461. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 08:17:09AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10461

First Name: Sally  
Last Name: Philips  
Address: 4651 NE Killingsworth #22  
City: Portland  
State: OR  
Zip: 97218  
Country: USA  
Email: [sally.philips@gmail.com](mailto:sally.philips@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
This is an insane plan that puts millions of people and our water resources at risk. It is not suitable to locate nuclear waste so near a vital body of water (haven't we learned anything from Fukushima?), nor is it responsible to truck it through major metropolitan areas. Please make another choice. I don't need to be an expert to know that nuclear wastes should only be located away from water resources and major fault lines.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W461-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W461-1

**Pierce, Susan, Commenter ID No. W90**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Monday, June 13, 2011 11:39 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10090

Thank you for your comment, Susan Pierce.

The comment tracking number that has been assigned to your comment is GTCC10090. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 13, 2011 11:38:37PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10090

First Name: Susan  
Last Name: Pierce  
State: OR  
Zip: 97060  
Country: USA  
Email: [susibtraveln@yahoo.com](mailto:susibtraveln@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

As is exemplified by Fukushima, while we "think" we can control nuclear energy, we OBVIOUSLY can not! The hazards of the waste material is well known, and to take such dangerous materials on public roads and face the dangers that driving can create, is incredibly irresponsible.

Please do NOT allow the transport of hazardous nuclear waste to the northwest, and let's continue to look into alternative greener energy sources! Thank you.

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W90-1

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W90-1

**Piet, Steve, Commenter ID No. T19**

T19-1 Changes to the radioactive waste classifications are outside the scope of the EIS.

1  
2  
3  
4  
5 MR. BROWN: The court reporter. Thank you.  
6 Stevan will be followed by Darryl Siemer.  
7 STEVAN PIET: Hello. The first thing I have  
8 to do is pronounce my name correctly. It's Steve  
9 Piet.  
10 MR. BROWN: Piet. Okay.  
11 STEVAN PIET: Don't worry about it. Everyone  
12 gets it wrong. It's great because when I get a  
13 telemarketer call at home, I know it's not a friend  
14 or a relative.  
15 I have four points. Number one, it is  
16 high time that the nation had a waste management  
17 classification system based on the characterization  
18 of waste and not the source. When you read these  
19 sorts of documents, this thing is coming from here,  
20 it's coming from there, it's DOE, it's NRC, it's  
21 commercial, it's high-level waste. That's garbage.  
22 You've got to have a clear, unambiguous, consistent  
23 characterization-based waste management  
24 classification scale.  
25 Point number two, my reaction to the

T19-1

Piet, Steve - T19

**Piet, Steve, Commenter ID No. T19 (cont'd)**

1 various alternatives. I oppose the no-action  
2 alternative because no action is no solution. It  
3 doesn't get things done. It leaves problems to my  
4 children, and who will some day, perhaps, have their  
5 own children.

6 I oppose the deep geological burial idea  
7 that, apparently, the Governor loves. It's way too  
8 expensive and it's a -- it's an overkill. I think  
9 the idea of disposing things at WIPP in a trench, or  
10 in a vault, any of those could be made to work.

11 I oppose the bore hole approach for  
12 three reasons. Number one, as stated in the Draft,  
13 it cannot be implemented everywhere in the country.  
14 So from a geographical equity prospective, bore holes  
15 are a loser. Number two, I don't believe I know how  
16 to monitor it in a reliable way, whereas I know I can  
17 monitor trenching and vaults. Finally, the last  
18 argument against bore holes is if I screw up or I  
19 decide later that I want to undo things, I don't know  
20 how to reverse it. So those are criteria that I  
21 would like to see DOE consider; geographical equity,  
22 monitoring, and reversibility. Bore holes do have  
23 one useful purpose, and that's the place where we  
24 could deposit excess lawyers.

25 The third point, the Draft uses the

T19-2

T19-3

T19-4

T19-5

T19-2 Comment noted.

T19-3 Comment noted.

T19-4 The three land disposal facility conceptual designs (above-grade vault, enhanced near-surface trench, and intermediate-depth borehole) were selected as being representative of a range of land disposal configurations (varying degrees of waste consolidation and geometry) that could be employed for the disposal of the GTCC LLRW and GTCC-like waste inventory. As discussed in Section 1.4.2, each concept has been used to some degree in the United States or other countries to dispose of radioactive waste similar to the three waste types analyzed in the GTCC EIS. The same vault, borehole, and trench characteristics were considered for the disposal sites evaluated in order to compare the performance of each site's natural hydrological, geological, and meteorological properties relative to contaminant fate and transport once any engineered barriers would begin to fail.

The conceptual nature of these configurations takes into account the characteristics of all of the disposal sites for which they were considered, but their designs (e.g., width, depth, cover depth, reinforced containment) could be altered or enhanced, as necessary, to provide an optimal solution at a specific location. As an example, the cover depth could be adjusted to ensure that roots from vegetation would not compromise the top of the engineered barrier. In addition, the dimensions of the generic land disposal units (e.g., trench - width and depth, borehole - diameter and depth, vault - width, depth, and height) were selected based on similar existing facilities, existing equipment and methods for construction, and optimized (maximized waste volume disposed of for a given disposal unit volume; simple waste handling procedures to minimize exposure) for the types of waste packages considered. All designs could also accommodate different disposal packages (existing and proposed) with minor variations in their dimensions, but the EIS analyses would remain relevant for each option considered.

For example, if borehole disposal at NNSS became a preferred alternative, any capacity in the existing boreholes would have been considered in follow-up studies. For an above-grade vault with a 5 m cover, long-term impacts from the above-grade vault as determined by modeling for the EIS would be expected to be similar to those for a vault set lower with respect to grade, including with the top of the vault at or below grade, except in the case where the bottom of the waste confinement was closer to the groundwater table. For any disposal option, the bottom of any disposal unit would not be located at or below the water table to exclude the chance of groundwater migration into the disposal unit. Actual implementation of a disposal option at a specific location at a given site may have to be modified (i.e., the depth of a trench or a borehole may need to be reduced to avoid groundwater issues).

Past operational experience with these types of disposal facilities at DOE sites has shown that when properly implemented, they can provide isolation of radioactive waste from the environment for extended time periods. Past problems that have arisen with each option provide additional information to improve the design and performance of future land disposal facilities. Issues related to performance over time would be analyzed in a project-specific analysis to address technical and long-term cultural concerns (e.g., tribal issues).

T19-5 Estimated radiation doses and LCFs were calculated for each site and disposal concept for 10,000 years, and if the peak impact did not occur during this time frame, the analysis was extended out to 100,000 years. DOE believes that the assumptions made to support the long-term modeling calculations for the groundwater pathway are reasonable and enable a comparative evaluation of the impacts between alternatives. The results of the evaluation presented in the EIS are sufficient to inform the selection of sites and methods for disposal. Site-specific NEPA reviews would be conducted as needed.

**Piet, Steve, Commenter ID No. T19 (cont'd)**

1 tired, old, discredited approach of linear dose  
2 response. It looks like a value of about .05  
3 fatalities per person. It's especially wrong in  
4 using that approach when you're dealing with  
5 population doses. The ICRP, the Health Physics  
6 Society, the French National Academy, the Japanese,  
7 and so forth, all say don't do that. You are  
8 overestimating cancer risk when you do that. It is  
9 not justifiable science.  
10 And the fourth point is bring the waste  
11 here and send us money to do it. Thank you.

T19-5  
(Cont.)



Capital Reporting Company

1

MR. BROWN: Can you spell your last name?

2

3

MS. POLISHUK: It's Polishuk. Sandy Polishuk,  
and I want to say before I begin my testimony that I  
was in touch with Congressman Earl Blumenauer's  
office today, and he had hoped to be here. He is  
certainly against bringing in the waste, and he said  
he sent his apologies and his regrets, but he will  
send in his comments so they will get in the record.

9

10

11

12

13

14

15

16

17

Just by chance today, total coincidence, I  
happened to read that Washington and Oregon are  
ranked number one and number two in the nation for  
breast cancer incidence. That's a brand-new fact for  
me. I was born in Seattle, grew up there, and except  
for three years of my life, I've spent the rest of my  
adult life here in Oregon. So I am a Northwesterner;  
those two states.

18

19

20

21

22

23

24

25

I was diagnosed with breast cancer at 46, age  
46. Back then, that was considered young. It no  
longer is. Woman in their thirties are routinely  
diagnosed with breast cancer. They never were  
before. So something has changed. And many of us  
feel pretty clearly that it's the environment. And  
reading this number one and number two, I couldn't  
help but think of Hanford and the contamination that

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Polishuk, Sandv, Commenter ID No. T160 (cont'd)**

Capital Reporting Company

76

1 it has brought to our two states. I was the first of  
2 my friends diagnosed, but definitely not the last,  
3 and I've lost three, that I can think of off the top  
4 of my head, to breast cancer in those ensuing years.

5 Just like Japan, this is earthquake country. We  
6 do not want a Fukushima here. And the idea of  
7 purposely bringing more, of relicensing a plant that  
8 is up there for longer -- did you know that? Did you  
9 know that originally it was licensed for 20 years and  
10 now they want to -- before that license is even done,  
11 they want to renew it. That is another thing we need  
12 to be working against. But, you know, maybe you  
13 can't have a tidal wave that far up the Columbia, but  
14 you can certainly have an earthquake. An earthquake  
15 would be a terrible disaster for Eastern Washington,  
16 for the river, for the entire Northwest.

17 So like everyone, save one, who has testified, I  
18 say the same thing. Clean up what's there and do not  
19 bring any more. Find an appropriate, safe place for  
20 that garbage that has been created and stop creating  
21 it. In 1977 I happened to have a conversation with a  
22 man who had been a nuclear engineer, and I was  
23 arguing with him then about the fact that we were  
24 creating this nuclear waste that we didn't know how  
25 to deal with. And he assured me that it was not a

866.488.DEPO  
www.CapitalReportingCompany.com

T160-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

T160-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

T160-1

T160-2

1           problem, that the technocrats were going to have it  
2           fixed, the scientists, the physicists, they were  
3           going to figure it out before it was a problem. It  
4           is 34 years later, and it is still a problem. He is  
5           still wrong in what he told me, and I'm not a  
6           scientist. You don't have to be a scientist to know  
7           how dangerous this stuff is, how --  
8           MR. BROWN: I'm sorry. You're at your time  
9           limit.  
10          MS. POLISHUK: Okay. Thank you.

**Pollard-Stein, Kristine, Commenter ID No. W40**

---

From: gtceiswebmaster@anl.gov  
Sent: Wednesday, May 18, 2011 11:41 PM  
To: gtceiswebmaster@anl.gov  
Subject: Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10040

Thank you for your comment, Kristine Pollard-Stein.

The comment tracking number that has been assigned to your comment is GTCC10040. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 18, 2011 11:40:36PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10040

First Name: Kristine  
Middle Initial: N  
Last Name: Pollard-Stein  
Address: 365 NW Cherry Street  
City: White Salmon  
State: WA  
Zip: 98672  
Country: USA  
Email: [krispollard70@gmail.com](mailto:krispollard70@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The main priority of the Hanford Nuclear Facility should be waste clean-up and not finding room for more additional waste. The toxic waste that is already stored at Hanford toxic waste is already is currently and for many years have been leaching into the land around the tanks that are leaking, and it is slowly moving into our ground water. I absolutely oppose to any additional waste being stored at the Hanford site. No additional toxic waste should be stored at the Hanford site. This would be very unethical and immoral practice of putting our community at further risk by adding to an already tragic and overwhelming problem of the Hanford clean-up that is already being spoken of. No more toxic waste at Hanford!!!!!!

W40-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W40-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Polychronis, Jan, Commenter ID No. W206**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 9:10 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10206

Thank you for your comment, Jan Polychronis.

The comment tracking number that has been assigned to your comment is GTCC10206. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 09:10:06AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10206

First Name: Jan  
Last Name: Polychronis  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I do not want more nuclear waste shipped to Hanford through the Gorge or any other way. Hanford still hasn't perfected their vitrifying method and shipping more waste to be stored there is not a good answer. We need to find them however and spend the time, energy and money towards this end.

W206-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W206-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Pomeroy, Kelly, Commenter ID No.W450**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 7:51 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10450

Thank you for your comment, Kelly Pomeroy.

The comment tracking number that has been assigned to your comment is GTCC10450. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 07:50:39PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10450

First Name: Kelly  
Last Name: Pomeroy  
Address: 59-148 Olomana Rd.  
City: Kamuela  
State: HI  
Zip: 96743  
Country: USA  
Email: [kpterra@gmail.com](mailto:kpterra@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

We have already seen ample evidence that Hanford is incapable of properly storing nuclear waste, so why would anyone think it appropriate to send them thousands and thousands of gallons more of this highly toxic material, endangering the whole Columbia Gorge in the process?

W450-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W450-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Pope, B., Commenter ID No. W434**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 1:30 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10434

Thank you for your comment, B. Pope.

The comment tracking number that has been assigned to your comment is GTCC10434. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 01:30:17PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10434

First Name: B.  
Last Name: Pope  
Country: USA  
Email: [bpope@pacifier.com](mailto:bpope@pacifier.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Increased use of the limited and narrow Columbia River Gorge travel corridor for radioactive waste going to an already overburdened Hanford site, is unacceptable. I live and breathe here. I do not chose to have this radioactive transport burden added to the environmental problems of the Gorge.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W434-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W434-1

**Pope, B., Commenter ID No. W280**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 9:57 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10280

Thank you for your comment, B. Pope.

The comment tracking number that has been assigned to your comment is GTCC10280. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 09:56:58PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment:GTCC10280

First Name: B.  
Last Name: Pope  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The Columbia River Gorge is a restricted corridor of railroad, highway, river traffic, and trails connecting a population living in small towns and communities on either side of the river. Any additional traffic of hazardous materials is unthinkable in the increased risk it poses for everyone living and working here.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W280-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

W280-1



received  
JUN 27 2011

Charles R. Powell  
P.O. Box 20451  
Albuquerque, NM 87154

June 20, 2011

Mr. Arnold M. Edelman, EIS Documents Manager  
Cloverleaf Building, EM-43  
1000 Independence Ave SW  
Washington, D.C. 20585

Dear Mr. Edelman:

I'm strongly opposed to sending  
Greater than Class C nuclear waste  
to the WIPP storage facility in  
New Mexico.

WIPP's mission is limited by law.

Promises were made that higher  
than transuranic waste would not  
be sent to WIPP.

Alternatives should be seriously  
considered. Considering Hardened

L52-1

DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

L52-2

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

L52-1

L52-2

Powell, Charles, Commenter ID No. L52 (cont'd)

on site storage (HOSS), where the waste is produced and presently stored makes a lot of sense.

L52-2  
(Cont.)

I believe the flawed process should be stopped and no final environmental impact statement (EIS) should be issued.

Charles R. Powell

**Powers, Patrick, Commenter ID No. W460**

---

From: gtceiswebmaster@anl.gov  
Sent: Saturday, June 25, 2011 5:28 AM  
To: gtceiswebmaster@anl.gov  
Subject: Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10460

Thank you for your comment, Patrick Powers.

The comment tracking number that has been assigned to your comment is GTCC10460. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 05:28:09AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10460

First Name: Patrick  
Middle Initial: M  
Last Name: Powers  
Address: 46 Lakeview  
City: White Salmon  
State: WA  
Zip: 98672  
Country: USA  
Email: [patmpowers@gmail.com](mailto:patmpowers@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Radioactive waste next to the Columbia River? Forget it.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W460-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

W460-1

**Presley, Elizabeth, Commenter ID No. W406**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 9:27 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10406

Thank you for your comment, Elizabeth Presley.

The comment tracking number that has been assigned to your comment is GTCC10406. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 09:26:53PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10406

First Name: Elizabeth  
Middle Initial: N  
Last Name: Presley  
Address: 3221 Minnesota Ave  
City: Duluth  
State: MN  
Country: USA  
Email: [beep2222@gmail.com](mailto:beep2222@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Having lived in the Seattle area from 1975 until 2003, I have been well versed in the canisters of waste leaking into the Columbia River, the railroad transfer of waste to Ground Zero, the high incidence of cancer in the Hanford area, the death in Seattle of the Chernobyl pilot, and the frustrated attempts to start the cleanup. If this were not enough to make the case for abandoning the current plan, surely the Japanese disaster must.

W406-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W406-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Procter, Rebecca, Commenter ID No. T79

Capital Reporting Company

1 MS. PROCTER: Thank you.

2 MR. BROWN: So please proceed.

3 MS. PROCTER: Hello. My name is Rebecca

4 Procter. I'm a resident of Santa Fe County.

5 In my professional life I've been involved  
6 quite a lot with NEPA. So I wanted to start off with  
7 just a couple of technical points, just kind of  
8 reminders for you, and especially if this is new for  
9 you, things you should keep in mind.

10 The NEPA process is only a consultation  
11 process. It requires that federal agencies like DOE  
12 consider the effects that their proposed actions have  
13 on people in the environment. It does not -- and it's  
14 important to remember this -- it does not mandate any  
15 particular level of protection or consideration by an  
16 agency. It only requires that those effects be  
17 considered in some fashion.

18 So this means that you, the public, must  
19 advocate for the appropriate level of evaluation and  
20 protection for the action that's being considered.  
21 This is no guaranteed outcome for the National  
22 Environmental Policy Act process.

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Procter, Rebecca, Commenter ID No. T79 (cont'd)**

Capital Reporting Company

1           Secondly, I'd like to make the point that in  
2 this case, it appears that the NEPA process has been  
3 foreshortened in a way that is not defensible, to wit,  
4 the failure of DOE to consider and evaluate all  
5 reasonable alternatives.

6           There's an alternative that some of our  
7 Nuclear Watch Groups with their special expertise are  
8 advocating, and that is that this higher level and more  
9 dangerous waste be stored on site at nuclear plants.  
10 This is the hardened on-site storage that you were  
11 hearing about in the presentation earlier, HOSS.  
12 You'll probably hear that acronym again.

13           I would advocate that the HOSS method is, in  
14 fact, within the boundaries of the mandate for the EIS  
15 simply because it states clearly that DOE must develop  
16 a facility or facilities, plural, for this kind of  
17 waste.

18           Now, I want to get to the real heart of the  
19 matter. Why is New Mexico an acceptable dumping ground  
20 for higher level and commercial grade nuclear waste?  
21 This more potent question underlies and actually  
22 subverts the NEPA process. For decades New Mexico has

866.488.DEPO  
www.CapitalReportingCompany.com

T79-1       The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

T79-2       The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

T79-1

T79-2

**Procter, Rebecca, Commenter ID No. T79 (cont'd)**

Capital Reporting Company

1 been viewed as a poor, low population, fringe area that  
2 serves as a politically and socially acceptable place  
3 to hide toxic materials that richer, more densely  
4 populated or more commercially profitable communities  
5 would never consider housing in their own areas.

6 I suggest, therefore, that as New Mexicans,  
7 you must become very angry, very vocal, and very  
8 politically motivated to prevent this disaster in the  
9 making.

10 Further, New Mexicans must recognize and be  
11 willing to paint the elephant in the room a shocking  
12 electric pink. Any technology that generates large  
13 amounts of incredibly toxic material that never in the  
14 foreseeable future of the human species really goes  
15 away, any technology that does that is clearly  
16 unmistakably maladaptive and harmful to the human  
17 community and the planet as a whole.

18 We must, therefore, reject not just any  
19 unacceptable waste disposal, but this technology as a  
20 whole as it is being used to enrich a few while  
21 endangering all. This is clearly not in line with the  
22 values of the American democracy.

866.488.DEPO  
www.CapitalReportingCompany.com

T79-2  
(Cont.)

T79-3

T79-3

DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

**Procter, Rebecca. Commenter ID No. T79 (cont'd)**

Capital Reporting Company

10

1           Now, I will just leave you with one final  
2 thought, and that is it appears to me that the  
3 reasoning that would lead this agency to choose to  
4 dispose of higher level waste in facilities that are of  
5 a less secure nature than the geologic containment at  
6 WIPP -- you've seen some of the other alternatives here  
7 -- is faulty reasoning and should not be followed.  
8           Thank you.

T79-3  
(Cont.)



**Prvor, Peggy, Commenter ID No. W8**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, May 06, 2011 10:26 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10008

Thank you for your comment, Peggy prvor.

The comment tracking number that has been assigned to your comment is GTCC10008. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 6, 2011 10:26:14PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10008

First Name: Peggy  
Middle Initial: J  
Last Name: prvor  
Address: 1420 nw 12th Andrews Texas 79714  
City: Andrews  
State: TX  
Zip: 79714  
Country: USA  
Email: [prvors02@suddenlink.net](mailto:prvors02@suddenlink.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Leave low level radioactive waste at its origin of generation! When will you understand every time you move and store in a new place you are contaminating a new area also mixing these waste have proven that new elements are created . You more than likely have not done health studies to be able to verify any contamination in the future that is a number one way we as individuals have no way to prove our new illness ,example Andrews texas has lowlevel it has been at least 15 years the only study that was done in 1996 is lost,not,appropriate,etc.

You fail to listen to the concerns of the public until a Chernobyl or Japan crisis occurs, in the low level waste sites you are creating health crisis with no way to prove or side and by not listening or conducting proper studies only how much money you can make (the states main interest or to do anything to get your job done to without worrying about consequences to health,and safety of the public.

Our Earth is all we have to protect us and God ask us to care for it for it can feed us house us it our source of water and you are not maintaining due diligents as we are mandated in Gods law.

Say no to a gamble to us the public but also to gods law. Peggy Prvor

1420 nw 12th  
Andrews Texas 79714  
432-523-4550

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W8-1

DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

W8-1

**Prvor, Peggy and Melodye, Commenter ID No. E28**

---

**From:**  
**Sent:** Monday, October 01, 2012 2:31 PM  
**To:**  
**Cc:**  
**Subject:** FW: Greater than Class C Comments

-----Original Message-----

**From:** Diane D'Arrigo/NIRS [mailto:dianed@nirs.org]  
**Sent:** Thursday, June 16, 2011 5:39 PM  
**To:** Arnold Edelman  
**Cc:** Diane D'Arrigo/NIRS  
**Subject:** Greater than Class C Comments

June 16 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000  
Independence Avenue, SW., Washington, DC 20585

Dear Arnold Edelman and DOE

Please extend the public comment period for one month so that individuals, organizations and communities affected and potentially affected by GTCC and GTCC like waste can fully review, evaluate and comment. Those living and working at and around some of the sites with large amounts of this waste or potentially in line to receive large amounts of waste deserve the chance to learn more and provide input. It has been a long time coming --getting to the point where the public can weigh in on this unique waste category. We would greatly appreciate a 31 day extension.

E28-1

Sincerely

Diane D'Arrigo  
Nuclear Information and Resource Service  
Takoma Park MD

1

Pryor, Peggy and Melodye -- E28

E28-1

DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. Notices were placed in various local newspapers to announce the public hearings before and during the scheduled hearings. DOE considers the 120-day public comment period to be adequate relative to the 45-day NEPA requirement.

**Pryor, Peggy and Melodve, Commenter ID No. E28 (cont'd)**

Peggy and Melody Pryor

Andrews TX

Diane D'Arrigo/NIRS  
6930 Carroll Ave #340  
Takoma Park MD 20912  
301 270 6477 x 16

**Putkey, Lisa, Commenter ID No. E53**

---

**From:** Lisa Putkey <lputkey@gmail.com>  
**Sent:** Monday, June 27, 2011 8:45 PM  
**To:** gtceis@anl.gov  
**Subject:** GTCC EIS Comment - Lisa Putkey  
**Attachments:** GTCC Comments.doc

Dear Mr. Edelman,

Copied below and attached are my comments on the Greater than Class C EIS. Please contact me if you have any trouble viewing them.

Best, Lisa Putkey, [lisa\\_putkey@gmail.com](mailto:lisa_putkey@gmail.com)

Arnold Edelman

Document Manager

DOE GTCC EIS

Cloverleaf Bld. EM-43

1000 Independence Avenue, SW.

Washington, DC 20585

Dear Department of Energy,

As I write this a giant forest fire is burning up the southwest corner of Los Alamos National Laboratory. It has been very dry in the desert this year and this is just one of rampant wildfires in the area. The city of Los Alamos was evacuated earlier this afternoon. Natural Disasters do happen. Science is not infallible.

Please do NOT bring any of the 160,000,000 curies of radioactive GTCC waste to New Mexico. GTCC radioactive waste will be dangerous to humans and the environment for hundreds of years. Right now the Waste Isolation Pilot Plant east of Carlsbad has a capacity of only 5,000,000 curies of radioactivity. This waste is 30 times more radioactivity than intended for WIPP and would break their ban on commercial (nuclear power) waste disposal. Los Alamos National Laboratory has no adequate facility for this waste storage and currently disposes of low level nuclear waste at Area G in unlined trenches, pits and shafts. Area G is leaking and in need of clean-up not more shallow radioactive waste burial!

E53-1

E53-1

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

**Putkey, Lisa, Commenter ID No. E53 (cont'd)**

I live in Chimayo and volunteer with a youth organization called Think Outside the Bomb. We educate, train, and mobilize youth to be involved with environmental justice issues in their communities, focusing on the impacts of the nuclear industrial complex. I have been working with youth in the Espanola Valley for a year now and when this proposal came out we started meeting with local intergenerational groups to read through the EIS together (which by the way we need much much more time to do, since it is two thick books of dense technical information and many of the youth in the Espanola Valley struggle with the English language). As we read through we became very dismayed by this proposal and the negative implications for our community, which has already suffered from 65 years of nuclear contamination.

We started doing outreach in the community and at the high schools about the proposal and not only was NO One aware of this proposal, but they all were very concerned and didn't want this waste brought to New Mexico. We did art sessions in which students and community created art and wrote letters to be brought to the public comment period (which is always a sham so that the project can check off "involved local communities.") Many of the students' letters spoke of wanting healthy, safe, and sustainable communities to grow up in and for their families.

In my opinion New Mexico has been a sacrifice state for the U.S. nuclear industrial complex since the beginning, with LANL, Sandia, WIPP, Kirtland's nuke storage, uranium mining, and more. The Espanola Valley Communities, which are downwind of LANL, have already suffered enough from their air, land, water and bodies being contaminated and it has lead to severe health problems. To bring more radioactive waste to be stored in shallow burial in inadequate facilities at LANL is a slap in the face that puts a community historically contaminated with radioactivity even more at risk. Furthermore, it is an environmental injustice to the predominately Indigenous and Chicano Espanola Valley.

The fire happening as I write is a blaring example of how this community cannot sustain this waste. As global warming progresses these disasters will only increase. Even so, in hundreds of years the geography of Lo: Alamos, between a rift valley and a dormant volcano, with underlying fault lines, will have changed. Its shallow burial at Area G cannot handle waste that needs to be secured in deep geological repositories and monitored for generations. The surrounding Indigenous Pueblos are land-based peoples who have always and will always live in the sacred land they are living. To ask future generations, as stewards of the land, to bear this radioactive burden is unacceptable. The "Native Text" of the Draft EIS for GTCC waste should be read by the DOE in greater sincerity. The proposed LANL site is just not suitable.

Additionally, since the Department of Energy seems to have soooooo much radioactive waste, and NO good solution for what to do with it, perhaps they should immediately cease all of their efforts to hype up nuclear power and create more of this waste that will be toxic for generations. Nuclear power is an absurdly dangerous and dirty process to boil water, and only profitable because of government subsidies. I only see it as a way for a handful of rich to profit at the direct expense of low income communities in our country and abroad, and the ultimate expense of everyone.

E53-2 DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. Notices were placed in various local newspapers to announce the public hearings before and during the scheduled hearings.

E53-3 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Text prepared by potentially affected American Indian tribes is included in this EIS. DOE considered this text for Hanford, INL, LANL, and NNSS; however, DOE also needed to ensure consistency in the EIS analyses between the various sites, so that an even comparison could be made between alternatives as required by NEPA. Because of this, it was not possible to fully utilize all of the information provided by the tribal governments in order to perform specific analyses associated with exposure events unique to a given American Indian tribe (such as greater intakes of fish, game, and plants; the use of sweat lodges; and the use of natural pigment paints for traditional ceremonies). Once a decision is made on a specific site location and method, site-specific NEPA reviews would be conducted as needed, including appropriate analysis of exposure events unique to the impacted local American Indian tribes.

However, the information provided in these narratives was considered in the identification of the preferred alternative presented in this EIS. The information provided in the narratives for Hanford, INL, LANL, and NNSS was very useful, and DOE appreciates the time and effort expended by the various tribes in supporting this EIS process.

E53-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

E53-1 (Cont.)

E53-2

E53-3

E53-4

**Putkey, Lisa, Commenter ID No. E53 (cont'd)**

Sincerely,

---

Lisa Putkey

Organizer, Think Outside the Bomb

Chimayo, New Mexico

Email: [lisaputkey@gmail.com](mailto:lisaputkey@gmail.com)

Phone: 650-303-1353

Mailing Address: 1940 Willow Way

San Bruno, Ca 94066

**Putkey, Lisa, Commenter ID No. T89**

Capital Reporting Company

39

1 MS. PUTKEY: And we are both active in groups  
2 around here, including Think Outside the Bomb, the  
3 Environmental Justice Group at Tewa Women United, Honor  
4 Pueblo's Existence. We work with a lot of the other  
5 groups coming together to analyze this EIS.

6 And I've been working with youth in the  
7 Espanola Valley. I can't help but notice that you --  
8 when I say "you," I mean DOE -- you've been not doing a  
9 very good job of letting anyone in this community, the  
10 Espanola Valley, that lives downwind of Los Alamos,  
11 which is one of the sites where you want to put 160  
12 million Curies of radioactive waste, that you haven't  
13 really got the word out.

14 I've been looking in the *Rio Grande Sun*. Take  
15 note. The *Rio Grande Sun*, it's the valley newspaper.  
16 It comes out every Wednesday. Try to get an article or  
17 an ad or something in there.

18 We've been doing outreach in the community and  
19 talking to people and youth. We went to Espanola  
20 Valley High School and talked to a lot of classes. Not  
21 one person that we have come across has heard about  
22 this proposal to bring waste here to New Mexico. So I

866.488.DEPO  
www.CapitalReportingCompany.com

T89-1

T89-1

DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. Notices were placed in various local newspapers to announce the public hearings before and during the scheduled hearings.

J-1429

January 2016

Putkey, Lisa - T89

**Putkey, Lisa, Commenter ID No. T89 (cont'd)**

Capital Reporting Company

40

1 think it's kind of preposterous to even have a  
2 community hearing without doing the proper, adequate  
3 outreach to the community.

4           That being said, when we were at Espanola High  
5 School, we worked with youth. Maybe you come to our  
6 table afterwards. You can check out the artwork that  
7 the youth from the Espanola High School made in regards  
8 to this, and we made it as a way for them to have their  
9 comments and have their voices here even though it's  
10 very, very hard to get around in the area, lack of  
11 public transportation and such.

12           So I'm going to have Elizabeth read one and  
13 I'm going to read another one from two different  
14 students from the Espanola High School that they wrote  
15 on Tuesday.

16           MS. CHAVEZ: This letter is written to the  
17 Department of Energy. It says, "New Mexico is a  
18 beautiful, peaceful and friendly environment. Please  
19 do not take that away from us. This state is not a  
20 waste for the government to be destroying. We are all  
21 humans, and we all deserve to live in a free, healthy,  
22 and clean environment.

866.488.DEPO  
www.CapitalReportingCompany.com

T89-2

T89-2

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.



**Putkey, Lisa, Commenter ID No. T89 (cont'd)**

Capital Reporting Company

41

1 "Please consider another source or idea to put  
2 this waste. We care about our community. We want it  
3 to be the best for our economy, and we do care for a  
4 clean, healthy environment. Please reconsider.  
5 Students of Espanola Valley High School."

6 Ms. Putkey: "We don't support this idea  
7 because we don't want anything to harm our community.  
8 We want our children and grandchildren to live healthy  
9 lives and not have to live through devastation if  
10 something goes wrong.

11 "This idea is frightening. This idea isn't  
12 going to allow us to live long, healthy lives."

13 Thank you.

T89-3

T89-3 See response to T89-2.

received

received  
JUL - 5 2011

Dear, Mr. Arnold M. Edelman  
 My name is Marlene Quintana  
 of Albuquerque, and I am  
 writing to tell you that  
 I don't want GTCC waste  
 coming to New Mexico. The  
 waste should stay where  
 ever it is made. We don't  
 need more waste, its dangerous  
 to our health, our earth  
 and our lives. I want the  
 waste to stop being made,  
 we don't need more bombs  
 or waste. We need to clean  
 up our home and make  
 it safer for future generations  
 and for the rest our lives.  
 I am 25 yrs old and I've  
 seen enough damage done  
 to our homeland and  
 especially after what  
 happened in Fukushima  
 we should see that Los Alamos  
 is an earthquake zone  
 and we should be getting  
 all the waste cleaned

L77-1

L77-2

L77-3

L77-4

L77-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

L77-2 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

L77-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

L77-4 DOE is performing environmental restoration activities at LANL and ongoing cleanup efforts at the site will continue. DOE does not anticipate that GTCC LLRW or GTCC-like waste disposal would affect ongoing cleanup activities at these sites.

up rather than bringing more.  
Please don't bring Q+CE  
waste to New Mexico. We  
don't need it, We don't  
want it. I don't want  
any more waste. It's a  
idumb idea. Please CleanUp  
My Home New Mexico!

L77-4  
(Cont.)

Thanks for listening  
to my letter from my heart

Marlene Quintana  
210 Rencher Ave. SE.  
Albng. N.M. 87105  
mQ1986@cardnm.org

**Radford, William, Commenter ID No. T161**

1 short of funds needed to finish a containment structure  
2 for the Chernobyl reactor today. So how can it ever be  
3 safe? It can't.

4 So I would like to submit that for the time  
5 being, that all of this GTCC waste be kept at exactly  
6 where it was produced at those commercial plants and  
7 leave it there for 100 years, and in that space of  
8 time, maybe we'll come to some realization of a better  
9 place to start. And I would also like to say that I  
10 don't think any of it should be transported across the  
11 state. Thank you.

12 MR. BROWN: Thank you. William Radford will  
13 be speaking next, and then Astrid Webster.

14 MR. RADFORD: First of all, I'd like to lodge  
15 a complaint that I wasn't sent a copy of the draft  
16 Environmental Impact Statement. I have been on the  
17 DOE's list since 1976, and I keep getting dropped from  
18 the list. I don't know what it takes to get on there  
19 permanently, but please put me on permanently. So the  
20 remarks I'm going to give this evening are based on my  
21 review of the panels in the back and a brief review of  
22 the documents in the front there.

866.488.DEPO  
www.CapitalReportingCompany.com

T161-1

T161-1 DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. Notices were placed in various local newspapers to announce the public hearings before and during the scheduled hearings. The EIS was also posted on the project website. Request for a copy of the EIS can also be made through the website.

**Radford, William, Commenter ID No. T161 (cont'd)**

1 I think that this proposal amounts to a  
2 cynical breach of the public trust, primarily because  
3 the WIPP project that seems to be your not quite yet  
4 preferred alternative, seems to ignore the fact that  
5 the citizens of New Mexico who have under some duress,  
6 I would say, accepted this project, was with the  
7 understanding that it would be for defense-related  
8 waste only, and now we find that we're being told that  
9 it will include some commercial waste as well. I  
10 consider that a breach of trust. There was a great  
11 deal of negotiation, and discussion through Congress  
12 and other means to come up with a decision which was  
13 made, which was that it was not to include any  
14 commercial waste.

15 The next point I would like to raise is that  
16 the WIPP site should be precluded from consideration as  
17 an alternative for the same reason that it should have  
18 been precluded in the site selection process for the  
19 transatlantic disposal. That is to say, the  
20 government's own criteria, site selection criteria,  
21 called to avoid any site that had attractive natural  
22 resources. In the case of WIPP, we're dealing of

866.488.DEPO  
www.CapitalReportingCompany.com

T161-2

T161-3

T161-2 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

T161-3 The WIPP has been certified by the EPA for the disposal of defense-generated TRU waste. The physical and chemical characteristics of the GTCC LLRW and GTCC-like wastes proposed for disposal in the WIPP repository are comparable to the TRU wastes currently being disposed of in the repository. WIPP is surrounded by various natural resources – including potash, oil, and natural gas – as identified in Section 4.2.2.2 of this EIS. Resource considerations were included in the site selection process for WIPP and are documented in the Final Environmental Impact Statement, Waste Isolation Pilot Plant, Section 7.3.7). Disposal of GTCC LLRW and GTCC-like wastes at WIPP would not invalidate the WIPP site selection decision.

Radford, William, Commenter ID No. T161 (cont'd)

Capital Reporting Company

33

1 course, with potash and oil and gas. If you look at  
2 the claims and the drills around the WIPP project,  
3 you'll see it's just dotted. Everywhere around the  
4 land withdrawal site, there are oil and gas sites. It  
5 cannot be denied that it's a very attractive site for  
6 natural resources.

7           So it should be excluded for the same reason  
8 that it should have been excluded for what it was. I  
9 didn't -- I asked whatever the DOE represents is  
10 outside, whether or not there was any criteria for  
11 avoidance of natural resources; he said he didn't know  
12 or that the list that was on the panels there did not  
13 include all of the criteria. I'm suggesting that if  
14 there isn't a criteria for exclusion due to natural  
15 resource competition or attractiveness, that that  
16 should be there, and that the WIPP site should be  
17 precluded for that reason.

18           The next point I would like to raise also  
19 relates to the WIPP project, and it has to do with your  
20 definition of the word "deep." Now, your criteria call  
21 for deep geologic disposal. I contend that "deep" in a  
22 geologic sense should mean some amount greater than

866.488.DEPO  
www.CapitalReportingCompany.com

T161-3  
(Cont.)

**Radford, William, Commenter ID No. T161 (cont'd)**

1 less than a half mile. I think most of the audiences -  
2 - I think that if the general public understood that  
3 when they think of the waste -- at the waste isolation  
4 pilot plant as being deep, deep, deep underground, if  
5 they really thought about how far less than a half mile  
6 it is, they would be far less complacent about it.  
7 That's only about four throws of a good rock, if a good  
8 arm, or younger arm perhaps.

9 So I would think that if we're going to be  
10 talking about deep geologic disposal, it should be  
11 considerably more than the depth at which the waste  
12 isolation pilot plant sits; i.e., way deeper than a  
13 half mile. Those are my comments.

14 MR. BROWN: Thanks very much. Astrid Webster  
15 and Erich Kuerschner will be next.

16 MS. WEBSTER: Hi. My name is Astrid. I've  
17 been in New Mexico since I was an 18-year-old freshman  
18 at the University of New Mexico, and my affiliation is  
19 for life. And I'd like to speak to the man in the red  
20 jacket who thinks that solar power and wind power can't  
21 meet our needs. I have solar panels on my roof, and  
22 they're more than meeting our needs, by a bunch. And

866.488.DEPO  
www.CapitalReportingCompany.com

T161-4 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

T161-4

**Rajnus, Carla, Commenter ID No. W37**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Wednesday, May 18, 2011 1:10 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10037

Thank you for your comment, Carla Rajnus.

The comment tracking number that has been assigned to your comment is GTCC10037. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 18, 2011 01:09:21PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10037

First Name: Carla  
Last Name: Rajnus  
Address: 5905 sw pendleton ct.  
City: portland  
State: OR  
Zip: 97221  
Country: USA  
Email: [carlarajnus@gmail.com](mailto:carlarajnus@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please do not move toxic waste to Hanford. It is too dangerous and there is a better way to dispose of it; at least clean it before transporting it.  
thanks.

W37-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W37-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.



**Ralston, Carla, Commenter ID No. W389**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 5:30 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10389

Thank you for your comment, Carla Ralston.

The comment tracking number that has been assigned to your comment is GTCC10389. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 05:30:14PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10389

First Name: Carla  
Last Name: Ralston  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The #1 priority should be cleaning up the existing waste, not dumping more waste on the problem.

W389-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W389-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Randolph, Gretchen, Commenter ID No. L318**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)  
U.S. Department of Energy**

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

**received**

Mr. \_\_\_ Mrs. \_\_\_ Ms. \_\_\_ Mr. & Mrs. \_\_\_ Dr.   
Name: Gretchen Randolph  
Title: Nurse Practitioner  
Organization: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Phone: 503 968 1155 E-Mail Address: \_\_\_\_\_

**Comment:**  
Stop! Hanford is insane as a National  
Radioactive Waste Dump. Use Granite Bedrock  
Driving Radioactive Waste through Portland  
in trucks is extreme risk - do not transport  
Radioactive waste. Keep it where it is produced  
Do not start the Plutonium Plant. We  
need alternative energy - Nuclear is too costly  
and toxic to human life  
Please use other side if more space is needed.

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Thank you

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtcecis@anl.gov](mailto:gtcecis@anl.gov)

L318-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D).

DOE's Record of Decision 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

L318-1

J-1440

January 2016

Randolph, Gretchen - L318

**Ray, Gisela S., Commenter ID No. L212**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)  
U.S. Department of Energy**

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

**received**  
JUN 27 2011

Mr. \_\_\_ Mrs. ✓ Ms. \_\_\_ Mr. & Mrs. \_\_\_ Dr. \_\_\_  
Name: Gisela S. Ray  
Title: \_\_\_\_\_  
Organization: Alliance for Democracy  
Address: 85 SE 16th Court  
City: Gresham State: OR Zip Code: 97080  
Phone: \_\_\_\_\_ E-Mail Address: \_\_\_\_\_

Comment:  
I am in agreement with Portland OR City  
Council & the Oregon legislative delegation -  
our two senators & 4 out of 5 representatives -  
in opposing the plan to add more nuclear  
waste to the already polluted & leaking  
Hanford, WA site. We need a speeded up  
clean-up, not more contamination  
Please use other side if more space is needed.

L212-1

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtccis@anl.gov](mailto:gtccis@anl.gov)

L212-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Reilley Urner, Carol, Commenter ID No. T171**

Capital Reporting Company

61

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

MR. BROWN: Carol will be followed by Ken Ferguson.

MS. REILLEY URNER: Well, someone who spoke here was 81. I'm 82. And we became Oregonians way back when I was 29. And it was when we were here, my husband was a planner for metro -- the metro area of Portland, and I am very proud of the work that he did and the fellow planners. I think that Oregon, Portland and the surrounding communities, are something very special in this country. And I think we owe it to all the people that have helped make

866.488.DEPO  
www.CapitalReportingCompany.com

T171-1

T171-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Reilley Urner, Carol, Commenter ID No. T171 (cont'd)**

Capital Reporting Company

64

1 this a wonderful place to live as well, as Mother  
2 Nature and Mother Earth themselves, who've made it a  
3 wonderful place. Not to let this desecration occur  
4 along our Columbia River.

5 When my children were only two and five the  
6 Berlin crisis happened, and we were teetering on the  
7 edge of nuclear war. Some of you haven't had to live  
8 through that. We lived through it several times.  
9 And a newspaper columnist asked, Where are the people  
10 in this country? Why aren't they speaking out?

11 And so I wrote a letter saying the reason we  
12 weren't speaking was we were helpless. And I'm sure  
13 that when I looked at my own children and realized  
14 they probably weren't going to grow to adulthood, and  
15 I thought Russian women -- who at that point, by the  
16 way, were demons because they were Communists -- I  
17 was sure that they felt the same when they looked at  
18 their children.

19 Well, the next day, after -- well, the paper put  
20 it in the paper with a five-column headline. The  
21 next day, women all over Portland were calling me,  
22 women, most of them I'd never met and didn't know.  
23 And they said, Carol, we have to do something. So I  
24 felt helpless, had to help, and I love the women of  
25 Portland and will ever since, because they gathered

866.488.DEPO  
www.CapitalReportingCompany.com

T171-1  
(Cont.)

T171-2

T171-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

Capital Reporting Company

65

1 together, formed a movement, and helped get that  
2 nuclear test ban that stopped dropping fallout on our  
3 children and helped to put a break and get people to  
4 think, where are we going? Why are we preparing to  
5 kill?

T171-2  
(Cont.)

6 Well, for 35 years we lived overseas, because my  
7 husband worked with poor countries. He wanted to  
8 help them lift up. He didn't want to be involved in  
9 killing or the military in any way. And I came to  
10 love all the countries we lived in and all the  
11 hundreds of countries we visited, and all the people,  
12 the poor people. There were so many wonderful people  
13 that we think about killing without a second thought.  
14 And these are precious people, and we need to  
15 recognize their preciousness, just like the Columbia  
16 River is precious and Oregon and Washington are  
17 precious.

18 And now I've come back, and I don't know as much  
19 as a lot of you do about the details of Hanford and  
20 nuclear power and nuclear weapons, but I do know,  
21 listening to you and reading and looking, this is  
22 crazy. My people are worth more than this. The  
23 world is worth more than this. We can't keep going  
24 in this direction.

T171-3

25 And in those years overseas -- I'll end with

866.488.DEPO  
www.CapitalReportingCompany.com

**Reilley Urner, Carol, Commenter ID No. T171 (cont'd)**

1 this -- I mostly worked with very poor people to help  
2 them work for their own human rights, their own  
3 communities. And I learned that they had a power in  
4 them and that they were smart and that they knew what  
5 was best, and they wouldn't have done foolish things.  
6 But I also learned when I took them up to meet with  
7 ambassadors or generals or corporation presidents, in  
8 everyone we met, there was something we could reach.  
9 But they too knew that what they were doing to these  
10 people was wrong. And we stopped a lot of bad things  
11 that way.

12 So I know that we together, and these people  
13 with us, can stop this madness. We have a great  
14 country and a great people and a great world. So  
15 let's stop messing with nuclear bombs, nuclear power,  
16 killing people, and piling up this waste that nobody  
17 knows what to do with.

T171-4

T171-4 See response to T171-2.

**Reilley Urner, Carol, Commenter ID No. W562**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 10:49 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10562

Thank you for your comment, Carol Reilley Urner.

The comment tracking number that has been assigned to your comment is GTCC10562. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 10:48:27PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10562

First Name: Carol  
Middle Initial: J  
Last Name: Reilley Urner  
Address: 3745 S.E. Harrison Street  
City: Portland  
State: OR  
Zip: 97214  
Country: USA  
Email: [carol.urner02@gmail.com](mailto:carol.urner02@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please do not transfer more nuclear waste to Hanford. Our Columbia, lifeline of the northwest, will be dangerously polluted for generations with tritium and beryllium. Tiny particles of plutonium dust will be carried in the air and remain in Hanford soil for centuries. Instead please concentrate on vitrification, shut down nuclear power plants and cease nuclear weapons production before we destroy our beautiful planet home as sustainer of life.

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W562-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W562-1



**Reinhart, Robert, Commenter ID No. W352**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 1:40 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10352

Thank you for your comment, Robert Reinhart.

The comment tracking number that has been assigned to your comment is GTCC10352. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 01:40:03PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10352

First Name: Robert  
Middle Initial: W  
Last Name: Reinhart  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [wizsalmch@nventure.com](mailto:wizsalmch@nventure.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
Hello. Pay attention to the needs, desires and public health protection of all Washington State citizens.  
Try putting this waste next to the Potomac River!  
Our citizenship is no less important than people living in your neighborhood!  
We already have more than our share of this national trash.  
Thank you.  
Robert Reinhart

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W352-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W352-1

**Rempe, Norbert, Commenter ID No. T163**

1

2 MR. REMPE: Rempe.

3 MR. BROWN: I thought I remembered from the last

4 time. Thanks. Janet Greenwald will be following you.

5 Thank you.

6 MR. REMPE: Good evening. I have a few comments

7 that I actually referenced from the summary. One on page

8 S26, it says, "WIPP is a DOE facility," true. "It's the

9 first underground deep geologic repository." Not true.

10 The Czechs built the first underground

11 repository. The Russians were there before WIPP. The

12 Germans, the Swedes and the Finns, so please don't repeat

13 nonsense like that.

14 As far as sealed sources is concerned, I believe

15 you, gentlemen, just like so many government bureaucrats,

16 are in a deep conceptual rut that is defined by the

17 regulatory regime. Of course, we have several disposal

18 facilities for Greater-Than-Class-C waste in Eddy County

19 and in southeasteen New Mexico already.

20 One is, of course, known, I guarantee you there

21 is Greater-Than-Class-C waste in there as well. The

22 others are radioactive sources that are being used in the

23 oil patch, and when a logging company uses a radioactive

24 source after days to weeks of trying to fish it out,

25 they're unsuccessful. They get usually an NRC license to

T163-1

T163-2

- T163-1 Text has been revised to state that WIPP is the first underground deep geologic repository in the US.
- T163-2 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

**Rempe, Norbert, Commenter ID No. T163 (cont'd)**

1 actually cement it in place.  
2 So I can pretty much guarantee you there are  
3 probably at least dozens of those places. And by the way,  
4 these borehole disposals, they are much deeper than the  
5 intermediate borehole disposal that you mentioned in your  
6 report. They're thousands of feet deep, several thousands  
7 of feet deep. So let's talk facts, not regulatory  
8 figures. Try to think outside the box when you write  
9 these kind of things.

T163-2  
(Cont.)

10 Without saying or without -- it goes without  
11 saying that disposal of Greater-Than-Class-C at WIPP is  
12 not rocket surgery (sic). Okay? No problem whatsoever.  
13 I need to make that point, you know, while I express some  
14 criticism of other things.

T163-3

15 On page S37, you're stating that, "The  
16 Administration has determined that developing a permanent  
17 repository for high-level waste and spent nuclear fluid at  
18 Yucca Mountain, Nevada, is not a workable option and that  
19 the project should be terminated."

20 I should think that the term "determined" assumes  
21 that there was some intellectual thought process that  
22 formed the basis for this determination. I should suggest  
23 the next time you write this, you write "decreed" or  
24 "declared," because it is nothing but a declarative  
25 statement without any kind of intellectual foundation.

T163-4

T163-3 Comment noted.

T163-4 Comment noted.

**Rempe, Norbert, Commenter ID No. T163 (cont'd)**

1 On page S59, you have -- in Table S5, you compare  
2 the costs of the different waste disposal alternatives.  
3 WIPP there comes out to be the most expensive of all the  
4 options by actually a factor of more than three over all  
5 the other options, which seems really rather out of whack,  
6 and actually there's very little explanation for that.

7 I believe the assumption for -- I believe you  
8 need to explain the assumptions for that gigantic  
9 difference in cost much more explicitly.

10 And finally, just to put a little bit of an order  
11 of magnitude on what this total radioactive inventory of  
12 Greater-Than-Class-C waste is out there that needs to be  
13 disposed, if we compare those 160 megacuries to some  
14 national entity, that would be about the equivalent of the  
15 granite mass in the Matterhorn in Switzerland times ten.  
16 So you would bury about the equivalent of the granite in  
17 the Matterhorn that sticks out over the surrounding  
18 mountains at about 10 to 15 of those. That would be the  
19 same radioactive inventory that you're planning to dispose  
20 of with Greater-Than-Class-C waste.

21 I would suggest that even if you don't like that  
22 analogy, that in the final draft Environmental Impact  
23 Statement you draw some analogies, you make some  
24 comparisons to how much of this stuff is compared to some  
25 quantities of naturally radioactive materials that we are

T163-5

T163-6

T163-5 The operational costs for WIPP reflect the use of smaller packages which also result in a much larger number of shipments as well as the higher overall cost to operate the existing WIPP facility.

The footnote "c" has been updated to explain the difference.

T163-6 A megacurie is a measure of radioactivity (i.e., radioactive decay) equal to one million curies. One curie of radioactivity would be approximately the same as from 1 gram of Radium-226 (<sup>226</sup>Ra).

Although some analogous information has been provided in the EIS to assist the public in understanding disposal of GTCC LLRW and GTCC-like wastes, DOE chose not revise the EIS with a description of "Curie" beyond that provided by the glossary.

**Rempe, Norbert, Commenter ID No. T163 (cont'd)**

25

- 1 all familiar with. Because 160 megacuries otherwise
- 2 doesn't really mean anything to the average citizen.
- 3 Thank you for your time.

T163-6  
(Cont.)

Rempe, Norbert, Commenter ID No. T163 (cont'd)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: Yes?

MR. REMPE: Can I make a second comment?

MR. BROWN: Yes.

MR. REMPE: Norbert Rempe again. It is time to correct two previous speakers. The red herring of karst is being brought up by certain folks all the time. The issue revolves around features in the neighborhood of WIPP

**Rempe, Norbert, Commenter ID No. T163 (cont'd)**

1 that would allow water to dissolve the salt. This issue  
2 was laid to rest by both the environmental evaluation  
3 group in one specific report and by an independent report  
4 by a gentleman named John Lawrence, who is an  
5 internationally-recognized authority. He was, among other  
6 things, the president of the American Association of  
7 Petroleum Geologists, a very honorable professional  
8 organization of which I myself also am a member.

9 And that was published in the form of a Sandia  
10 report. So these reports are available. Let's lay the  
11 issue of karst to rest before it festers some more in this  
12 community. There has been no karst documented at WIPP  
13 anywhere on the land disposal area, the 16 square miles  
14 that are reserved for WIPP. There is karst outside of  
15 WIPP.

16 I'm a geologist. I know what karst is. I'm not  
17 a karst expert, but I know enough about it to make a few  
18 statements, and that is even if there were karst right at  
19 the WIPP site, it would still not bother me in the least.  
20 It wouldn't cost me sleepless nights because karst, the  
21 solution features associated and sort of summed up under  
22 the term "karst," they are surface and near-surface  
23 features. They have no impact whatsoever on something  
24 that is half a mile underground.

25 So even if there were karst at WIPP, and there's

T163-7 Comment noted.

T163-7

**Rempe, Norbert, Commenter ID No. T163 (cont'd)**

30

- 1 no evidence there is, it would not be a problem. So I
- 2 just want to lay that issue to rest once and for all.
- 3 Hopefully, it won't pop again like a vampire.



**Rendar, Byron, Commenter ID No. W127**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 7:53 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10127

Thank you for your comment, Byron Rendar.

The comment tracking number that has been assigned to your comment is GTCC10127. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 07:52:23PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10127

First Name: Byron  
Last Name: Rendar  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Hanford cleanup projects and plans have been delayed time after time. We know that whistleblowers have been sanctioned unlawfully. We know Hanford is already the most polluted area in the West, with high level nuclear and chemical waste stored in aging, leaky tanks near the Columbia River.

W127-1

Do not add to the problem and end any possibility of cleaning Hanford by trucking highly radioactive waste to it. That is a recipe for disaster.

W127-2

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W127-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W127-2 See response to W127-1.

**Richards, Betty, Commenter ID No. T25**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. RICHARDS: My name is Betty Richards, and I'm a totally independent citizen of Carlsbad. I'd like to comment on the integrity of the WIPP site.

I was here at the very, very beginning of the WIPP project. I was here when they drilled the test holes. I was here when a company, I think, was called Abalonia drilled into the brine pocket that underlies WIPP.

The pressurized water erupted several hundred feet into the air, blowing out the casings and scattering them like pick-up sticks. The eruption never stopped. One week later, one whole week later, they made the decision to cap that well with cement.

I was here when Dr. Larry Barrows said that there was karst at WIPP. He was told that if he said the word "karst" one more time, he would be fired. I was here when they gerrymandered WIPP 33 from the Land Withdrawal permit because it was a sinkhole. I was here when they totally

T25-1

T25-2

T25-1 Comment noted.

T25-2 The WIPP has been certified by the EPA for the disposal of defense-generated TRU waste. The physical and chemical characteristics of the GTCC LLRW and GTCC-like wastes proposed for disposal in the WIPP repository are comparable to the TRU wastes currently being disposed of in the repository.

Dissolution has occurred outside of the WIPP Land Withdrawal Boundary, as shown by karst features in the Nash Draw area. The EPA has noted that it is possible that dissolution occurred at the WIPP site sometime in the distant past (i.e., millions of years ago for strata-bound features) but was associated with a geologic setting other than that currently present at WIPP. However, dissolution in the underlying geology is not an ongoing process at the WIPP site. The EPA, as part of its compliance certification process, concurred with the modeling performed by DOE (which assumed that there was no karst within the WIPP site boundary) and indicated that this was consistent with existing borehole data and other geologic information.

WIPP is located in a salt formation, and moisture (brine) is naturally present. The brine makes up about 1% of the rock volume. The brine comes in two forms: interstitial and included. Interstitial brine is trapped between crystal facies (between fracture boundaries at the microscopic scale). Included brine is inside small cavities called inclusions trapped within the crystals themselves. Samples of brine collected from locations just inches apart from one another show different chemical and isotopic compositions, indicating that the brine did not move more than a few inches from where it was trapped when an ancient tidal flat dried up 250 million years ago. This indicates the extremely slow movement of water in this salt formation. In addition, the current design for operating WIPP involves sealing the shafts to ensure that no fresh water can enter and affect the disposed-of wastes.

**Richards, Betty, Commenter ID No. T25 (cont'd)**

1 dissolved EEG, who was standing up to the public because  
2 their numbers were not acceptable to the DOE's numbers.

3           So I believe that the WIPP site hydrogeologically  
4 is not stable, nor is it the end-all answer for disposal  
5 of nuclear waste.

6           Thank you for listening.

T25-2  
(Cont.)

**Risser, Susan and Peter, Commenter ID No. W28**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Tuesday, May 17, 2011 11:41 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10028

Thank you for your comment, Susan and Peter Risser.

The comment tracking number that has been assigned to your comment is GTCC10028. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 17, 2011 11:40:25AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10028

First Name: Susan and Peter  
 Last Name: Risser  
 Country: USA  
 Email: [risser@yahoo.com](mailto:risser@yahoo.com)  
 Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

It is perfectly clear that USDOE has no viable plan nor support for any method of actually disposing of this radioactive material. Until such exists it is incredibly irresponsible to transport it to a site which is already out of control and unsafe

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W28-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W28-1

**Ritter, John, Commenter ID No. W165**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 10:10 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10165

Thank you for your comment, john ritter.

The comment tracking number that has been assigned to your comment is GTCC10165. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 10:09:32PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10165

First Name: john  
Middle Initial: I  
Last Name: ritter  
Address: 109 Montello Ave.  
City: hood river  
State: OR  
Zip: 97031  
Country: USA  
Email: [ritter@gorge.net](mailto:ritter@gorge.net)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
The columbia river gorge is the largest national scenic area in the united states..... please protect it for future generations.thank-you

W165-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W165-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Ritter, John, Commenter ID No. W53**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Saturday, May 21, 2011 5:29 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10053

Thank you for your comment, John Ritter.

The comment tracking number that has been assigned to your comment is GTCC10053. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 21, 2011 05:29:21PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10053

First Name: John  
Last Name: Ritter  
Address: 109 montello ave  
City: hood river  
State: OR  
Zip: 97031  
Country: USA  
Email: [ritter@gorge.net](mailto:ritter@gorge.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please, Hanford is NOT the place for a dumping ground of nuclear waste. It has been promised for years that Hanford would be cleaned -up. The chance of radioactive ground water to end up in the Columbia is too great;the movement of waste material byroad,rail, or barge is too great a risk....It is an insane prospect.We are talking about the largest national scenic area in the United States.Please do not risk changing this amazing, beautiful place

W53-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W53-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Roberts, Susan, Commenter ID No. W24**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Sunday, May 15, 2011 4:20 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10024

Thank you for your comment, susan roberts.

The comment tracking number that has been assigned to your comment is GTCC10024. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 15, 2011 04:20:11PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10024

First Name: susan  
Middle Initial: e  
Last Name: roberts  
Address: 1130 36th ave  
City: seattle  
State: WA  
Zip: 98122  
Country: USA  
Email: [susanrobertsart@gmail.com](mailto:susanrobertsart@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Keep radioactive waste out of Washington.

W24-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W24-1 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

**Rock, Kibbey, Commenter ID No. W262**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 2:21 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10262

Thank you for your comment, kibbey rock.

The comment tracking number that has been assigned to your comment is GTCC10262. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 02:21:10PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10262

First Name: kibbey  
Middle Initial: h  
Last Name: rock  
Organization: friends  
Address: 32 b algona dr  
City: vancouver  
State: WA  
Zip: 98661  
Country: USA  
Email: [kibbey@kibbeyrock.com](mailto:kibbey@kibbeyrock.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
No radioactive trucks in the Gorge.

W262-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W262-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.



**Rodriguez, Susan, Commenter ID No. T64**

Capital Reporting Company

43

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

MR. BROWN: Okay, thank you. Susan will be followed by Judith Kidd.

MS. RODRIQUEZ: Good evening, my name is Susan Rodriguez. I've lived in Albuquerque for 22 years. I agree with, from what I understand, what Don Hancock said. I usually do agree with him. And I agree with Astrid and with Elaine.

And I've been here -- for the 22 years I've been here, it's been a real learning of what New  
866.488.DEPO  
www.CapitalReportingCompany.com

**Rodriguez, Susan, Commenter ID No. T64 (cont'd)**

Capital Reporting Company

44

1 Mexico is really into and how uninformed we are and how  
2 ignorant we are and how some of us are paying the price  
3 for the nuclear industry, and how when we do ask  
4 questions, we're told by people who have their Ph.D.s  
5 who work at Sandia that, oh, don't worry; it's just --  
6 it'll hold all -- whatever's coming down from Los  
7 Alamos will fall into that dam and all the heavy metals  
8 will fall to the bottom, and you won't be drinking any  
9 of it. And when we get our water bill, the study of  
10 the water, we take a look at it, and they're not even  
11 testing for the nuclides.

12           Nuclides are very small, and they are  
13 cumulative, which means-- that word means it adds up,  
14 and if we get it in the air, we get it in our food,  
15 we're now getting it more substantially in our water.  
16 I think close to 80 percent of the water that we now  
17 drink is coming from the Rio Grande. And they're not  
18 testing for the nuclides. I find this very  
19 disconcerting.

20           The Japanese, of all people, are learning  
21 the hard way how an industry can sell them something  
22 that they don't need, they shouldn't have had, and

866.488.DEPO  
www.CapitalReportingCompany.com

T64-1

T64-1 Other concerns or programs suggested for DOE consideration are considered outside the scope of the EIS and do not meet the purpose and need for agency action stated for this EIS.

1 they're really sorry. And I did here one of the --  
2 probably the only report that I heard from a Japanese  
3 citizen questioned by U.S. media, how did this happen?  
4 You guys, you had the bomb, you had two bombs, and you  
5 know what could happen when you're affected by this.  
6 And they said, well, the industry came here and they  
7 convinced us, and that's what happened.

8           Here in New Mexico, the industry goes  
9 around and the city helps, and the school system gets -  
10 - has special schools to educate our brightest and gets  
11 them into Sandia and pays them really good money and  
12 also up to Los Alamos. My daughter is in her last year  
13 in chemistry at the University. She didn't have such a  
14 great education at APS, but she got into some courses  
15 that interested here, I'm glad, in medicine, not in  
16 working at Sandia. And my husband also has a Ph.D. and  
17 he was never interested in that. But she says she gets  
18 all these forms, or these advertisements, to get these  
19 young kids to work in the industry, without being  
20 really aware. I don't think there's enough information  
21 about it.

22           If you support it and you understand what  
              866.488.DEPO  
              www.CapitalReportingCompany.com

T64-2

**Rodriguez, Susan, Commenter ID No. T64 (cont'd)**

Capital Reporting Company

46

1 you're doing, then that's one thing, but most of the  
2 people, that's why there's such a poor turnout here, I  
3 think. It's very poorly advertised on what you're  
4 doing, and when we come here we don't get the full  
5 truth. I didn't really understand what kind of waste  
6 was coming here. I don't see why we taxpayers should  
7 pay for private industry to be storing waste. What is  
8 that all about? I mean, we're paying for everything.  
9 The bottom line is we're paying with our lives, that's  
10 what I feel, and it is very dangerous.

11               So I'm very upset about that, and I know  
12 what EIS Studies are, and Don Hancock said that there's  
13 an EIS Study that goes back to 1999. I mean, they  
14 tried -- they did that here in Albuquerque, used an old  
15 EIS in order to build the road through the petroglyph,  
16 and they needed to update that, and they never did. So  
17 you have to update EISs. That is totally -- see, I  
18 think it's illegal.

19               What you try to do is what they do over  
20 in Sandia. They decompartmentalize what everything,  
21 what people are doing. So they don't work in war,  
22 because this guy doesn't know what this guy is doing.

866.488.DEPO  
www.CapitalReportingCompany.com

T64-3

T64-3 The LLRW PAA (P.L. 99-240) assigns DOE responsibility for the disposal of GTCC LLRW generated by NRC and Agreement State licensees. The LLRW PAA (P.L. 99-240) does not limit DOE to using only non-DOE facilities or sites for GTCC LLRW disposal. Under NEPA, DOE must evaluate the range of reasonable alternatives for a GTCC LLRW disposal facility. DOE sites represent reasonable alternatives for a GTCC LLRW disposal facility.

**Rodriguez, Susan, Commenter ID No. T64 (cont'd)**

Capital Reporting Company

47

1 You put it all together, they certainly are, and that's  
2 their greatest mission, is to work in the war industry.  
3 When we look at Chernobyl or we look at Three Mile  
4 Island, and you say, oh, that's different. It's not  
5 different; it's all nuclear energy, and it's nuclides  
6 that do add up to a very dangerous situation for human  
7 health.

8           If we want to have certain types of  
9 energy, the last resort should be something like coal  
10 or nuclear energy. We really should go the way of  
11 Denmark, which is green. They also -- do they produce  
12 any oil? I'm not aware of the oil, but there was a  
13 wonderful program on NPR showing what that country has  
14 done to a great extent, of making that country green.  
15 And we should try much harder to do that. It's  
16 cleaner, it's safer, and certainly the people in the  
17 industries will not be making big money, but tough crap  
18 for them. Thank you.

T64-4

T64-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Roper, Catherine, Commenter ID No. W553**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 7:25 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10553

Thank you for your comment, Catherine Roper.

The comment tracking number that has been assigned to your comment is GTCC10553. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 07:24:32PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10553

First Name: Catherine  
Middle Initial: H  
Last Name: Roper  
Address: 5620 200th Street S.W. #A109  
City: Lynnwood  
State: WA  
Zip: 98036  
Country: USA  
Email: [kate.ropер@gmail.com](mailto:kate.ropер@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

DOE and those involved in these decisions: I request and insist that NO more RADIOACTIVE NUCLEAR WASTE BE DUMPED AT HANFORD. Due to careless, ignorant, criminal dumping of toxic radioactive waste at Hanford over the past 60 years, the ground water, soil, river, fish, and people have been poisoned. Despite millions of \$ appropriated, clean-up has been poorly supervised and partial so the poisoning continues. No one wants this in their backyard, so stop generating radioactive waste. ~ 8 years ago we testified against more dumping at a Town Hall in Seattle. These toxins cause psychosis, mental retardation, cancer, autism etc. Obama talks about Green Energy - help him on this PATH. If we "cannot afford" to cleanup and safely dispose of nuclear waste, remind the rich if they want tax reductions that these toxins know no borders. Wars have caused amputations, PTSD, depression, death to millions, suicide, poor education, homeless and unemployed and broken families. Nuclear weapons and nuclear energy have proven to not be the answer. Reciprocal violence abounds with terrorists and rogue states. The poisoning of our soil, rivers and people certainly is not a safe alternative. Destroying our environment is foolish and goes against the EPA mandate. Thank you.

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W553-1 The Hanford Site is analyzed as a candidate location for a new GTCC waste disposal facility in the GTCC EIS. DOE is performing environmental restoration activities at the Hanford Site, and the ongoing cleanup efforts at the Hanford Site will continue.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

The analysis in the GTCC EIS also indicates that the radiation dose to a nearby hypothetical future resident farmer could be as high as 49 mrem/yr within the first 10,000 years (see Table 6.2.4 2 and Figure 6.2.4 1 in this EIS).

W553-1

**Rose, Viola, Commenter ID No. W507**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 6:46 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10507

Thank you for your comment, Viola Rose.

The comment tracking number that has been assigned to your comment is GTCC10507. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 06:45:41PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10507

First Name: Viola  
Last Name: Rose  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Dear Hafiz,

Protect our Columbia River and prevent cancer in the children who will drink the contaminated water from the Energy Department's (USDOE's) latest plan to use Hanford as a National Radioactive Waste Dump for extremely radioactive wastes.

12,600 truckloads of extremely radioactive waste would come through Oregon and Spokane to Hanford, if Hanford is chosen as the national radioactive waste dump for extremely radioactive (GTCC) wastes.

This is in addition to the 17,000 truckloads with 3 million cubic feet of other radioactive and radioactive chemical wastes which USDOE decided in 2004 to ship to Hanford for disposal - Heart of America Northwest continues legal efforts and organizing to overturn. This would total 4 trucks a day, every day for 20 years.

Truck routes include I-5 through Eugene, Salem, Portland; I-84 over the Blue Mountains; and I-90 through Spokane.

W507-1 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W507-1

**Rose, Viola, Commenter ID No. W507 (cont'd)**

In 2008, USDOE admitted that trucking similar highly radioactive wastes to Hanford would cause as many as 816 fatal cancers in the public exposed to the radiation from the trucks along the routes - even if there are no accidents or terrorist attacks.

W507-2

This is due to the fact that the casks used for trucking cannot shield all of the radiation without being too heavy to truck.

Highly radioactive Plutonium shipments are a prime target for terrorists - especially when the US government is trucking them through the center of cities such as Portland or Spokane.

W507-3

In the event of a foreseeable accident with fire or a terrorist attack on a truckload of highly radioactive Plutonium waste en route to Hanford on I-205 and I-5 or I-90, an independent analysis commissioned by Heart of America Northwest Research Center found that hundreds of square miles of either Portland or Spokane would be contaminated and over a thousand fatal cancers would result.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W507-2 While over 800 LCFs were identified in the Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (Draft GNEP PEIS, DOE/EIS 0396) this value is not relevant to the proposed action in the GTCC EIS. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing domestic commercial light-water reactors if all of them were replaced with high temperature, gas-cooled reactors. DOE cancelled the GNEP PEIS process on June 29, 2009 (74 FR 31017). The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers (see Section 6.2.9.1).

W507-3 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017). The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers (see Section 6.2.9.1).

Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).



**Rothman, Kenneth, Commenter ID No. W510**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 7:34 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10510

Thank you for your comment, Kenneth Rothman.

The comment tracking number that has been assigned to your comment is GTCC10510. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 07:33:42PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10510

First Name: Kenneth  
Middle Initial: J  
Last Name: Rothman  
Address: 110 E Hilliard Ln  
City: Eugene  
State: OR  
Zip: 97404  
Country: USA  
Email: [krothman2@msn.com](mailto:krothman2@msn.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

High level radioactive waste (spent fuel rods) should not be transported on the highways or railroads to Hanford, Washington because transportation involves significant risk of accident, and risks exposure of the public to dangerous levels of radiation. The history of Hanford is full of incidents of leakage into the Columbia River, contaminating Caddis Fly larvae, fish, and those who eat the fish. The example to the Fukushima disaster should convince the DOE to change course to not develop new nuclear plants for electricity.

W510-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W510-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

Stopping nuclear power research is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

**Rowe, Joe, Commenter ID No. W564**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 11:54 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10564

Thank you for your comment, Joe Rowe.

The comment tracking number that has been assigned to your comment is GTCC10564. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 11:54:18PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10564

First Name: Joe  
Last Name: Rowe  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [jrowe@igc.org](mailto:jrowe@igc.org)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I ask that this waste remain in the current location and not be transported to Hanford or any other distant location. Safe containers for the waste should be transported to the location of the waste. The waste should not be moved until there is much more time given to design safer modes of transport, and more local storage options.

W564-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W564-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

Stopping nuclear power research is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

**Rubenstein, Catherine, Commenter ID No. W212**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 4:57 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10445

Thank you for your comment, Catherine Rubenstein.

The comment tracking number that has been assigned to your comment is GTCC10445. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 04:56:44PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10445

First Name: Catherine  
Last Name: Rubenstein  
City: Portland  
State: OR  
Zip: 97221  
Country: USA  
Email: [cathruben@yahoo.com](mailto:cathruben@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Secretary Chu and Mr. Edelman:

Please remove the Hanford Nuclear Reservation from the U.S. Department of Energy's list of candidate sites for a permanent nuclear waste dump site to store radioactive materials coming from across the United States. Hanford is the wrong place to transport and dispose of more highly dangerous radioactive material.

Hanford is already the most contaminated site in the Western Hemisphere and the Department of Energy is already engaged in one of the largest and most complex cleanup projects in U.S. history at Hanford. The number one priority should be to stop waste from leaking into the Columbia River and clean up the existing waste at Hanford. No new nuclear waste should be stored at Hanford.

W212-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W212-1 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

**Sanders, Elizabeth, Commenter ID No. W347**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 1:10 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10347

Thank you for your comment, elizabeth sanders.

The comment tracking number that has been assigned to your comment is GTCC10347. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 01:09:58AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10347

First Name: elizabeth  
Middle Initial: a  
Last Name: sanders  
Country: USA  
Email: [nexugar@comcast.net](mailto:nexugar@comcast.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Instead of trucking this extremely toxic radioactive waste around the country, WHY ARE WE NOT VITRIFYING IT ON SITE AND BURYING IT? (other countries vitrify their waste, eg. France) We must deal with our deadly waste in an aware and responsible manner. The cost of vitrification should be factored into the cost of nuclear power, and if this cost is too high then we need to look at other energy options.

The DOE's safety record at Hanford is dismal. There are 60+ year old single wall containers from atomic bomb development leaking radioactive waste into the ground, and ground water. There is no credibility here!!!

W347-1

W347-2

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W347-1 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

The technologies and alternatives suggested for evaluation are not within the reasonable range of alternatives for disposal of GTCC LLRW and GTCC-like wastes. Other concerns or programs suggested for DOE consideration are considered outside the scope of the EIS and do not meet the purpose and need for agency action stated for this EIS.

W347-2 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

**Sather, John, Commenter ID No. E48**

**From:** JOHN SATHER <jssather@mac.com>  
**Sent:** Sunday, June 26, 2011 6:57 PM  
**To:** gtccis@anl.gov  
**Subject:** Nuclear Waste

Pleas do not transport nuclear waste through the heart of the Willamette Valley or uo the Columbia Gorge. Japan's experience should remind us just how risky nuclear activity is. Any additional nuclear waste in the Columbia Watershed puts the whole northwest water supply at risk.

E48-1

Please reconsider this obviously foolherdy plan.

John Sather

E48-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Savelle, Michele, Commenter ID No. W49**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Friday, May 20, 2011 12:10 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10049

Thank you for your comment, Michele Savelle.

The comment tracking number that has been assigned to your comment is GTCC10049. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 20, 2011 12:10:08PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10049

First Name: Michele  
Middle Initial: A  
Last Name: Savelle  
Address:  
City: :  
State:  
Zip:  
Country: USA  
Email: [michelesavelle@earthlink.net](mailto:michelesavelle@earthlink.net)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I would like to go on record in opposition to the increase of radioactive waste storage at Hanford as proposed by the DOA. The risks of continued groundwater contamination and exposure to humans at that site are far to great to make it unsuitable as a long-term solution to the problem of waster disposal. I favor the development of a more secure site in the Granite Shield of North America. It is unconscionable to simply continue to dump these wastes at Hanford because it is already there, and offers the cheapest alternative for disposal. If the Fukushima disaster has taught us anything, it is that long-term safety must be the first priority in the development of nuclear energy, not cost. Thank you.

W49-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W49-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC EIS. LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

**Scanlon, Bruce, Commenter ID No. W489**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 10:27 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10489

Thank you for your comment, Bruce Scanlon.

The comment tracking number that has been assigned to your comment is GTCC10489. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 10:26:58AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10489

First Name: Bruce  
Last Name: Scanlon  
Address: POBOX 4559  
City: Eagle  
State: CO  
Zip: 81631  
Country: USA  
Email: [bruce.scanlon@gmail.com](mailto:bruce.scanlon@gmail.com)

Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

1. Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.
2. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.
3. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.
4. USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W489-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W489-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W489-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W489-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

**Schaffner, Benjamin, Commenter ID No. W481**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 4:59 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10481

Thank you for your comment, Benjamin Schaffner.

The comment tracking number that has been assigned to your comment is GTCC10481. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 04:58:37PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10481

First Name: Benjamin  
Middle Initial: J  
Last Name: Schaffner  
Address: 2121 Reed Rd.  
City: Hood River  
State: OR  
Zip: 97031  
Country: USA  
Email: [benjaminjschaffner@gmail.com](mailto:benjaminjschaffner@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I highly disapprove of the plan to bring spent fuel rods from nuclear plants across the states to the Hanford site. I'm not sure as to what the alternatives would be but I would hope that whomever is making these decisions would consider the possible risks of transporting such material in close proximity to people's homes, jobs, etc. This seems like a very poorly planned solution. Though budgets may or may not be an issue, and I may or may not have all the information regarding this situation, I feel that this is generally lacking due consideration.

W481-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W481-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the Federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.



**Schilke, Peter, Commenter ID No. T57**

Capital Reporting Company

24

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

MR. BROWN: Peter Schilke and then Rosemart

18

Evens.

19

MR. SCHILKE: Good evening. My name is Peter

20

Schilke. I've lived in various parts of the country.

21

I've been in New Mexico for 16 years. My background is

22

in the fields of engineering. I've worked for various

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Schilke, Peter, Commenter ID No. T57 (cont'd)**

Capital Reporting Company

25

1 countries that were part of the military industrial and  
2 nuclear complex.

3           And, I'm here to say that there's no  
4 credibility in these industries. If all of the  
5 projections of -- and statistics that they put forth  
6 were valid, we wouldn't have had the many, many space  
7 accidents that we have had, the launch vehicles burning  
8 up on the launch pads. The shuttles -- one blowing up  
9 on launch or partly through the launch, another one  
10 coming back in and being destroyed, and I go back to  
11 the time when the mercury project had many problems  
12 happen in one of the capsules and the computers failed  
13 and the astronaut, fortunately, was able to manually  
14 bring it back in.

15           I mention this aspect even though it doesn't  
16 seem like it's part of the nuclear program because all  
17 of these programs had people pushing numbers and  
18 statistics about the reliability. Reliability? I  
19 don't think so. So many of these numbers that have  
20 been put forward to you this evening are purely picked  
21 out of the air. I just don't believe any of the things  
22 that officially get put forth anymore and my history

866.488.DEPO  
www.CapitalReportingCompany.com

T57-1

T57-1 This comment is outside the scope of this EIS.

1 goes back to the 50's when I first got my first  
2 security clearance.

3           So, I've been through the industry. I see the  
4 lies that go on, the cover-ups, pushing the facts under  
5 the rug. We've had this with Los Alamos. We've had it  
6 at Kirtland Air Force Base. It just permeates the  
7 whole economy, the whole society, to make all of these  
8 outrageous claims about the safety to me, is totally,  
9 bogus.

10           If the things were as safe as they were, the  
11 nuclear industry, we would not need the Price-Anderson  
12 Act. We would not need to be giving loan guarantees to  
13 the nuclear industry. Wall Street would gladly step up  
14 to the plate. So, what we are dealing with is a lot of  
15 smoke and mirrors and lies, I believe. And, if they're  
16 looking for a good place to bury nuclear waste, they  
17 might bury it under Washington, D.C., and under Wall  
18 Street.

T57-2

**Schlarb, Theresa, Commenter ID No. W257**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 1:21 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10257

Thank you for your comment, theresa schlarb.

The comment tracking number that has been assigned to your comment is GTCC10257. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 01:20:23PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10257

First Name: theresa  
Middle Initial: m  
Last Name: schlarb  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [sacrivhorse@comcast.net](mailto:sacrivhorse@comcast.net)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
GTCC waste is dangerous to human health and the environment for more than 500 years. A 2008 Department of Energy study predicts over 800 adult cancer deaths along the trucking routes as a result of radiation leaking from the trucks during normal operation, even if no accidents occur! And this "best case scenario" study only includes adults, excluding children who are even more susceptible to the dangers of radioactive waste. An accident resulting in the spillage of highly radioactive waste would be catastrophic for the Columbia River Gorge and its residents.

W257-1

Hanford is already the most polluted area in the Western Hemisphere, with 53 million gallons of high level nuclear and chemical waste stored in aging, leaky tanks near the Columbia River. This deadly waste is currently leaking underground and flowing slowly into the Columbia. The number one priority should be to stop more waste from leaking into the river and clean up the existing waste and contaminated soil.

W257-2

Now is the time to speak up and say NO to nuclear waste in the Gorge!

W257-3

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W257-1 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017). The *GNEP PEIS* involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the *GNEP PEIS* and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W257-2 The retrieval, treatment and disposition of wastes from underground tanks at Hanford are not part of the GTCC EIS scope. That scope is part of the *Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington (TC & WM EIS DOE/EIS-0391)*.

W257-3 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Schmitt, Kate, Commenter ID No. W169**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 10:43 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10169

Thank you for your comment, Kate Schmitt.

The comment tracking number that has been assigned to your comment is GTCC10169. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 10:43:11PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10169

First Name: Kate  
Last Name: Schmitt  
State: OR  
Zip: 97296  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Please do not allow this insanity.

W169-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W169-1 Comment noted.

**Scholtz, Claudia, Commenter ID No. W491**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 11:45 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10491

Thank you for your comment, Claudia Scholtz.

The comment tracking number that has been assigned to your comment is GTCC10491. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 11:45:04AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10491

First Name: Claudia  
Last Name: Scholtz  
State:  
Country: USA  
Email: [claudia.scholtz@gmail.com](mailto:claudia.scholtz@gmail.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
We can't cleanup Hanford and protect our Columbia River while more waste gets dumped at Hanford - Put Cleanup First!

W491-1

Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed. NO MORE WASTE BROUGHT TO HANFORD.

USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes. MAKE A PLAN TO LIMIT OR ELIMINATE PRODUCTION OF HIGHLY RADIOACTIVE WASTES.

W491-2

USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes. CLEANUP OF EXISTING WASTES AT HANFORD SHOULD BE A PRIORITY.

W491-3

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W491-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W491-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W491-3 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

**Scholz, Elizabeth, Commenter ID No. W517**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 12:35 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10517

Thank you for your comment, Elizabeth Scholz.

The comment tracking number that has been assigned to your comment is GTCC10517. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 12:34:25AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10517

First Name: Elizabeth  
Last Name: Scholz  
Address: -----  
City:  
State:  
Zip:  
Country: USA  
Email: [libbybett@comcast.net](mailto:libbybett@comcast.net)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
Please DO NOT allow any nuclear waste to be transported through Oregon. Hanford is already a very contaminated site, and the wastes in existing soil trenches and ditches and from tank leaks need to be removed, not added to! Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults. The Columbia River is being poisoned by nuclear waste and Hanford must be cleaned up. Please do not deposit any more nuclear waste at Hanford, or transport any through Oregon.  
Thank you very much!

W517-1

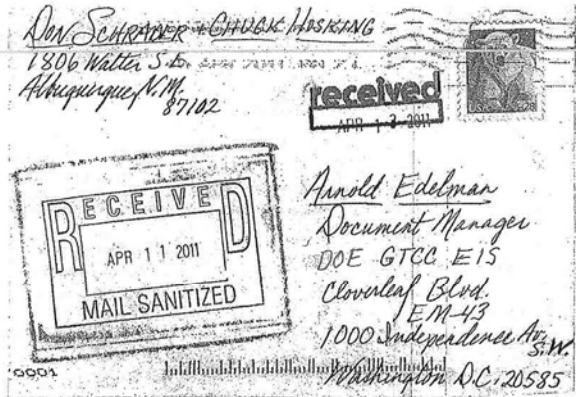
Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W517-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Schrader, Don, Commenter ID No. L291**

Schrader, Don - L291



*We strongly OPPOSE DOE's plan to dump 160,000,000 curies of radioactive waste from commercial nuclear power plants - at WIPP in New Mexico. GTCC waste is dangerous to humans and the environment for hundreds of years. GTCC waste would be 30 times more radioactivity than previously planned for WIPP and would eliminate the ban on commercial waste. Expanding WIPP (or putting waste nearby) makes it much more likely that all highly radioactive waste would be transported through New Mexico for many decades and buried here forever!!*  
 DON SCHRADER & CHUCK HOSKING

L291-1

L291-1 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.



**Schreck, Theresa, Commenter ID No. T101**

Capital Reporting Company

76

1

2

3

4

5 MR. BROWN: Gary here. Okay. Thanks.

6 Teresa. Okay, and Miguel Moreno will follow.

7 MS. SCHRECK: I know everybody has been trying

8 to wrap their mind around this one, you know. I think

9 I've been --

10 MR. BROWN: I'm sorry. Speak into the

11 microphone a little, a little more.

12 MS. SCHRECK: Oh, can you hear me?

13 MR. BROWN: Okay. Good. Thanks.

14 MS. SCHRECK: I said I know people have been

15 trying to wrap their minds around this one. I think we

16 have for a long time.

17 It's always, you know -- it's a saddening

18 situation, you know, that we have to, you know, kind of

19 waste our time coming here because in some ways you

20 want to keep and protect what you have. You know, the

21 promises which they make which are always broken, and

22 you look and you say, "Where is the real issue for New

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Schreck, Theresa, Commenter ID No. T101 (cont'd)**

1 Mexico and what is it that we're really looking at?"  
2 I think that, you know, part of their  
3 continuous efforts to create a place to store high  
4 level waste or Class C waste or whatever it is anymore,  
5 I don't even -- I can't even follow what class the  
6 waste is anymore.  
7 But I do know one thing. I know the impacts  
8 that it's having on our community and especially the  
9 indigenous and traditional communities of New Mexico  
10 and the cultural impacts that it has to our communities  
11 and, you know, the lack of DOE's and the lack of  
12 respect that it has had for our communities, and never  
13 putting forth our communities and the needs that we  
14 need.  
15 It's a shame when we, people that have been  
16 here long before anybody else was, that --  
17 (Applause.)  
18 MS. SCHRECK: -- you know, we have to come  
19 here and feel like we're sitting in the welfare line  
20 once again, you know, asking for, you know, for  
21 participation. And, you know, it's heartening because,  
22 you know, as New Mexico is changing because New Mexico

866.488.DEPO

www.CapitalReportingCompany.com

T101-1

T101-1 As required by NEPA, the EIS evaluates the potential impacts of the proposed action on cultural resources at the various DOE sites in sufficient detail to assess the potential impacts of the proposed alternatives. DOE recognizes that development of a disposal facility for GTCC LLRW and GTCC-like wastes would require that future land uses be restricted at and near the site for the protection of the general public. This action could affect areas that may be important to American Indian tribes.

DOE considered the text provided by the participating affiliated American Indian tribes for each of DOE sites evaluated in selection of the preferred alternative. Information provided by the tribal governments associated with exposure pathways unique to American Indian tribes (e.g., greater intakes of fish, game, and plants; use of sweat lodges; use of natural pigment paints for traditional ceremonies) would be evaluated in site-specific NEPA reviews for the alternative(s) selected in a ROD for this EIS.

Schreck, Theresa, Commenter ID No. T101 (cont'd)

Capital Reporting Company

78

1 is changing, and you know, the people that are getting  
2 left behind are our communities. It's our communities.  
3 It's the indigenous and traditional communities and the  
4 people that have lived here forever, you know, that are  
5 -- that are getting impacted, and Los Alamos doesn't  
6 care. It never has cared.

7       Because it all comes down to money. There's  
8 where it all goes down to. It goes down to, you know,  
9 where is the money. It has nothing to do with  
10 alternative.

11       Look what happened in Japan, and those people  
12 were promised, I mean, literally promised that they  
13 were safe. And then they want us to believe that we're  
14 safe. There ain't no safety in this kind of stuff.  
15 And we know that if anything ever happens at WIPP,  
16 that's "caliche" (phonetic). They'll never trace the  
17 contamination. They can't contain the contamination,  
18 and yet they want us to believe, want us to believe  
19 that it's safe.

20       Safe for who? Safe for the hundreds of  
21 thousands of cancers that we deal with every day in our  
22 communities, things that we've never seen, cancers in

866.488.DEPO  
www.CapitalReportingCompany.com

T101-2

T101-2 The WIPP has been certified by the EPA for the disposal of defense-generated TRU waste. The physical and chemical characteristics of the GTCC LLRW and GTCC-like wastes proposed for disposal in the WIPP repository are comparable to the TRU wastes currently being disposed of in the repository.

**Schreck, Theresa, Commenter ID No. T101 (cont'd)**

Capital Reporting Company

79

1 our children?

2 When in the world did you ever imagine that

3 you would have to face seeing your child or your

4 grandchild or your niece or your nephew or your cousin

5 with cancer?

6 How many people were compensated after the

7 Cerro fires? They send us away to hunt, and yet people

8 have to grow because what? It's not a green economy

9 for us. It's a way of life. It's what we call

10 sustainable. It's the new word, "green." This is the

11 way we've lived all our life. We've planted, hunted,

12 fished and did all the rest.

13 And then I look at here, that if they can't

14 send it and give it to us, now they're going to send it

15 to people like Hanford? Well, those are our brothers

16 and sisters. They live along the Columbia River. They

17 hunt and fish for their substance and their survival.

18 They're talking about sending it to Savannah

19 where our African brothers and sisters are trying to

20 survive. You know, I mean, yeah, don't put it in our

21 backyard, but don't give to anybody else. If you've

22 got the world's best scientists in the world, why don't

866.488.DEPO

www.CapitalReportingCompany.com

T101-2  
(Cont.)

T101-3

T101-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Schreck, Theresa, Commenter ID No. T101 (cont'd)**

Capital Reporting Company

80

1 you create something else? Why do you have to come and  
2 dump your trash in our yards? Why do you have to come  
3 and give us the trash that you try to convince us that  
4 that is the best way that we and the best and safe and  
5 creates no foot -- carbon footprint or anything,  
6 nuclear energy? Why?

7           Come on. Let's get real. I mean, this is --  
8 you know, it has not only gotten old, but I think as,  
9 you know, indigenous and traditional communities and  
10 rural communities, we need to stand up and start saying  
11 no more. You know, this is already pathetic. It's  
12 gotten old, you know.

13           And the only thing is, is that we see the  
14 cancer rates growing in our community, and we see the  
15 contaminations of our water, land, food, and everything  
16 else, and our traditional ways of life. So I think  
17 that it's, you know, a part of DOE that not only should  
18 they have these kind of meetings, but they ought to  
19 consider having strictly meetings with community  
20 representatives. Don't always just look to the  
21 officials, you know. It's the communities that are  
22 being impacted. It's us that are planting the gardens.

866.488.DEPO  
www.CapitalReportingCompany.com

T101-3  
(Cont.)

T101-4

T101-4 DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. Notices were placed in various local newspapers to announce the public hearings before and during the scheduled hearings. Site-specific NEPA reviews would be conducted as needed and would consider the meetings with community representatives as suggested by the commenter.

Schreck, Theresa, Commenter ID No. T101 (cont'd)

Capital Reporting Company

81

1 It's us that have to go out there and water, you know.  
2 It's us, the people that actually live in the  
3 community, that aren't always in your offices. We are  
4 the people that you've got to talk to. We are the  
5 people you should be meeting with, and we shouldn't  
6 have to always meet in this kind of situation, but I  
7 know it's the only one, the only way that was created  
8 because, believe me, I've been struggling in this  
9 struggle for years and fighting for them to bring this  
10 kind of hearings to our community.

11 Thank you.

**Schwartz, Maxine, Commenter ID No. W338**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Tuesday, June 21, 2011 6:36 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10338

Thank you for your comment, Maxine Schwartz.

The comment tracking number that has been assigned to your comment is GTCC10338. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 21, 2011 06:35:30PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10338

First Name: Maxine  
Middle Initial: R  
Last Name: Schwartz  
Address: 8325 SE 11th Ave.  
City: Portland  
State: OR  
Country: USA  
Email: [blackkatz@comcast.net](mailto:blackkatz@comcast.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

We have been warned with the what happened in Japan. Nuclear waste...NOT IN THE GORGE.

W338-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W338-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Schwarz, Peggie, Commenter ID No. W289**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 17, 2011 12:23 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10289

Thank you for your comment, Peggie Schwarz.

The comment tracking number that has been assigned to your comment is GTCC10289. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 17, 2011 12:23:11AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10289

First Name: Peggie  
Last Name: Schwarz  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I strongly oppose the trucking of radioactive waste through the Columbia River Gorge. It puts people at risk who have no options for protecting themselves.

W289-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W289-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.



**Seabrook, Kathy, Commenter ID No. W364**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 3:33 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10364

Thank you for your comment, Kathy Seabrook.

The comment tracking number that has been assigned to your comment is GTCC10364. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 03:32:53PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10364

First Name: Kathy  
Middle Initial: L  
Last Name: Seabrook  
State:  
Zip:  
Country: USA  
Email: [ladylane99@hotmail.com](mailto:ladylane99@hotmail.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
To whom it may concern,  
I don't want wasteful, subsidized, dirty, carcinogenic nuclear power let alone the nuclear waste in my backyard or anywhere upwind (planet earth).

W364-1

In response to your proposal to truck it through our little paradise...NO!

W364-2

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W364-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes. W364-1 The Hanford Site is analyzed as a candidate location for a new GTCC waste. Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

W364-2 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

**Selbin, Susan, Commenter ID No. E93**

**From:** susan selbin <sselbin@hotmail.com>  
**Sent:** Wednesday, April 27, 2011 8:18 PM  
**To:** gtccis@anl.gov  
**Subject:** No to More Radioactive Waste in New Mexico

Thanks you for the opportunity to comment on the draft Environmental Impact Statement (EIS) for the disposal of Greater-Than-Class C (GTCC) low-level radioactive waste and "GTCC-Like" waste.

There are several alternative locations; two of them involve bringing GTCC wastes to either the Waste Isolation Pilot Project (WIPP) near Carlsbad or to Los Alamos National Laboratory.

The *Waste Isolation Pilot Plant* east of Carlsbad is prohibited under federal and New Mexico law from storing commercial radioactive wastes (nuclear power plants, for example).

*Los Alamos National Laboratory* has no adequate facility for this waste storage and currently disposes of low level nuclear waste at Area G in unlined trenches, pits and shafts. Area G is leaking and in need of clean-up - not more shallow radioactive waste burial!

It appears that the DOE is ignoring discussion of real alternatives and rushing a decision on storage of GTCC waste now, while most GTCC waste cannot be collected and transported to a storage site for decades.

Do not rush to a decision. And do not send more radioactive waste to New Mexico.

Susan Selbin  
2431 Northwest Circle NW  
Albuquerque, NM 87104

E93-1 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

E93-2 LANL is analyzed as a candidate location for a new GTCC waste disposal facility. DOE is performing environmental restoration activities at LANL. The ongoing cleanup efforts at LANL will continue. A GTCC waste disposal facility would not affect ongoing cleanup activities at LANL.

E93-3 The scope of this EIS is adequate to inform decision-making for the disposal of GTCC LLRW and GTCC-like waste. Sufficient information is available to support the current decision-making process to identify (an) appropriate site(s) and method(s) to dispose of the limited amount of GTCC LLRW and GTCC-like waste identified in the EIS.

DOE believes that this EIS process is not premature and is in compliance with NEPA. On the basis of an assumed starting date of 2019 for disposal operations, more than half (about 6,700 m<sup>3</sup> [240,000 ft<sup>3</sup>] of the total GTCC LLRW and GTCC-like waste inventory of 12,000 m<sup>3</sup> [420,000 ft<sup>3</sup>]) is projected to be available for disposal between 2019 and 2030. An additional 2,000 m<sup>3</sup> (71,000 ft<sup>3</sup>) would become available for disposal between 2031 and 2035. This information is presented in Figure 3.4.2-1. DOE believes this EIS is timely, especially given the length of time necessary to develop a GTCC waste disposal facility.

DOE developed this EIS to support a decision on selecting a disposal facility or facilities for GTCC LLRW and GTCC-like waste, to address legislative requirements, to address national security concerns (especially for sealed sources), and to protect public health and safety. The purpose and need for the proposed action, as discussed above, is stated in the EIS (Section 1.1). The scope of the EIS is focused on addressing the need for developing a disposal capability for the identified inventory of GTCC LLRW and GTCC-like wastes. DOE plans a tiered decision-making process, in which DOE would conduct further site-specific NEPA reviews before implementing an alternative ultimately selected on the basis of this EIS.

**Seligman, Carole, Commenter ID No. E12**

---

**From:** caroleseligman@sbcglobal.net  
**Sent:** Saturday, June 25, 2011 6:35 AM  
**To:** gtccsis@anl.gov  
**Subject:** Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)  
**Importance:** High

Document Manager Arnold Edelman,

I want an end to the generating of nuclear waste, be it from commercial or military uses. No Nuclear weapons and no nuclear power plants! This is a clear necessity in light of the disaster still taking place from the Fukushima plant in Japan; the historic accidents at Chernobyl, Three Mile Island and others; as well as the plans now underway to build pilotless, stealth planes that could carry nuclear weapons.

E12-1

In the meantime, I definitely don't want to see nuclear waste transported around the country. First, stop producing it; Second, store it as safely as possible on site where it has been produced until a safe way can be developed for disposing of it.

E12-2

Sincerely,

Carole Seligman  
245 Whitney Street  
San Francisco, CA 94131

- E12-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.
- E12-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Serres, Daniel, Commenter ID No. T162**

Capital Reporting Company

47

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: Daniel is advancing on the podium,  
and he will be followed by Ross Tewksbury.

MR. SERRES: Thank you for the opportunity to  
comment. I also want to take this opportunity to  
thank the Washington Department of Ecology and Oregon  
Department of Energy for telling it like it is and  
for taking a strong position. It's nice to have our  
state agencies backing up the vast majority of people  
in this room who oppose new GTCC waste coming to  
Hanford.

Columbia Riverkeepers, like Oregon and  
Washington, oppose the use of Hanford for importing

866.488.DEPO  
www.CapitalReportingCompany.com

T162-1

T162-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

DOE's Record of Decision 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

Stopping nuclear power research is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

1 greater-than-class C waste. There is class A waste,  
2 class B waste, class C waste, and all this  
3 miscellaneous nuclear junk that's way more  
4 radioactive than any of those other three.

5 What's proposed to come to Hanford is a real  
6 risk to the Columbia River, and that means it's a  
7 risk to the river environment, to the salmon that  
8 spawn in the Hanford reach, and to the people who eat  
9 those salmon. And that's a risk that will last for  
10 thousands of years as it is, without even importing  
11 new GTCC waste. So that is why we think, as so many  
12 of you said so eloquently, it is pure insanity to  
13 even look at this.

14 The Columbia River -- to answer the question  
15 that was posed earlier -- is already contaminated by  
16 radioactive waste coming off the Hanford site. There  
17 are groundwater plumes that include tridium and other  
18 radionuclides that hit the river now. You can detect  
19 radiation in the Columbia from Hanford as we speak.  
20 The idea of contributing more waste to that is  
21 something that will obviously make cleanup much more  
22 difficult.

23 Ultimately, you know, the long-term plan for  
24 Hanford and the Columbia River Treaty Tribes that  
25 (inaudible), that people should be able to live

866.488.DEPO  
www.CapitalReportingCompany.com

T162-1  
(Cont.)

**Serres, Daniel, Commenter ID No. T162 (cont'd)**

Capital Reporting Company

49

1 there, literally should be able to live on the site.  
2 That's the agreement that existed between the tribes  
3 and the federal government when they claimed this  
4 land.

5 And so that's something -- you know, long-term,  
6 by adding this additional nuclear burden, you're  
7 foreclosing that option, certainly, for another  
8 thousand -- 10,000 years. The dose levels in the  
9 long term for things like uranium and plutonium in  
10 the next 50 to 100 to 1,000 years are very high and  
11 completely unacceptable.

12 There are major problems with technetium-99,  
13 iodine-129, and various isotopic uraniums already at  
14 the Hanford site. GTCC makes it worse.

15 And I think, you know, one of the ways we look  
16 at this is -- it was said in the presentation that  
17 deep geologic repository, that alternative may not be  
18 reasonable at this time. And from my perspective,  
19 what you should do then is to back out. Okay, if we  
20 don't have a good place to put this stuff, we should,  
21 at the very least, stop making it.

22 And this point has been made, and it is a really  
23 good one, but there are two groups of waste in the  
24 EIS. The one is Group I, and that involves waste  
25 that has already been produced -- I'm sorry -- that

866.488.DEPO  
www.CapitalReportingCompany.com

T162-2 When the impacts of technetium-99 from past leaks and cribs are combined, DOE believes it may not be prudent to add significant additional technetium-99 to the existing environment. Therefore, one means of mitigating the impact would be for DOE to limit disposal of off-site waste streams containing iodine-129 or technetium-99 at Hanford.

T162-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

T162-2

T162-3

1 would come from nuclear operations that are already  
2 ongoing. So that's the ongoing operations and  
3 decommissioning of existing licensed nuclear  
4 facility.

5 And then there is Group II, which are things we  
6 might build in the future. And that, actually, by  
7 volume is the majority of the waste, by volume. So  
8 what we are contemplating here today is not just  
9 using Hanford as a nuclear waste dump. It is looking  
10 upstream at where this stuff comes from, and I'm  
11 really encouraged. There's some people here who made  
12 that point over and over. It is really important.  
13 It may not be something that the Department of Energy  
14 gets to deal with directly, but they should. They  
15 should look at it, and it is something you can pass  
16 through the line to NRC and say, Hey, our good  
17 friends, we encourage you to solve this problem for  
18 us.

19 Ultimately, you know, from Columbia  
20 Riverkeepers' perspective, we plant our heels on the  
21 source of the Columbia River, and we look at what's  
22 coming off the Hanford site to the Columbia.  
23 Anything that goes in is going to come out. I mean,  
24 the story is, plutonium is forever. And what we  
25 bring in, along with highly mobile radioactive waste,

866.488.DEPO  
www.CapitalReportingCompany.com

T162-4

Serres, Daniel, Commenter ID No. T162 (cont'd)

Capital Reporting Company

51

1 will be a problem for generations to come. And I am  
2 very inspired by all the testimony tonight. So thank  
3 you very much.



**Shaulis, Dahn, Commenter ID No. E21**

---

**From:** Dahn@santamedia.nmsrv.com  
**Sent:** Monday, June 27, 2011 10:24 AM  
**To:** Arnold Edelman  
**Cc:** Dahn@santamedia.nmsrv.com; Shaulis@santamedia.nmsrv.com; Ph.D.  
**Subject:** Greater than Class C Comments

June 27, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000

Independence Avenue, SW., Washington, DC 20585

Dumping nuclear waste in Nevada is not a thoughtful solution. The Nevada Test Site (or whatever you wish to call it presently) is Western Shoshone land that you have already defiled--in violation of International Law and the Ruby Valley Treaty. It will take thousands of years to heal the destruction you have already made. Who will speak for those generations not yet born? Who will answer those generations when they ask why you destroyed the ecosystem for short-term gain?

Dahn Shaulis, Ph.D.  
Rancocas, NJ 08073

E21-1

E21-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Shea, Jan, Commenter ID No. W209**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 9:27 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10209

Thank you for your comment, Jan Shea.

The comment tracking number that has been assigned to your comment is GTCC10209. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 09:26:16AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10209

First Name: Jan  
Last Name: Shea  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Sending more nuclear waste to a facility that cannot safely contain what is already there is ludicrous. Sending through the gorge, which has very dangerous weather conditions much of the year, precious wildlife habitat and many residents is unconscionable. We need alternative energy NOW, and continuing down this road when thinking people know this is unsafe has got to stop.

W209-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W209-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

Stopping nuclear power research is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

**Siemer, Darryl, Commenter ID No. T164**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: Thank you. Darryl Siemer, and he will be followed by Beatrice Brailsford.

DARRYL SIEMER: I guess we've got the names right this time. We pronounced them right. I guess my concern with this, I agree that this nation needs a Greater-Than-Class C repository site. It definitely does need one. This isn't the best quick possible remedy to be implemented here.

The thing that concerns me about this is that I see it as a backdoor, a way for DOE to end up leaving its reprocessing waste at the Site for quite a number of years. I used to work at the Site as a consulting scientist in the management technology development business.

T164-1

T164-2

T164-1 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. The EIS impact analyses for all alternatives took into consideration the factors discussed in Section 2.9 for the identification of the preferred alternative described in Section 2.10.

T164-2 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

DOE recognizes that including GTCC-like wastes within the scope of this EIS along with GTCC LLRW may complicate the implementation of GTCC LLRW disposal alternative(s). However, DOE determined that the most efficient approach was to address both types of waste, which have many similar physical and radioactive characteristics, in a single NEPA process. DOE's intent is to facilitate the overall process for addressing the disposal needs of both waste types. Issues associated with potential regulatory changes or NRC licensing would be addressed as necessary to enable implementation.

1                   And we have over the years -- the Site  
2                   has over the years talked itself out of doing  
3                   everything that's logical with its reprocessing  
4                   waste, and is left with illogical things to do. Most  
5                   prominently, the steam reforming of the remaining  
6                   liquid reprocessing waste that are still in the  
7                   tanks.

T164-2  
(Cont.)

8                   Steam reforming is a way of calcining  
9                   waste in a spectacular, only inefficient fashion. We  
10                  could and should have calcined those sediments a long  
11                  time ago using the already-paid-for Calcine with a  
12                  flow sheet that was developed at Argonne National Lab  
13                  in the 1950's. That could have been done. It should  
14                  have been done, which would have put all of the  
15                  reprocessing waste developed at this particular  
16                  site -- and one would have to classify most of the  
17                  waste that was so processed as nondefense waste,  
18                  unlike the waste that was processed at Savannah River  
19                  and Hanford and places. So this nondefense type  
20                  reprocessing generated this site as a uniquely  
21                  inefficient disposal path right at this point.

22                  Starting off with this rebuilding of a  
23                  calciner, renamed and reformed instead of calcining.  
24                  The project cost -- it started off with \$45 million.  
25                  The latest official guess is \$571 million. It's way

1 behind -- way behind schedule. Contractors are going  
2 to make a heroic effort to get the thing started,  
3 which means it's contaminated before this contract  
4 runs out in a year and a half, that's when the  
5 contract ends out.

6 When they run that facility, if it runs,  
7 which is highly questionable, it's going to create  
8 vast amounts of very fluffy, readily water soluble,  
9 high carbon containing dust and granules, which are  
10 unsuitable for converting into a real waste plant,  
11 that is, a chunk of glass, and it will be  
12 spectacularly expensive.

13 And DOE, of course, has no place to  
14 dispose of it. Now, DOE had sold this whole idea to  
15 the State of Idaho based on the notion that this  
16 particular reprocessing waste, largely because it  
17 hasn't calcined yet, wasn't really a reprocessing  
18 waste. And, therefore, wasn't a high-level waste,  
19 just like everything else that had been calcined  
20 through the same process previously.

21 It was going to be done and then it was  
22 going to be shipped off to WIPP. So a part of the  
23 original contract let back in 2005 was not only that  
24 it would be steam reformed, it would be shipped to  
25 WIPP. And the WIPP folks that decide what's going to

1 go to WIPP had openly declared well before this  
2 contract was left that it would not be satisfactory  
3 to ship it to WIPP.

4 DOE went ahead and sold it to the  
5 locals. The locals loved this idea because it takes  
6 a lot of time, spends a lot of money right here in  
7 the good old State of Idaho.

8 And so the contract is lifted, the thing  
9 is gone. And then if it works, it's going to create  
10 all of this stuff that's not going to go to WIPP.  
11 It's not going to go to a high-level waste repository  
12 either because we don't have one.

13 Where is it going to go? Well, if one  
14 looks at this fluff, this water soluble, carbon  
15 containing, highly volumetric or highly voluminous  
16 stuff that's going to come out of the reformer, if it  
17 works, one can classify it as a Greater-Than-Class  
18 C-like waste because, technically, that's what it's  
19 going to be.

20 Now, DOE has made many arguments over  
21 the years that this stuff really isn't high-level  
22 waste, so I presume, and I think it's likely, that  
23 this stuff, if they can get the process to run, will  
24 go into a repository just like we're talking about  
25 here situated at this site. And, again, this is an

T164-3

Siemer, Darryl, Commenter ID No. T164 (cont'd)

---

1 observation, based on working at the Site for  
2 30 years and seeing how decisions are made.  
3           We back ourselves into a corner. We  
4 don't have any place to get rid of this stuff, and  
5 now we're going to open up a repository that will  
6 seemingly fit this stuff. I just wanted you guys to  
7 be aware of this. Thank you.

**Sill, Marjorie, Commenter ID No. W9**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, May 09, 2011 11:45 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10009

Thank you for your comment, Marjorie Sill.

The comment tracking number that has been assigned to your comment is GTCC10009. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 9, 2011 11:44:53AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10009

First Name: Marjorie  
Last Name: Sill  
Address: 720 Brookfield Dr.  
City: Reno  
State: NV  
Zip: 89503  
Country: USA  
Email: [msill@juno.com](mailto:msill@juno.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I do not believe that low level nuclear waste should be stored at the former Test Site. Instead I favor hard cask storage on site so there is no possibility of spill or sabotage during transportation.

W9-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W9-1 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements. The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.



**Simpson, Katharine, Commenter ID No. W76**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 03, 2011 10:01 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10076

Thank you for your comment, Katharine Simpson.

The comment tracking number that has been assigned to your comment is GTCC10076. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 3, 2011 10:00:26PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10076

First Name: Katharine  
Middle Initial: S  
Last Name: Simpson  
Address: 5817 SW Texas St.  
City: Portland  
State: OR  
Zip: 97219  
Country: USA  
Email: [sksms180@aol.com](mailto:sksms180@aol.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please do not consider sending more nuclear waste to Hanford, a location that still has persistent contamination according to testing, despite ongoing efforts to clean it up. This threatens the health of the 3 native tribes along the Columbia River, as well as life in and near the river.

Trucking 12,000 additional loads of extremely radioactive GTCC wastes to the dump at Hanford would provide huge danger to all areas along the trucking routes, increasing the risk of cancer to the public.

Please consider alternatives such as deep geologic repositories, where groundwater would not be affected.

This problem needs to be solved in a safe manner before we continue to produce more radioactive waste.

Sincerely,  
Katharine Simpson

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W76-1 The Hanford Site is analyzed as a candidate location for a new GTCC waste disposal facility in the GTCC EIS. DOE is performing environmental restoration activities at the Hanford Site, and the ongoing cleanup efforts at the Hanford Site will continue. Proposed actions for the retrieval, treatment and disposition of wastes at the Hanford Site are described in *Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington (TC & WM EIS)*. These factors, along with other environmental factors were considered in developing DOE's preferred alternative for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

Tribal perspectives from the Wampum, Umatilla and the Nez Perce are reflected in Chapter 6 as well as in Appendix G.

W76-2 See response to W76-1.

W76-3 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W76-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W76-1

W76-2

W76-3

W76-4

**Sims, Anita, Commenter ID No. L89**



Jun. 26. 2011 10:19AM Brookdale senior living

No. 2141 P. 2

**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL RADIOACTIVE WASTE AND GTCC-LIKE WASTE (DOE/EIS-0375-D)**

U.S. Department of Energy

**WRITTEN COMMENT FORM**  
Must be received on or before June 27, 2011

**received**  
JUN 27 2011

Mr. \_\_\_ Mrs.  Ms. \_\_\_ Mr. & Mrs. \_\_\_ Dr. \_\_\_

Name: ANITA SIMS

Title: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: 503-430-5444 E-Mail Address: SIMS.22074@COMCAST.NET

Comment: ONLY DEFLECTION TO CONCERN RE.

STAINING WASTE AT HANFORD.

I WORKED AT YUCCA Mtn. FOR 4 YEARS +

BELIEVE THAT THE CONTAINERS THEY

USE ARE SAFE.

L89-1

L89-2

Please use other side if more space is needed.

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

Withhold my name and address from the public record.

Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtccsis@anl.gov](mailto:gtccsis@anl.gov)

- L89-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.
- L89-2 Comment noted. A discussion of the types of packaging used in the EIS analysis and their usage may be found in Appendix B of the EIS.

**Smith, Claire, Commenter ID No. E10**

**From:** C Smith <starmystt@gmail.com>  
**Sent:** Monday, June 27, 2011 7:07 PM  
**To:** gtccels@anl.gov  
**Subject:** Written Comment re: Draft EIS for Disposal of GTCC & GTCC-like waste (DOE/EIS-0375-D)

Mr. Arnold Edleman  
 Document Manager  
 Office of Regulatory Compliance (EM-43)  
 US Department of Energy  
 1000 Independence Ave., SW  
 Washington, DC 20585-0119

Claire Smith  
 Private Citizen  
 2638 SE 52nd Ave.  
 Portland, OR 97206

Dear Mr. Arnold Edelman,

I was at the public hearing held here in Portland and received a copy of the summary Draft GTCC EIS. I did not address my comments at the time because, honestly, I needed a little time to digest just what was being proposed.

It is my understanding that you are not actively considering the Hanford site, as it is under moratorium until such time as the treatment facility for the current nuclear mess, has been constructed. I am under the impression that, according to your documentation, there is not even a projected completion date. With the recent news of further, current, safety concerns regarding that construction, I can only surmise you will be scratching Hanford, WA off the list permanently.

E10-1

I do however wish to state that I am opposed to the entire concept of truckloads of UNMARKED radioactive waste traveling on our roads. It would be risky enough to transport it via rail, at least the railroads have a buffer area built in already and are not subject to "civilian" traffic. The idea of transporting it via truck, terrifies me. I am glad that you will not be shipping it to Hanford as that would mean that you are committing any American between the East and West coast at risk for DNA stripping without even notifying them.

E10-2

I seem to recall the American citizens were mobilized at the thought of Russia sending nuclear weapons against the US. Would not shipping TONS of nuclear waste across the US in UNMARKED trucks be the same type of terrorist activity? Especially since there is a risk of more no-bid contracting, if not outright cronyism inherent in the treatment of waste no one wants to touch, much less transport, I would like to point to Hanford, if you have any questions regarding the results...When were you going to have the treatment plant built? After it is built, when do you intend to have the radioactive waste leaking into the Columbia (one of North America's major arteries) cleaned up? When do you intend to begin shipping Greater than Class C (The highest classification for nuclear waste possible) waste into this currently damaged environment for safe keeping?

E10-3

Additionally, the draft Environmental Impact Statement makes no mention of Tritium. It is my understanding that this highly volatile material, made from leftover nuclear weapons, is now being considered for a few of our

E10-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

E10-2 The transportation of radioactive waste will meet or exceed DOT and NRC regulatory requirements that promote the protection of human health and the environment. These regulations include requirements for radioactive materials packaging, marking, labeling, placarding, shipping papers, and highway routing. The waste shipments would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC wastes would be shipped in approved waste packages and transportation casks. The robust nature of these casks limits the potential release of radioactive and chemically hazardous material under the severest of accident conditions. It is unlikely that the transportation of GTCC waste to any of the alternative sites evaluated in the EIS would cause an additional fatality as a result of radiation from either incident-free transportation or postulated transportation accidents.

Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

E10-3 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Smith, Claire, Commenter ID No. E10 (cont'd)**

power plants back east. Thank goodness you hadn't tried it out in Minot, ND. Isn't this the same substance they had just loaded into Fukushima? If so, perhaps we ought to look at the full fallout from that disaster before we begin submitting our people to the same level of hazard.

E10-3  
(Cont.)

Since the northwest is currently generating more power than we need via wind and water technology, I would like to encourage you to consider a plan of discontinuing nuclear power and begin building wind farms and hydroelectric dams. Or perhaps you could take half the money being considered for allocation to the safe storage of nuclear material, and send it to infrastructure improvements so we can sell some of our power to the east coast...just a thought.

E10-4

In short the only plan that makes any sense to me is to continue to store these materials at the 84 facilities (Region I, II & III) east of the often flooded Mississippi and the 20 in (Region IV) west of the Mississippi in place. Allow the people within transmission range of these plants and able to access the medical facilities, to take the risk associated with that benefit, instead of spreading it through the already ravaged mid-west and all across the continental US.

E10-5

Thank you for your time and consideration. If you have any questions or if my information is inaccurate, please contact me.

Sincerely,

Claire Smith  
(503) 233-3165

Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

E10-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

E10-5 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Smith, Dawn, Commenter ID No. W86**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 11, 2011 7:13 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10086

Thank you for your comment, Dawn Smith.

The comment tracking number that has been assigned to your comment is GTCC10086. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 11, 2011 07:13:15PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10086

First Name: Dawn  
Middle Initial: F  
Last Name: Smith  
Address: 3110 19th Ave. Apt. 318  
City: Forest Grove  
State: OR  
Zip: 97116  
Country: USA  
Email: [dawn45810@hrecn.net](mailto:dawn45810@hrecn.net)

Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I am opposed to having more nuclear waste disposed of at Hanford WA. site

It is near the Columbia River which is already contaminated. This affects the cities downriver as well as the surrounding area. | W86-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W86-1 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

**Smith, Doyle, Commenter ID No. T27**

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

MR. BROWN: That's very much.

Doyle Smith is next, to be followed by Dale

Janway.

MR. SMITH: I'm Doyle Smith, and I'm a long-time  
resident, lifetime resident of Carlsbad. I've been here a  
long time. I've left and followed construction all over

**Smith, Doyle, Commenter ID No. T27 (cont'd)**

14

1 New Mexico. I was here when I was a young man, whenever  
2 they set that bomb off out here, the Gnome Project, so was  
3 Mr. Bob Forrest. Some of the rest of us is here.

4 I disagree with what's -- you know, I want every  
5 -- it's a lot of people working at the WIPP site, good  
6 people that need jobs. And I understand what's -- but my  
7 concern is you all were talking about transportation. The  
8 transportation of the highways, and I live out at the  
9 north end of town up by Bob Forrest, out there on Canal  
10 Street, and I've got a little bit of pasture out there  
11 that I graze a few cows on once in awhile and put some  
12 heifers on, weaning heifers. And I can't even get the  
13 state to go out there and fix the cattle guards alongside  
14 the highway that they're hauling the nuclear waste on.

15 If you came in the evening like the wind's been  
16 blowing, and it's so dry, and the wind is so bad here --  
17 two weeks ago, my wife and I were coming back from  
18 Lubbock, and we were on the Loop Road that they haul the  
19 nuclear waste on right out here north of Carlsbad. I had  
20 to slow down to 20 miles an hour. It's a 55-mile-an-hour  
21 highway. And if you pull the trailer down it, or a horse  
22 trailer or anything, it's so rough, you can't even hardly  
23 drive down right now.

24 And as we turned the corner of the curb there,  
25 the wind was blowing. They've got a -- what you call it

T27-1

T27-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

Smith, Doyle, Commenter ID No. T27 (cont'd)

15

1 -- the injection wells -- the oil fields. I'm so nervous,  
2 I can't hardly talk. But they inject the bypass of the  
3 byproduct with what they drill the water, the oil wells  
4 back to into the ground, and they call it an injection  
5 well. There's some out here on the Hobbs Highway between  
6 here and Hobbs.

7           And those injection wells, I think they haul a  
8 lot of trucks on it. And they stir up the dust so bad out  
9 there on the Loop Road that I had slow down to about 20  
10 miles an hour and keep flashing my lights because the  
11 truck's pulling off of the highway out there. It's an  
12 accident looking to happen. And I went to the county  
13 commission meeting about it and talked to some of the  
14 county commissioners, and Jack Volpato -- he's here  
15 tonight. He just got through talking. And he knows what  
16 I was talking about. And it's a crying shame that our  
17 government has let that road right here north of our town  
18 get in such shape that you -- it's -- it's bad. And  
19 that's all I have to say. Thank you.

T27-2

T27-2 See response to T27-1.



**Smith, Madeline, Commenter ID No. W546**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 4:27 PM  
**To:** mail\_gtccisarchives; gtcciswebmaster@anl.gov; gtccis@anl.gov  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10546  
**Attachments:** letter\_to\_Wash\_D.C\_on\_Hanford\_GTCC10546.doc

Thank you for your comment, madeline smith.

The comment tracking number that has been assigned to your comment is GTCC10546. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 04:27:03PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10546

First Name: madeline  
Middle Initial: m  
Last Name: smith  
Address: 594 west 11 ave  
City: eugene  
State: OR  
Zip: 97401  
Country: USA  
Email: [msmith28@uoregon.edu](mailto:msmith28@uoregon.edu)  
Privacy Preference: Don't withhold name or address from public record  
Attachment: E:\letter to Wash. D.C on Hanford.doc

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**Smith, Madeline, Commenter ID No. W546 (cont'd)**

---

Greater-Than-Class C Waste  
Office of Technical and Regulatory Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585-01198

June 27, 2011

[www.gtccceis.anl.gov/involve/comments/index.cfm](http://www.gtccceis.anl.gov/involve/comments/index.cfm)

To those who are concerned about Hanford's nuclear wastes:

The latest issue of Heart of America Northwest contains four pages, in great detail, concerning the dangers of the Energy Department's proposal to use Hanford as the *national* waste dump for extremely high level radioactive wastes.

At this time we are especially aware of those dangers because of what has happened in Japan. That disaster has become a wake-up call. The geography of the Hanford site is ripe for a disaster due to more signs of climate warming. While such a disaster would likely have a different process than Fukushima's earthquake, tsunami, and then cracking open three of nuclear power plants, the problems of containing a disaster might be the similar: extremely expensive, extremely difficult to bring under control, with all manner of leakage of highly toxic radiation problems extending far into the future.

At this decision point junction, one path promises to lead to desolation of vast areas and a high number deaths from radiation related diseases; whereas one or more of the alternative paths promise a more peaceful planet capable of nurturing all life.

W546-1 The EIS considered the geology of the Hanford site in analyzing the risks associated with disposal of GTCC LLRW and GTCC-like wastes. A description of the geology used in this analysis may be found in Section 6.1.2 of the EIS.

W546-1

**Smith, Madeline, Commenter ID No. W546 (cont'd)**

If we choose any one of the alternative paths, for starters, we dedicate ourselves to cleaning up all nuclear waste now while we're still in the early stages of global warming because Fukushima illustrates how hard it is to have to deal with several kinds of global warming induced disasters when they occur together.

W546-2

We are advised to heed the disaster warning signs being reported here at home. For example, recent mid-west floods may mean the Cooper Nuclear Station will have to close down if Missouri River rises three more inches. The Fort Calhoun nuclear power plant has already shut down due to flooding. Emergency generators have been powering it. Now another plant on the Missouri is in danger. In addition, extreme heat caused Prairie Island Minn. plant's two emergency diesel generators to fail. In New Mexico, the Nuclear Weapons lab has been shutdown for the day due to a fast moving wildfire which is not yet under control.

W546-3

Global warming presents one set of problems. Another set of problems that has surfaced involves aging nuclear power facilities. The Nuclear Power Industry, against common sense, has decided to fail and/or inadequately address dangers to public health! For example, they ignore the report that radioactive tritium has leaked from 48 of the 65 U.S. commercial nuclear power sites due to corroded, buried piping and even when reports include the fact of leaks from 37 contain concentrations which exceed the federal drinking water standard—sometimes a hundred times the limit—they don't take these problems on with due seriousness. Why didn't/doesn't the Nuclear Power Industry explore real solutions to public safety?

Instead of thinking through to solutions the problems recently reported, the Nuclear Power Industry and the Department of Energy weakened safety margins for a second time and also failed to feel any need to enforce the

W546-2 The EIS considered the impact of the climate at the Hanford site in analyzing the risks associated with disposal of GTCC LLRW and GTCC-like wastes. A description of the climate analysis used may be found in Section 6.1.1 of the EIS.

W546-3 See response to W546-2

existing standards. Why aren't they paying closer attention to Japan?

I'm aware that clean-up will cost money. I'm aware that issues regarding the Hanford Budget for the Fiscal year 2012 are now being reviewed by House Appropriations Committee. We don't know how much of the \$5.4 billion proposed for environmental cleanup at defense sites in 2012 will be allocated to Hanford? For sure, not enough to do the safest clean-up. I'm aware that doing a proper clean-up will be extremely expensive. But to do nothing has to be far worse.

W546-4

It's horrifically callous to think it's OK to have collateral deaths due to radiation, especially that of children. How dare the U.S. Department of Energy trample on all our futures for this unbeautiful-mass-commodity-mindless-of-what's-important-culture.

We need real solutions to how to sequester nuclear wastes. Simultaneously, we need to do all the mitigations which can slow down and/or contain global warming. Simultaneously, we need to clean-up poverty world-wide, and create a steady-state economy.

Only then can we evaluate exactly how successful renewables have been as sole source of energy.

Only when we've done everything we already know how to do to bring both nature and how we use' nature's resources back into planetary balance, might it be a reasonable idea to revisit nuclear power as a source of energy.

I'm well aware that many issues are overwhelming us—

- Two wars eating up too much money
- Local social services being cut due to shortfalls

W546-4 This comment is outside the scope of this EIS.

Smith, Madeline, Commenter ID No. W546 (cont'd)

- ocean marine species and entire maritime ecosystems on the brink of disappearing within a single generation
- land species disappearing
- plagues and diseases due to environmental toxics
- refugee population reaches a 15 year high—44 million this year, and likely to go higher due to coastal areas liable to go underwater
- too many floods, droughts and tornadoes
- ongoing financial and home foreclosure troubles
- high joblessness
- hunger, and in some areas, food riots
- food and water insecurity, and contamination

The general feeling is that the strong leadership that's needed to bring all this under control just isn't there.

But Vermont is in the process of shutting down its Mark 1 reactor. Robert Alvarez, former senior policy advisor to U.S. Secretary of Energy and now a senior scholar at the Institute for Policy Studies has written a new report called, "Spent Nuclear Pools in the US: Reducing the Deadly Risks of Storage". There have been other eloquent anti-nuclear activists, for example Helen Caldicott. Germany and Switzerland, and some other nations plan to phase out their nuclear plants. A few leaders already are seeking solutions that end nuclear waste as a perpetual hazard.

My question is this—what arguments would persuade you in nuclear industry and government officials who side with them, to join us in figuring out how to achieve the changes we the people, we the ordinary citizens really want? Once we find our common ground, we'd find the ways to remove the obstacles. We can work on the technical problems we need to solve to create a clean land, air and water planet. We do have laws guaranteeing that to us. Can anything be more important than safeguarding our presence on the planet for all time to come?

**Smith, Madeline, Commenter ID No. W546 (cont'd)**

---

Sincerely,

Madeline Smith  
594 West 11<sup>th</sup> Ave.  
Eugene, OR 97401

Msmith28@uoregon.edu

**Smith, Pamela, Commenter ID No. W475**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 12:52 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10475

Thank you for your comment, Pamela Smith.

The comment tracking number that has been assigned to your comment is GTCC10475. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 12:51:45PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10475

First Name: Pamela  
Last Name: Smith  
Organization: [pamelasmith1974@yahoo.com](mailto:pamelasmith1974@yahoo.com)  
Address: 1822 SE 12th Ave  
City: Portland  
State: OR  
Zip: 97214  
Country: USA  
Email: [PAMELASMITH1974@YAHOO.COM](mailto:PAMELASMITH1974@YAHOO.COM)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
USDOE's environmental impact statement on its proposal to use Hanford as a national radioactive waste dump for the extremely radioactive GTCC wastes puts waste in landfill trenches at Hanford and would result in annual radiation doses of 48 millirem per year to the people who will be drinking the groundwater - which flows straight to the Columbia.

W475-1

We can't cleanup Hanford and protect our Columbia River while more waste gets dumped at Hanford - Put Cleanup First!

That's a radiation level which would cause fatal cancers in approximately 1 to 2.5% of the Native American children living in the area under Yakama, Umatilla and Nez Perce Treaty Rights.

W475-2

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W475-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W475-2 All relevant potential exposure pathways were considered in the analyses presented in the EIS, including impacts from surface runoff and airborne emissions. These analyses addressed a range of reasonable scenarios and estimated the potential impacts on all environmental resources consistent with NEPA requirements. The assessment of impacts from accidents occurring hundreds to thousands of years into the future was considered too speculative to include because of the large uncertainty associated with estimating future land use and population patterns. For the human health assessment, the focus was on the groundwater pathway, since this is the most likely manner in which someone could be exposed to the radioactive contaminants in the GTCC LLRW and GTCC-like wastes in the distant future. Locations closer than the 100 m (330 ft) evaluated would result in higher dose and cancer risk estimates. The 100 m (30 ft) distance was used to be consistent with the minimum buffer zone distance surrounding a DOE LLRW disposal site identified in DOE Manual 435.1 1. As discussed in Section 2.7.4.2, the hypothetical resident farmer scenario was only used to provide estimates for comparing the various sites evaluated; however, this scenario may not be consistent with the reasonably foreseeable future scenario at some of the sites evaluated. Site-specific NEPA reviews would be conducted as needed. This information could include sensitive subpopulations and specific pathways of exposure for American Indians. In a similar fashion, additional cumulative impacts analyses would be conducted by using additional site-specific information when the location selected for a GTCC LLRW and GTCC-like waste disposal facility was determined.

**Soden, Mary, Commenter ID No. W210**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 9:34 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10210

Thank you for your comment, Mary Soden.

The comment tracking number that has been assigned to your comment is GTCC10210. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 09:34:05AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10210

First Name: Mary  
Middle Initial: E  
Last Name: Soden  
Address:  
City:  
State:  
Zip:  
Country: USA  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

We do not need an Chernobel/Japan in this country let alone in the Columbia River Gorge. Hanford has the ability to murder every living thing in the northern hemisphere. Why would anyone, any government, continue to promote death as a form of commerce? Time to ask GE for solutions to their worn out and hazard making failed engineering projects instead of promoting more. We all are brought closer to death by Hanford's failure. Hanford needs to be buried, not the Columbia River Gorge. Both are possible.

W210-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W210-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.



**Sorgen, Jacqueline, Commenter ID No. W518**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 1:03 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10518

Thank you for your comment, Jacqueline Sorgen.

The comment tracking number that has been assigned to your comment is GTCC10518. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 01:02:33AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10518

First Name: Jacqueline  
Last Name: Sorgen  
Organization: (Community Volunteer)/multiple orgs  
Address: 325 North 79th Street  
City: Seattle  
State: WA  
Zip: 98103-4619  
Country: USA  
Email: [jacqueline98103@gmail.com](mailto:jacqueline98103@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I am a Cancer Patient/Survivor. IT is a terrible disease.  
The treatment is also MISERABLE!!

Just to 'think' that OUR GOVERNMENT could be causing CANCER, when 'IT' SHOULD 'KNOW' BETTER --- I find appalling.

I did STOP Smoking (I knew the risk/and chose to 'sidestep' it). But how can the 'Native American Population' SIDESTEP the "RISK" you are proposing?

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W518-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

All relevant potential exposure pathways were considered in the analyses presented in the EIS, including impacts from surface runoff and airborne emissions. These analyses addressed a range of reasonable scenarios and estimated the potential impacts on all environmental resources consistent with NEPA requirements. The assessment of impacts from accidents occurring hundreds to thousands of years into the future was considered too speculative to include because of the large uncertainty associated with estimating future land use and population patterns. For the human health assessment, the focus was on the groundwater pathway, since this is the most likely manner in which someone could be exposed to the radioactive contaminants in the GTCC LLRW and GTCC-like wastes in the distant future. Locations closer than the 100 m (330 ft) evaluated would result in higher dose and cancer risk estimates. The 100 m (30 ft) distance was used to be consistent with the minimum buffer zone distance surrounding a DOE LLRW disposal site identified in DOE Manual 435.1 1. As discussed in Section 2.7.4.2, the hypothetical resident farmer scenario was only used to provide estimates for comparing the various sites evaluated; however, this scenario may not be consistent with the reasonably foreseeable future scenario at some of the sites evaluated. Site-specific NEPA reviews would be conducted as needed. This information could include sensitive subpopulations and specific pathways of exposure for American Indians. In a similar fashion, additional cumulative impacts analyses would be conducted by using additional site-specific information when the location selected for a GTCC LLRW and GTCC-like waste disposal facility was determined.

W518-1

**Sotir, Gregorv, Commenter ID No. T165**

T165-1 This comment is out of scope for this EIS.

Capital Reporting Company

41

1  
2 MR. SOTIR: Hi, everybody. I just moved to this  
3 region, and I hope to become a homeowner soon. I'm  
4 looking for properties. And, you know, this area is  
5 so wonderful. I'm coming from a desert climate.  
6 And, well, you can feel the rivers here. You can  
7 feel them. And it just constantly blows me away the  
8 effects of the watershed, the way you can really just  
9 feel it moving.

10 That said, you know, this EIS, this puts me at  
11 risk. This really puts me at risk. Looking through  
12 it, it doesn't even talk about liabilities of  
13 companies like, you know, Bechtel and Yostocology  
14 (phonetic), for example, who will be contractors at  
15 the site who have violated local, state and federal  
16 laws over and over and over again, and will, no  
17 doubt, continue to do so if they're allowed to expand  
18 the contamination zone at Hanford.

19 So you really need to redo this, and you really  
20 need to include those liabilities in it to let people  
21 know, you know, that we're subsidizing these  
22 corporations to kill us down the road. I mean, that  
23 would really be environmental justice. And in this  
24 there's a lot of talk about environmental justice,  
25 but environmental justice is not dumping all this

866.488.DEPO  
www.CapitalReportingCompany.com

T165-1

Sotir, Gregory - T165

**Sotir, Gregory, Commenter ID No. T165 (cont'd)**

Capital Reporting Company

42

1 nuclear waste into 930 boreholes, you know, within  
2 the Columbia River watershed.

3 That's not environmental justice. It's not  
4 subsidizing, you know, an industry, such as nuclear,  
5 which is going to constantly produce products that  
6 are extremely radioactive and very, very dangerous.

7 That's not environmental justice. Environmental  
8 justice is not saying that we need to create a  
9 nuclear sacrifice zone, you know, in this part of  
10 North America, because that's what Hanford would be  
11 if it's turned into a nuclear dump site. It would be  
12 a sacrifice zone; that is, the whole country would  
13 sacrifice it forever.

14 I think it's really just a matter of time,  
15 right, in terms of contamination. Once the product  
16 is in the ground, whether it's next year or ten years  
17 or 10,000 years, it will reach the watershed. And,  
18 you know, time, though, is kind of a scientific  
19 construct. The lichens that live in that area, they  
20 don't experience time. The wolves, the hawks, the  
21 salmon, they don't know anything about time. They're  
22 contaminated today, they're going to be contaminated  
23 tomorrow, and they're going to be contaminated in  
24 10,000 years, you know.

25 The perennial plants that exist there, you know,

866.488.DEPO  
www.CapitalReportingCompany.com

T165-2

T165-3

T165-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

T165-3 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

1           they're going to be contaminated. And the humans  
2           that live in the vicinity, well, maybe -- do we know  
3           better? Do we? I don't know. When you have an EIS  
4           like this, it doesn't really seem like we do, because  
5           basically what this EIS is doing is, it's saying  
6           there's nothing wrong, there's nothing wrong, trust  
7           us.

8           Bechtel? Oh, they're great. They're going to  
9           do a good job. They're going to protect you. That's  
10          what this says, and it's wrong. It's a lie. In  
11          terms of acceptable risk, you know, this is not  
12          acceptable risk. I am not an acceptable risk. My  
13          future cancer and my future home contamination is not  
14          an acceptable risk.

15          So I would encourage the DOE to not only redo  
16          this and talk about the truth of the liabilities of  
17          the outside contractors involved, but you really need  
18          to decommission and get away from nuclear power in  
19          general. You really need to demolish this whole  
20          cycle of nuclear military, you know, industry as  
21          well. And we need to start thinking about our  
22          watersheds a lot more than we have been.

T165-4

T165-5

T165-4 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

T165-5 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Spadone, Marian, Commenter ID No. W535**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 12:50 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10535

Thank you for your comment, Marian Spadone.

The comment tracking number that has been assigned to your comment is GTCC10535. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 12:50:00PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10535

First Name: Marian  
Last Name: Spadone  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I am strongly opposed to adding more radioactive waste to Hanford, which has yet to be fully cleaned as it is, and if more waste is added, cannot be cleaned up effectively. The place for this waste, at this point, is deep under the ground, not in limited life-span casks or other kinds of containers. In addition, trucking this through our city is dangerous to the population...by DOE's own admission. Exposing innocent and unaware citizens to the danger of radiation poisoning is unconscionable. AND, these issues--of storage and of transport-- need to be considered separately. Stop this action now. IN the end...we need to work to eliminate energy sources that create nuclear waste and do not pose threats to people now and so far into the future.

W535-1

Sincerely,  
Marian Spadone

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W535-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Spaeth, Thea, Commenter ID No. T107**

Capital Reporting Company

101

1 MR. BROWN: Okay. Thea?

2 MS. SPAETH: Yes.

3 MR. BROWN: Okay.

4 MS. SPAETH: Thea Spaeth, and I represent  
5 several organizations: womanhood, motherhood, animal  
6 and plant life because -- and the earth itself because  
7 all of that is part of my body. I represent oceanic  
8 creatures and insects, too, whether we like them or  
9 not.

10 I'd like to talk about, first of all, what the  
11 DOE has come here specifically on. I agree with many  
12 of the speakers here that the waste should be kept on  
13 site where it's created. If the large populations are  
14 wanting nuclear energy to supply them, the areas around  
15 Chicago I know have several nuclear power plants. They  
16 should keep their own waste.

17 I also think that your choices of bore holes  
18 and trenches are not only unacceptable. They're  
19 ridiculous because all of the other sites that you've  
20 located in here, Hanford, Los Alamos, Savannah, they  
21 already have trenches, and they're already polluting  
22 our environment, and many people have already discussed

866.488.DEPO  
www.CapitalReportingCompany.com

T107-1

T107-2

T107-1 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

T107-2 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Spaeth, Thea, Commenter ID No. T107 (cont'd)**

Capital Reporting Company

102

1 that. So I don't think that they are acceptable.

2           Next, I want to talk about the issue of the  
3 gentleman who was supporting the facility based on the  
4 medical radioactive waste. I choose to work for  
5 myself, my family, my neighbors, my state, my country  
6 to live and work towards eating and living in a health  
7 manner so as to live a healthy life and, with God's  
8 blessing, to come to a healthy death. Our modern way  
9 of life is unhealthy, which leads to the need for such  
10 medical testing. Our fear-based way of life  
11 contributes as well.

12           The Hippocratic Oath is to first do no harm.  
13 If the trash from medical testing is nuclear  
14 radioactive waste, then doctors are choosing poorly. I  
15 choose to live and die as God intends, over getting an  
16 MRI or whatever such test produces this waste.

17           Next, to the points of the discussion in  
18 general. The Department of Energy, what is that? Most  
19 of what we have in our society is defined on where the  
20 money goes. If you look at the budget for the  
21 Department of Energy, most of it goes to testing for  
22 nuclear energy and for weapons research and for a

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T107-2  
(Cont.)

T107-3

T107-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

1 handful of other things, but very little money actually  
2 goes to alternative energy resource investments.

3           So I agree with many of the other people that  
4 with our brain capacities and with our financial  
5 investments, we can make a great dent on other  
6 possibilities.

7           But also the Department of Energy focused on  
8 how to create more. Now, I know this intimately  
9 because my mother is a nuclear physicist and she works  
10 on the NIF Project, and I believe that NIF has some  
11 unique possibilities, but it is so young and so in the  
12 research and development stages that this is not the  
13 waste that the Department of Energy is actually  
14 discussing, and NIF supposedly will burn waste and not  
15 create it.

16           But you're talking about waste that is a  
17 future waste. On page 1 you talk about less than ten  
18 percent of the total volume is currently in storage.  
19 Most of the waste will be generated for several --  
20 won't be generated for several decades. So let's talk  
21 about generating that next waste.

22           The Department of Energy is unbalanced. It's  
                  866.488.DEPO  
                  www.CapitalReportingCompany.com



**Spaeth, Thea, Commenter ID No. T107 (cont'd)**

Capital Reporting Company

104

1 focusing on creating energy for the world, for the  
2 future, for global warming, for water drought, for how  
3 will be provide for our refrigerators and for our  
4 commercial load. Nobody is talking, and not even the  
5 Department of Energy about conservation. Not even the  
6 conservative political party is talking about  
7 conserving.

8           During the California energy crisis I heard  
9 that through voluntary turning off of power and through  
10 smart usage of power that they reduced their use load  
11 enough that if sustained, they could have shut down  
12 seven power plants.

13           So if we can conserve, we don't have to have  
14 such a conversation. Now, if we're talking about  
15 India's growing energy needs, let's talk about it  
16 without the pollutants and toxic variabilities of  
17 nuclear.

18           Thank you.

T107-4 See response to T107-3.

T107-4

**Spence, Michael, Commenter ID No. W384**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 4:55 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10384

Thank you for your comment, Michael Spence.

The comment tracking number that has been assigned to your comment is GTCC10384. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 04:55:16PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10384

First Name: Michael  
 Last Name: Spence  
 Address: 5810 S. 144th Street  
 City: Tukwila  
 State: WA  
 Zip: 98168  
 Country: USA  
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
 It's patently crazy to be considering sending thousands of truckloads of nuclear waste through the Columbia Gorge, one of our nation's most precious natural resources. Please don't knuckle under to the nuclear industry, just so it can expand its toxic business. We need more conservation, not a doubling-down on this lethal, outdated technology.

W384-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W384-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Spencer, Amanda, Commenter ID No. W95**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 7:05 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10095

Thank you for your comment, Amanda Spencer.

The comment tracking number that has been assigned to your comment is GTCC10095. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 07:05:29PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10095

First Name: Amanda  
Last Name: Spencer  
Country: USA  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**  
The risks for this method and location of transport are not acceptable! Even if there are not any spills (which are very likely if you have ever driven that highway!) the detriment to residents (human and animal) is unacceptable.

W95-1

An alternative solution needs to be found.

Thank you

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W95-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Stannard, Richard, Commenter ID No. W19**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, May 14, 2011 10:15 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10019

Thank you for your comment, richard stannard.

The comment tracking number that has been assigned to your comment is GTCC10019. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 14, 2011 10:14:34PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10019

First Name: richard  
Middle Initial: m  
Last Name: stannard  
Organization: heart of america northwest  
City: seattle  
State: WA  
Zip: 98105  
Country: USA  
Email: [olympicview@comcast.net](mailto:olympicview@comcast.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Nothing should be done about these wastes until 1)a disposal site with maximum safety is ready; and 2)rail transport, when the time comes, should be the preferred transfer method, much safer than trucks and highways.

Having said that, I must say that this is so far an unsolvable problem because no locality will tolerate the disposal site in their area. Which means no more nukes to generate more waste until there is a solution.

Spare no expense. Budgetary considerations should be set aside for this project, which is probably the single most important project in the ccountry.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W19-1 The use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater. Based on the GTCC EIS evaluation, land disposal facilities located in arid climates (e.g., NNSS and WIPP Vicinity) would isolate radionuclides for a sufficient period of time to allow for significant radioactive decay to occur.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W19-2 Comment noted. Recommendations will be taken into consideration, as appropriate, in the implementation of the preferred alternative.

W19-3 Stopping the generation of nuclear waste is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluates the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes in compliance with the requirements specified in NEPA, the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240), and Section 631 of the Energy Policy Act of 2005 (P.L. 109-58). The GTCC EIS evaluates the potential environmental impacts of the proposed disposal alternatives for GTCC LLRW and GTCC-like wastes. Based on the evaluation, DOE has determined that there are safe and secure alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS provides information that supports this determination, and, as discussed in Section 1.1, Purpose and Need for Agency Action, DOE is responsible for the disposal of GTCC LLRW and GTCC-like wastes.

W19-1  
W19-2

W19-3

**Stanton, Elizabeth, Commenter ID No. W380**

---

**From:** gtccseiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 4:44 PM  
**To:** gtccseiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10380

Thank you for your comment, Elizabeth Stanton.

The comment tracking number that has been assigned to your comment is GTCC10380. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 04:43:20PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10380

First Name: Elizabeth  
Middle Initial: a  
Last Name: Stanton  
Address: 2803 SW Montgomery Drive  
City: Portland  
State: OR  
Zip: 97201  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I am opposed to Hanford becoming the dumping site for our nation's nuclear waste. Transportation of highly toxic waste across our highways is unthinkable.

W380-1

Questions about submitting comments over the Web? Contact us at: [gtccseiswebmaster@anl.gov](mailto:gtccseiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W380-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D).

There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

**Stein, Fay, Commenter ID No. W499**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 3:56 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10499

Thank you for your comment, Fay Stein.

The comment tracking number that has been assigned to your comment is GTCC10499. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 03:55:27PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10499

First Name: Fay  
Middle Initial: J  
Last Name: Stein  
Organization: Education-Related  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [fayjayalltheway@hotmail.com](mailto:fayjayalltheway@hotmail.com)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

When I heard that there were plans to use the Columbia River as a waterway for nuclear waste disposal, I was sickened to think that anyone would endanger the life of this wonderful River and the lives of the inhabited areas of the Gorge. I say that you are here to protect your citizens and our environment from danger, so please do not allow nuclear waste to be moved in our waterways.

W499-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W499-1 It is assumed that GTCC LLRW and GTCC-like waste would be transported by truck and rail to the disposal facility in Type B shipping packages, as discussed in Section 5.2.9 of the EIS.

**Stengle, James, Commenter ID No. W323**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 20, 2011 12:59 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10323

Thank you for your comment, James Stengle.

The comment tracking number that has been assigned to your comment is GTCC10323. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 20, 2011 12:59:04PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10323

First Name: James  
Middle Initial: B  
Last Name: Stengle  
Address: 730 SE 33rd Street  
City: Troutdale  
State: OR  
Zip: 97060  
Country: USA  
Email: [jstengle@frontier.com](mailto:jstengle@frontier.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I live in Troutdale which is a gateway city to the Columbia River Gorge. Because the Columbia River and Gorge are so critical for the ecological, economical, and social survival of the area, these areas are important to protect and preserve. Hauling hazardous materials through these areas is an accident waiting to happen. When it does happen, there are likely very significant impacts that will be difficult to control and mitigate. Find a better choice to manage the radioactive waste.--James B. Stengle, Certified Wildlife Biologist

W323-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W323-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Sterling, Shila, Commenter ID No. T43**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: Thank you.

(Whereupon Exhibit No. 4 was marked for identification.)

Okay. Shila Z. is next, and she will be followed by Mike Kelly.

MS. STERLING: Good evening. I'm Shila Z. Sterling, and I'm just representing I am a voting citizen of Las Vegas, a long-time resident. I am also a trained participant and presenter for the climate project with Al Gore, and I'm the Southern Nevada coordinator for Ions. I am Ions, Las Vegas, which is the noetic sciences.

There's a plethora of reasons why this shouldn't happen. I just want to talk about a couple of them. One, the economics. Las Vegas is known as a destination. People come here to get married. People come here for a holiday. If this happens, if there is a repository for nuclear waste, regardless of what level, the public eye will no longer be able to look at Las Vegas as a romantic destination. It would be

T43-1

T43-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.



**Sterling, Shila, Commenter ID No. T43 (cont'd)**

1 economically disastrous.

2           Secondly, in 2005, I was in Washington DC,  
3 lobbying for the national parks and became privy to  
4 what was called a "safe route." At that time, they  
5 were looking at Yucca Mountain for other -- as a  
6 repository. And when you overlaid what they considered  
7 safe routes, because they were going to be trucking and  
8 you overlaid it over the states, the route they  
9 considered safe went through 14 of our 22 national  
10 parks.

11           Because they were going to try and stay off  
12 of a lot of the main highways here in Las Vegas, it  
13 would be impossible; and as many have said before, it  
14 is a high-risk danger. It's a disaster looking for a  
15 place to happen. There are no safe routes for nuclear  
16 waste to be trucked.

17           I'd like to just say a little bit about  
18 solutions. It's my personal opinion that companies who  
19 engage and companies who make and use radioactive  
20 materials need to be responsible for that, if they're  
21 going to do that. They need to be not moved but  
22 disposed of or done with where they stand. The less  
23 movement -- because there is no way to 100 percent  
24 contain nuclear waste when it is being in a movement.  
25 And I think it's time that corporations start taking

T43-1  
(Cont.)

T43-2

T43-3

T43-2 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

The transportation analysis as presented in the EIS is conservative in that consideration of the TRUPACT III and the SNF casks could reduce impacts. However, while these packages are viable options for transport of the GTCC LLRW and GTCC-like wastes, consideration of their use as an option in the EIS did not influence the identification of the preferred alternative. Use of the spent fuel cask designs would require rail transport, and any of the conceptual land disposal designs could be modified to accommodate the larger packages, but their use at WIPP would require further study.

T43-3 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Sterling, Shila, Commenter ID No. T43 (cont'd)**

1 responsibility.

2           And, also, I would like for -- I think I  
3 mentioned before there is technology. There is now  
4 technology. One is called a "plasmic arc," and I would  
5 like to see the government looking into this. There is  
6 a way to dispose of the waste that we have today  
7 without poisoning the earth and poisoning the air and  
8 potentially poisoning everybody. Because we are on the  
9 endangered species list, and if we don't wake up pretty  
10 soon, we're coming to that tipping point.

11           So my recommendation is also stop making  
12 nuclear waste by finding alternative methods of power  
13 and use. The technology is out there, and it's time we  
14 put our feet forward for the future, for the future of  
15 this planet, let alone our children and other  
16 generations.

17           Thank you very much.

T43-4

T43-4 The technologies and alternatives suggested for evaluation are not within the reasonable range of alternatives for disposal of GTCC LLRW and GTCC-like wastes. Other concerns or programs suggested for DOE consideration are considered outside the scope of the EIS and do not meet the purpose and need for agency action stated for this EIS.

**Stewart, Margaret, Commenter ID No. E58**

---

**From:** Margaret Stewart <maggiemaystewart@yahoo.com>  
**Sent:** Thursday, June 23, 2011 2:19 PM  
**To:** gtccis@anl.gov  
**Subject:** re: DOE GTCC EIS  
**Attachments:** GTCC HOSS ltr to DOE 6232011.doc

Mr. Arnold Edelman,

Attached you will find my concerns regarding the disposal of GTCC radioactive nuclear waste. Please include it and my grave concerns in your final EIS.

Thank you,

Margaret Macdonald Stewart

**Stewart, Margaret, Commenter ID No. E58 (cont'd)**

June 23, 2011

Arnold Edelman, Document Manager  
DOE GTCC EIS  
Cloverleaf Building, EM-43  
1000 Independence Avenue  
Washington, DC 20585

Mr. Edelman,

I am writing regarding the proposal to dispose of Greater-Than-Class-C radioactive waste. GTCC nuclear waste is some of the most dangerous radioactive nuclear waste on the planet and the thought of transporting it to a central location for disposal is beyond belief. I am vehemently opposed to transporting any existing or future projected GTCC waste to a central repository – no matter the type of repository (burial or otherwise). The idea of burying it underground, either in boreholes, ‘enhanced’ near-surface trenches, a deep geologic repository ....we all know this scenario will never happen....is to not look very far into the future – or into the past. Once buried, it will be nearly impossible to monitor and we are already spending hundreds of millions to *un-bury* nuclear waste that was unwisely buried decades ago.

If this country insists on creating more nuclear waste, (which any thinking person will agree is not only unnecessary, but insane) the only reasonable, sensible, monitoring-possible and economically rational solution is to store the GTCC nuclear waste in hardened, on-site storage systems (HOSS). Nuclear waste, whatever its type, should be stored as safely as possible above ground, as close to its point of generation as possible. This will prevent states that have nuclear waste-producing reactors from creating more of this dangerous waste to be sent off “into the sunset,” without a care of its final destination ....which is usually the arid west. As a resident of the arid west, I am incensed that I have no voice as to the deposition of this horrid material...even though I am paying for it daily. Environmental discrimination is what this is called. The HOSS system has been advocated by many scientists for more than a decade but it has been ignored.

As the economics of our world grow more dismal by the day, it seems the DOE should make the wisest (and most economical) decision (*not* the political decision) and chose the HOSS system for disposal of its GTCC nuclear waste.

Sincerely,

Margaret Macdonald Stewart  
Box 2404, Ketchum, ID 83340

E58-1 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

E58-2 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

E58-1

E58-2

**Stock, Ron, Commenter ID No. E105**

---

**From:** Ron Stock <stockontheroad@yahoo.com>  
**Sent:** Monday, June 27, 2011 5:23 PM  
**To:** gtceis@anl.gov  
**Subject:** No to waste storage proposal on Los Alamos

Arnold Edelman,

It is 4:15 p.m. on Monday, June 27th. I just stepped outside my door here in Taos, New Mexico and inhaled the pungent odor of smoke from the Las Conchas fire in Los Alamos. It is not hard for me to imagine, maybe sooner than I think, that after an earthquake or human error accident, those fire fumes could be carrying radiation. I beseech you to first stop producing this indisposible nuclear waste, and two, find a site as far away from people as possible, not 50 miles downwind from our little village.

Ron Stock Taos resident.

E105-1

E105-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most cases, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Stolzberg, Karen, Commenter ID No. W455**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 12:57 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10455

Thank you for your comment, Karen Stolzberg.

The comment tracking number that has been assigned to your comment is GTCC10455. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 12:57:09AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10455

First Name: Karen  
Last Name: Stolzberg  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

It seems highly ill advised to consider moving nuclear waste through a corridor that is subject to extremes of weather, fog, and traffic. The inevitable accident will threaten not only the unlucky participants, the other travelers, local residents, but also a unique natural area. We need to work together to keep this extraordinary environment as unscathed as possible, given the existing transportation.

This is a bad idea that must be rejected.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W455-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W455-1

**Stoney, Mindy, Commenter ID No. W560**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 9:59 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10560

Thank you for your comment, Mindy Stoney.

The comment tracking number that has been assigned to your comment is GTCC10560. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 09:58:31PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10560

First Name: Mindy  
Middle Initial: I  
Last Name: Stoney  
Address: P.O. Box 213  
City: Bellevue  
State: ID  
Zip: 83313  
Country: USA  
Email: [omstoney@yahoo.com](mailto:omstoney@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Keep Nuclear waste off the road! This beyond hazardous; it is just plain stupid!

W560-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W560-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Stookey, Jeffrey, Commenter ID No. L211**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)  
U.S. Department of Energy**

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

**received**  
JUN 27 2011

Mr.  Mrs.  Ms.  Mr. & Mrs.  Dr.

Name: Jeffrey Stookey

Title: ordinary citizen

Organization: Alliance for Democracy

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: 503-232-6867 E-Mail Address: jstookey@imagina.com

Comment:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Please use other side if more space is needed*

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtccois@anf.gov](mailto:gtccois@anf.gov)

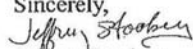


**Stookey, Jeffrey, Commenter ID No. L211 (cont'd)**

28 May 2011

Ten thousand years! That is how long nuclear contamination would continue to pollute the Columbia Rive if the Hanford site is not adequately cleaned up. But now the Dept. of Energy is planning to store "Greater than Class C" nuclear waste in unlined trenches that would in time leach into the Columbia River which flows past Portland, OR, the city where I live. What is more, this dangerous waste would be trucked through my city to reach the Hanford site. A terrorist attack or a serious accident with one of these trucks could render a 30 mile radius around Portland uninhabitable for many years, similar to the Fukushima site in Japan. And now there are plans to use the same experimental Plutonium fuel as Fukushima reactor 3 in our region's only commercial reactor at Hanford.

The environmental risks of the proposed plans are simply too high. I urge that the USDOE's proposal to tuck and bury "greater than Class C" waste at Hanford be stopped.

Sincerely,  
  
Jeffrey Stookey

L211-1

L211-2

L211-3

L211-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

L211-2 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

L211-3 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Storhm, John, Commenter ID No. W72**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Friday, May 27, 2011 11:34 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10072

Thank you for your comment, John Storhm.

The comment tracking number that has been assigned to your comment is GTCC10072. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 27, 2011 11:34:06AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10072

First Name: John  
Last Name: Storhm  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [jstorhm@burnedbookspublishing.com](mailto:jstorhm@burnedbookspublishing.com) Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I am opposed to the plan, proposed by the DOE, to ship 12,000 truckloads of Greater-Than-Class C Low-Level Radioactive Waste (GTCC LLRW) to the Hanford site. Hanford, as the DOE is well aware, is already a highly contaminated site, sitting in the banks of the Columbia River, up stream from many large population areas. The DOE plans and progress on cleaning up the waste already at Hanford have not been well executed, not been well planned, and have lacked sufficient funding. Adding additional waste to this site, a site that is struggling to cope with the waste already on site, seems foolhardy and exceedingly risky. In addition, shipping waste to the site, will expose a larger population to the risks of health impacts, property damage, and, in the event of an accidental release en route, even death. I urge the DOE to cancel this planned transportation of Greater-Than-Class C Low-Level Radioactive Waste (GTCC LLRW) to Hanford.

W72-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W72-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Sullivan, Robert, Commenter ID No. W416**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 11:38 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10416

Thank you for your comment, Robert Sullivan.

The comment tracking number that has been assigned to your comment is GTCC10416. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 11:37:50PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10416

First Name: Robert  
Last Name: Sullivan  
State: OR  
Zip: 97217  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

The Hanford site in Washington State is already the most radioactive site in the U.S. Radioactivity is already leaking from storage tanks into the Columbia River. Allowing more radioactive waste into the Hanford site is insane. Allowing many many trucks to haul the waste through the Gorge is insane. The result of a spill in the Gorge would be a catastrophe beyond description. Trucking radioactive waste through the Gorge must not be allowed.

W416-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W416-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Sunrise, Elizabeth Anne, Commenter ID No. W79**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 09, 2011 5:47 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10079

Thank you for your comment, Elizabeth Anne Sunrise.

The comment tracking number that has been assigned to your comment is GTCC10079. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 9, 2011 05:46:51PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10079

First Name: Elizabeth Anne  
Middle Initial:  
Last Name: Sunrise  
City:  
State:  
Zip:  
Country: USA  
Email: [annewsunrise@yahoo.com](mailto:annewsunrise@yahoo.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
I'm shocked & appalled that Hanford,WA. is the planned national site for dumping of 12,000 truckloads of highly radioactive waste by the DOE. It is totally outrageous and unacceptable. There would be countless causes of cancer over a long period of time. It's highly irrational and unfair to ship all the nation's waste to one location and it should be banned permanently!!!

W79-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W79-1 DOE's Record of Decision 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.



DRAFT ENVIRONMENTAL IMPACT STATEMENT for the DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL RADIOACTIVE WASTE AND GTCC-LIKE WASTE (DOE/EIS-0375-D) U.S. Department of Energy

WRITTEN COMMENT FORM Must be received on or before June 27, 2011

Mr. Mrs. Ms. Mr. & Mrs. Dr. Name: Al & Julie Sutherland Title: La Loma Neighborhood Assoc. Organization: HC 81 B9 Address: Questa State: NM Zip Code: 87556 Phone: 575-5861657

Comment: DO NOT DO IT! [Signature]

L80-1

Please use other side if more space is needed.

WITHHOLDING OF PERSONAL INFORMATION: Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record. Withhold only my address from the public record

Comment forms may be mailed to: Mr. Arnold Edelman Document Manager Office of Regulatory Compliance (EM-43) U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585-0119

Comment form may be faxed to: (301) 903-4303

or sent by electronic mail to: utceis@anl.gov

L80-1 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Swanson, John, Commenter ID No. L292**

Received  
MAR 30 2011

March 24, 2011

1318 Cottonwood Dr.  
Richland, WA 99354  
509-946-7871

Arnold Edelman, EIS Document Manager  
Office of Environmental Management  
U.S. Department of Energy  
Cloverleaf Building, EM-43  
1000 Independence Avenue, SW  
Washington, D.C. 29585

Dear Mr. Edelman,

Subject: Comments on DOE/EIS-0375-D (Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste)

I believe that this EIS should be modified to make much more clear the fact that it addresses only a (perhaps small) portion of the GTCC LLW that may require disposal during the time period that is addressed in it. While the current draft Summary does acknowledge (page S-13) that this EIS does not address wastes that would result from an increase (above an unspecified number) in the number of new commercial nuclear power plants and/or would result from implementation of nuclear fuel cycles involving advanced reactors or recycling of used fuel, it does not emphasize this fact sufficiently well. Thus, it is easy for a reader to conclude that the scope of the EIS is much greater than it actually is. Specific recommendations to improve this situation include:

- 1) Add a new paragraph to the Introduction (following the first paragraph?); this paragraph should repeat the inventory information now contained in the last three sentences of the first paragraph on page S-13. This action will put the information in a location that will better call attention to the limited scope of this EIS.
- 2) Define, and use frequently throughout the EIS, a term to indicate that the waste inventory considered in this EIS is a limited one. I'm having a hard time suggesting such a term; "existing" isn't accurate; I thought briefly of "currently-licensed", but page S-13 says that the study inventory includes wastes from planned facilities (including an unspecified number of new reactors) not yet in operation, so I assume that those facilities are also not yet licensed. I also wondered about "currently-anticipated", but many (including me) anticipate that a reprocessing/recycle fuel cycle, giving larger volumes and more types of GTCC LLW, will be implemented within the time frame covered by this EIS. Maybe the term "currently-planned"

L292-1

L292-1 DOE respectfully disagrees. The inventory is based on the best available information from DOE and the industry.

**Swanson, John, Commenter ID No. L292 (cont'd)**

would work? Examples of places where use of such a qualifying term would be especially valuable include:

- a. In the title. Add a term such as "currently-planned" – to make it read "--- for the Disposal of Currently-Planned Greater-Than Class-C ----."
- b. In locations where the types of wastes are discussed. For example, on page S-3, "Other Waste consists of ----." A better statement would say "----. Currently-planned Other Waste consists of ----." (An alternative improved wording would be " Other Waste considered in this EIS consists of ----.")
- c. In locations where conclusions based on the volume of waste are discussed. For example, on page S-65 of this draft is "--- siting another deep geologic repository facility --- would be impractical due to --- and the relatively small volume of GTCC LLRW ---." A better statement would say "--- and the relatively small volume of currently-planned GTCC LLW ---." (An alternative improved statement would include "--- and the relatively small volume of GTCC covered by this EIS ---.")

L292-1  
(Cont.)

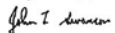
I also believe that the decision to not include consideration in this EIS of co-disposal of GTCC LLW along with used fuel and high-level waste at the Yucca Mountain repository should be reversed – and that that co-disposal option should be included in this EIS, as was planned originally. The decision to not include this option is stated (page S-37) to be based on the Obama Administration's determination that the Yucca Mountain repository is not a workable option and that the project should be terminated. However, the legality of that administration-determination has not been established (it is being contested in the court system), so it would appear to be prudent to include consideration of this option in the EIS. Another reason to include consideration of this option in the EIS is that it is also possible that, even if the legality of this administration's determination is upheld, the next administration could determine that the Yucca Mountain repository is indeed a workable option.

L292-2

Finally, I am disappointed that this draft EIS uses the acronym "LLRW" instead of "LLW". The LLW acronym has been the common usage for decades (including, for example, in the NOI of this EIS and in existing NRC regulations), and I see no value to having this EIS use a different one. I urge that the final EIS be returned to the use of LLW. If that is not done, it should at least be stated somewhere (perhaps in the list of acronyms) that "LLRW" in this EIS means the same as does "LLW" elsewhere.

L292-3

Respectfully yours,



John L. Swanson

L292-2 The EIS considered the range of reasonable alternatives for disposal of the inventory of GTCC LLRW and GTCC-like wastes identified for inclusion in these analyses. The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS. DOE has included analysis of generic commercial facilities in the event that a facility could become available in the future. In that case, before making a decision to use a commercial facility, DOE would conduct further NEPA reviews, as appropriate.

L292-3 The acronym LLRW is defined in the EIS.

**Swanson, Marsha, Commenter ID No. W525**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 8:41 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10525

Thank you for your comment, marsha Swanson.

The comment tracking number that has been assigned to your comment is GTCC10525. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 08:40:54AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10525

First Name: marsha  
Last Name: Swanson  
Country: USA  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
I am totally opposed to trucking nuclear waste to Hanford and to trucking nuclear waste on the Columbia River highway system | W525-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W525-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.



**Swanson, Rod, Commenter ID No. W555**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 4:28 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10500

Thank you for your comment, rod Swanson.

The comment tracking number that has been assigned to your comment is GTCC10500. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 04:27:27PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10500

First Name: rod  
Middle Initial: c  
Last Name: Swanson  
Organization: Education-Related/Training  
Address:  
City: I  
State:  
Zip:  
Country: USA  
Email: [swansonrod@hotmail.com](mailto:swansonrod@hotmail.com)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

my wife and i have had to leave our home of 30 years because our corrupt county surrounded our home with a wind factory, we now live in the columbia gorge. hearing that the department of energy is going to bring radioactive waste through the gorge now makes me wonder how long we will be living here. the whole question of nuclear energy needs to be addressed. after japan nuclear disaster to think we'll never have a problem like that is wishful thinking not a reality. please don't truck nuclear waste through the gorge it's just not worth the risk of destroying this magnificent columbia gorge.

W555-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W555-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Tarpey, Raymond, Commenter ID No. W44**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Thursday, May 19, 2011 8:00 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10044

Thank you for your comment, Raymond Tarpey.

The comment tracking number that has been assigned to your comment is GTCC10044. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 19, 2011 07:59:40PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10044

First Name: Raymond  
Middle Initial: J  
Last Name: Tarpey  
City: Lake Oswego  
State: OR  
Zip: 97034  
Country: USA  
Email: [raymontarpey@yahoo.com](mailto:raymontarpey@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

As a citizen of the state of Oregon and the USA,  
I strongly object to the plans to truck more nuclear waste to the Hanford site in the state of Washington.  
The plan is haphazard at best with proven radioactive leakage already occurring and threatening our precious Columbia River and adjacent lands.  
The other sites in Nevada should be used until our waste leakage is addressed. We should have a short-term plan of removal of waste at Hanford with commitment to full removal as removal technology develops in the future.  
Any plan to pave it over and start carting in new waste is a denial of the existing problem and pandering to Washington government & business interests. In addition, the transport of such huge amounts of radioactive waste threatens large areas of our lands adjacent to the highways to be used.  
We expect more accountability from our Federal Government and a common sense attitude in solving problems.  
All I see is pandering and ridiculously unaccountable solutions to a life-threatening problem.  
Please get the other sites back on the table and get to work in seriously removing the radioactive leakage threat at Hanford.  
We are tired of your half-hearted promises and corrupt short-term solution proposals.  
Please protect our precious Columbia watershed from the effects of this poisonous nuclear technology.  
Signed,  
Raymond Tarpey

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W44-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

W44-2 Proposed actions for the retrieval, treatment and disposition of wastes at the Hanford Site are outside the scope of GTCC EIS. Those activities are described in *Final Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington (TC & WM EIS)*.

W44-1

W44-2

**Tatum, Ron and Paulette, Commenter ID No. W194**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 2:22 AM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10194

Thank you for your comment, Dr. Ron and Paulette Tatum.

The comment tracking number that has been assigned to your comment is GTCC10194. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 02:21:51AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10194

First Name: Dr. Ron and Paulette  
Last Name: Tatum  
Address: 17435 SW Blanton  
Address 2: Street  
City: Aloha  
State: OR  
Zip: 97007  
Country: USA  
Email: [pswitzeratum@peoplepc.com](mailto:pswitzeratum@peoplepc.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
The Columbia Gorge National Scenic Area is a beautiful and important scenic area of the Northwest. It's a protected area and should remain protected all of the time and in all circumstances. This area is a national treasure so let's keep it that way. Radioactive waste should not be transported through the Columbia Gorge area at any time. We do not want Hanford Nuclear Reservation to be a permanent waste dump for radioactive waste materials coming from all over the US. Hanford is already contaminated enough as it is.

W194-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W194-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Taylor, Sarah, Commenter ID No. T6**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

MR. BROWN: Thank you. Sarah Taylor. And Stewart  
Fox will be after Sarah.

MS. SARAH TAYLOR: Hi. I am a small business  
person and a small farmer in Aiken County. I am a  
private citizen. I want to record my opposition to

| T6-1

T6-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Taylor, Sarah, Commenter ID No. T6 (cont'd)**

17

1 having class-C waste stored in Savannah River Site. I  
2 wonder, and probably all of us in the back of our mind  
3 are wondering, did the Japanese have these meetings.  
4 That's something that's quite chilling that we should  
5 really look around and see how many empty seats we see  
6 here, how many of us can make a difference to our  
7 government in light of what has happened in--in Japan.  
8 And we certainly do not need more waste here in South  
9 Carolina. As a biologist I also am concerned about the  
10 350-plus square miles of the Savannah River Site  
11 itself, what will happen to it as it's been a 50-year  
12 laboratory which can--has some pristine qualities to it  
13 in spite of the fact that plutonium being in--the  
14 tonnage of the area. But I do believe that they are  
15 managing well but we do not need more waste coming in.  
16 We do not need a repeat of Japan's scenario here and we  
17 need to abridge our neighbors and our friends to be  
18 educated about this problem before it becomes a bigger  
19 problem. Thank you.

T6-1  
(Cont.)

**Tenhonen, Steve, Commenter ID No. W316**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 19, 2011 4:14 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10316

Thank you for your comment, steve tenhonen.

The comment tracking number that has been assigned to your comment is GTCC10316. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 19, 2011 04:14:25PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10316

First Name: steve  
Middle Initial: p  
Last Name: tenhonen  
Address: po box 5491  
City: portland  
State: OR  
Zip: 97228  
Country: USA  
Email: [stevetenhonen@hotmail.com](mailto:stevetenhonen@hotmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

I grew up near the Columbia River Gorge. I enjoyed hiking and visiting the water falls as a child. Today I work with disabled folks who love fishing and hiking in the Gorge. It is a place that creates a sense peace and serenity. I am very frightened by the idea of toxic waste being transported and stored in our national treasure. I am repulsed by the idea of developing cancer or other life threatening illness enjoying this sacred area. This is a dangerous violation of a place that touches so many lives.

W316-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W316-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Tewksbury, Ross, Commenter ID No. T167**

Capital Reporting Company

51

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: Gregory Kafoury will follow Ross.  
MR. TEWKSBURY: My name is Ross Tewksbury. I live in Portland, and I'm actually the seventh generation of my family that has lived here in Oregon, and my ancestors came out on the Oregon Trail. And, you know, you want to think, what is happening seven generations from now? And people who still, amazingly, are going to be dealing with this stuff, you know, because it basically never ends. So I'm against putting this waste at Hanford. They already have way too much waste there they have to deal with or clean up for the past 70 years, and we don't need any more.  
I think that a couple other people mentioned that nuclear waste ought to be handled by the proponents in the geographical areas that they're producing this, in the Midwest and South, because they're the ones that want the stuff. And, you know, they shouldn't be able to just get the benefits and not any of the costs.  
One thing that I was thinking about is the transportation. The transportation is sort of dealt

866.488.DEPO  
www.CapitalReportingCompany.com

T167-1

T167-2

T167-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.  
T167-2 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

1 with in this whole thing kind of, what I would say,  
2 sort of cavalierly or something. You're not really  
3 thinking about the real -- what really happens out  
4 there. You know, it is like some imaginary truck  
5 gets from point A to point B with no kind of problem  
6 or anything.

7 But, you know, what I want to ask these  
8 proponents, you know, what if your wife or husband or  
9 your children are stuck in traffic sitting next to  
10 one of these trucks getting irradiated? What about  
11 that? What if -- you know, I've seen these trucks  
12 before on the road, down in California, and I took  
13 pictures of a few of them.

14 What if you were, you know, eating lunch in a  
15 Burger King and a truck is parked in the back, you  
16 know, the driver is, you know, eating lunch? How  
17 much radiation are you getting there? I've actually  
18 seen that before. You know, what if you're at a rest  
19 stop and the truck pulls in behind, you know, where  
20 you're parked? There's many opportunities for -- you  
21 know, you can get a little bit here, a little bit  
22 there, and how much is too much? You need a Geiger  
23 counter to keep track of this.

24 And then what about, you know -- I mean, people  
25 mentioned accidents. But what about storms and

866.488.DEPO  
www.CapitalReportingCompany.com

T167-3 Transportation of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

T167-4 Details of the facility accident analysis can be found in Sections 5.3.4.2.1 and C.4.2. All information necessary to duplicate the transportation accident consequence assessment was available in Section 5.3.9.3 of the Draft EIS.

T167-3

T167-4



**Tewksbury, Ross, Commenter ID No. T167 (cont'd)**

Capital Reporting Company

53

1 calamities? Certainly in the last few weeks we've  
2 had, you know, more examples of those than anybody  
3 would ever -- there's terrorist attacks, there's  
4 tornadoes, hurricanes, earthquakes, flood, you know,  
5 these last few weeks.

6 I was just thinking, you know, what if a truck  
7 happened to be going through Tuscaloosa, Alabama,  
8 when the tornado hit? Then somebody had got  
9 (inaudible). Besides you have a section wiped off  
10 the map, then it is wiped off -- irradiated, like in  
11 Japan. But people don't seem to think about that too  
12 much.

13 There is always a lull, you know, of things  
14 happening, but lately there's been a lot higher  
15 things happening, because they keep happening, you  
16 know. So I do think that the idea about the --  
17 putting them in deep granite areas deep in the earth,  
18 you know, is about the best thing I've heard so far.

19 And finally, I think the one statement that you  
20 mentioned earlier about if there were no new nuclear  
21 facilities, there would be no more waste to be  
22 disposed of; then we wouldn't need this in the first  
23 place. So that's really the answer, as many people  
24 have pointed out, that we just need to use solar  
25 power and wind power and conservation, all the other

866.488.DEPO  
www.CapitalReportingCompany.com

T167-4  
(Cont.)

T167-5

T167-6

T167-5 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

T167-6 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

Tewksbury, Ross, Commenter ID No. T167 (cont'd)

Capital Reporting Company

54

1 alternatives, which are not completely free of  
2 problems. But compared to nuclear, it's like  
3 nothing, you know. Who wants to spend, you know, a  
4 hundred thousand years watching it take care of  
5 itself. Thank you.

**Thomas, Charles, Commenter ID No. W414**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 11:28 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10414

Thank you for your comment, Charles Thomas.

The comment tracking number that has been assigned to your comment is GTCC10414. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 11:28:02PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10414

First Name: Charles  
Middle Initial: L  
Last Name: Thomas  
Address: 1577 Holly Ave  
City: Eugene  
State: OR  
Zip: 97408  
Country: USA  
Email: [chucklthomas@yahoo.com](mailto:chucklthomas@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I am strongly opposed to the proposal to truck Greater than Class C Radioactive Waste through the Columbia River Gorge.

W414-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W414-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Thomas, David, Commenter ID No. W397**

From: gtcceiswebmaster@anl.gov  
Sent: Thursday, June 23, 2011 7:01 PM  
To: gtcceiswebmaster@anl.gov  
Subject: Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10397

Thank you for your comment, David Thomas.

The comment tracking number that has been assigned to your comment is GTCC10397. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 07:00:49PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10397

First Name: David  
Middle Initial: A  
Last Name: Thomas  
State: WA  
Zip: 98648  
Country: USA  
Email: [sharemydream@cablespeed.com](mailto:sharemydream@cablespeed.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I have lived her for 40 yrs, and I do not want any waste coming through our town of Stevenson....we have way to much to loose please dont truck it through here.I am begging you to help get rid of the waste, maybe take it to Hawaia and drop it in there Volcano!

W397-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W397-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

**Thomas, Eileen, Commenter ID No. W551**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 7:06 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10551

Thank you for your comment, Eileen Thomas.

The comment tracking number that has been assigned to your comment is GTCC10551. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 07:06:02PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10551

First Name: Eileen  
Last Name: Thomas  
City:  
State:  
Zip:  
Country: USA  
Email: [ei@efn.org](mailto:ei@efn.org)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
No more nuclear waste buried at Hanford until Hanford is cleaned up!

W551-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W551-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Till, Rick, Commenter ID No. W325**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Monday, June 20, 2011 3:07 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10325

Thank you for your comment, Rick Till.

The comment tracking number that has been assigned to your comment is GTCC10325. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 20, 2011 03:06:37PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10325

First Name: Rick  
Last Name: Till  
Country: USA  
Email: [ricktill@gmail.com](mailto:ricktill@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Secretary Chu and Mr. Edelman:

I strongly oppose including the Hanford Nuclear Reservation on the U.S. Department of Energy's list of potential sites for storing hazardous nuclear waste from across the country.

W325-1

What has occurred at Hanford over the years is a travesty and must be fixed. Given DOE's poor track record, the existing waste must be cleaned up and the existing threats to human health and the environment must be removed. To consider shipping additional waste to a site that is already a catastrophic waste is an insult to everyone living downstream of Hanford and to everyone that would be exposed to waste as it would be shipped through the Columbia River Gorge.

W325-2

Shockingly, the DEIS does not include a 2008 USDOE study that estimated 800 adult cancer deaths would occur due to ambient radiation from the transport vehicles alone. Nor does the DEIS include the unimaginable number of deaths and environmental damage resulting from a truck accident, an earthquake or an intentional attack. These risks must be added to the existing threat from ongoing hazardous waste leaching into the Columbia River.

W325-3

The risk is simply too severe. DOE must clean up the existing mess and needs to find alternative solutions for storage of hazardous waste. If safe alternative cannot be found, DOE needs to reconsider the practices that generate the waste in the first place.

W325-4

Thank you for your time and consideration.

Rick Till  
Portland, Oregon

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W325-1 DOE is performing environmental restoration activities at the Hanford Site, and the ongoing cleanup efforts will continue. As stated in the Hanford TC&WM EIS, the receipt of offsite waste streams (including GTCC LLRW) that contain specific amounts of certain isotopes, specifically iodine-129 and technetium-99, could cause an adverse impact on the environment. When the impacts of technetium-99 from past leaks and cribs are combined, DOE believes it may not be prudent to add significant additional technetium-99 to the existing environment. Therefore, one means of mitigating the impact would be for DOE to limit disposal of off-site waste streams containing iodine-129 or technetium-99 at Hanford. DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. These factors were considered in developing DOE's preferred alternative for the disposal of GTCC LLRW and GTCC-like waste, as discussed in Chapter 2 of the GTCC EIS.

W325-2 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

W325-3 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

W325-4 A GTCC waste disposal facility would not affect ongoing cleanup activities at the Hanford Site.

DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Till, Rick, Commenter ID No. W325 (cont'd)**

**Timm, Chris, Commenter ID No. T54**

Capital Reporting Company

18

1

2

3 MR. BROWN: Okay. Chris Timm and Rod Peterson  
4 will follow Chris.

5 MR. TIMM: Thank you ladies and gentlemen.

6 I'm pleased to see the turnout. I'm always pleased to  
7 see people interested in trying to solve a problem.

8 I'm Chris Timm, I'm also a civil engineer.

9 I've had about 20 plus years, closer to 30  
10 years in the environmental compliance, environmental  
11 cleanup, waste management business. I'm with Pecos  
12 Management Services, and most recently, we finished a  
13 five-year stint of being the independent oversight  
14 contractor for WIPP. Before that, I worked at Rocky  
15 Flat, I worked at Hanford's, I worked at Los Alamos, on  
16 a variety of cleanups. I'm very familiar with what  
17 these issues are, and I'll speak to it from a  
18 perspective of this is a problem that has to be solved  
19 and looking at the alternatives.

20 The citizens of this country have received  
21 many benefits from their lives from the use of  
22 radioactive elements that have resulted in Greater-

866.488.DEPO  
www.CapitalReportingCompany.com

T54-1



**Timm, Chris, Commenter ID No. T54 (cont'd)**

Capital Reporting Company

19

1 Than-Class-C waste. You've heard mention about the  
2 treatment of cancer and of other diseases by the  
3 medical -- by medical processes that result in this  
4 waste. And, I think there's a lot of people, probably  
5 many in the audience that would agree this has been  
6 beneficial, it's something that we'll want to continue  
7 (inaudible).

8 But, therefore, I think it's time that we  
9 agree on a permanent disposal path to protect us and  
10 our offspring from the side effects, if you wish, of  
11 having the waste. If it sits elsewhere, it's going to  
12 continue to cause problems. If it's put in a safe  
13 disposal, out of touch of all of us, then it's  
14 certainly a much safer situation.

15 Of the alternatives presented, the one with  
16 the demonstrated safety for permanent disposal of this  
17 type of waste is WIPP. Greater-Than-Class-C waste is  
18 essentially no more radioactive than the transuranic  
19 waste now being disposed of in WIPP. In fact, much of  
20 it is less hazardous than the waste being disposed in  
21 WIPP now. WIPP also has an established transportation  
22 system designed to minimize potential exposure to the

866.488.DEPO  
www.CapitalReportingCompany.com

T54-1  
(Cont.)

T54-2

T54-1 Comment noted.

T54-2 Based on the GTCC EIS evaluation and WIPP's operating record, DOE believes that the WIPP repository would be a safe location for the disposal of GTCC LLRW and GTCC-like wastes, some of which include long-lived radionuclides. DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require modification to existing law. In addition, it would be necessary to revise the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, the WIPP compliance certification with EPA, and the WIPP Hazardous Waste Facility Permit.

The State of New Mexico has indicated a willingness to accept GTCC LLRW and GTCC-like wastes for disposal at WIPP. Twenty-eight New Mexico State Senators signed a proclamation made in the Fiftieth Legislature, First Session, 2011, stating: "Be it resolved that we, the undersigned, support the opportunity for other potential missions in southeast New Mexico to adequately address the disposal of defense high-level waste, commercial high-level waste, Greater Than Class C LLRW and surplus plutonium waste, as well as the interim storage of spent nuclear fuel." In response to the Draft GTCC EIS, Secretary David Martin, Secretary of the New Mexico Environment Department, sent a letter to DOE on June 27, 2011, stating that "the Department encourages DOE to support the WIPP or WIPP Vicinity proposed locations as the preferred alternatives addressed in the Draft EIS. The geologic repository is the favored alternative being more effective for the enduring time frames for this waste type." In addition, the Governor of New Mexico, in a letter to DOE Secretary Steven Chu on September 1, 2011, stated that the State of New Mexico encourages DOE to support the proposed location of WIPP as the preferred alternative for the disposal of GTCC LLRW and GTCC-like wastes.

**Timm, Chris, Commenter ID No. T54 (cont'd)**

Capital Reporting Company

20

1 public, etc. Again, they've got the safety record.  
2 WIPP is also well regulated by EPA and the New  
3 Mexico Environment Department, which will continue to  
4 assure the citizens of Mexico that they would be safe.  
5 Finally, using WIPP is the quickest and most cost-  
6 effective solution as well as being safe. In this era  
7 of concern about federal spending, yet still wanting to  
8 protect our health, safety, and environment, all tracts  
9 -- all factors make it the preferred alternative.  
10 Thank you.

T54-2  
(Cont.)

**Tims, Margaret, Commenter ID No. W170**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 10:51 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10170

Thank you for your comment, Margaret Tims.

The comment tracking number that has been assigned to your comment is GTCC10170. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 10:50:58PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10170

First Name: Margaret  
Middle Initial: J  
Last Name: Tims  
Organization: None  
Address: 7754 S.E. 21st Ave.  
City: Portland  
State: OR  
Zip: 97202  
Country: USA  
Email: [mtfms@cmcast.net](mailto:mtfms@cmcast.net)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
People of the Northwest have been fighting for decades to have radioactive materials REMOVED from Hanford. After years of preparation of the Nevada site, now to have it suddenly dismissed and huge amounts of additional radioactive materials brought to Hanford represents a truly stealth attack. I and every other resident of the Northwest protest in the strongest terms. This must not be allowed.

W170-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W170-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Toll, Betsy, Commenter ID No. W336**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Tuesday, June 21, 2011 3:42 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10336

Thank you for your comment, Betsy Toll.

The comment tracking number that has been assigned to your comment is GTCC10336. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 21, 2011 03:41:48PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10336

First Name: Betsy  
Last Name: Toll  
City: Portland  
State: OR  
Zip: 97206  
Country: USA  
Email: [betsy.toll@gmail.com](mailto:betsy.toll@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Secretary Chu and Mr. Edelman:

I am writing to strongly urge you to remove the Hanford Nuclear Reservation from the U.S. Department of Energy's list of possible permanent nuclear waste storage sites, to dump radioactive materials from across the United States.

W336-1

The Hanford proposal would require thousands of trucks to carry deadly radioactive loads through the Portland metropolitan area, endangering half a million people with every trip. Then those trucks would drive another 100 miles through the Columbia River Gorge National Scenic Area, often in black-ice conditions, passing within yards of homes, schools, protected wilderness, critical wildlife habitat, and the Columbia River itself.

W336-2

These terrifying risks are undeniable and unacceptable. We don't need domestic terrorism from DOE!

The Draft Environmental Impact Statement (DEIS) for this proposal totally ignores that an estimated 800 adult cancer deaths would result from ambient radiation from "safe" transport vehicles, and the risks to children and wildlife are even higher.

W336-3

The DEIS ignores the possibility of a truck accident, earthquake, or deliberate attack, and the countless deaths and massive environmental damage that could result. These are not far-fetched dangers, but very real and likely disasters waiting to happen.

W336-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

W336-2 See response to W336-1.

W336-3 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers (see Section 6.2.9.1).

**Toll, Betsy, Commenter ID No. W336 (cont'd)**

My opposition to transporting more nuclear waste to Hanford is shared by Friends of the Columbia Gorge, Heart of America Northwest, Columbia Riverkeeper, thousands of Gorge-area residents, plus seventeen Oregon legislators, Congressman Earl Blumenauer, U.S. Senator Jeff Merkley, U.S. Senator Ron Wyden and many others.

Again, I urge you to cross Hanford off the list of possible nuclear dump sites. Our region has already suffered too much from Hanford's nuclear mess.

W336-4

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W336-4 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Tombleson, Barbara, Commenter ID No. W192**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 12:54 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10192

Thank you for your comment, Barbara Tombleson.

The comment tracking number that has been assigned to your comment is GTCC10192. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 12:53:31AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10192

First Name: Barbara  
Last Name: Tombleson  
State: i  
Country: USA  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
Please seriously reconsider trucking radioactive Class C nuclear waste into the Columbia Gorge. Thousands of trucks make the odds too high for leaking or accidents to occur. We need to protect our environment and not play dice with this destructive potentiality. The potential for catastrophe is way too high. No nuclear waste shipments in our precious Columbia River Gorge.

W192-1

Thank you for thinking deeply about this important issue.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W192-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Trainer, Patricia, Commenter ID No. W351**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 12:32 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10351

Thank you for your comment, Patricia Trainer.

The comment tracking number that has been assigned to your comment is GTCC10351. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 12:31:41PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10351

First Name: Patricia  
Middle Initial: S  
Last Name: Trainer  
Address: 1305 East Republican, #2  
City: Seattle  
State: WA  
Zip: 98102  
Country: USA  
Email: [triciatrainer@gmail.com](mailto:triciatrainer@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

There is toxic radiation leakage already at Hanford, threatening the health of the Columbia River. And all efforts to clean up Hanford have been slow, very costly, and not completely effective. So I do not want more toxic waste brought in to Hanford, until what is there has been successfully stored. I do not believe in nuclear power because there are as yet no successful ways to store waste products.

W351-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W351-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Truitt, Penny, Commenter ID No. T84**

Capital Reporting Company

24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

MR. BROWN: Okay. Penny Truitt is at the podium and Scott Kovac will follow.

MS. TRUITT: I'm Penny Truitt. I live in El Dorado, immediately adjacent to the 285 WIPP route to Carlsbad.

In light of the disaster 25 years ago at Chernobyl and its continuing impact, a continuing disaster with no solution, and in light of the present and concurrent disaster at Fukushima, there should be no further accommodation for transporting and containing materials that are death sentences to life on our planet, not just human beings, but all life.

866.488.DEPO  
www.CapitalReportingCompany.com

T84-1

T84-1 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).



**Truitt, Penny, Commenter ID No. T84 (cont'd)**

Capital Reporting Company

25

- 1           Only yesterday a near disaster occurred at
- 2 Brown's Ferry. None of the 442 working commercial
- 3 atomic reactors are safe.
- 4           Thank you.

**Trujillo, Mary Alice, Commenter ID No. T70**

Capital Reporting Company

59

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15 MR. BROWN: Okay, again, is it Mary Alice

16 Trujillo?

17 MS. TRUJILLO: Yes.

18 MR. BROWN: And she'll be followed by Michael

19 Trujillo.

20 MS. TRUJILLO: Good evening. My name is Mary

21 Alice Trujillo. I'm from a little town called

22 Antonito, Colorado, which is about six miles north of

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Trujillo, Mary Alice, Commenter ID No. T70 (cont'd)**

Capital Reporting Company

60

1 the New Mexican border. About a year and a half ago,  
2 we were told that there were train cars that were  
3 going, gondolas, they were called, going on a little  
4 rail that goes from Antonito all the way to Walsenburg  
5 and on up to Chicago. And we were going to be the  
6 facilitators of transporting nuclear waste out of Los  
7 Alamos.

8 Well, anytime anyone tells me about  
9 nuclear waste, after having taught for 30 years in the  
10 fields of chemistry, biology, and math, my ears go up  
11 and the hairs on my arm stand up, because nuclear  
12 waste, according to the Academy of Science, the only  
13 safe exposure to radiation is no exposure. And so I'm  
14 thinking, here we go, all those wonderful geniuses up  
15 at Los Alamos, they haven't figured out how to do what  
16 they need to do; and that is, dispose of whatever it is  
17 that they generate on site. Well, no, they're not  
18 going to do that. Why? Because there's a lot of money  
19 to be made in transporting this all over the country,  
20 through little towns like Antonito, Colorado, which  
21 they practiced environmental injustice. It's a little  
22 town made up of more than 90 percent Latinos, which are

866.488.DEPO  
www.CapitalReportingCompany.com

T70-1

T70-1 DOE is performing environmental restoration activities at LANL. The ongoing cleanup efforts at LANL will continue.

**Trujillo, Mary Alice, Commenter ID No. T70 (cont'd)**

Capital Reporting Company

61

1 what I call American Mexicans, a lot of Indian  
2 influence. Been there for generations, five  
3 generations. Ignorant? Well, yeah, most of us are  
4 ranchers. We're not ignorant about all things.  
5 Uneducated, but the majority of us might be. Average  
6 income per family in Conejose County, 24,000 dollars.  
7 Well, that's all we need. We have our own. We're  
8 self-sustainable. We don't need all that.  
9 But as they looked at the environment, they  
10 felt it was okay to take five gondolas full of nuclear  
11 waste dirt, transport it by truck and then transfer it  
12 on to rail. Well, thank goodness that our town mayor  
13 and our county commissioners were alert, and they put a  
14 stop to that because no one had ever applied for a  
15 special land use permit. No one had ever asked  
16 permission. We were those kinds of people you don't  
17 ask permission of. We're dispensable, and guess what?  
18 Our culture, our people, are very much like the people  
19 in New Mexico. We're of indigenous background, half of  
20 us. We're Hispanic and we're poor, and we're ignorant,  
21 and that's what they think.

22 And so when you have this elitist mentality  
866.488.DEPO  
www.CapitalReportingCompany.com

T70-2

T70-2 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

**Trujillo, Mary Alice, Commenter ID No. T70 (cont'd)**

Capital Reporting Company

62

1 that your Ph.D., shit piled high and deep, exempts you  
2 from practicing ethics, then we're in trouble. We're  
3 in trouble because therein sits the good old boy's  
4 club, making all the decisions for our country. I  
5 believe in nuclear energy. It's based in the sun, and  
6 we can capture it by using all the right technology.  
7 And you know how I think we can curb this behavior?  
8 When I was at one last meeting in Los Alamos and they  
9 were presenting the budget for their new metallurgical  
10 building, whatever, and they had line items that said,  
11 to be determined. Excuse me? I wish that my income  
12 tax said that: tax to be determined. You know? But  
13 no, they're taking all the pennies away from everybody,  
14 so six billion dollar structures can be built in Los  
15 Alamos.

16 Well, I had a thought. When my daughter and  
17 her son and her husband ran the Race for the Cure and  
18 each of them raised X amount of dollars, and for the  
19 whole thing it was a 40 thousand dollar benefit, why  
20 don't we get our scientists at all these various  
21 places, and have them run to raise money so that they  
22 can keep their science projects going? And so from

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T70-3

T70-3 This comment is outside the scope of this EIS.

**Trujillo, Mary Alice, Commenter ID No. T70 (cont'd)**

Capital Reporting Company

63

1 Colorado I tell you, the nation is aware in little bits  
2 and pieces, and we have prevailed. There will be no  
3 shipping unless a NEPA study and I question that, too,  
4 will be done; when they put their little shipping  
5 facility -- ready -- 75 yards from our river source,  
6 over a railway, a bridge that is over 100 years old,  
7 and then another bridge down about two miles. And what  
8 Michael will be talking about is just how dilapidated  
9 that rail line was. DOE isn't watching at the bottom;  
10 they just make the decisions at the top, and any  
11 subcontractor can do whatever they want, at the bottom.  
12 Thank you.

13 MR. TRUJILLO: Good evening, my name's Mike  
14 Trujillo. Thanks for having me here. I'm a property  
15 owner here at Rio Rancho, and a lot of my life was  
16 spent in Colorado. I've had something like nine career  
17 changes in my life. I'm a disabled United States  
18 Marine veteran, Vietnam. One of the things I learned  
19 when I was 18 is how the government tried to convince  
20 the masses that Agent Orange is a beautiful chemical.  
21 By listening to the big corporations, they enticed the  
22 U.S. government to invest in Agent Orange. It was a

866.488.DEPO  
www.CapitalReportingCompany.com

T70-4

T70-4 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most cases, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

The EIS evaluates the transportation impacts from the shipments that would be required to dispose of all of the GTCC LLRW and GTCC-like wastes at each of the reference locations evaluated. The EIS addresses the collective population risks during routine conditions and accidents, the radiological risks to the highest exposed individuals during routine conditions, and the consequences to individuals and populations as a result of transportation accidents, including those that could release radioactive or hazardous chemical contaminants. The EIS also evaluated the impact of intentional destructive acts that could occur during waste handling, transportation, and disposal (see Section 2.7.4.3 of the EIS). The potential risk of such destructive acts is estimated to be low. DOE sites considered in the EIS are secure, and the packaging for the GTCC LLRW and GTCC-like wastes would be robust. Because GTCC LLRW and GTCC-like wastes are not readily dispersible, the potential physical impacts from an intentional destructive act (e.g., an explosive blast) would be no greater than those from the release of any radioactivity from a severe accident during waste handling, transportation, and disposal.

**Trujillo, Mike, Commenter ID No. T71**

Capital Reporting Company

63

1 Colorado I tell you, the nation is aware in little bits  
2 and pieces, and we have prevailed. There will be no  
3 shipping unless a NEPA study and I question that, too,  
4 will be done; when they put their little shipping  
5 facility -- ready -- 75 yards from our river source,  
6 over a railway, a bridge that is over 100 years old,  
7 and then another bridge down about two miles. And what  
8 Michael will be talking about is just how dilapidated  
9 that rail line was. DOE isn't watching at the bottom;  
10 they just make the decisions at the top, and any  
11 subcontractor can do whatever they want, at the bottom.  
12 Thank you.

13 MR. TRUJILLO: Good evening, my name's Mike  
14 Trujillo. Thanks for having me here. I'm a property  
15 owner here at Rio Rancho, and a lot of my life was  
16 spent in Colorado. I've had something like nine career  
17 changes in my life. I'm a disabled United States  
18 Marine veteran, Vietnam. One of the things I learned  
19 when I was 18 is how the government tried to convince  
20 the masses that Agent Orange is a beautiful chemical.  
21 By listening to the big corporations, the enticed the  
22 U.S. government to invest in Agent Orange. It was a

866.488.DEPO  
www.CapitalReportingCompany.com

**Trujillo, Mike, Commenter ID No. T71 (cont'd)**

Capital Reporting Company

64

1 beautiful chemical to destroy forests and other plants  
2 and animals, thereby giving us the opportunity to see  
3 the enemy. It's no different now.

4           DOE, I hate to say it, but I must have  
5 met in the last year and a half, approximately 19, 20  
6 officials of DOE and their associates, contractors, and  
7 the railroad. And sad to say, I never met one with any  
8 substance. A pack of lies is all I heard from day one.  
9 I haven't heard the word here used tonight, propaganda.  
10 Propaganda's a term that we all kind of shy away from,  
11 but it's a very effective tool that's used by DOE and  
12 anybody associated with something that they want to  
13 pass onto to you to make a few bucks, because that's  
14 what it's all about. It's about money.

15           A railroad pre-existed in town. DOE came  
16 into town. A contractor came into town, and they said,  
17 this is where we're going to have a transloading  
18 station. Approximately fourteen people got together  
19 after finding out what was going on, and they said, no,  
20 no, you're not; you're not going to have any  
21 transloading station. And they said, well, we're just  
22 shipping dirt from Los Alamos. Well, if it's just

866.488.DEPO  
www.CapitalReportingCompany.com

T71-1

T71-2

T71-1 Comment noted.

T71-2 Comment noted.



**Trujillo, Mike, Commenter ID No. T71 (cont'd)**

Capital Reporting Company

65

1 dirt, just leave it in Los Alamos. We don't want Los  
2 Alamos' dirt. Lo and behold, I already knew from day  
3 one that that was a pack of lies, because that's the  
4 way they operate.

5 I was a former building inspector ten  
6 years for the City of Alamosa, Colorado. I was called  
7 upon to do a structural analysis of the fiscal plant,  
8 the railroad -- the ties, the railroad, the railroad  
9 bed, the bridges, the culverts -- you name it. And I  
10 presented 120 photos through a PowerPoint presentation,  
11 and I presented this at a hearing. And I asked  
12 officials of the DOEs, is this what you want to  
13 transport your waste in? Well, of course. Did they  
14 care? I doubt it. The facility to this day, is  
15 deficient, decrepit. It should be demolished and  
16 cleared, by analysis, be it structural engineer or  
17 building a specter, you name it.

18 I'm not going to take a whole lot more of  
19 your time, except to say this. When aggrieved by a  
20 bully, there's only one action to take, and that's to  
21 take the bully by the horns. And it's very easy to say  
22 it, but we took three bullies by the horn, and we said,

866.488.DEPO  
www.CapitalReportingCompany.com

T71-3

T71-3 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Trujillo, Mike, Commenter ID No. T71 (cont'd)**

Capital Reporting Company

66

1 you're not going to have a transloading site here.  
2 You're not going to ship anything from Los Alamos here.  
3 And we formed a corporation, and this corporation got  
4 services from lawyers, professionals in the community  
5 to help us out, and we never actually went to  
6 litigation. As a matter of fact, we went to a  
7 settlement. But I don't trust these guys to this day.  
8 They'll slip through the back door when they have a  
9 chance. They'll slip at the onset of sunset, and  
10 they'll try to sneak their stuff into my town. And my  
11 advice to you, don't let them do it. You organize; you  
12 form. You'd be surprised what a few people can do with  
13 bullies. Thank you.

T71-3  
(Cont.)

**Trujillo, Patricia, Commenter ID No. T111**

Capital Reporting Company

115

1 MR. BROWN: Okay, and Patricia Trujillo.

2 MS. TRUJILLO: (Speaking in foreign language.)

3 Good evening. My name is Dr. Patricia Trujillo. I am

4 a professor of literature, Chicano and Chicana

5 literature and Native American literature.

6 And I actually missed the beginning of this

7 meeting because I was teaching a class at Northern New

8 Mexico College, and so I come to speak to you all from

9 the perspective not of hearing the discourse, but being

10 familiar with it, but also as a community educator.

11 It's really difficult to live and work in this

12 area and to work with students in terms of creating

13 opportunity and envisioning and empowering them to be

14 stewards of their community, to want to work for the

15 community, and to want to have healthy lives for

16 themselves and for their families in this community

17 when we're inheriting the pollution from the years of

18 Los Alamos National Lab that's already been in

19 existence, but also this whole new proposition of

20 inheriting basically the nation's nuclear garbage.

21 (Speaking in foreign language.) I was born

22 and raised in the Espanola Valley. My mom is from Del

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T111-1

T111-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Trujillo, Patricia, Commenter ID No. T111 (cont'd)**

Capital Reporting Company

116

1 Guache. My dad is from Taos, and one of the things I  
2 know in terms of going away to earn my Ph.D. and to  
3 come back to want to serve my community is that we live  
4 in an area of great contradiction.

5           Los Alamos County is one of the wealthiest  
6 counties in the nation, while Rio Arriba County is one  
7 of the poorest. We live in one of the most culturally  
8 diverse and culturally rich areas. We have multiple  
9 land-based cultures that have lived with mutuality and  
10 interdependence for centuries, but the nuclear industry  
11 seeks to destroy that which we hold sacred: our  
12 mountains, our water, our air, our bodies.

13           We are told that Los Alamos must be protected  
14 for our economic viability, but our communities have  
15 always traditionally been sustainable, and we have  
16 survived for centuries like that.

17           Ironically we were never at economic risk  
18 until LANL made us dependent on the cash economy that  
19 it superimposed on us.

20           (Applause.)

21           MS. TRUJILLO: So when I left here ten years  
22 ago and recently returned last summer, I came back with

866.488.DEPO  
[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

T111-2

T111-2 See response to T111-1.

1 a knowledge that was infused with me not only by my  
2 parents and my family and my community, but now with  
3 the support of having read for many, many years and  
4 many, many theorists and working with many wonderful  
5 thinkers, and I fundamentally believe that education is  
6 a pathway to liberation.

7 But my consciousness is consistently  
8 challenged by the obstacles that we are asked to face  
9 as community members who are being challenged by this  
10 giant, right? It's the David and Goliath situation.

11 As a young indigenous educator, committed to  
12 helping students be stewards of their community, I am  
13 burdened by the contradictions that DOE and the U.S.  
14 government impose on us. In my Chicano studies classes  
15 and in my Native studies classes I ask my students four  
16 essential questions:

17 How do we learn to be human?

18 How do we behave as good relatives?

19 How do we become good ancestors?

20 And how do we learn to live again?

21 If I may be bold enough to impose myself as a  
22 warrior educator on the Department of Education, I

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

Trujillo, Patricia, Commenter ID No. T111 (cont'd)

Capital Reporting Company

118

1 would like to ask you to reflect on these same  
2 questions and think if the GTCC is the way that we  
3 learn to become more human, if it's the way that the  
4 U.S. government acts as good relatives, if it's the way  
5 that the U.S. government becomes good ancestors to  
6 Chicano and indigenous populations, and if it is truly  
7 the way that we learn to live again.

8           And in connecting to what David was saying in  
9 terms of how do we start to have a meaningful dialogue  
10 rather than monologue is that I would like to volunteer  
11 myself and hopefully other people in the audience, is  
12 as an expert in cultural studies I would be more than  
13 willing to go and do trainings with the Department of  
14 Energy so we can start having more meaningful  
15 conversations.

16           (Applause.)

T111-3

T111-3 DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS. To this end, nine public hearings at venues accessible to the interested public for the various sites evaluated in the EIS were conducted. See Section 1.5.

**Tsinhnahjinnie, Niyol, Commenter ID No. T56**

Capital Reporting Company

23

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

MR. BROWN: Okay. Our next speaker is Niyol

16

Tsinhnahjinnie. Are you here? Okay. Please come

17

forward then. Okay. And, our -- our next speaker

18

would be Peter Schilke. Hi.

19

MR. TSINHNAHJINNIE: Hello, my name's Niyol.

20

I'm here to represent the earth and sky. And, yeah, I

21

was pretty much -- first, I'd like to say I definitely

22

think it shouldn't come to New Mexico, but I mean, I

866.488.DEPO

www.CapitalReportingCompany.com

T56-1

T56-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

Tsinhnahjinnie, Nivol, Commenter ID No. T56 (cont'd)

Capital Reporting Company

24

1 think there should be definitely some sort of  
2 alternative. I mean, I wouldn't -- I personally  
3 wouldn't know the best alternative. Maybe like --  
4 maybe even like possibly send it out to space or  
5 something, to like a star or something, you know, like.  
6 I mean like it would cost a lot of money, but I think  
7 the earth deserves it. You know, because I mean like  
8 the earth is what made us all this money, and I mean  
9 like, I just pretty much -- I pretty much just hope --  
10 hope that this waste finds its home in like a  
11 harmonious -- harmonious like neutral place where it  
12 doesn't hurt anything including the earth or any  
13 organisms. But, yeah, I say good luck and loving you  
14 all.

T56-1  
(Cont.)



**Tsinhnahjinnie, Tsosie, Commenter ID No. L287**

April 26, 2011

Arnold Edelman

DOE Document Manager GTCC EIS

Cloverleaf Blvd, EM-43

1000 Independence Ave, SW

Washington DC, 20585

Dear Dept of Energy

This is a letter of strong opposition to the DOE plan to utilize the New Mexico Waste Isolation Pilot Program in Carlsbad for Greater Than Class C radioactive waste. Do not use New Mexico for GTCC radioactive waste. This is ample evidence that DOE and their scientist have failed to responsibly use nuclear energy. If DOE cannot keep and treat the radioactive waste where it is produced, then DOE should not support a wasteful expensive exercise with taxpayer money. Chernobyl, Fukushima and Three Mile Island have shown how devastating radiation damage can be. Thank you in advance to stop the shipments.

L287-1



Claudia Flugge/Tsosie Tsinhnahjinnie

6020 Northland Ave NE

Albuquerque, New Mexico 87109

L287-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

Capital Reporting Company

34

1

2

3

4

5

6 MR. BROWN: Okay. Is it Beata Tsosie? Do I  
7 have that right? Okay. Robert Chavez will follow.

8 MS. TSOSIE: My daughter was at a meeting we  
9 were at, and she heard. We were talking and I asked  
10 her if she wanted to make a drawing, and this is the  
11 drawing she made and the title she gave it was "The  
12 Rainbow of Life and Hope," and that's the image I'd  
13 like to put out there.

14 I think all our children are born with this  
15 image in their heads of what the world should be for  
16 them, and they get to a certain age when they're  
17 teenagers, when they realize it's a whole different  
18 picture than what they're given when they're born. And  
19 the truth is revealed to them, and we wonder why our  
20 young people have so many problems as they get older.

21 I don't have the answer or the solutions for  
22 this problem, but I think that if the DOE works with

866.488.DEPO  
www.CapitalReportingCompany.com

T88-1

**Tsosie, Beata, Commenter ID No. T88 (cont'd)**

Capital Reporting Company

35

1 the communities in a meaningful way, that we can help  
2 with it.

3 GTCC is not wanted here. It cannot safely be  
4 contained here where mountains have borne witness to  
5 desecration equal to only the volcano and fault lines  
6 that sleep beneath the labs. I pray the detonations,  
7 construction and disrespect do not awaken them.

8 GTCC is not wanted here where generations of  
9 our people have already suffered and died, who are sick  
10 from illness that did not exist before uranium was  
11 taken out of the ground. Area G once held the prayers  
12 of my relatives since the beginning of circular time  
13 and now holds waste that borders our groundwater  
14 beneath the ground in unlined pits.

15 Area G, whose now toxic breath cannot be  
16 cleansed even by the 70 mile per hour winds that sweep  
17 over barrels of mixed waste on top of the Pajarito  
18 Plateau, barrels of waste handled by brown brothers  
19 wearing only work gloves whose providing hands will go  
20 home and caress their families.

21 GTCC waste cannot be handled by workers  
22 wearing only gloves. It cannot be carried over roads

866.488.DEPO  
www.CapitalReportingCompany.com

T88-1  
(Cont.)

T88-2

T88-3

T88-2 DOE is responsible under the LLRWPA (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

T88-3 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

**Tsosit, Beata, Commenter ID No. T88 (cont'd)**

Capital Reporting Company

36

1 that pass our schools, cross our river, and where  
2 Pueblo emergency response does not have the training or  
3 capacity to handle an accident. It cannot be stored in  
4 an area where the people still live off the land, and  
5 this life style was not considered when producing more  
6 waste, where the trees' roots are strong and will  
7 penetrate anything over time, where fire threatens  
8 disaster, and no one can predict where lightning will  
9 strike.

10 Why is production of this nuclear waste  
11 continuing when there is no plan in place for the  
12 storage of its abomination offspring, where war made  
13 love to greed in pristine landscapes?

14 Why has there been no true dialogue happening  
15 with the people, no health studies, no clean-up? We  
16 know much. We have our own experts. We deserve  
17 equality. We can help with solutions to help heal our  
18 cultural homelands.

19 I ask for consideration for life, the life of  
20 the environment, my people, my children who have  
21 already endured so much, and who dream of rainbows and  
22 life and hope and the land of her birth.

866.488.DEPO  
www.CapitalReportingCompany.com

T88-3  
(Cont.)

T88-4

T88-5

T88-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

T88-5 DOE's goal with regard to its public participation process is to be able to disseminate the information to the public so that input from the interested public can be obtained to inform the Final EIS (see Section 1.5).

**Tsosie, Beata, Commenter ID No. T88 (cont'd)**

Capital Reporting Company

37

1           Desecration has been put in motion, has  
2 already begun before our generations coming and can  
3 still change. With wisdom and listening and when  
4 wellness and health for all are the priority for  
5 industry.  
6           Thank you.

**Turner, Barbara, Commenter ID No. E3**

**From:** Barbara Turner <barbaraturner9@yahoo.com>  
**Sent:** Tuesday, April 26, 2011 10:29 AM  
**To:** gtccsis@anl.gov  
**Subject:** nuclear waste disposal in New Mexico

Dear Sirs; I am writing as a citizen of the beautiful state of New Mexico to voice my complete rejection of the proposed plan of the DOE to bury yet more nuclear waste in our state. I am in support of the legal ban on high-level waste and spent nuclear fuel that I understand is currently in place. High level waste at the proposed New Mexico sites would be a threat to our groundwater for generations to come! WIPP, under the proposed DOE scenario, would be the only geologic disposal site and that is completely unacceptable. Nuclear waste from sites outside our state should remain at the commercial Nuclear power plants where the waste was produced.

Given the tragedy that is still playing out in Japan, I think New Mexico needs to be extremely careful about burdening our state with this nuclear waste legacy. Please consider my comments and include them in the DOE public comment gathering process. Thank you.

Barbara Turner

PO Box 261  
El Rito, New Mexico 87530

1

E3-1

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

E3-1

**Turner, Maggie, Commenter ID No. W274**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 6:11 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10274

Thank you for your comment, Maggie Turner.

The comment tracking number that has been assigned to your comment is GTCC10274. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 06:10:19PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10274

First Name: Maggie  
Last Name: Turner  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

| W274-1

Comment Submitted:  
I agree with the Columbia Gorge group that the trucks should never be allowed to drive in the Columbia Gorge. M

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W274-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Turner, Roger, Commenter ID No. E106**

---

**From:** ROGER TURNER KAYE TURNER <rktturner71@msn.com>  
**Sent:** Monday, June 27, 2011 12:32 PM  
**To:** gtceis@anl.gov  
**Cc:** Craig.Halverson@deq.idaho.gov; Susan.Burke@deq.idaho.gov  
**Subject:** Comments- DOE's GTCC waste- EIS, June, 2011  
**Attachments:** GTCC-2011-comments.doc

Arnold Edelman  
Document Manager, Office of Technical and Regulatory Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW.  
Washington, DC 20585-0119

Please find attached my comments on the DOE's Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste.

Please let me know if you have problems opening the attachment.

Thank-you.

Roger Turner  
307 N. Buchanan  
Pocatello, ID 83204



**Turner, Roger, Commenter ID No. E106 (cont'd)**

Submitted by e-mail to: [gtcceis@anl.gov](mailto:gtcceis@anl.gov)

June 26, 2011

Roger Turner  
307 N. Buchanan  
Pocatello, ID 83204

Arnold Edelman  
Document Manager  
Office of Technical and Regulatory Support (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW.  
Washington, DC 20585-0119

Dear Mr. Edelman:

Please find my comments on DOE's Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste.

(1) **GTCC Waste and GTCC-Like Waste not intended to be regulated in by 10 CFR Part 61.** The draft GTCC EIS (hereafter "DEIS") describes Greater than Class C waste Low-Level Waste as material that is not a new classification and therefore is subject to 10 CFR part 61. However, after a review of the classification section (61.55) it is clear that GTCC waste is not covered under these rules. Under 10 CFR section 61.55 there is only a reference to the fact that wastes that exceed the concentration in table no. 1 are "...not generally acceptable for near-surface disposal". This excerpt is hardly a comprehensive regulatory scheme necessary for disposal of GTCC waste, comprising over 160 million curies, but is merely a reference that the wastes that exceed class C characteristics must await further rulemaking or legislation. The incomplete nature of the regulations classifying GTCC waste is evident at 10 CFR 61, wherein they do not establish limits for the concentration of radionuclides in each classification of B and C waste! The regulations were not intended to regulate waste described by DOE as GTCC, and as such are unprotective of public health. In fact, the term "Greater than Class C waste" is not mentioned, defined, nor described by the rulemaking referenced in the DEIS.

Both GTCC and GTCC-like waste are clearly not intended to be classified or regulated by 10 CFR part 61. The DOE is attempting to sweep these wastes into a classification that has not gone through a full rulemaking process. The DEIS acknowledges that some of the GTCC is TRU waste, and contains concentrations that exceed the minimum threshold for TRU waste radiation and concentration levels, so this waste is not simply Low-Level Radioactive Waste (LLWA). A new rulemaking is required for safe disposal of this waste; one that details the radiation activity limits, and provides guidance on treatment, blending, and disposal.

(2) **Draft EIS alternatives do not follow NEPA and other laws.** In addition to the aforementioned error in classification of GTCC waste, the alternatives presented do not

E106-1 DOE recognizes that including GTCC-like wastes within the scope of this EIS along with GTCC LLRW may complicate the implementation of GTCC LLRW disposal alternative(s). However, DOE determined that the most efficient approach was to address both types of waste, which have many similar physical and radioactive characteristics, in a single NEPA process. DOE's intent is to facilitate the overall process for addressing the disposal needs of both waste types. Issues associated with potential regulatory changes or NRC licensing would be addressed as necessary to enable implementation.

E106-2 The scope of this EIS is adequate to inform decision-making for the disposal of GTCC LLRW and GTCC-like waste. Sufficient information is available to support the current decision-making process to identify (an) appropriate site(s) and method(s) to dispose of the limited amount of GTCC LLRW and GTCC-like waste identified in the EIS.

DOE believes that this EIS process is not premature and is in compliance with NEPA. On the basis of an assumed starting date of 2019 for disposal operations, more than half (about 6,700 m<sup>3</sup> [240,000 ft<sup>3</sup>] of the total GTCC LLRW and GTCC-like waste inventory of 12,000 m<sup>3</sup> [420,000 ft<sup>3</sup>]) is projected to be available for disposal between 2019 and 2030. An additional 2,000 m<sup>3</sup> (71,000 ft<sup>3</sup>) would become available for disposal between 2031 and 2035. This information is presented in Figure 3.4.2-1. DOE believes this EIS is timely, especially given the length of time necessary to develop a GTCC waste disposal facility.

DOE developed this EIS to support a decision on selecting a disposal facility or facilities for GTCC LLRW and GTCC-like waste, to address legislative requirements, to address national security concerns (especially for sealed sources), and to protect public health and safety. The purpose and need for the proposed action, as discussed above, is stated in the EIS (Section 1.1). The scope of the EIS is focused on addressing the need for developing a disposal capability for the identified inventory of GTCC LLRW and GTCC-like wastes. DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), this regulation also indicates that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

E106-1

E106-2

adhere to existing court-defined requirements for disposal. The entire premise of this draft EIS is flawed. The draft EIS proposes alternatives for waste disposal that are against the laws and regulations. According to the draft EIS (GTCC Summary, page S8) NRC regulations require that GTCC be disposed of in a geologic repository as defined in 10 CFR Parts 60 and 63, unless proposals for an alternative method are approved by NRC. Since no alternative method has been approved by NRC...by definition all GTCC waste must go to WIPP or another similar geologic repository licensed by the NRC. Borehole, trench, and vault methods presented as alternatives are "land disposal methods" may not meet the minimum requirements for disposal in geologic repositories. Since the Low-Level Radioactive Waste Policy Amendments Act of 1985 (LLRWPA) specifies that all Low-level waste including GTCC be licensed by the NRC, the GTCC EIS is flawed by presenting disposal methods that could not be licensed by the NRC. While NEPA allows for consideration of alternatives that are outside of existing jurisdiction and current regulations, such conflicts, time-lines, permitting, must be discussed and reviewed in the draft EIS.

Section 631 of the Energy Policy Act of 2005 requires that DOE submit a report to Congress on disposal alternatives under consideration and await Congressional action before issuing a Record of Decision. (see GTCC-EIS Summary page S-3). No such action is underway or discussed in the draft EIS, and the DOE must withdraw the alternatives that are not able to be licensed by the NRC or at a minimum, discuss this potential conflict, compare the alternate safety impacts, permitting requirements and time-lines.

The DOE should add alternatives that are based on the actual characteristics of the waste - not vague definitions that result in storage options that are not protective of public health and the environment. For example the curie level in some low-level waste under the NRC classification will exceed the low-limit concentration that TRU waste is characterized. Hence, as proposed, this EIS will allow unsafe disposal. Class C waste disposal requirements only require barriers to be effective for 500 years, but the wastes will continue to be a risk to human health many centuries later. Technetium-99 has a half-life of over 200,000 years! Section 1502.14 of NEPA requires that DOE: Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

Given the lack of regulatory coverage of GTCC wastes, the absence of a DOE report to congress and the lack of subsequent Congressional action, the entire DEIS is premature at the least, and does not meet the requirements of NEPA to present reasonable alternatives waste disposal.

(3) **GTCC-Like waste problems.** The DOE is proposing that the "GTCC-like waste", which is not subject to the LLRWPA, be reviewed under this GTCC-DEIS, in order to, "...determine a path to disposal that is similarly protective of public health and safety". (Page S-3 of GTCC-EIS Summary). However, as my comments above in numbers 1 and

E106-2  
(Cont.)

E106-3

E106-4

E106-5

E106-3 The LLRWPA (P.L. 99-240) specifies that GTCC LLRW, designated a federal responsibility under section 3(b)(1)(D) that results from activities licensed by the NRC, is to be disposed of in an NRC-licensed facility that has been determined to be adequate to protect public health and safety. However, unless specifically provided by law, the NRC does not have authority to license and regulate facilities operated by or on behalf of DOE. Further, the LLRWPA does not limit DOE to using only non-DOE facilities or sites for GTCC LLRW disposal. Accordingly, if DOE selects a facility operated by or on behalf of DOE for disposal of GTCC LLRW for which it is responsible under section 3(b)(1)(D), clarification from Congress would be needed to determine NRC's role in licensing such a facility and related issues. In addition clarification from Congress may be needed on NRC's role if DOE selects a commercial GTCC LLRW disposal facility licensed by an Agreement State rather than by NRC.

The NRC decided to serve as a commenting agency on the GTCC EIS and therefore did not actively participate in its preparation. Issues associated with potential regulatory changes or NRC licensing would be addressed as necessary to enable implementation.

E106-4 In evaluating the performance of the proposed land disposal facilities, a number of engineering measures were assumed in the conceptual facility designs to minimize infiltration of water into the wastes and thereby minimize contaminant migration from the disposal units. Monitoring and maintenance of the land disposal units were assumed to be for 100 years, and corrective measures could be implemented during this time period to ensure that the engineered barriers lasted for at least 500 years. This is consistent with the institutional control time frame given in both NRC and DOE requirements and was determined to be a reasonable approach for assessing the long-term performance of the disposal units.

It was assumed that after 500 years, the barriers would gradually fail. To account for these measures in the modeling calculations, it was assumed that the water infiltration to the top of the waste disposal area would be zero for the first 500 years and then 20% of the natural rate for the area for the remainder of the assessment time period (10,000 years). A water infiltration rate of 20% of the natural rate for the area was used only for the waste disposal area; the natural background infiltration rate was used at and beyond the perimeter of the waste disposal units.

Additional assumptions were used for a number of parameters, including the distance to a nearby hypothetical receptor (100 m or 330 ft from the edge of the disposal facility). The analyses in the EIS indicate that a near-surface trench facility at NNSS and the WIPP Vicinity can be safely used (e.g., estimates indicated no dose to a hypothetical nearby receptor at 10,000 years).

DOE agrees that the GTCC waste disposal facility must ensure the protection of a hypothetical future inadvertent human intruder. In the conceptual design for the trench disposal facility, the trenches are about 3 m (10 ft) wide, 11 m (36 ft) deep, and 100 m (330 ft) long. The GTCC waste disposal placement is assumed to be about 5 to 10 m (16 to 33 ft) below ground surface.

On the basis of the depth of waste disposal, DOE believes that the only reasonable potential for intrusion into a trench is from a future drilling event, such as drilling for a water well. The likelihood of inadvertent intrusion from a drilling event would be very low for a GTCC trench disposal facility at the reference locations evaluated because of (1) the narrow width of the trench, (2) the use of intruder barriers, (3) the remoteness of the sites, (4) DOE's commitment to long-term institutional control at these sites, (5) site conditions such as the general lack of easily accessible resources and the great depth to groundwater, and (6) waste form stability. On the basis of these considerations, DOE did not include a quantitative analysis of an inadvertent human intruder in this EIS. Site-specific NEPA reviews would be conducted as needed.

2 indicate, GTCC waste requires new rulemaking in order to be classified, and disposed safely, then Congressional approval is required, and until these milestones are satisfied it is inappropriate and unsafe for the DOE to sweep "GTCC-Like waste" into this DEIS. The DEIS documents disclose that so-called "GTCC-Like waste" is similar to non-defense generated TRU waste, underscoring the need for this material to be treated like TRU or HLW waste rather than low-level. Also, the DOE should not select disposal alternatives for GTCC-like waste that the NRC would not license due to safety reasons. Yet that is exactly what the DEIS proposes with GTCC-Like waste, when they propose near-surface impoundment alternatives.

NEPA requires that an EIS explore the permitting requirements as part of the process, but this issue of whether GTCC-Like waste could or should be NRC licensed is left vague in the DEIS. If, in this DEIS DOE is proposing that the GTCC-Like waste not be licensed under NRC...then what permits and regulations will provide safety of its disposal and how would that scheme compare with NRC licensing requirements? These issues need to be more fully reviewed in the EIS to meet NEPA regulations.

**(4) DEIS, in its classification of GTCC waste is conflicting with NRC classification.** The proposed DEIS, with respect to GTCC waste does not adhere to the classification system of the NRC, wherein Classes B and C contain concentrations of radionuclides with half-lives that diminish to background levels in 500 years

In the past, GTCC waste was not considered LLW, and it is totally unjustified for DOE to initiate a DEIS that re-classifies it as LLW. Also, the DEIS proposes to place GTCC and GTCC-Like waste in shallow deposits and vaults, even in cases where some radioactive constituents will have lost only a small percentage of their radioactivity after 500 years -- in direct conflict with NRC classification regulation.

**(5) Why only Federally owned Sites?** The DEIS needs to review non-federal sites for this waste. While its true that no commercial facility is operating or licensed for GTCC waste, by the same token, neither is any Federal one, and so it is just as logical for the DEIS to review and present non-federal commercial sites as alternatives, since they could also be operating in the future. A large percentage of GTCC waste is of commercial origin.

**(6) DEIS should compare dilution of wastes to concentrating them.** DOE should consider an alternative that, rather than blending HLW, metals, tank sludges, TRU and other wastes into various Low-Level waste categories, select an alternative that concentrates the waste so that it can be disposed of in HLW sites.

**(7) Decommissioning of nuclear plants may create mixed or hazardous waste.** The DEIS must, at least review the GTCC waste inventories, including tank sludge, and other inventories that may be created or uncovered that are mixed waste and need to be regulated under RCRA and/or CERCLA. Such wastes would often not meet the waste acceptance criteria of any of the site alternatives reviewed. A draft EIS under NEPA

Issues associated with potential inadvertent human intrusion into WIPP have been addressed in the documentation supporting its current operations. Disposal of the GTCC LLRW and GTCC-like waste inventory in addition to the wastes already planned for disposal in this repository would not be expected to change the results associated with this hypothetical event.

E106-5 DOE recognizes that including GTCC-like wastes within the scope of this EIS along with GTCC LLRW may complicate the implementation of GTCC LLRW disposal alternative(s). However, DOE determined that the most efficient approach was to address both types of waste, which have many similar physical and radioactive characteristics, in a single NEPA process. DOE's intent is to facilitate the overall process for addressing the disposal needs of both waste types. Issues associated with potential regulatory changes or NRC licensing would be addressed as necessary to enable implementation.

E106-6 See response to E106-5.

E106-7 DOE conducted a generic evaluation of commercial disposal facilities on nonfederal lands in the EIS in order to provide, to the extent possible, information regarding the potential long-term performance of other (nonfederal) locations for siting a GTCC LLRW land disposal facility. It would not be reasonable to analyze in detail an essentially unlimited number of additional non-DOE or nonfederal sites where there is little or no anticipated potential for facility development.

E106-8 The action alternatives evaluated in the GTCC EIS did not include interim storage of GTCC LLRW and GTCC-like wastes until a geologic repository for spent nuclear fuel and high-level radioactive waste becomes available because such interim storage is outside the scope of the GTCC EIS. The purpose of the GTCC EIS is to evaluate the range of reasonable alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. The No Action Alternative evaluates continued storage of GTCC LLRW and GTCC-like wastes consistent with ongoing practices.

E106-9 DOE agrees that some GTCC LLRW and GTCC-like wastes may be characterized as mixed waste (waste containing hazardous chemical constituents in addition to radionuclides). However, currently available waste characterization information is limited, and these wastes only constitute approximately 4% by volume of the Group 1 wastes. Additional information would be obtained prior to any disposal, however, and the mixed waste would be rendered nonhazardous before being submitted for disposal. In addition, potential health impacts from hazardous chemicals are expected to be small when compared to radiological risks presented in the EIS (due to the higher volume and activity from the radioactive component of the GTCC LLRW and GTCC-like waste inventory). Any mixed waste in the GTCC EIS inventory would be managed in accordance with federal and state laws and requirements (see also 2.3 comment and response).

E106-5  
(Cont.)

E106-6

E106-7

E106-8

E106-9

**Turner, Roger, Commenter ID No. E106 (cont'd)**

requires DOE to discuss environmental consequences of the proposed actions, as well as permitting – this DEIS is lacking for mixed and hazardous waste inventories.

**(8) Transportation risks are underestimated in violation of NEPA.** Over the years the Department of Energy has documented over a thousand transportation accidents of LLW and TRU waste with releases occurring on at least 545 cases. (See Carol Bradley, *Transportation Mishaps Taint Nuclear Waste*, GANNETT News SERVICE, Nov. 25, 1990, available in LEXIS, Envirm & Energy Libraries)

As the State of Idaho and the Shoshone-Bannock Tribes are already exposed to an increase risk due to transportation accidents, the DOE in the EIS process must more fully evaluate transportation risks. The State of Idaho and the Shoshone-Bannock Tribes have already done more than their share in the country by allowing large numbers of shipments through their jurisdictions, the additional risks of GTCC waste shipments are unfair and pose risks not adequately reviewed under the DEIS,

**(9) Cumulative Impacts- insufficient review of transportation impacts.** The DEIS reports that alternatives 3, 4 and 5 will not be a significant problem nor contribute substantially to cumulative impacts. The DEIS does not adequately consider the large number of nuclear shipments already going through the Fort Hall Reservation, and across Idaho. GTCC waste shipments when combined with all the TRU, and HLW shipments will definitely result in cumulative impacts that must reviewed more fully by the EIS.

**(10) The use of Hardened On Site Storage not adequately covered.**

The DEIS is partly driven by the need to find long-term storage and treatment options for this orphaned waste. But the DEIS should more carefully review and provide alternatives for the use of Hardened On-Site Storage (HOSS) at their points of origin. HOSS could provide for an interim retrievable option that would safely leave the waste right at the nuclear facility that produced it. This option may be safe for the long term, it also should be reviewed as an alternative for interim storage until a deep geologic site is approved for this GTCC waste. The EIS must compare the risk of HOSS storage with the risk of transporting GTCC waste all over the country.

Thank-you for this opportunity to comment on this important EIS document.

Sincerely,  
Roger Turner  
307 N. Buchanan  
Pocatello, ID 83204

E106-9  
(Cont.)

E106-10

E106-11

E106-12

E106-10 Calculation of the collective population risk (under routine and accident conditions) is provided in the EIS. While these estimates are conservative, the calculations used expected values where practical (e.g., external shipment dose rates) and provide a reasonable measure for comparison among alternatives, as summarized in Tables 2.7-5 and 2.7-6, and the estimates show that the transportation risks would be small. All alternatives involve routes of hundreds of miles through similar types of rural, suburban, and urban areas. For specific local impacts, Section 5.3.9.2 provides information on potential human health impacts on individuals during normal waste transport along a route. However, the consideration of specific local stakeholder concerns is more appropriate during the final planning stages of a project when actual route selections are finalized, not at the level addressed in this EIS. A generic accident consequence assessment was performed because there is no way to predict the exact location and conditions of an accident, as discussed in C.9.3.3 of the EIS. For all alternatives, potential accidents, even those at the same location, could have impacts that range from negligible to significant depending on the waste involved, the accident severity, and weather conditions. Such an analysis would not help distinguish between alternatives because all alternatives involve routes through or near major population centers.

The additional human health impacts from intermodal transfer and transport of waste from the nearest rail access point to those disposal sites without direct rail access is generally a small percentage of the total risk discussed in Section C.9.5.5 of the EIS. Costs involved in either building a rail spur to a site or the additional cost of intermodal operations would need to be considered if that option was considered further. For the rail option, the use of dedicated trains, if sufficient waste is available for transport at the same time, could reduce transportation risks and costs by minimizing transit times. The current rail analysis therefore bounds what might be expected if dedicated trains were used. In general, transportation costs would be similar across all disposal alternatives. The primary difference would be related to the distances traveled in each case. Thus, the transportation costs will scale with the shipment distances travelled as presented in the EIS. Any decisions made by DOE would take these factors into account during implementation.

Once an alternative is selected in a ROD for this EIS for implementation, site-specific NEPA reviews would be conducted as needed, including an assessment of specific routing and an accident analysis, including dedicated trains and the potential for multiple railcar accidents if applicable. This process will include planning that involves transportation stakeholders.

E106-11 Approximately 12,000 shipments over more than 60 years results in less than one shipment per day on average. Thus, no significant cumulative transportation impacts would be expected.

E106-12 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

**Turnov, David, Commenter ID No. W345**

---

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 12:07 AM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10345

Thank you for your comment, David Turnov.

The comment tracking number that has been assigned to your comment is GTCC10345. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 12:06:35AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10345

First Name: David  
Last Name: Turnov  
Address: 811 Wendy Court  
City: West Linn  
State: OR  
Zip: 97068  
Country: USA  
Email: [turnov1@comcast.net](mailto:turnov1@comcast.net)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
USDOE's environmental impact statement (EIS) on its proposal to use Hanford as a national radioactive waste dump for the extremely radioactive GTCC wastes admits that putting the waste in landfill trenches at Hanford would result in annual radiation doses of 48 millirem per year to the people who will be drinking the groundwater - which flows straight to the Columbia.

That's a radiation level which would cause fatal cancers in approximately 1 to 2.5% of the Native American children living in the area under Yakama, Umatilla and Nez Perce Treaty Rights.

Those cancer risks and radiation doses do NOT include the doses from the adjacent landfill, over which we sued USDOE for adopting a separate proposal to use as a national radioactive waste dump. Nor does it include the risk from the adjacent state operated UNLINED, leaking soil trenches of the commercial radioactive waste dump at Hanford. Heart of America Northwest and the Yakama Nation are working closely together suing the State for operating the unlined leaking radioactive waste dump and planning to just cover it with dirt instead of cleaning up the chemical and radioactive wastes.

W345-1 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. A potential dose of 48 mrem per year, with an LCF risk of  $3 \times 10^{-5}$  (about 1 chance in 33,000 of contracting a fatal cancer) was assessed for a resident farmer at the Hanford site far into the future. As discussed in Section 6.2.4.2 of the EIS, the exposure pathways considered in the analysis include the ingestion of contaminated groundwater, soil, plants, meat, and milk; external radiation; and the inhalation of radon gas and its short-lived progeny. Because of lower breathing and ingestion rates as well as body size for a child, the dose assessed for an adult would be larger and cannot be directly attributed to one that a child might receive. Based on information provided by the commenter, DOE was unable to verify the statement related to cancer rate increase of 1-2.5% to the Native American Children living in the area. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).

DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

W345-1

**Turnov, David, Commenter ID No. W345 (cont'd)**

We can't cleanup Hanford and protect our Columbia River while more waste gets dumped at Hanford - Put Cleanup First!

Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.

Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.

USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.

USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W345-2

W345-3

W345-4

W345-5

W345-2 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W345-3 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W345-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W345-5 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

**Twombly, Mary, Commenter ID No. W459**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 1:46 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10459

Thank you for your comment, Mary Twombly.

The comment tracking number that has been assigned to your comment is GTCC10459. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 01:45:36AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10459

First Name: Mary  
Middle Initial: c  
Last Name: Twombly  
Address: 842 Little Rock creek rd  
City: Cook  
State: WA  
Zip: 98605  
Country: USA  
Email: [mtwombly@gorge.net](mailto:mtwombly@gorge.net)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Hello- I am writing this with deep concern about the proposed trucking of more nuclear waste to the Hanford site. I have lived in the Columbia River Gorge and have attended meetings regarding the clean-up of the toxic and hazardous nuclear wastes at the Hanford Site. I am very upset at the idea of trucking in more waste to the site when the clean up of the site has not been completed. For one thing, the transportation of the materials is not safe. Humans, transportation systems and weather are not perfect. There is always a possibility of accidents that will have a grave impact on those in the vicinity. No one was prepared for all the variables at Fukushima either...even though a long history of earthquakes and the like.

I know that alot has been done at the Hanford site, but we still don't even know if the massive vitrification project will work, much less WHEN it will be finished, or even started. I am concerned about the already leaking chemical and nuclear materials that are seeping into the groundwater and the river. We need these materials in safe underground repositories, not leaking trenches. Whenever there is a proposal for a new project at the Hanford site, we need to look at the "big picture" not just the single proposal. The GTCC EIS needs to include all the projects that the USDOE is planning ie plans to add 3 million cubic feet of radioactive and chemical wastes, and the GTCC waste. This all needs to be included in the GTCC EIS so that the public has the big picture and can comment on that. Please consider all of the accumulated toxins and materials with half lives of thousands of years sitting by that river. Deal with the mess that's there before we even consider adding to it. We all know it's a terrible mess, and we don't know exactly how to clean it up. Let's get it cleaned up before we make any more messes. We have had alot of earth shaking of late and there is more to come. Hanford is on a fault line and I doubt if the site is prepared to sustain a large earthquake. Please consider these comments and stop the transportation of more toxic materials to Hanford.

W459-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

W459-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W459-3 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

W459-1

W459-2

W459-3

**Utley, Charles, Commenter ID No. T10**

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

MR. BROWN: All right. Thanks very much. Charles Utley is next.

MR. CHARLES UTLEY: Good evening. Thank you for this opportunity to speak with you this afternoon. And I'm kind of perplexed in that the idea that we are on Earth Day discussing what we are discussing. It is

T10-1

T10-1

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.



**Utley, Charles, Commenter ID No. T10 (cont'd)**

1 disgusting to have to discuss what we are, disgusting,  
2 and that we would be considering the idea of moving in  
3 greater-than-C waste to an area that has already given  
4 to much to this nation. We moved a whole community, we  
5 moved churches, we moved families, we moved homes, we  
6 moved everything for what we call the great America.  
7 How much is enough for one community? The impact is  
8 astronomical. So I speak on behalf--tonight on behalf  
9 of just humanity itself, the empty chairs, the unborn  
10 babies, the ones that are less fortunate. We call them  
11 socioeconomically deprived, however you want to label  
12 them. Humanity must be considered and we must say  
13 enough is enough. And what I meant by it on this  
14 particular day in particular, the NRC is having a  
15 meeting in Waynesboro because there are ideas of  
16 building some more power plants. We call them nuclear  
17 plants. And I heard earlier, haven't we learned  
18 anything, but yet we want to have a meeting to discuss  
19 it but at the same time and at the same moment in  
20 Waynesboro they're talking about how great those  
21 nuclear plants will be. Haven't we learned from Japan?  
22 Or maybe we're just that blessed that we will never  
23 have it to happen to us. I stand here tonight to tell  
24 you that don't count your hens before your biddies are  
25 hatched. And I want to remind you that when you talk  
26 about transporting and storing you're talking about

T10-1  
(Cont.)

T10-2

T10-2 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Utley, Charles, Commenter ID No. T10 (cont'd)**

28

1 going through these EJ communities. They're not  
2 bringing those tracks in the upper part of Augusta;  
3 they're brining them in the low part where those who  
4 would be exposed to it, those that are carrying their  
5 unborn babies. Are we thinking or are we just  
6 reacting? And I say to each and every one of you, look  
7 at the empty chairs and just imagine those empty chairs  
8 in your cemeteries because every time we approve  
9 something like class-C and thinking it's okay, slap it  
10 on your back and bring it on we just put somebody in  
11 the grave. And I'm saying that because when I look  
12 around and I think about the little children that I  
13 work with day in and day out, some of them I have in  
14 sixth grade they have tumors. Some of them have skin  
15 diseases yet they don't know what caused it. And Earth  
16 Day when we're telling them how beautiful this earth is  
17 and all the goodness there is and we're talking about  
18 bringing some more to dump on them. Ladies and  
19 gentlemen, DOE has done a great job and I commend them  
20 for it, but enough is enough. Let's not move anything  
21 because what you're doing is causing a ripple effect.  
22 You approve this, you're not only telling them it's  
23 okay to build other plants, you're telling them I'm  
24 going to help you because I'll take your waste. And if  
25 you can tell me how you can build one and not have  
26 waste I'll tell you build it. But one thing we must do

T10-2  
(Cont.)

T10-3

T10-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Utlev, Charles, Commenter ID No. T10 (cont'd)**

29

1 and we must do it for humanity, look around you. Would  
2 you do it to yourself? I wouldn't. So I say to you  
3 and to your great-grands and your great, great,  
4 great-grandchildren, it says you should leave a legacy,  
5 not detrimental. Any man who refuses to stand for his  
6 unborn generation I will say is not a man. And I say  
7 that because if we fail to do what is in our faces  
8 tonight we'll fail the unborn generation. And I want  
9 to tell DOE today don't move it. Leave it where it's  
10 at. Don't transport it because it's going through  
11 those EJ communities and there's others. And don't  
12 think we are unexposable and unexpendable. We never  
13 know where the next earthquake may hit. We may be  
14 right here sitting on it. Who would have thought North  
15 Carolina would be looking like it is today from this  
16 weekend. Thank you.

T10-4

T10-4

DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Van Dyk, Lisa, Commenter ID No. W63**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, May 22, 2011 7:27 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10063

Thank you for your comment, Lisa Van Dyk.

The comment tracking number that has been assigned to your comment is GTCC10063. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 22, 2011 07:27:08PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10063

First Name: Lisa  
Last Name: Van Dyk  
Organization: Heart of America NW  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [lisavandyk@gmail.com](mailto:lisavandyk@gmail.com)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

My primary concern is that the U.S. Department of Energy seriously consider how to reduce the amount of highly radioactive wastes created in the United States. Regardless of where the current stockpile of GTCC wastes end up, it is unsustainable and irrational to continue to create such wastes.

Secondly, highly radioactive and long-lived wastes should be disposed deep underground in stable geologic formations, not in landfills, trenches, boreholes and vaults. USDOE should learn a lesson from the horrific results from the groundwater modeling in Hanford's draft Tank Closure & Waste Management EIS, showing extensive groundwater contamination from inappropriately disposed of wastes. Groundwater contamination obviously threatens the environment and is a threat to the public's health.

Finally, USDOE needs to disclose and consider the total cumulative impacts of all of of USDOE's proposals to use Hanford as a national radioactive waste dump along with proposals to leave tank residues and previous leaks in the soil. All of the risks from proposals to truck waste to Hanford - including the actual truck routes - need to be disclosed in one document, an EIS. The piecemealed series of documents that have been presented for public review are unfair in that they do not consider the TOTAL impacts of all of the proposals.

Thank you.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W63-1 Stopping the generation of nuclear waste is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluates the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes in compliance with the requirements specified in NEPA, the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240), and Section 631 of the Energy Policy Act of 2005 (P.L. 109-58). The GTCC EIS evaluates the potential environmental impacts of the proposed disposal alternatives for GTCC LLRW and GTCC-like wastes. Based on the evaluation, DOE has determined that there are safe and secure alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS provides information that supports this determination, and, as discussed in Section 1.1, Purpose and Need for Agency Action, DOE is responsible for the disposal of GTCC LLRW and GTCC-like wastes.

W63-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater. Based on the GTCC EIS evaluation, land disposal facilities located in arid climates (e.g., NNSS and WIPP Vicinity) would isolate radionuclides for a sufficient period of time to allow for significant radioactive decay to occur.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., enhanced near-surface trench, intermediate-depth borehole, and above-grade vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W63-3 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

If DOE decides to implement its preferred alternative for the TC&WM EIS, GTCC LLRW and GTCC-like wastes would not be shipped through the Columbia River Gorge for disposal at the Hanford Site until the waste treatment plant is operational. However, regardless of where the GTCC waste disposal facility is ultimately located, a relatively small amount of GTCC LLRW and GTCC-like wastes may be transported through the Columbia River Gorge on their way to the disposal facility. The waste would be generated within the states of Oregon and Washington and would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Vance, Anne R., Commenter ID No. W477**

**From:** gtccelswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 1:57 PM  
**To:** gtccelswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10477

Thank you for your comment, Anne Vance.

The comment tracking number that has been assigned to your comment is GTCC10477. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 01:57:06PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10477

First Name: Anne  
Middle Initial: R  
Last Name: Vance  
State:  
Zip:!  
Country: USA  
Email: [annevance@hrecn.net](mailto:annevance@hrecn.net)  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I live here in the Gorge. I know what traffic conditions are like here that would make it especially unsafe to transport nuclear waste by truck. We have constant spring and fall rains, high winds most of the year through the Gorge, and heavy ice and snow in the winter.

This is a beautiful place with many visitors from all over the world, so it is not just local people who would be put in danger if an accident should happen. And if the plan to transport nuclear waste through the gorge it means an accident is just waiting to happen that would be devastating to our people and our economy, which is very fragile anyway.

Questions about submitting comments over the Web? Contact us at: [gtccelswebmaster@anl.gov](mailto:gtccelswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W477-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

W477-1

**VanderKloot, Robert, Commenter ID No. W153**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 9:38 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10153

Thank you for your comment, Robert VanderKloot.

The comment tracking number that has been assigned to your comment is GTCC10153. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 09:37:21PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10153

First Name: Robert  
Middle Initial: W  
Last Name: VanderKloot  
Address: PO Box 253  
Address 2: 211 E Franklin  
City: Bingen  
State: WA  
Zip: 98605  
Country: USA  
Email: [bovander@gmail.com](mailto:bovander@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Shipping nuclear waste is madness. One single accident could have devastating results for thousands of people and the environment for centuries! All radioactive material needs to be processed at the facilities that produce it. These nuclear facilities should be permanently decommissioned immediately.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W153-1 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

The EIS evaluates the transportation impacts from the shipments that would be required to dispose of all of the GTCC LLRW and GTCC-like wastes at each of the reference locations evaluated. The EIS addresses the collective population risks during routine conditions and accidents, the radiological risks to the highest exposed individuals during routine conditions, and the consequences to individuals and populations as a result of transportation accidents, including those that could release radioactive or hazardous chemical contaminants. The EIS also evaluated the impact of intentional destructive acts that could occur during waste handling, transportation, and disposal (see Section 2.7.4.3 of the EIS). The potential risk of such destructive acts is estimated to be low. DOE sites considered in the EIS are secure, and the packaging for the GTCC LLRW and GTCC-like wastes would be robust. Because GTCC LLRW and GTCC-like wastes are not readily dispersible, the potential physical impacts from an intentional destructive act (e.g., an explosive blast) would be no greater than those from the release of any radioactivity from a severe accident during waste handling, transportation, and disposal.

W153-1

**VanneBrightyn, Delinda, Commenter ID No. E26**

---

**From:** Delinda VanneBrightyn <delinda@taosnet.com>  
**Sent:** Thursday, April 28, 2011 1:28 AM  
**To:** gtcceis@anl.gov  
**Subject:** radio-active waste

Please be a steward of our enchanted lands – say no to the GTCC radioactive waste in New Mexico!

E26-1

Thank you,

Delinda VanneBrightyn

Taos, NM

E26-1

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Vasquez, Amanda, Commenter ID No. T168**

Capital Reporting Company

26

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BROWN: Amanda is next, and then Jackie McClary.

MS. VASQUEZ: Good evening. My name is Amanda Vasquez, and I'm a senior at Aloha High School. And five years ago I used to live in Nevada. And if you guys have been there, there's a lot of desert. So I would always get really bad allergies. So my parents were, like, let's move to Washington or Oregon. And we chose Oregon because it's really clean and fresh. And so when we got here, it was really nice. It is really beautiful, and my allergies went away. And I

866.488.DEPO  
www.CapitalReportingCompany.com



**Vasquez, Amanda, Commenter ID No. T168 (cont'd)**

Capital Reporting Company

27

1 don't want that to change. I don't want -- I don't  
2 want to, like -- breathe without worrying. Like, is  
3 there something in the air that might harm us?

4 Not only that, but what kind of people would  
5 let -- would let somebody else come in their home and  
6 put a bunch of bags full of garbage in it? I mean, I  
7 wouldn't let nobody do that. So how can we let  
8 somebody -- how can we let somebody put 20,000  
9 truckloads of radioactive waste into our home?  
10 Because this is our home. Even if it's in  
11 Washington, it's our home. So I oppose the  
12 Department of Energy's plan to bring more nuclear  
13 waste to Hanford.

T168-1

T168-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Vidrine, Paul, Commenter ID No. W74**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 01, 2011 11:53 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10074

Thank you for your comment, Paul Vidrine.

The comment tracking number that has been assigned to your comment is GTCC10074. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 1, 2011 11:53:04AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10074

First Name: Paul  
Last Name: Vidrine  
Country: USA  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

Despite the fact that the Gregoire administration wants nothing to do with ANY more nuclear waste in Washington state, the simple fact is that it DOES exist, it will continue to be generated and it needs to go somewhere. The Hanford area is an IDEAL site to handle and store ALL forms of radioactive waste for many reasons. We have plenty of land, a highly skilled and experienced work force, ready access to technical help and we are relatively isolated from major population areas. When the Waste Treatment Plant becomes operational, it will be possible to process not only the current tank waste but also processed nuclear fuel from commercial reactors. Once the waste is in glass form, it can be safely stored on site. Even if a terrorist manages to blow up an entire cache of glass-form waste, all that will happen is that the chunks of glass will have to be picked up. Not a major issue with the work force we have here. Besides the fact that Hanford is an ideal area for rad waste, the potential economic benefit to the state is incredible, I repeat, incredible. Generators pay an enormous amount of money to dispose of their wastes. Why in the world would any administration NOT want to participate in the economic windfall that is available to those capable of effectively dealing with this issue, as the Hanford site clearly is. I fail to understand why the current administration is so opposed to any more waste being brought into the state. Perhaps this administration needs to take another look at it's position on this issue, using facts and reason as a guide.

W74-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W74-1 Comment noted.

**Von Hippel, Peter and Josephine, Commenter ID No. W497**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 1:59 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10497

Thank you for your comment, Peter & Josephine von Hippel.

The comment tracking number that has been assigned to your comment is GTCC10497. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 01:58:50PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10497

First Name: Peter & Josephine  
Last Name: von Hippel  
Address: 1900 Crest Drive  
City: Eugene  
State: OR  
Zip: 97405  
Country: USA  
Email: [jovh@rioua.com](mailto:jovh@rioua.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

We would like to comment strongly that the DOE should transport no additional radioactive waste to the Hanford Nuclear Reservation in Washington state. We would argue that the Hanford Reservation is not a suitable place for putting more waste, especially since the government is heavily involved in cleaning up that site already, since it contains much older radioactive waste which is not properly stored and is leaking into the Columbia River and the local groundwater. In addition it is unacceptable, and poses a significant health risk to a large population, to transport the amount of waste contemplated to be moved to Hanford over the roads in Oregon and elsewhere. Given the volume of waste to be transported, the probability of significant accidents is very high, and represent risks that we must not take. It is essential that the Hanford cleanup be completed and the area be assessed for its capability for storing radioactive waste in any form before further storage there, or trucking to the site, is even contemplated. Please consider these concerns carefully in reaching a final decision on this proposal. Thank you!

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

- W497-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.
- W497-2 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).
- W497-3 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W497-1

W497-2

W497-3

**Wardhal, Laura, Commenter ID No. L400**



6-19-11

821 Wilmore SE  
Albuquerque, NM 87106

Mr Arnold M. Edelman, EIS Document Manager  
US DOE  
GTCC EIS  
Cloverleaf Bldg EM-43  
1000 Independence Ave SW  
Washington DC 20585

Dear Mr. Edelman,

I ardently and sincerely oppose considering any sites in New Mexico for disposal of the 160,000 curies of commercial GTCC waste. Waste should be stored for now at or near the commercial reactors that produce the appx 98% of the radioactive waste.

Let's stop and ponder for a longer period of time before making hasty decisions about nuclear waste storage, which are also being transported on our nation's highways.

L400-1

L400-2

L400-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

L400-2 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

receive

Page 2 of 2

Our WIPP facility was designed to be used mainly for defense waste, not commercial waste. In fact, there is the WIPP Land Withdrawal Act which prohibits this very thing.

L400-3

New Mexico should not alone carry this burden. Communities along their route are being asked to allow fuel transport - which seems so risky.

L400-4

Please do not issue the EIS as a final statement. Alternative sites need to be considered first & the most.

L400-5

On site storage should remain the option for now + allow for the study of safety & security issues.

L400-6

Sincerely, Laura Wardhal

L400-3 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

L400-4 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

L400-5 See response to L400-4.

L400-6 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

**Watson, Vicki, Commenter ID No. W512**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 8:54 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10512

Thank you for your comment, vicki watson.

The comment tracking number that has been assigned to your comment is GTCC10512. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 08:53:44PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10512

First Name: vicki  
Last Name: watson  
State: MT  
Zip: 59801  
Country: USA  
Email: [h2oshed1@hotmail.com](mailto:h2oshed1@hotmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

1. Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes – the wastes in existing soil trenches and ditches and from tank leaks need to be removed.
2. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.
3. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.
4. USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W512-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W512-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W512-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W512-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

W512-1

W512-2

W512-3

W512-4

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

**Webster, Astrid, Commenter ID No. T61**

Capital Reporting Company

34

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22

MR. BROWN: Thanks very much. Astrid Webster and Erich Kuerschner will be next.

MS. WEBSTER: Hi. My name is Astrid. I've been in New Mexico since I was an 18-year-old freshman at the University of New Mexico, and my affiliation is for life. And I'd like to speak to the man in the red jacket who thinks that solar power and wind power can't meet our needs. I have solar panels on my roof, and they're more than meeting our needs, by a bunch. And

866.488.DEPO  
www.CapitalReportingCompany.com

T61-1

T61-1 Comment noted.

Capital Reporting Company

35

1 if more people had the courage and the faith in the  
2 future, they would do the same.

3           Every time we make anything nuclear,  
4 every time we utter the word, "nuclear," the next word  
5 should be waste; whether it's spoken or not, it's a  
6 waste. From the time that uranium comes from the  
7 ground, it wastes money, water, lungs and life. The  
8 damage to the environment finds its way across the  
9 pads, our pads, beginning among the state's poorest,  
10 and finding its way to impoverish all of our lives.  
11 Nuclear waste begins its life providing power for  
12 homes, industry, and most of all, war. It ends its  
13 first incarnation in cooling ponds that use a million  
14 gallons a minute to keep them from causing another  
15 Fukushima. What a waste that's turning into! That's  
16 touching all our lives.

17           Some waste finds its way to places like  
18 Los Alamos, where it has turned into even greater  
19 waste. That means not by accident, but intentionally,  
20 we can take thousands, even millions of lives. A  
21 criminal waste, according to the World Court, and  
22 according to the NPT Treaty, that it's the law of the

866.488.DEPO  
www.CapitalReportingCompany.com

T61-2



1 land. That's as old as my 33-year old daughter, and  
2 that we have been weakening by degrees by the stories  
3 that are told. A gentleman who I'm sure is well  
4 educated, mechanical engineer, spoke a few minutes ago,  
5 and he said, this is over my head.

6           It's not over your head. It's not over  
7 anybody's head. It's ridiculous. (Applause.) And the  
8 reason some of us used to think it was over our heads,  
9 because somebody told us with a big fat degree and much  
10 less compassion than a very narrow, thoughtless  
11 education, and this stuff is still being foisted on us,  
12 and it's still a waste.

13           If any of you listened to Helen Caldicott  
14 talk, she said, this stuff bioaccumulates. It goes  
15 from the lowest of the food chain, and it's filling the  
16 fish that are farmed and in the oceans around Japan.  
17 It's going to be shipped around the world, and after it  
18 kills the first body, it will be pushing up daisies and  
19 it will kill the second body, and it will skill the  
20 third and the fourth. And I was not surprised but  
21 still angered to find that a child 500 years from now  
22 wandering into a field, can die, from this stuff that's

866.488.DEPO

[www.CapitalReportingCompany.com](http://www.CapitalReportingCompany.com)

**Webster, Astrid, Commenter ID No. T61 (cont'd)**

Capital Reporting Company

37

1 being safely carried across the state? No, not for a  
2 second. It's not safe anywhere, and we're not safe  
3 anywhere until we all stand up and so no, no more.  
4 Erich's going to talk in just a minute. He's got a  
5 book by John Gofman, who studied this for a long, long  
6 time, longer than I've been alive, and he said, it is  
7 not safe, not one shred, not one scrap. And so when  
8 they say they're going to bury it near Carlsbad, where  
9 they say it's a tourist site and I went there as a kid,  
10 you know what? That's wrong. These people who have no  
11 sense but to continue making this stuff should carry it  
12 home in their lunchboxes. Thank you.

T61-3

T61-3

Disposal of GTCC LLRW and GTCC-like wastes at WIPP or the WIPP Vicinity site is included in the range of reasonable alternatives and is evaluated in this EIS. DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

**Weersing, Sally, Commenter ID No. E103**

---

**From:** Sally Weersing <pennysmom1@me.com>  
**Sent:** Sunday, June 26, 2011 7:28 PM  
**To:** gtcceis@anl.gov  
**Subject:** Shipping Nuclear Waste Along the Columbia is a Bad Idea

> Please do not transport nuclear waste through the heart of the Willamette Valley or up the Columbia Gorge. Japan's experience should remind us just how risky nuclear activity is. Any additional nuclear waste in the Columbia Watershed puts the whole northwest water supply at risk.

E103-1

Sally Weersing  
 38 Da Vinci Street  
 Lake Oswego OR 97035

E103-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**Weisman, Robert, Commenter ID No. T169**

Capital Reporting Company

60

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. WEISMAN: I'm Robert Weisman, a fairly new member of the Heart of America Northwest. I try to, probably like a lot of you, relate things from other parts of my life than the fear and concern about nuclear power, nuclear weapons, nuclear waste storage. I'll try to relate things, events and activities from the rest of my life to these nuclear issues.

And one thing I did within the last two weeks is I saw a film that went into some of the caves where there were drawings in southern France, and the time scale in that movie was 40,000 years. Now, 40,000 years is probably the longest -- no, it's the oldest human artifact I've seen; beautiful things to see in the movie. But you figure that's one and a third life -- half lives for plutonium. We don't have many human experiences to deal with some of these numbers that are critical to the nuclear issue.

And I'm afraid, I think, government hides behind some of the sort of screens. A very prevalent screen when I heard this evening that in 12,000 truckloads over 40 years they'll be no nuclear-related deaths

866.488.DEPO  
www.CapitalReportingCompany.com

T169-1

T169-1 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

**Weisman, Robert, Commenter ID No. T169 (cont'd)**

Capital Reporting Company

61

1 and maybe two or three people would be killed in -- I  
2 guess when a wheel flies off.

3 Cancer, another favorite -- it is a favorite  
4 number of mine. Cancer takes 25 years, most often,  
5 to develop. So if we were looking at the instance of  
6 exposure to radioactive particles and saying, well,  
7 there's no cancer evident this year, there's no  
8 cancer evident next year, there's no cancer evident  
9 in ten years, so I guess there's no cancer. Wrong.  
10 So I think the government is hiding -- DOE estimates  
11 of harm are hiding behind that very simple, central  
12 fact.

13 The other thing is -- again, from every day  
14 experience, within the last couple months -- and this  
15 relates to the Columbia River -- I was in Astoria and  
16 saw the sweet little museum there of the history of  
17 crossing the bar and how it's the most dangerous --  
18 the most dangerous river, treacherous river area in  
19 the United States, continental United States. And I  
20 forget the numbers, but, say, 500 ships have been  
21 wrecked there. How many lives have been lost?  
22 5,000? I don't know. I don't remember that one.  
23 But compare it to a true contamination of radioactive  
24 material into the Columbia River through the aquifers  
25 to the river that's occurring right now. We can only

866.488.DEPO  
www.CapitalReportingCompany.com

T169-2

T169-2 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Weisman, Robert, Commenter ID No. T169 (cont'd)

Capital Reporting Company

62

1 guesstimate the lethality of what's going on.  
2 Therefore, my overall point is, these are really  
3 difficult issues to conceptualize beyond the fact  
4 that it's bad stuff. We've got to get it out of  
5 here. We've got to quit making it. We've got to  
6 store it in the Rockies. Yes, all that's true. But  
7 to really grasp -- the devil's in the details of the  
8 atomic genie, and I don't trust the DOE at all except  
9 as doing the master's work. I mean, if --

T169-2  
(Cont.)

**Weiss, Richard, Commenter ID No. W547**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 6:10 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10547

Thank you for your comment, Richard Weiss.

The comment tracking number that has been assigned to your comment is GTCC10547. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 06:10:16PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10547

First Name: Richard  
Last Name: Weiss  
State: OR  
Zip: 97124  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**  
It is too dangerous to ship Nuclear Waste thru the Gorge!

W547-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W547-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

**West, Hans C., Commenter ID No. W472**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 12:09 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10472

Thank you for your comment, Hans West.

The comment tracking number that has been assigned to your comment is GTCC10472. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 12:09:17PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10472

First Name: Hans  
Middle Initial: C  
Last Name: West  
Organization: NA  
Address: 545 Waldo Ave SE.  
City: Salem  
State: OR  
Zip: 97302  
Country: USA  
Email: [westh3@gmail.com](mailto:westh3@gmail.com)  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Dear Sirs: Hanford has already "flunked" as a site for Nuclear Waste storage. With radioactive waste continuing to leak underground and likely reaching the Columbia River, the first priority should be to stabilize and "decontaminate" Hanford, if it can be done (not a sure thing). Turning the site into a National Radioactive Waste Dump at this point makes no sense and I would argue is entirely illogical. Adding to this argument is the geological instability of the Northwest, ie similar to Japan insofar as risk for tectonic plate earthquakes. Please take these issues into consideration. Sincerely, Hans C West

W472-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W472-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.



**Wexler, Joseph, Commenter ID No. T53**

Capital Reporting Company

13

1 watershed that feeds into the essential drinking water  
2 system for all the urban centers of New Mexico, and  
3 that's affected by periodic catastrophic fire. I  
4 cannot for the life of me think that there is no other  
5 more suitable place in the country.

6           So, I really, with all due respect, ask the  
7 Department of Energy to go back and look at all  
8 potential suitable sites across this country. This is  
9 a national issue. This is a national activity and I  
10 think in Mexico, we've done our due burden and it's  
11 about time others also share. As I said, I am not  
12 anti-nuclear in any shape, or form, especially when it  
13 comes to nuclear medicine. Thank you so much, and you  
14 know, I appreciate that you're giving us this chance to  
15 talk to you.

16           MR. BROWN: Okay. Thanks a lot.

17           (Applause)

18           MR. BROWN: Okay. Joseph Wexler is next and  
19 he will be followed by Chris Timm.

20           MR. WEXLER: Well, I hadn't read any of this  
21 information until I got here tonight. By the way, my  
22 name's Joe Wexler. I'm a civil engineer, long-term  
              866.488.DEPO  
              www.CapitalReportingCompany.com

**Wexler, Joseph, Commenter ID No. T53 (cont'd)**

Capital Reporting Company

14

1 work in New Mexico, since 1964. And, I'm getting more  
2 and more interested in this nuclear business and  
3 radioactivity.

4 First of all, I just want to say I don't see  
5 many young people out here. I saw a young fellow --  
6 yeah, in the back -- I told him he reminded me of  
7 Isaiah. He had a staff --

8 (Laughter)  
9 -- he looked like he just emerged from the desert.  
10 Good for you. I guess you've got something to tell us.  
11 This is also the time of Easter and Passover just  
12 passed on for the year, and that too, is a desert.  
13 And, also, we're rapidly destroying the Ann Valencia  
14 (ph).

15 The reason I live here is because New Mexico -  
16 - when I first came here in '64, I realized there's  
17 something going on here. Not just nuclear activity,  
18 but here's the last remnant of Ann Valencia of the 12th  
19 and 13th Centuries. Christians, Jews, Muslims living  
20 in peace in a beautiful creative culture, okay. And,  
21 all nuclear waste is going to do is destroy it. That's  
22 one item.

866.488.DEPO  
www.CapitalReportingCompany.com

T53-1

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

T53-1

Wexler, Joseph, Commenter ID No. T53 (cont'd)

Capital Reporting Company

15

1           Also, in this time, we've gotten Chernobyl.  
2 It's the anniversary of Chernobyl. Russians are pretty  
3 good engineers. Now, we've got Fukushima -- Kashima  
4 (ph). The Japanese are pretty good engineers too, and  
5 everybody takes great pride over there. Hell, the  
6 Russians can build anything and the Japanese can build  
7 anything. Yeah, until it comes to making money or  
8 showing your power or going home and getting laid or  
9 what the hell you're doing.

10           And, we're human beings. It's over our heads,  
11 from beginning to end, and we're going to destroy not  
12 only New Mexico, but the entire planet with this  
13 behavior. I'm an engineer, I've seen guys on  
14 construction. I've seen contractors. If they can make  
15 a few bucks, they're going to cut corners. Even if  
16 it's radioactive.

17           Now, getting back to this report, that is --  
18 which I just saw tonight in any detail. I notice  
19 there's a lot of stuff in here about medical -- medical  
20 supplies. My wife was helped. She was helped greatly  
21 by radiation and so forth with cancer, so it is  
22 helpful. We must take care of these materials.

866.488.DEPO  
www.CapitalReportingCompany.com

T53-2

T53-2      Certain wastes from medical isotopes production are included in the GTCC EIS inventory.

**Wexler, Joseph, Commenter ID No. T53 (cont'd)**

Capital Reporting Company

16

1           And, why is this lumped together with nuclear  
2 bomb waste or nuclear fuel waste and so forth? That's  
3 the trick here. And, it threw me off balance, to talk  
4 about hospital wastes, radioactive materials. Hey,  
5 that's good stuff, but why put it together with what  
6 these characters are doing with nuclear power?

7           For GE and Westinghouse and I don't know who  
8 all else, making massive sums of money and not doing  
9 the job right -- doing the job -- okay, oh, he'll do,  
10 let's get home for the night. We won't put the  
11 additional concrete in and we won't put the additional  
12 reinforcing in. We won't put the water pumps up on top  
13 that we need, we'll put them right down on the ocean  
14 and let the sea wall collapse on them. And, now  
15 they're still -- and now the dead -- the dead are going  
16 to build up.

17           At Chernobyl, the estimate of dead up to this  
18 point is 1 million. And, in addition to that, there  
19 are many youngsters who are sick, their thyroid glands  
20 are screwed up. We just can't handle nuclear energy.  
21 I know you've got to get rid of this stuff somehow, but  
22 we can't afford building any more plants until we

866.488.DEPO  
www.CapitalReportingCompany.com

T53-2  
(Cont.)

T53-3

T53-3      Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

Wexler, Joseph, Commenter ID No. T53 (cont'd)

Capital Reporting Company

17

1 become super human, like the guys in the movies.

2 I don't know, the robots, the guys -- is it --

3 MR. BROWN: You've got one minute left.

4 MR. WEXLER: Okay.

5 MR. BROWN: Thanks.

6 MR. WEXLER: Has Hollywood convinced us that  
7 we can really do anything with a few electronic pieces  
8 of equipment? That a guy from Texas who hates -- who  
9 hates the world around him, who can't stand a black guy  
10 or Hispanic guy, is going to come out and build a  
11 beautiful nuclear plant that will care for the world?  
12 That will take care of all of us? It can't happen.

13 If you're a racist and you hate people, you're  
14 going to do a lousy job. Look, I've been around this  
15 country, we all have. I've lived in Mississippi and I  
16 know what happens to people's minds.

17 MR. BROWN: If you make just one more point,  
18 please.

19 MR. WEXLER: Okay.

20 MR. BROWN: Time's up.

21 MR. WEXLER: Okay. That's about it, thank  
22 you.

866.488.DEPO  
www.CapitalReportingCompany.com

T53-3  
(Cont.)

**Wheeler, Mark, Commenter ID No. W31**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Tuesday, May 17, 2011 3:18 PM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10031

Thank you for your comment, Mark Wheeler.

The comment tracking number that has been assigned to your comment is GTCC10031. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 17, 2011 03:17:32PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10031

First Name: Mark  
Last Name: Wheeler  
Address: 628 SE 58th Av  
City: Portland  
State: OR  
Zip: 97215  
Country: USA  
Email: [mark@rootsrealty.com](mailto:mark@rootsrealty.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Please do NOT use Hanford Washington as the national radioactive waste dump for extremely radioactive (GTCC) wastes.

W31-1

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W31-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Wheeler, Steven, Commenter ID No. W334**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Tuesday, June 21, 2011 1:50 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10334

Thank you for your comment, Steven Wheeler.

The comment tracking number that has been assigned to your comment is GTCC10334. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 21, 2011 01:49:55PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10334

First Name: Steven  
Middle Initial: B  
Last Name: Wheeler  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [swheeler@arrisi.com](mailto:swheeler@arrisi.com)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
I do not find that the Draft GTCC LLRW EIS adequately addresses grave issues with transporting radioactive waste through the Columbia River Gorge. Furthermore, the Hanford area is already highly polluted. We do not need to make the mess worse. Back to the drawing board on this bum idea.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W334-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

W334-1

**Wilkins, Shirley, Commenter ID No. L90**

06/26/2011 18:15 5033574288

AWA12ST GRV NURS STN

PAGE 06/10

received  
JUN 27 2011

Dr. W. Permit May Comment:  
 I am a new resident in  
 your beautiful state of Oregon.  
 I agree with the residents  
 of Hanford and their  
 concerns about the Nuclear  
 Waste problems.  
 With all the brilliant  
 scientists and the  
 wonderful technology  
 in today's world, it  
 would seem that some-  
 thing could be done to  
 neutralize this horrible  
 danger to the public.  
 Our again Man has  
 put smarter themselves  
 only to create more  
 danger to their fellowman.  
 Time is so essential and  
 is passing, all to fast.

A concerned Citizen, Shirley Wilkins  
 3110 19th Ave. Forest Grove, Or 97116

L90-1

L90-2

L90-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

L90-2 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.



**Williams, Ruth, Commenter ID No. W77**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 08, 2011 12:44 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10077

Thank you for your comment, Ruth Williams.

The comment tracking number that has been assigned to your comment is GTCC10077. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 8, 2011 12:43:37AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10077

First Name: Ruth  
Middle Initial: A  
Last Name: Williams  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [ruthalice@comcast.net](mailto:ruthalice@comcast.net)  
Privacy Preference: Withhold address only from public record

Comment Submitted:  
To Whom It May Concern:

I understand the US Department of Energy is hoping to transport over 12,000 truckloads of GTCC nuclear waste to the Hanford Nuclear Reservation in my state, and that this process will take about 20 years. This is such an inherently risky proposal I find it nearly impossible to believe it is under serious consideration.

W77-1

Can it really be true that to save a few dollars now our government is willing to play this high-stakes roulette with its own population and lands? The 'what-ifs' are unthinkable and, as we've seen in the recent case of Japan, could become 'what-were-we-thinking' at any time. Why not vitrify and bury the waste at stable geological sites or vitrify it and store it above ground on site, which would eliminate shipping altogether?

W77-2

The Hanford Reservation, still one of the most toxic sites in America, was chosen for the nuclear program because of its remote location. Insisting now that Hanford should be used as a shipping destination is absurd. There is no way 12,000 insufficiently sealed cargoes should be towed along our highways and through population centers to Hanford.

W77-3

The nuclear program has left Hanford with horrendous environmental problems that have yet to be addressed. The reservation rests on a morass of contaminated land and groundwater that flows into the Columbia River. (If you need to learn the details from me, I'll provide them.) Despite some clean-up, critical pollution mitigation is still being avoided by the same USDOE that wants to ship in another 12,000 truckloads of GTCC waste.

I urge you to please drop this shipping proposal. The risks are much greater than any apparent short term benefit.

W77-1 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs (see Section 6.2.9.1).

W77-2 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

W77-3 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2. See also W77-1.

**Williams, Ruth, Commenter ID No. W77 (con t'd)**

Thank you for your consideration.

---

Sincerely,

Ruth Williams

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**Wills, Margaret, Commenter ID No. W29**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Tuesday, May 17, 2011 12:51 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10029

Thank you for your comment, Margaret Wills.

The comment tracking number that has been assigned to your comment is GTCC10029. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 17, 2011 12:50:57PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10029

First Name: Margaret  
Last Name: Wills  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Hanford is already leaking into the ground and toward the Columbia River.

We do not need or want more waste in this area which is earthquake and volcano prone.

The danger of shipping on our highways is very dangerous to our citizens.

I am keeping this brief and to the point.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W29-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W29-2 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities. Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations (see Section 6.2.9.1). Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

W29-1

W29-2

**Wilson, Nick, Commenter ID No. T170**

T170-1 Comment noted.

Capital Reporting Company

70

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

MR. WILSON: Hello. I'm just -- I can talk loud. My name is Nick Wilson. I am a student at Aloha High School, and I'm going to say something that you guys will probably disagree with. As of right now, I'm the only person here who is actually in support of putting more nuclear waste at the site. Yeah, I know. I've been listening to what all you guys have been saying, and I understand your point of view. You're saying we're from Oregon, a community, and we need to keep that community safe and clean. And I completely agree, but I kind of have a different mind-set.

I think of us more as a country as a whole than just Oregon as a community. We have this nuclear waste and something has to be done with it. That's not really a question. The question is what we should do with it. And no one has really given a good alternative other than send it somewhere else. And as an Oregonian, that sounds great, but as an American, that's just sad.

I don't see any reason why we can't -- I'm not

866.488.DEPO  
www.CapitalReportingCompany.com

T170-1

Wilson, Nick - T170

1 saying, by any means, we should take nuclear waste  
2 and dump it in a ditch. That is even more sad. But  
3 there is no reason we can't build containment  
4 vessels, we can't actually line our trenches, or we  
5 can't do other things to make sure it is kept safe  
6 but still in Washington.

7 There is no really easy answer to this problem,  
8 but just sending it somewhere else definitely is not  
9 the answer at all. It's just sad. We're better than  
10 that, and it's not like -- I know it's not great for  
11 anything, but it's also not going to destroy  
12 everything. People say they love our clean air and  
13 beautiful trees. That's not going to go away. Just  
14 because we have some waste buried upwind of us does  
15 not really -- it is not going to change anything. It  
16 won't be quite as good, but I think for the sake of  
17 our country, we can handle it. But maybe that's just  
18 me. Thank you for listening.

T170-1  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 20, 2011 9:29 AM  
**To:** mail\_gtceisarchives; gtceiswebmaster@anl.gov; gtceis@anl.gov  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10321  
**Attachments:** CommentsOnGTCC\_DraftEIS\_2011\_personal\_copy\_combined\_GTCC10321.doc

Thank you for your comment, John Wojtowicz.

The comment tracking number that has been assigned to your comment is GTCC10321. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 20, 2011 09:28:41AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10321

First Name: John  
Middle Initial: A  
Last Name: Wojtowicz  
Address: 7042 Yellow Oak Lane  
City: Knoxville  
State: TN  
Zip: 37931  
Country: USA  
Email: [john.wojtowicz@tn.gov](mailto:john.wojtowicz@tn.gov)  
Privacy Preference: Don't withhold name or address from public record  
Attachment: CommentsOnGTCC\_DraftEIS\_2011\_personal\_copy\_combined.doc

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Document Review**

**Date of Review:** February 23, 2011 By: John Wojtowicz

**Document Title:** Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D), February 2011, SUMMARY

**Document Number:** DOE/EIS-0375-D Summary, February 2011

**Discussion:** See discussion for Comments on Volume 1 for additional information.

Included below are additional comments, many of an editorial nature.

**Specific Comments:**

**Coversheet, Abstract, Paragraph 1, Last line:**

Should the Energy Policy Act of 2005 be included in the S.8 References?

**Coversheet, Page 2, Public Comments:**

Should the ANOI and NOI be included in the S.8 References?

**Page s-vii, Line 35:**

Should the National Environmental Policy Act of 1969 be included in the S.8 References?

**Page s-xi, Radiation Dose Text Box, Paragraph 5, Line 3:**

Should the website of the Environmental Protection Agency (<http://www.epa.gov/radiation/understand/calculate.html>) be included in the S.8 References?

**Page S-3; Bottom Right Text Box, Line 12:**

RDDs is not in the list of Acronyms and Abbreviations.

**Page S-4, Line 7:**

GAO is not in the list of Acronyms and Abbreviations.

**Page S-6, Line 27:**

Should the Clean Air Act be included in the S.8 References?

**Page S-6, Text Box:**

For completeness, should OR, ID, WA and NM be included in the Acronyms and Abbreviations?

**Page S-7, Lines 3, 4, & 7:**

W321-1 The reference list was reviewed against the citations in the EIS and was corrected, as appropriate. Conventional format holds that public laws are named but not provided as references. Argonne's default style is largely based on the University of Chicago Style Guide, whereby, if there are multiple authors of a reference, the last name of the first author is cited, followed by "et. al.". This is the format followed in this and other EISs.

Acronyms were reviewed and added to the Acronym list, as appropriate. However, the intent of the acronym list in the Final EIS was to focus on providing those acronyms that were of most benefit to facilitate the understanding of the content of the EIS; it was not intended to be all inclusive. Many abbreviated terms are defined in the adjacent discussion.

The editorial comments were reviewed and incorporated into the Final EIS, as appropriate. Comments requesting clarification were reviewed and incorporated into the Final EIS as appropriate.

W321-1

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

Should the Memorandum on Tribal Consultation, Executive Order 13175, and DOE Order 144.1 be included in the S.8 References?

**Page S-8, Text Box, Lines 3 & 10:**

Should 10 CFR 61.55 and 10 CFR 61.7 be included in the S.8 References?

**Page S-9, Footnote 1:**

Should the case cited here be included in the S.8 References?

**Page S-9, Footnote 1, Line 2:**

Fed. Cir. is not in the list of Acronyms and Abbreviations.

**Page S-10, Line 19:**

Although MCi is included in the Units of Measure on pg. S-viii., there it is referred to as megacuries. Here it is referred to as million curies. A member of the general public may not make this connection. Perhaps this should be clarified.

**Page S-10, Lines 30-31:**

In Volume 1 of the EIS on pages 1-8 (Line 41) and 1-9 (Line 3&4) Group 1 wastes are defined as "Group 1 consists of wastes that are either already in storage or are expected to be generated from existing facilities (such as commercial nuclear power plants)." Here it is indicated that "Group 1 consists of wastes from currently operating facilities that are either already in storage or are expected to be generated from these facilities (such as commercial nuclear power plants)." Are not some of the materials currently in storage from facilities no longer in operation?

**Page S-10, Footnote 2:**

Should the Nuclear Waste Policy Act of 1982 be included in the S.8 References?

**Page S-10, Footnote 2, Line 6:**

Sec. in not in the list of Acronyms and Abbreviations.

**Page S-12, Transuranic (TRU) Waste Text Box, Line 2:**

Perhaps a nanocurie should be explained somewhere to be a billionth of a curie. This could help the understanding of the general public.

**Page S-13, Lines 42-43:**

Should the WIPP Land Withdrawal Act of 1992 be included in the S.8 References?

**Page S-14, Table S-1:**

BWRs and PWRs are not in the list of Acronyms and Abbreviations.

**Page S-18, Line 7:**

NTS is not in the list of Acronyms and Abbreviations.

**Page S-28, Line 21:**

Should CERCLA be included in the S.8 References?

W321-1  
(Cont.)



**Page S-40, Table S-3, Column 4, Row 1, Paragraphs 1 & 2:**  
Should SO<sub>2</sub>, NO<sub>x</sub>, and dBA be included in the list of Acronyms and Abbreviations?

**Page S-41, Table S-3 cont., Column 4, Row 1:**  
Should L and gal. be included in the Units of Measure?

**Page S-42, Table S-3 (cont.), Maximum Long-Term Impacts, Alternative 2, Lines 9-14:**  
Should the WIPP EIS (1997) be included in the S.8 References?

**Page S-42, Table S-3 cont., Column 4, Row 2:**  
SWB is not included in the list of Acronyms and Abbreviations.

**Page S-62, Line 22:**  
The Pasco, Washington meeting has been entered twice.

**Page S-65, Line 13:**  
HOSS is not in the list of Acronyms and Abbreviations.

**Document Review**

**Date of Review:** February 23, 2011 By: John Wojtowicz

**Document Title:** Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D), February 2011, Volume 1.

**Document Number:** DOE/EIS-0375-D February 2011

**Discussion:** Thank you this opportunity to review the above cited document. The document is clearly and well written. However, a couple of additions might be valuable in aiding the understanding of the general public. This deals primarily with clarification of a few of the terms used in the document. Although an individual familiar with the technical aspects of radiation and radioactivity would understand terms such as curies, megacuries, and nanocuries, someone without a technical background might gain no real information from these terms. Perhaps the addition of understandable analogies would help.

It might also benefit readers if a chart of US vs. international radiation units and their conversions were included in the document.

After a thorough reading of both volumes as well as the Summary of the Draft EIS, a few questions and/or comments come to mind.

A number of the sites should be eliminated from consideration due to Health and Environmental

W321-2 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

W321-1  
(Cont.)

W321-2

concerns. These include the SRS, Idaho, LANL, Hanford, and any of the generic commercial sites considered in Regions I, II or III. Although Hanford's Health and Environmental impacts may not be as great as the other mentioned sites, at Hanford the many rights of the Native Americans in that area must be seriously considered.

Regarding the best method for disposal of the GTCC and GTTC-like wastes, it appears that for activated metals and possibly sealed source irradiators (because of their high activity levels), the best option would be a deep depository with the possibility of using the borehole method. The remainder of the sealed sources, as well as the other waste could, it appears, be securely dispositioned in either a borehole, trench, or vault. It also appears from the available analyses that the least potential for environmental and human impacts would occur if the wastes were dispositioned either at the NNSS or the WIPP and/or WIPP Vicinity. Considering other variables, the WIPP and/or WIPP Vicinity might be preferable. As stated in the EIS, Nevada historically has a greater likelihood of seismic events than does the WIPP and/or WIPP Vicinity. Also to be seriously considered are concerns stated in the Native American narratives. Several valid points are made there regarding the necessity to properly observe the government-to-government relationship between the various Tribes and the DOE, the gross uncertainties of climatic variation over a period of 10,000+ years, the methods used to evaluate Health and Environmental Justice based on the life style led by Native Americans, and the rights of Native Americans for reasonable access to Sacred and Culturally Significant sites. Based on Native American concerns, it appears that the WIPP and/or WIPP vicinity would be the preferable of the two alternative sites (i.e., NNSS vs. WIPP and/or WIPP vicinity).

According to the information and data given in the EIS, other locations (generic commercial) might be acceptable for dispositioning of the waste; however, serious consideration would have to be given to Health and Environmental Effects, as well as the rights of Native Americans.

A final comment regarding long-term maintenance of the disposal site(s) is the idea of a 500 year period before significant deterioration of the waste entombment begins. In terms of which method of disposal might be most stable, it appears logical that from most to least stable would follow the sequence: deep depository, borehole, trench, vault. The failure would also logically occur more quickly in a wet rather than a drier climate. Regardless, how was the 500 year period decided upon. Most likely it was arrived at through modeling, bringing into question the validity and accuracy of the model. Also, regarding the assumption that grouting of the other waste is expected to stabilize the material for at least 500 years, again the question arises as to the reliability and accuracy of the model used for this determination.

Included below are additional comments, many of an editorial nature.

**Specific Comments:**

**Page Iv-Page Iviii, Notation, Acronyms and Abbreviations:**

The following Acronyms/Abbreviations are not used in Volume 1: AEA, ASTDR, CWA, DOD, DOE-NV, GIS, GSA, MMI, NNSA/NSO, NTS SA, SDWA, TDEC, TRAGIS, TSCA, and TVA.

W321-3 Based on the GTCC EIS evaluation and WIPP's operating record, DOE believes that the WIPP repository would be a safe location for the disposal of GTCC LLRW and GTCC-like wastes, some of which include long-lived radionuclides. DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require modification to existing law. In addition, it would be necessary to revise the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, the WIPP compliance certification with EPA, and the WIPP Hazardous Waste Facility Permit.

The State of New Mexico has indicated a willingness to accept GTCC LLRW and GTCC-like wastes for disposal at WIPP. Twenty-eight New Mexico State Senators signed a proclamation made in the Fiftieth Legislature, First Session, 2011, stating: "Be it resolved that we, the undersigned, support the opportunity for other potential missions in southeast New Mexico to adequately address the disposal of defense high-level waste, commercial high-level waste, Greater Than Class C LLRW and surplus plutonium waste, as well as the interim storage of spent nuclear fuel." In response to the Draft GTCC EIS, Secretary David Martin, Secretary of the New Mexico Environment Department, sent a letter to DOE on June 27, 2011, stating that "the Department encourages DOE to support the WIPP or WIPP Vicinity proposed locations as the preferred alternatives addressed in the Draft EIS. The geologic repository is the favored alternative being more effective for the enduring time frames for this waste type." In addition, the Governor of New Mexico, in a letter to DOE Secretary Steven Chu on September 1, 2011, stated that the State of New Mexico encourages DOE to support the proposed location of WIPP as the preferred alternative for the disposal of GTCC LLRW and GTCC-like wastes.

W321-4 Text prepared by potentially affected American Indian tribes is included in this EIS. DOE considered this text for Hanford, INL, LANL, and NNSS; however, DOE also needed to ensure consistency in the EIS analyses between the various sites, so that an even comparison could be made between alternatives as required by NEPA. Because of this, it was not possible to fully utilize all of the information provided by the tribal governments in order to perform specific analyses associated with exposure events unique to a given American Indian tribe (such as greater intakes of fish, game, and plants; the use of sweat lodges; and the use of natural pigment paints for traditional ceremonies). Once a decision is made on a specific site location and method, site-specific NEPA reviews would be conducted as needed, including appropriate analysis of exposure events unique to the impacted local American Indian tribes.

However, the information provided in these narratives was considered in the identification of the preferred alternative presented in this EIS. The information provided in the narratives for Hanford, INL, LANL, and NNSS was very useful, and DOE appreciates the time and effort expended by the various tribes in supporting this EIS process.

W321-5 The EIS analyses are based on conceptual engineering information and necessitated the use of a number of simplifying assumptions. This approach is consistent with NEPA, which requires such analyses to be made early in the decision-making process. The various land disposal conceptual designs were assumed to be constructed and operated in a comparable manner at each of the various sites. Information on the conceptual engineering designs for the three proposed land disposal methods is provided in Section D.3 of Appendix D in the EIS. By using the same conceptual designs at all of the sites evaluated in the GTCC EIS, except for cases where a design did not apply (e.g., an intermediate-depth borehole at a site with shallow groundwater), the potential impacts (e.g., radionuclides reaching the groundwater) at the different environmental settings could be readily compared.

In performing these evaluations, a number of engineering measures were included in the conceptual facility designs to minimize the likelihood of contaminant migration from the disposal units. No facility design can guarantee that radionuclide migration from the facility would not occur over and beyond a 10,000-year time period. It was assumed that these

W321-2 (Cont.)

W321-3

W321-4

W321-5

W321-6

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page lix:**

'gpd' is not used in Volume 1 of the document. 'gal/d' is, however, used in several places in the Volume.

'mL' is not used in Volume 1 of the document.

'MW' meaning megawatt(s) is not used in Volume 1 of the document; however, 'Mw' meaning moment magnitude is used.

**Page lix: Units of Measure, Mci:**

It might be helpful here to clarify that megacuries = million curies. Although individuals familiar with these designations may understand megacuries, the general public may not.

**Page lxiii: Amphibian Definition:**

It might be helpful to indicate that we are dealing here with primarily frogs and salamanders.

**Page lxiv, Atomic Energy Commission Definition, Line 7:**

ERDA is not in the list of Acronyms and Abbreviations.

**Page lxvi, Best Management Practices Definition:**

BMPs are not included in the Acronyms and Abbreviations.

**Page lxvi, Conformity Definition:**

Would this definition be clearer if "Defined in the Clean Air Act as the action's compliance" were changed to something like "Defined in the Clean Air Act as a federal action's compliance"?

**Page lxxxii, Hazardous Air Pollutants Definition:**

HAPs is not included in the list of Acronyms and Abbreviations.

**Page lxxxii, High Level Waste Definition:**

HLW is not in the list of Acronyms and Abbreviations.

**Page lxxxiii, Hydraulic Head Definition:**

NAVD88 is not in the list of Acronyms and Abbreviations.

**Page lxxxvi, Magnitude (of an earthquake) Definition:**

ML, mb, Ms, and Mw are not included in the list of Acronyms and Abbreviations.

**Page 1-1, Lines 6-8:**

Should *Code of Federal Regulations* (10 CFR Part 61), "Licensing Requirements for Land Disposal of Radioactive Waste." Be included in the Chapter 1 References?

**Page 1-1, Lines 14-15:**

Should some indication be given that a synopsis of the Act cited here can be found in Chapter 13 of the document?

**Page 1-1, Line 21:**

measures would perform similarly for all conceptual designs, remaining intact for 500 years after the disposal facility closed. After 500 years, the barriers would gradually fail. To account for these engineered features in the modeling calculations, it was assumed that the water infiltration to the top of the waste disposal area would be zero for the first 500 years and then 20% of the natural rate for the area for the remainder of the time period (through 10,000 years). A water infiltration rate of 20% of the natural rate for the area was only used for the disposal area; the natural background infiltration rate was used at the perimeter of the waste disposal units. Again, this approach enables a comparative evaluation of the influence that site-specific environmental factors would have on the potential migration of radionuclides from the disposal facilities and the potential impacts on human health. It should be emphasized that project- and site-specific engineering factors would be incorporated into the actual facility designs of the site or sites selected in a ROD to dispose of GTCC LLRW and GTCC-like wastes.

DOE recognizes that modeling potential releases of radionuclides from the conceptual disposal sites far into the future approximates what might actually occur. Sufficient detail was included in these designs for use in the EIS analyses, consistent with the current stage of this process. Some of the input values may change in the future and could result in higher impacts (such as from increased precipitation at some sites due to climate change), while others could result in lower impacts (due to decreased precipitation).

DOE believes that 500 years is a realistic time period for the longevity of the types of engineering barriers assumed in the analyses. DOE believes the approach and the assumptions used in the EIS are reasonable for performing the comparative analysis of alternatives required by NEPA. For example, the assumption of a 20% natural background infiltration rate after 500 years was based on a study at SRS that indicated that after 10,000 years, the closure cap at the F-area would still shed about 80% of the cumulative precipitation falling on it, with an effectiveness that would be greater before 10,000 years, then decrease very slowly after 10,000 years. The approach used in the EIS is more conservative than indicated by this study.

Estimated radiation doses and LCFs were calculated for each site and disposal concept for 10,000 years, and if the peak impact did not occur during this time frame, the analysis was extended out to 100,000 years. DOE believes that the assumptions made to support the long-term modeling calculations for the groundwater pathway are reasonable and enable a comparative evaluation of the impacts between alternatives. The results of the evaluation presented in the EIS are sufficient to inform the selection of sites and methods for disposal. Site-specific NEPA reviews would be conducted as needed.

W321-6 See response to W321-1

W321-6  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

See comment on Page 1-1, Lines 14-15 above.

**Page 1-1, Lines 35-40:**

See comment on Page 1-1, Lines 14-15 above.

**Page 1-2, Lines 9-11:**

Should a reference to this NOI be included in the Chapter 1 References?

**Page 1-2, Line 17:**

See comment on Page 1-1, Lines 14-15 above.

**Page 1-2, Lines 40-41:**

See comment on Page 1-1, Lines 14-15 above.

**Page 1-3, Lines 4-5:**

See comment on Page 1-1, Lines 14-15 above.

**Page 1-3, Lines 41-42:**

See comment on Page 1-1, Lines 14-15 above.

**Page 1-3, Lines 42-45:**

Should this report be included in the Chapter 1 References?

**Page 1-6, Footnote a:**

Should a list of all these Radionuclides be included in the preliminary material as is done for the Summary Document (see page S-viii)?

**Page 1-7, Transuranic Waste Text Box, Lines 10 & 13:**

Should references for 40 CFR Part 191 and 10 CFR Part 61 be included in the Chapter 1 References?

**Page 1-7, Footnote 1:**

Should a reference for the case cited in the footnote be included in the Chapter 1 References?

**Page 1-8, Footnote 2, Line 1:**

Should some indication be given here that a synopsis of the LLRWPA is to be found in Chapter 13 of Volume 2?

**Page 1-8 (Line 41); Page 1-9 (Lines 3& 4); Page 1-9, Two Waste Groups Text Box:**

The descriptions here of Group 1 wastes leave some confusion. On pages 1-8 and 1-9 the impression is given that any material in storage and material to be generated in the future from existing facilities are considered Group 1. In the text box it indicates that the material already in storage must be from existing facilities. Are some of the materials in storage from formerly existing facilities? In any event the two definitions should be adjusted to eliminate any confusion.

W321-6  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 1-9, Lines 22-26:**  
See comment for **Page 1-6, Footnote a:**

**Page 1-12, Lines 13-14:**  
See comment on Page 1-1, Lines 14-15 above.

**Page 1-17, Line 7:**  
Should CsCl be included in the list of Acronyms and Abbreviations?

**Page 1-23, Line 25:**  
MMES is not in the list of Acronyms and Abbreviations.

**Page 1-24, Line 28:**  
Should 'four regions' be 'four NRC regions'?

**Page 1-27, Lines 17-18:**  
Should "The Consultation and Cooperative Agreement with the State of 18 New Mexico (1981)" be included in the Chapter 1 References?

**Page 1-31, Lines 14-16:**  
Should it be indicated here that the Draft Tank Closure EIS is included in the Chapter 1 References?

**Page 1-31, Line 23:**  
Should it be included here that a synopsis of CERCLA is available in Chapter 13?

**Page 1-33, Line 12:**  
Should SWPP be WIPP?

**Page 1-40, Lines 26-33:**  
Should references for CEQ, ANOI and NOI be included in the Chapter 1 References?

**Page 1-40, Line 32:**  
ANOI is not included in the list of Acronyms and Abbreviations.

**Page 1-43, Line 36:**  
HOSS is not in the list of Acronyms and Abbreviations.

**Page 1-43, Line 42:**  
Should some indication be given here that a synopsis of the Energy Policy Act of 2005 is available in Chapter 13 of Volume 2?

**Page 1-46, Line 23:**  
WVDP is not in the list of Acronyms and Abbreviations.

W321-6  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 1-47, Lines 4 & 5:**

The Draft Tank Closure EIS is included in the Chapter 1 References as DOE 2009 and should be cited here as such.

**Page 1-47, Line 10:**

IDF is not included in the list of Acronyms and Abbreviations. Furthermore, it does not appear to be defined as the Integrated Disposal Facility anywhere except on page E-36 of Volume 2.

**Page 1-47, Lines 11-16:**

Should the settlement agreement or the 2004 EIS mentioned here be included in the Chapter 1 References?

**Page 1-47, Lines 40-41:**

Should some indication be given here that a synopsis of the Clean Air Act is included in Chapter 13 of Volume 2?

**Page 1-48, Line 12:**

Should some indication be given here that a synopsis of this DOE Order is included in Chapter 13, Volume 2?

**Page 1-48, Line 23:**

Should indication of synopses in Chapter 13, Volume 2 be given?

**Page 1-48, Lines 34-39:**

Should indication of synopses in Chapter 13, Volume 2 be given?

**Page 1-53 Lines 32, 38:**

It would be more appropriate here to list all the authors of the cited article. It's alright to cite the article as 'X, et al.', but improper to not list all authors in the reference.

**Page 1-53 Line 44:**

LEU is not in the list of Acronyms and Abbreviations.

**Page 1-53 Line 45:**

The link given here does not lead to the publication.

**Page 1-54 Line 1:**

It would be more appropriate here to list all the authors of the cited article. It's alright to cite the article as 'X, et al.', but improper to not list all authors in the reference.

**Page 1-54 Lines 36 & 38:**

EIA is not included in the list of Acronyms and Abbreviations. Also, the link given on Line 38 does not work.

**Page 1-56 Line 7:**

The link given here does not work.

W321-6  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page 2-1 Line 20:**

Should a reference be included in the Chapter 2 References for 10 CFR Parts 60 and 63?

**Page 2-5 Line 9:**

Should some indication be made that a synopsis of the Act is to be found in Chapter 13, Volume 2?

**Page 2-5 Line 10:**

Should a reference for this Agreement be included in the Chapter 2 References?

**Page 2-6 Line 36:**

Should "on-site-specific" be 'on site-specific'?

**Page 2-8 Line 40:**

Should a reference for the NOI be included in the Chapter 2 References?

**Page 2-9 Lines 3-4:**

DOE 2010 is included in the Chapter 2 References. It may be appropriate to cite that reference here.

**Page 2-9 Line 28:**

Should FedBizOpps be included in the Chapter 2 References?

**Page 2-10 Line 24:**

Should CO<sub>2</sub> be included in the list of Acronyms and Abbreviations?

**Page 2-11, Line 3:**

Should O<sub>3</sub> be included in the list of Acronyms and Abbreviations?

**Page 2-17, Line 11:**

Should K<sub>4</sub>s be included in the list of Acronyms and Abbreviations?

**Page 2-22, Lines 11 & 13:**

Should these two CFRs be included in the Chapter 2 References?

**Page 2-30, Last Column, Lines 6 & 7:**

Should some indication be given that a synopsis of the NHPA is given in Chapter 13 of Volume 2?

**Page 2-32, Last Column, Line 6:**

Should some indication be given that a synopsis of the NHPA is given in Chapter 13 of Volume 2?

**Page 2-33, Fourth Column, Second Paragraph, Lines 11 & 12:**

Should the USFWS's opinion be included in the Chapter 2 References?

W321-6  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page 2-33, Last Column, Lines 5 & 6:**

Should some indication be given that a synopsis of the NHPA is given in Chapter 13 of Volume 2?

**Page 2-34, Last Column, Line 13:**

Should some indication be given that a synopsis of the NHPA is given in Chapter 13 of Volume 2?

**Page 2-40, Column 4, Row 1:**

NA is not included in the list of Acronyms and Abbreviations.

**Page 2-42, Footnote h, Line 1:**

Should 40 CFR Parts 191 and 194 be included in the Chapter 2 References?

**Page 2-59, Line 10:**

Should 10 CFR Part 61 be included in the Chapter 2 References?

**Page 2-59, Line 19:**

See comment for **Page 2-59, Line 10:** above.

**Page 2-59, Line 31:**

Should 10 CFR Parts 60 & 63 be included in the Chapter 2 References?

**Page 2-62, Line 17:**

See comment for **Page 2-59, Line 10:** above.

**Page 2-65, Line 10:**

Should 'four regions of the United States' read "four NRC regions of the United States"?

**Page 2-66, Lines 13-14:**

Since this document is included in the Chapter 2 References, wouldn't it be more appropriate to cite it as something like "...the TC&WM EIS (DOE 2009)"?

**Page 2-68, Lines 14, 17 & 33:**

It would be more appropriate here to list all the authors of the cited article. It's alright to cite the article as 'X, et al.', but improper to not list all authors in the reference.

**Page 3-2, Line 20:**

Should 10 CFR 61 be included in the Chapter 3 References?

**Page 3-21, Lines 19-20:**

The non-inclusion of the sources recovered by GTRI/OSRP is not really discussed in Section 3.1; it is, however, discussed in Section 1.4.1.2 **Sealed Sources**.

**Page 4-2, Line 13:**

Should this agreement be included in the Chapter 4 References?

W321-6  
(Cont.)



**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 4-2, Line 23:**

Should some indication be given that a synopsis of this Act may be found in Chapter 13?

**Page 4-6, Line 25:**

DRZ is not included in the list of Acronyms and Abbreviations.

**Page 4-11, Line 32:**

Should MgO be included in the list of Acronyms and Abbreviations?

**Page 4-11, Line 35:**

CPR is not included in the list of Acronyms and Abbreviations.

**Page 4-11, Lines 41-43:**

Should 40 CFR Parts 191 and 194 and 10 CFR Part 61 be included in the Chapter 4 References?

**Page 4-13, Lines 12-14:**

Should some indication be given that synopses of the two DOE Orders are to be found in Chapter 13 of Volume 2?

Should "DOE/EH 0173T, "Environmental Regulatory Guide 14 for Radiological Effluent Monitoring and Environmental Surveillance" be included in the Chapter 4 References?

**Page 4-15, Line 35:**

Should "provides" be "provide"?

Also, should the CAAA be included in the Chapter 4 References?

**Page 4-15, Line 40:**

Should some indication be given here that a synopsis of this Code is given in Chapter 13, Volume 2?

**Page 4-16, Lines 3-6:**

Should CO, SO<sub>2</sub>, and NO<sub>x</sub> be included in the list of Acronyms and Abbreviations?

**Page 4-16, Line 15:**

Why not cite the New Mexico air regulations appropriately and include the reference in the Chapter 4 References?

**Page 4-16, Line 18:**

H<sub>2</sub>S is not included in the list of Acronyms and Abbreviations.

**Page 4-18, Footnote g, Line 2:**

EAC is not in the list of Acronyms and Abbreviations.

**Page 4-18, Line 4:**

Should 40 CFR 81.332 be included in the Chapter 4 References?

W321-6  
(Cont.)

Woitowicz, John, Commenter ID No. W321 (cont'd)

Page 4-18, Lines 30-31:

If 40 CFR 81 (see above comment) is included in the Chapter 4 References, the citation in the above comment and the two here on lines 30 and 31 would be covered.

Page 4-23, Lines 4, 17, 26, 35, 45; Page 4-24, Line 5:

Powers (2009) is not included in the Chapter 4 References.

Page 4-23, Line 16:

Should "surface water" used here be "groundwater"?

Page 4-25, Line 28:

NMEMNRD is not included in the list of Acronyms and Abbreviations.

Page 4-26 Line 7:

See comment Page 4-23, Lines 4, 17, 26, 35, 45; Page 4-24, Line 5:

Page 4-31, Line 3:

Should 40 CFR Part 191 be included in the Chapter 4 References?

Page 4-31, Line 15:

Should 40 CFR Part 61 be included in the Chapter 4 References?

Page 4-31, Line 38:

Should some indication be given that a synopsis of this DOE Order is available in Chapter 13 of Volume 2?

Page 4-33, Page 4-34, Table 4.2.5-1:

*Aquilegia chaplinei*: *Aquilegia chrysantha* var. *chaplinei* is the currently accepted name.  
*Empidonax trallii extimus* should be *Empidonax trallii extimus*

Page 4-34, Footnotes:

Should C, E, SC, SE, SSC, ST, and T be included in the list of Acronyms and Abbreviations?

Page 4-45, Line 15:

BNSF is not in the list of Acronyms and Abbreviations.

Page 4-49, Line 10:

Should 40 CFR Part 81 be included in the Chapter 4 References?

Page 4-50, Line 28:

See comment Page 4-49, Line 10:, above.

Page 4-57, Line 4:

Should 10 CFR Part 835 be included in the Chapter 4 References?

W321-6  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 4-60, Lines 24-27:**

Should 40 CFR Parts 191 and 194 be included in the Chapter 4 References?

**Page 4-67, Lines 8-9:**

Should 49 CFR 173 and 10 CFR 71 be included in the Acronyms and Abbreviations?

**Page 4-74, Table 4.3.11-1, Footnote b:**

NA is not in the list of Acronyms and Abbreviations. Also note that NA is used in Table 2.7-3, Page 2-41 in Footnote a to mean 'not analyzed'.

**Page 4-75, Line 30:**

Should 40 CFR 1508 be included in the Chapter 4 References?

**Page 4-77, Line 9:**

Should some indication be given here that a synopsis of the WIPP LWA is available in Chapter 13, Volume 2?

**Page 4-77, Lines 18-20:**

Should this agreement be included in the Chapter 4 References?

**Page 4-77, Line 26:**

Should some indication be given here that a synopsis of the LLRWPA is to be found in Chapter 13 of Volume 2?

W321-6  
(Cont.)

**Page 4-77, Lines 32-33:**

Should this agreement be included in the Chapter 4 References?

**Page 4-77, Lines 34, 41-42, 44; Page 4-78, Line 7:**

See comment **Page 4-77, Line 9:**

**Page 4-77, Line 46; Page 2-78, Lines 2-4:**

See comment **Page 4-77, Lines 32-33:**

**Page 4-78, Lines 13-14; Lines 32-33; Lines 36-37:**

The link does not work.

**Page 4-78, Lines 16, 23, 27:**

All the authors of these papers should be listed here.

**Page 4-79, Line 2:**

The link does not work.

**Page 4-79, Line 30:**

This link connects to the WIPP 2006 Annual Site Environmental Report not the 1997 Supplemental EIS.

Woitowicz, John, Commenter ID No. W321 (cont'd)

Page 4-81, Lines 12-13:

The link does not work.

Page 4-81, Line 18:

All the authors for this reference should be listed here.

Page 4-82, Lines 5, 39, 42:

All the authors should be listed for these references.

Page 4-83, Lines 1, 4, 33:

All the authors should be listed for these references.

Page 4-83, Lines 40-41, 44:

The links do not work.

Page 4-84, Lines 4-5, 8-9:

The links do not work.

Page 4-84, Line 32:

NEIC is not in the list of Acronyms and Abbreviations.

Page 5-21, Sources:

Should 40 CFR 52.21 be included in the Chapter 5 References?

Page 5-21, Footnote c:

P & S are not included in the list of Acronyms and Abbreviations.

Page 5-22, Line 2:

AQRV is not in the list of Acronyms and Abbreviations.

Page 5-22, Line 10:

Should the Clean Air Act Amendments be included in the Chapter 5 References?

Page 5-22, Lines 16-17:

Should EPA's 1999 Regional Haze Rule be included in the Chapter 5 References?

Page 5-22, Lines 23-24:

Should 40 CFR Parts 51 and 93 be included in the Chapter 5 References?

Page 5-22, Lines 45-46:

Should 40 CFR Part 61 be included in the Chapter 5 References?

Page 5-23, Lines 28-29:

Should some indication be included here that a synopsis of the Noise Control Act of 1982 is available in Chapter 13, Volume 2?

W321-6  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

Should the "Quiet Communities Act of 1978, 42 USC, Parts 4901-4918" be included in the Chapter 5 References?

**Page 5-24, Lines 9 & 13:**

PPV and L<sub>v</sub> are not included in the list of Acronyms and Abbreviations.

**Page 5-33, Line 14:**

Should some indication be given here that a synopsis of the Endangered Species Act is available in Chapter 13, Volume 2?

**Page 5-33, Line 22:**

NMFS is not in the list of Acronyms and Abbreviations.

**Page 5-34, Line 40:**

Should some indication be given here that a synopsis of this Executive Order is available in Chapter 13, Volume 2?

**Page 5-35, Column 3, Last Row:**

NE is not in the list of Acronyms and Abbreviations.

**Page 5-41, Lines 30-31:**

Should a reference for the National Register of Historic Places be included in the Chapter 5 References?

Should some indication be given here that a synopsis of the NHPA is available in Chapter 13, Volume 2?

**Page 5-41, Line 40:**

Should 36 CFR Part 800 be included in the Chapter 5 References?

**Page 5-42, Column 1, Rows 4&5:**

AHPA and ARPA are not included in the list of Acronyms and Abbreviations.

**Page 5-44, Line 46:**

Barnes et al. 1977 is not in the Chapter 5 References.

**Page 5-47, Lines 15-16:**

Should a reference for the EPA Announcement be included in the Chapter 5 References?

**Page 5-47, Line 25-26:**

Should H<sub>2</sub>O, CH<sub>4</sub>, and N<sub>2</sub>O be included in the list of Acronyms and Abbreviations?

**Page 5-53, Lines 31:**

Should 10 CFR Part 835 be included in the Chapter 5 References?

**Page 5-63, Line 25:**

W321-6  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

Should 10 CFR Part 61 be included in the Chapter 5 References?

**Page 5-65, Lines 43-45:**

Should "increase" here be 'decrease'?

**Page 5-69, Lines 24-25:**

Should some indication be given here that synopses of these two DOE Orders are given in Chapter 13, Volume 2.

**Page 5-74, Line 13:**

NAS is not included in the list of Acronyms and Abbreviations.

**Page 5-74, Line 39:**

Should 73 FR 45029 be included in the Chapter 5 References?

**Page 5-75, Line 42:**

Should some indication be given that a synopsis of this Executive Order is given in Chapter 13, Volume 2?

**Page 5-77, Line 36:**

The scientific name for elk should be *Cervus elaphus*.

**Page 5-82, Lines 44-45:**

Should "49 CFR 173.441 (Radiation Level Limitations) and 10 CFR 71.47 (External Radiation Standards for All Packages)" be included in the Chapter 5 References?

**Page 5-89, Line 16:**

Should 40 CFR 1508.7 be included in the Chapter 5 References?

**Page 5-90, Table 5.3.11-2, Last Column, Second Row, Line 5:**

RTC is not in the list of Acronyms and Abbreviations.

**Page 5-90, Table 5.3.11-2, Column Four, Last Row, Line 6; Last Column, Last Row, Line 5:**

CRWSS is not in the list of Acronyms and Abbreviations.

RLWTF is not in the list of Acronyms and Abbreviations.

**Page 5-91, Table 5.3.11-2, Column 2, Second Row, Line 6:**

CSWTF is not in the list of Acronyms and Abbreviations.

**Page 5-94, Line 3:**

Should 10 CFR Part 61 be included in the Chapter 5 References?

**Page 5-96, Line 11:**

Should a reference for DOE P 454.1 be included in the Chapter 5 References?

W321-6  
(Cont.)

Woitowicz, John, Commenter ID No. W321 (cont'd)

Page 5-96, Lines 40-41:

The link does not work.

Page 5-97, Line 13:

All authors should be given for this reference.

Page 5-99, Lines 1, 26, 36, 43:

All authors should be listed here for each of these references.

Page 5-100, Lines 1, 4, 33:

All authors should be listed here for each of these references.

Page 5-101, Lines 39 & 43:

All authors should be listed here for each of these references.

Page 5-102, Lines 1 & 21:

All authors should be listed here for each of these references.

Page 5-102, Lines 18-19:

The link here will work if “.html” is changed to “.htm”

Page 5-102, Line 42:

The link does not work.

Page 6-5, Line 41-44:

Should some indication be given here that a synopsis of the CAA is available in Chapter 13, Volume 2?

Also, should “*Washington Administrative Code 42 (WAC) 173-401-200(19)*” be included in the list of Chapter 6 References?

Should the Air Permit be included in the Chapter 6 References?

Page 6-7, Lines 18 & 24:

Should NH<sub>3</sub> and CCl<sub>4</sub> be included in the list of Acronyms and Abbreviations?

Page 6-9, Text Box, Paragraph 4, Line 2:

ERDF is not in the list of Acronyms and Abbreviations.

Page 6-10, Line 5:

Should WAC 173 be included in the Chapter 6 References?

Page 6-10, Line 13:

Should 40 CFR 81 be included in the Chapter 6 References?

Page 6-12, Line 12:

W321-6  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

EDNA is not in the list of Acronyms and Abbreviations.

**Page 6-14, Lines 7, 8 12:**

Should references be included in the Chapter 6 References for the Skagit/Hanford Nuclear Power Plant characterization, the Basalt waste Isolation Project study and the New Production Reactor EIS?

**Page 6-23, Text Box, Line 2:**

OWL is not in the list of Acronyms and Abbreviations.

**Page 6-27, Line 23:**

Should 10 CFR Part 1022 be included in the Chapter 6 References?

**Page 6-34, Text Box, Paragraph 1, Line 3; Paragraph 2, Line 1:**

FWS is not included in the list of Acronyms and Abbreviations.  
CCP is not included in the list of Acronyms and Abbreviations.

**Page 6-34, Line 19:**

Should CaCO<sub>3</sub> be included in the list of Acronyms and Abbreviations?

**Page 6-39, Lines 37-40:**

Would travel times for groundwater from the 200 Area to the Columbia River not increase rather than decrease due to the reduced hydraulic gradient?

**Page 6-40, Lines 8-9:**

TEDF and SALDS are not in the list of Acronyms and Abbreviations.

**Page 6-42, Text Box, Lines 1 & 5:**

OU and CLUP are not in the list of Acronyms and Abbreviations.

**Page 6-42, Table 6.1.3-1, Second Column, Title; Column 1 Entries:**

DWS is not in the list of Acronyms and Abbreviations.  
TCE, TCM and PCE are not in the list of Acronyms and Abbreviations.

**Page 6-43, Line 21:**

Should some indication be given here that a synopsis of DOE Order 5400.5 is available in Chapter 13 of Volume 2?

**Page 6-46, Line 5:**

Should 40 CFR Part 61 be included in the Chapter 6 References?

**Page 6-46, Line 18:**

Should 10 CFR Part 835 be included in the Chapter 6 References?

**Page 6-47, Paragraph 1, Lines 3-4:**

W321-6  
(Cont.)



**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

Should some indication be given at least in a footnote to clarify what reference Harper and Harris might be? It might also be useful to add this reference to the Chapter 6 References.

**Page 6-48, Line 10:**

WDFW is not in the list of Acronyms and Abbreviations.

**Page 6-49, Line 14:**

The currently accepted name for *O. hymenoides* is *Achnatherum hymenoides*.

**Page 6-49, Line 35:**

*Cervis elaphus* is the currently accepted name for the elk.

**Page 6-50, Line 15:**

*Ammodramus savannafum* should be *Ammodramus savannarum*.

**Page 6-50, Line 18:**

*Centrocercus urophasianus* is currently accepted name for the Western Sage Grouse.

**Page 6-50, Line 40:**

The accepted name for the Basin spadefoot toad is *Spea intermontana*.

**Page 6-50, Line 40:**

The accepted name for the Western toad is *Anaxyrus boreas*.

**Page 6-50, Line 40-41:**

The accepted name for Woodhouse's toad is *Anaxyrus woodhousii*.

**Page 6-52, Table 6.1.5-1:**

*Anagallis minima* is the accepted name for Chaffweed.

The accepted name for Desert Evening Primrose is *Oenothera primiveris*.

The accepted name for Fuzzytongue penstemon is *Penstemon eriantherus*.

The accepted name for rosy pussypaws is *Cistanthe rosea*.

The accepted name for Spreading loflingea *Loeflingia squarrosa* ssp. *squarrosa*

The accepted name for White Bluff's Bladderpod is *Lesquerella tuplashensis*.

The accepted name for the shortface lanx is *Fisherola nuttalli* (note only one i).

The accepted name for the Leopard dace is *Rhinichthys falcatus*.

**Page 6-53, Table 6.1.5-1:**

The accepted name for the Mountain sucker is *Catostomus platyrhynchus*.

The accepted name for the River Lamprey is *Lampetra ayresii*

The accepted name for the Western Toad is *Anaxyrus boreas*.

The accepted name for the White Pelican is *Pelecanus erythrorhynchos*.

**Page 6-54, Footnote a:**

SCa, SM, . and X are not in the Acronyms and Abbreviations.

W321-7 Revised per comment.

W321-8 See response to W321-1

W321-6  
(Cont.)

W321-7

W321-8

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page 6-70, Line 10:**

SR is not in the list of Acronyms and Abbreviations.

**Page 6-72, Line 36:**

RL and PNNL are not in the list of Acronyms and Abbreviations.

**Page 6-72, Line 40:**

DOE-RL and PA are not in the list of Acronyms and Abbreviations.

**Page 6-72, Line 40:**

Should a reference to the Programmatic Agreement be included in the Chapter 6 References?

**Page 6-78, Line 13:**

Should 40 CFR 81.348 be included in the Chapter 6 References?

**Page 6-92, Line 11:**

The accepted name for *Charadrius vociferous* is *Charadrius vociferous* (note the lack of an 'o' in *vociferus*).

**Page 6-96, Line 46; Page 6-97, Line 1:**

Should references for 49 CFR 173 and 10 CFR 71 be included in the Chapter 6 References?

**Page 6-102, Line 26:**

Should some indication be given here that a synopsis of the NHPA is available in Chapter 13 of Volume 2?

**Page 6-106, Line 14:**

See comment **Page 6-102, Line 26:** above.

**Page 6-111, Section 6.5:**

Should a reference for the cited agreement be placed in the Chapter 6 References?

Should a reference for 74 FR 67189 be included in the Chapter 6 Reference?

Should a reference for the ROD mentioned here be included in the Chapter 6 References?

**Page 6-111, References, AMA 2006:**

The link does not work.

**Page 6-112:**

All the authors need to be listed here for Barnes, J.D., et al., Bilyard, G.R., et al., and Blew, R.D., et al.

**Page 6-112, Dicks, N 1999; DOC 2008:**

The links do not work.

**Page 6-113:**

W321-8  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

All the authors need to be listed here for Downs J.L., et al., and Duncan, J.P., et al.

**Page 6-113, EPA 2008b:**  
The link does not work.

**Page 6-114:**  
All the authors need to be listed here for Hartman, M.J., et al., Hoitink, D.J., et al., Kennedy, E. et al., and Murray, C.J., et al.

**Page 6-115:**  
All the authors need to be listed here for Poston, T.M., et al. (2006), Poston, T.M., et al. (2007), Poston, T.M., et al. (2009), and Rohay, A.C., et al.

**Page 6-116, U.S. Bureau of the Census, 2008c; USDA, 2008:**  
The links do not work.

**Page 6-117, WDFW 2009:**  
The link does not work.

**Page 7-3, Figure 7.1.1-1, Note:**  
ANL-W is not in the list of Acronyms and Abbreviations.

**Page 7-4, Line 46:**  
Should the CAAA be included in the list of Acronyms and Abbreviations?

**Page 7-5, Line 27:**  
Should some indication be given here that a synopsis/reference is given for Idaho Administrative Procedures Act [IDAPA] 58.01.01 in Chapter 13, Volume 2?

**Page 7-5, Line 33:**  
Should a reference for 40 CFR 81 be included in the Chapter 7 References?

**Page 7-7, Line 16:**  
Should 40 CFR 81 be included in the Chapter 7 References?

**Page 7-10, Figure 7.1.2-1, Legend:**  
EBR-1, MFC and TAN are not in the list of Acronyms and Abbreviations.

**Page 7-15, Line 3:**  
WCFS is not in the list of Acronyms and Abbreviations.

**Page 7-20, Figure 7.1.3-2, Legend, Water Table Contour, Lines 2 & 4:**  
NGVD is not in the list of Acronyms and Abbreviations.  
Should Lindholm and others, 1988 be included in the Chapter 7 References?

**Page 7-22, Figure 7.1.3-4, Source:**

W321-8  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

Is DOE 2000 indicated here the same as the reference included in Chapter 7 References?  
Should DOE 2004 mentioned here be included in the Chapter 7 References?

W321-8  
(Cont.)

**Page 7-26, Lines 5, 10:**

The accepted name for the elk is *Cervus elaphus*.  
The accepted name for *Myotis ciliolabrum* is *Myotis leibii*.

**Page 7-27, Line 20:**

The accepted name for Townsend's big-eared bat is *Plecotus townsendii*.

**Page 7-28, Table 7.1.5-1; Page 7-29, Footnotes:**

The accepted name for the narrowleaf *Oxytheca* is *Oxytheca dendroidea*.  
The accepted name for the Spreading gilia is *Ipomopsis polycladon*.  
The accepted name for the Long-billed curlew is *Numenius americanus*.  
See comment for **Page 7-27, Line 20:** regarding Townsend's big-eared bat.  
See comment for **Page 7-26, Lines 5, 10:** for Western small-footed Myotis.  
EXPN, SP2 and UR are not in the list of Acronyms and Abbreviations.

W321-9

**Page 7-32, Line 29:**

The phrase "...Census data for the year 2000 and from CEQ) guidelines (CEQ 1997." should read "...Census data for the year 2000 and from CEQ) guidelines (CEQ 1997)."

**Page 7-40, Table 7.1.9-1 Title, Line 1; Line 3:**

AADT is not in the list of Acronyms and Abbreviations.  
CRMO is not in the list of Acronyms and Abbreviations.

**Page 7-41, Lines 18-19:**

Should the Carey Land Act of 1894 and the Desert Reclamation Act of 1902 be included in the Chapter 7 References?

W321-10

**Page 7-43, Line 10:**

Should 40 CFR 81 be included in the Chapter 7 References?

**Page 7-61, Lines 41-42:**

Should 49 CFR 173.441 and 10 CFR 71.47 be included in the Chapter 7 References?

**Page 7-68, Line 27:**

Should "under Alternatives 3 and 4" be "under Alternatives 3 through 5"?

**Page 7-70, Line 31:**

Here it indicates that in the peak year less than .5% of vacant housing would be required; however, on Page 7-58, Lines 17-18, it indicates that no more than 2% of the vacant housing would be required. Which is the better number and shouldn't its use be consistent?

W321-9 Revised per comment.

W321-10 See response to W321-1.

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page 7-72, Lines 7, 13, 39:**

ICDF is not in the list of Acronyms and Abbreviations.  
AMWTP is not in the list of Acronyms and Abbreviations.  
RPS is not in the list of Acronyms and Abbreviations.

**Page 7-75, Table 7.5-1 (Cont.), Column 3, Row 1, Line 2:**

LDR is not in the list of Acronyms and Abbreviations.

**Page 7-76:**

All authors should be listed for the following references: Ackerman, D.J., et al.; Anderson, S.R., et al.; Berenbrock, C., et al.; Black, G., et al.; Blew, R.D., et al.; Braun, J.B., et al.; Cahn, L.S., et al.; and Clawson, K.L., et al..

**Page 7-76, Lines 9-10:**

The link does not work.

**Page 7-76, Line 46:**

The link does not work.

**Page 7-77, Line 26:**

The capabilities of this search site only extend back 365 days. Is putting in the web address of any real value?

**Page 7-79:**

All authors should be listed for the following references: Knobel, L.L., et al.; Mattson, E.D., et al.; and Mitchell, J.C., et al. 1980.

**Page 7-79, Line 4:**

The link does not work.

**Page 7-80:**

All authors should be listed for the following references: Payne, S.J., et al., 2000; and Payne, S.J., et al., 2007.

**Page 7-81:**

All authors should be listed for the following references: Reynolds, T.D., et al.; and Sperber, T.D., et al.

**Page 7-81, Lines 18-19:**

The link does not work.

**Page 7-81, Lines 22-23:**

The link does not work.

**Page 7-81, Line 45:**

The link does not work.

W321-10  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 7-82:**

All authors should be listed for the following references: Vilord, S.J., et al.; and Wood, T.R., et al.

**Page 8-3, Line 28:**

WRCC is not in the list of Acronyms and Abbreviations.

**Page 8-5, Line 27:**

LANS is not in the list of Acronyms and Abbreviations.

**Page 8-8, Line 6:**

Should a reference for 20.2.3 NMAC be included in the Chapter 8 References?

**Page 8-8, Line 15:**

Should a reference for 40 CFR 81 be included in the Chapter 8 References?

**Page 8-8, Line 22:**

AIRNET is not in the list of Acronyms and Abbreviations.

**Page 8-10, Line 36:**

Should the reference citation here be for DOE 2008b and not DOE 2008c?

**Page 8-11, Line 39:**

DOE 2008c is not in the Chapter 8 References.

**Page 8-12, Lines 16 & 24:**

See **Page 8-11, Line 39:** comment.

**Page 8-13, Line 3:**

See **Page 8-11, Line 39:** comment.

**Page 8-14, Line 1:**

See comment **Page 8-10, Line 36:**

**Page 8-15, Line 3:**

See **Page 8-11, Line 39:** comment.

**Page 8-17, Figure 8.1.2-4, Above X-axis:**

Purtymun 1984 is not in the Chapter 8 References.

**Page 8-19, Lines 26, 35, 37:**

See **Page 8-11, Line 39:** comment.

**Page 8-19, Footnote, Line 2:**

Should 10 CFR Part 100 be included in the Chapter 8 References?

W321-10  
(Cont.)

Woitowicz, John, Commenter ID No. W321 (cont'd)

Page 8-20, Line 3:

See Page 8-11, Line 39: comment.

Page 8-20, Bottom of Figure:

CCFZ, NFZ, PFZ, PPFZ and VC are not in the list of Acronyms and Abbreviations.

Page 8-21, Lines 2, 13, 15, 17:

See Page 8-11, Line 39: comment.

Page 8-22, Line 6:

See Page 8-11, Line 39: comment.

Page 8-22, Line 29:

See Page 8-11, Line 39: comment.

Page 8-23, Lines 6 & 35:

See Page 8-11, Line 39: comment.

Page 8-24, Line 20:

See Page 8-11, Line 39: comment.

Page 8-25, Figure 8.1.3-1 Title:

See Page 8-11, Line 39: comment.

Page 8-26, Text Box, Paragraph 1, Line 5:

TIMS is not in the list of Acronyms and Abbreviations.

Page 8-26, Lines 20 & 29:

See Page 8-11, Line 39: comment.

Page 8-28, Line 7:

See Page 8-11, Line 39: comment.

Page 8-29, Lines 2 & 19; Table 8.1.3-2, Source:

See Page 8-11, Line 39: comment.

Page 8-31, Line 12:

See Page 8-11, Line 39: comment.

Page 8-33, Line 3:

See Page 8-11, Line 39: comment.

Page 8-35, Line 11:

RDX and TNT are not in the list of Acronyms and Abbreviations.

W321-10  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

W321-11 Revised per comment.

**Page 8-36, Table 8.1.3-4, Footnote a:**

DCE, NMGWS and TCA are not in the list of Acronyms and Abbreviations.

**Page 8-36, Line 4:**

See **Page 8-11, Line 39:** comment.

**Page 8-38, Text Box, Paragraph 2, Line 3:**

SCP is not in the list of Acronyms and Abbreviations.

W321-10  
(Cont.)

**Page 8-38, Line 13:**

Should some indication be given here that a synopsis of DOE Order 5400.5 is available in Chapter 13, Volume 2?

**Page 8-41, Line 25:**

See **Page 8-11, Line 39:** comment.

**Page 8-42, Line 1:**

Bouteloua dactyloides is the accepted name for Buchloe dactyloides .

**Page 8-42, Lines 6 & 7:**

See **Page 8-11, Line 39:** comment.

**Page 8-42, Text Box:**

Achnatherum hymenoides is the accepted name for Oryzopsis hymenoides.

Artemisia tridentata is the accepted name for Artemisia tridentate.

Ericameria nauseosa var. nauseosa is the accepted name for Chrysothamnus nauseosus.

Gutierrezia sarothrae is the accepted name for Gutierrezia sarthrae.

**Page 8-43, Lines 6, 7 & 26:**

See **Page 8-11, Line 39:** comment.

W321-11

**Page 8-43, Lines 11, 12, 18:**

Tamias quadrivittatus is the accepted name for Neotamias quadrivittatus.

Cervus elaphus is the accepted name for Cervus canadensis.

Cnemidophorus velox is the accepted name for Cnemidophorus velux.

**Page 8-44, Lines 3, 26, 37:**

See **Page 8-11, Line 39:** comment.

**Page 8-44, Line 15:**

Empidonax traillii extimus is the accepted name for Empidonax callii extimus.

**Page 8-45 Table 8.1.5-1:**

Cypripedium pubescens var. pubescens is the accepted name for Cypripedium calceolus L. var. pubescens.



**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

*Accipiter gentilis* is the accepted name for *Accipiter gentiles*.  
*Ochotona princeps saxatilis* is the accepted name for *Ochotona princeps nigrescens*.  
*Bassariscus astutus* is the accepted name for *Bassariscus astulus*.  
*Myotis leibii* is the accepted name for *Myotis ciliolabrum*.

**Page 8-46 Table 8.1.5-1, Source:**  
See **Page 8-11, Line 39:** comment.

**Page 8-48, Line 20:**  
Should "county" here be 'ROI'?

**Page 8-51, Line 23 & 30:**  
See **Page 8-11, Line 39:** comment.

**Page 8-53, Line 5 & 10:**  
See **Page 8-11, Line 39:** comment.

**Page 8-56, Line 6:**  
Should a source as well as a year (2009) be cited here for Santa Fe's population of 70,000?

**Page 8-56, Line 10:**  
See **Page 8-11, Line 39:** comment.

**Page 8-57, Line 13:**  
Should a reference be included for 49 CFR 177.825 in the Chapter 8 References.

**Page 8-59, Line 12:**  
LANS is not listed in the Acronyms and Abbreviations.

**Page 8-60, Lines 2-5:**  
Should the "natural and cultural resources management plan" and the accords with the four Pueblos be included in the Chapter 8 References?

**Page 8-64, Text Box, Paragraph 3, Line 2:**  
DARHT is not in the list of Acronyms and Abbreviations.

**Page 8-66, Line 17:**  
Should 40 CFR 81.332 be included in the Chapter 8 References?

**Page 8-77, Lines 14-16:**  
How can the dose from Tc-99 be largely attributable to both GTCC LLRW activated metal wastes and GTCC-like Other Waste-RH? Does this statement need rewording?

**Page 8-80, Line 8:**  
*Bouteloua dactyloides* is the accepted name for *Buchloe dactyloides*.

W321-12 See response to W321-1.

W321-13 Revised per comment.

W321-11  
(Cont.)

W321-12

W321-13

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page 8-85, Lines 2-4:**

Should 49 CFR 173.441 (Radiation Level Limitations) and 10 CFR 71.47 (External Radiation Standards for All Packages) be included in the Chapter 8 References?

**Page 8-94, Line 43:**

See **Page 8-11, Line 39:** comment.

**Page 8-95, Line 20:**

See **Page 8-11, Line 39:** comment.

**Page 8-95, Lines 38 & 44:**

The DOE 2008b reference in the Chapter 8 References is not the one for the NNSA Complex Transformation.

**Page 8-95, Lines 44-45:**

Should a reference for the ROD mentioned here be included in the Chapter 8 References?

**Page 8-97, Lines 34, 40:**

See **Page 8-11, Line 39:** comment.

**Page 8-97, Line 46:**

Why is a number of 13,500 people currently working at LANL used here when a number of employees from 2004 is used on page 8-44?

**Page 8-98:**

The following references should have all authors included: Ball, T., et al.; Baltz, E.H., et al.; Birdsell, K.H., et al., 2005a; and Birdsell, K.H., et al., 2005b.

**Page 8-98 Line 27:**

The link does not work.

**Page 8-99:**

The following references should have all authors included: Blew, R.D., et al.; Bradley, C.R., et al.

**Page 8-99, Line 5:**

Bowen, B.M., 1990 is not cited in Chapter 8.

**Page 8-99, Line 26:**

The link does not access the intended information.

**Page 8-99, Line 32:**

The link does not work.

**Page 8-100, Lines 28-29:**

The link does not work.

W321-14 See response to W321-1.

W321-14

**Page 8-100:**

All of the authors should be listed for Gardner, J.N., et al., 1999.

**Page 8-101, Line 13:**

Kwicklis, E., et al., 2005 is not cited in Chapter 8.

**Page 8-101:**

All the authors should be listed for Krier, D., et al., 1997.

**Page 8-101, Lines 20, 24, 28:**

The links do not work.

**Page 8-102, Lines 1, 44:**

McLin, S.G., and E.H. Keating, 2005 and Stauffer, P.H., et al., 2005 are not cited in Chapter 8.

**Page 8-102:**

Nyhan, J.W., et al., 1978; Reneau, S.L., et al., 1998; Romero, R.P., et al.2007 and Shuman, R., et al., 2002 should have all of the authors listed.

**Page 8-103:**

All of the authors should be listed for Wachs, D., et al., 1988 and Wong, I.G., et al., 1995.

**Page 8-103, Lines 7, 11-12:**

The links do not work.

W321-14  
(Cont.)

**Document Review**

**Date of Review:** March 25, 2011 By: John Wojtowicz

**Document Title:** Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D), February 2011, Volume 2.

**Document Number:** DOE/EIS-0375-D February 2011

**Discussion:** See discussion for Volume 1 comments.

Included below are additional comments, many of an editorial nature.

**Specific Comments:**

**Page xxxiii, Units of Measure:**

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

'gpd' is not used in Volume 2 of the document as gallon(s) per day. 'gal/d' is, however, used in several places in the Volume.  
kV, mR, nCi, oz, R, rad, VdB and µm are not used in this Volume.

**Page 9-5, Figure 9.1.1-1, Figure Top Labels, Legend, Figure Caption:**

ARL, SORD, MEDA, LLW, and Ann are not included in the list of Acronyms and Abbreviations.

ASN is not included in the list of Acronyms and Abbreviations.  
kts is not included in the list of Acronyms and Abbreviations.

**Page 9-5, Lines 17-20:**

Regarding the likelihood of winter precipitation below 4000 ft. elevation, what is the elevation of the proposed GTCC site?

**Page 9-6, Line 16:**

Should a reference for the 1990 CAAA be included in the Chapter 9 References?

**Page 9-6, Line 27:**

SO<sub>2</sub>, NO<sub>x</sub> and CO are not included in the list of Acronyms and Abbreviations.

**Page 9-6, Lines 36, 41, 46:**

HAPs is not in the list of Acronyms and Abbreviations.

O<sub>3</sub> is not included in the list of Acronyms and Abbreviations.

H<sub>2</sub>S is not included in the list of Acronyms and Abbreviations.

**Page 9-6, Line 42:**

*The Nevada Administrative Code* 445B.391 has a short synopsis in Chapter 13 as *Nevada Revised Statutes*: Air Emission Controls Chapter 445B. Someone trying to relate this synopsis to the citation here would likely have difficulty realizing they might be the same thing. Would it be better to use the same titles in both places and give some indication that a synopsis is available in Chapter 13, or, perhaps better, put a reference to the law in the Chapter 9 References?

**Page 9-7, Lines 4, 19 :**

Should 40 CFR 81.329 be included in the Chapter 9 References?

Should 40 CFR 81.418 be included in the Chapter 9 References?

**Page 9-9, Footnote g, Line 2:**

EAC is not included in the list of Acronyms and Abbreviations.

**Page 9-10, Table 9.1.1-3, Sources:**

See comment **Page 9-6, Line 42:**. Also, note that the link given here does not work.

**Page 9-12, Figure 9.1.2-2, Legend, Adapted From:**

Nevada Bureau of Mines and Geology (1996) is not included in the Chapter 9 References.

**Page 9-14, Figure 9.1.2-3:**

W321-14  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

BOA, BWZ, and Pz are not in the list of Acronyms and Abbreviations. The source document given for this figure is not the correct document. The figure originated in what is given as Bechtel Nevada, 2005a and not Bechtel Nevada, 2005b.

In the original source document (Bechtel Nevada 2005a) there is a table that explains all the abbreviations on the Stratigraphic Column in the figure. Perhaps that table should be included here rather than leaving the reader guessing. Not all the Stratigraphic Nomenclature agrees with that of the original figure. Also some indication should be made that the figure has been modified from the original.

**Page 9-15, Line 13:**  
REEC is not in the list of Acronyms and Abbreviations.

**Page 9-15, Line 38:**  
ANSS is not in the list of Acronyms and Abbreviations.

**Page 9-16, Line 6:**  
PSHA is not in the list of Acronyms and Abbreviations.

**Page 9-17, Figure 9.1.2-5:**  
This source of this figure is cited from the incorrect document. It comes from the reference Bechtel Nevada, 2005a not Bechtel Nevada, 2005b.

**Page 9-17, Figure 9.1.2-5, bottom right below figure:**  
Should Workman, et al., 2002 be included in the Chapter 9 References?

**Page 9-21, Lines 6-7:**  
CRWMS M&O is not in the list of Acronyms and Abbreviations.

**Page 9-22, Figure 9.1.3-1:**  
Should some indication be given here that the original figure came from Hansen, et al, 1997?

**Page 9-24, Figure 9.1.3-2:**  
Should some indication be given here that the figure has been modified somewhat from the original. Also, in the original a table explaining the various stratigraphic symbols is referred to. Should that table also be included in this document?

**Page 9-28, Figure 9.1.3-3:**  
Should the Hydrostratigraphic Acronyms in the Figure be included in the list of Acronyms and Abbreviations?

**Page 9-29, Lines 44-45:**  
Elsewhere in the Draft EIS water use is given in gallons and liters. The same should be done here. No way of converting from acre-ft to gallons is even included in the Conversion Table.

**Page 9-30, Lines 10 & 16:**

W321-14  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

See comment **Page 9-29, Lines 44-45:**

**Page 9-31, Table 9.1.3-4:**

Should the original sources of this data (as included in the Table in Bechtel Nevada 2005a) be mentioned for this table and included in the Chapter 9 References?

**Page 9-31, Lines 5-7:**

See comment **Page 9-29, Lines 44-45:**

**Page 9-34, Text Box, Paragraph 2, Lines 10-11:**

Should Lindsay, et al. 1968 and Austin 1998 be included in the Chapter 9 References?

**Page 9-37, Lines 18-19:**

The valid name for the bullfrog is Lithobates catesbeianus.

**Page 9-38, Line 14:**

Penstemon fruticiformis ssp. amargosae is the accepted name for the Death Valley beardtongue.

**Page 9-38, Line 16:**

NNHP is not in the list of Acronyms and Abbreviations.

**Page 9-38, Line 20:**

Cymopterus ripleyi is the accepted name for Cymopterus ripleyi var. saniculoides.

**Page 9-39, Table 9.1.5-1:**

See comment **Page 9-38, Line 14:**

The common name for 'Drain' buckwheat should be 'Darin's' buckwheat.

Frasera albicaulis var. modocensis is the accepted name for Frasera pahutensis.

See comment **Page 9-38, Line 20:**

Sauromalus ater is the accepted name for the Chuckwalla.

Myotis leibii is the accepted name for Myotis ciliolabrum.

Plecotus townsendii is the valid name for Corynorhinus townsendii.

**Page 9-40, Footnote a:**

Should S, S2, SC, ST, T, and W be included in the list of Acronyms and Abbreviations?

**Page 9-47, Text Box, Line 6:**

In 'NNSA SA', 'SA' is not in the list of Acronyms and Abbreviations.

**Page 9-47, Lines 12 & 24:**

NTTR is not in the list of Acronyms and Abbreviations.

NTS is not in the list of Acronyms and Abbreviations.

**Page 9-53, Line 6:**

PAs is not included in the list of Acronyms and Abbreviations.

Should these agreements be included in the Chapter 9 References?

**Page 9-57, Line 4:**

W321-15 Revised per comment.

W321-16 See response to W321-1

W321-14  
(Cont.)

W321-15

W321-16

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

CO<sub>2</sub> is not included in the list of Acronyms and Abbreviations.

**Page 9-58, Line 18:**

O<sub>3</sub> is not included in the list of Acronyms and Abbreviations.

**Page 9-58, Line 21:**

Should 40 CFR 81.329 be included in the Chapter 9 References?

**Page 9-66, Line 46:**

'William 2009' should be 'Williams 2009'.

**Page 9-67, Line 21:**

See comment **Page 9-66, Line 46:**

**Page 9-72, Lines 9-10:**

Should 49 CFR 173.441 and 10 CFR 71.47 be included in the Chapter 9 references?

**Page 9-82, Lines 21, 34, 38:**

JASPER is not in the list of Acronyms and Abbreviations.  
DAF is not included in the list of Acronyms and Abbreviations.  
BEEF is not included in the list of Acronyms and Abbreviations.

**Page 9-83, Line 6:**

Ula is not included in the list of Acronyms and Abbreviations.

**Page 9-87, Line 29:**

Should the Notice of Availability (73 FR 2023) be included in the Chapter 9 References.

**Page 9-88, Lines 24-25:**

The link does not work.

**Page 9-89:**

The following references need to have all authors listed: Becker, B.D., et al., 2000; Blomquist, K.W., et al., 1995; Bright, D.J., et al., 2001; Byers, Jr., F.M., et al., 1989; Crowe, B.M., et al., 1983; and, DeNovio, N., et al., 2006.

**Page 9-89, Line 23:**

The link does not take you to any Environmental Justice Guidance.

**Page 9-89, Line 42:**

The link does not work.

**Page 9-89, Line 44:**

DOE 1992 was not cited in Chapter 9. Perhaps the citation on Page 9-32, Line 29 should have been DOE 1992 rather than DOE 1994.

W321-16  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 9-91:**

The following links do not work:  
Line 2; Line 5 (takes you to HSS but not the reference indicated.); Lines 37-38.

**Page 9-92, Line 1:**

GSA 2006 is not cited in Chapter 9.  
Also, GSA (Geological Society of America) is not included in the list of Acronyms and Abbreviations (although, GSA (General Separations Area (SRS)) is).

**Page 9-92:**

The following references need to have all authors listed: Hall, D.B., et al., 2003; Hershey, R.L., et al.; Hoover, D.L., et al.; Klute, D.S., et al.; and, Laczniak, R.J., et al.

**Page 9-93:**

The following links do not work:  
Line 26-27.

**Page 9-94:**

The following links do not work:  
Line 34-35; Line 38-39.

**Page 9-95, Line 9:**

This reference lacks a date.

**Page 9-95, Line 38:**

All authors should be listed for Wills, C.A., et al., 2005.

**Page 10-1, Lines 37 & 41:**

SCSCO and DCS are not included in the list of Acronyms and Abbreviations.

**Page 10-5 Line 3:**

Should some indication be given here that a synopsis of the CAA is available in Chapter 13.  
Should CAAA be included in the Chapter 10 References?

**Page 10-5 Line 6:**

SCDHEC is not included in the list of Acronyms and Abbreviations.

**Page 10-5, Line 34:**

SCE&G is not included in the list of Acronyms and Abbreviations.

**Page 10-7, Table 10.1.1-2, Footnote b:**

NC is not included in the list of Acronyms and Abbreviations.

**Page 10-7, Line 13:**

AQCR is not included in the list of Acronyms and Abbreviations.

W321-16  
(Cont.)



**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 10-7, Line 14-15:**

Should (40 CFR 81.311 and 81.341 be included in the Chapter 10 References?

**Page 10-9, Table 10.1.1-3, Sources:**

Should 40 CFR 52.21 be included in the Chapter 10 References?

**Page 10-9, Line 11:**

Should 40 CFR 81.426 be included in the Chapter 10 References?

**Page 10-10, Table 10.1.1-4, Column 1, Title:**

Hz is not included in either the Acronyms and Abbreviations or Units of Measure.

**Page 10-13, Figure 10.1.2-2, Legend:**

Should Qal 1, Td, Tu, Ttr, Tdb, Tm, and The be included in the list of Acronyms and Abbreviations?

**Page 10-15, Lines 22-24:**

MPSSZ, BSZ, and ARSZ are not included in the list of Acronyms and Abbreviations.

**Page 10-15, Line 38:**

'None of the fault systems at SRS is considered "capable"' should be 'None of the fault systems at SRS are considered "capable"'.  
Should 10 CFR Part 100 be included in the Chapter 10 References?

**Page 10-16, Figure 10.1.2-4, Legend, Last Line:**

ATTA is not included in the list of Acronyms and Abbreviations.

**Page 10-19, Figure 10.1.3-1, Figure proper:**

SRTC/SREL and TNX are not included in the list of Acronyms and Abbreviations.

**Page 10-20, Line 10:**

Based on Figure 10.1.3-1, it appears that the distance given here (i.e., 50 km (31 mi)) should likely be 5 km (3.1 mi).

**Page 10-20, Line 31:**

ETP is not in the list of Acronyms and Abbreviations.

**Page 10-21, Line 12:**

CSWTF is not included in the list of Acronyms and Abbreviations.

**Page 10-23, Table 10.1.3-1, Footnotes f, g, h:**

NR, NA, and ND are not included in the list of Acronyms and Abbreviations.

**Page 10-32, Figure 10.1.3-7, Figure proper:**

LLRWDF and MWMF are not included in the list of Acronyms and Abbreviations.

**Page 10-32, Line 10:**

TCE and PCE are not included in the list of Acronyms and Abbreviations.

W321-16  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 10-33, Table 10.1.3-2, Column Headings:**

µCi is not included in the Units of Measure.

**Page 10-33, Lines 31 & 32:**

Should some indication be given here that a synopsis of DOE Order 5400.5 can be found in Chapter 13?  
SRNS is not included in the list of Acronyms and Abbreviations.

**Page 10-34, Line 26:**

Should 10 CFR Part 835 be included in the Chapter 10 References?

**Page 10-35, Table 10.1.4-1, Footnotes c & d:**

Although CAP88-PC is included in the list of Acronyms and Abbreviations, MAXDOSE-SR and POPDOSE-SR are not.

**Page 10-36, Table 10.1.4-1, Footnote e:**

BJSWA and I&D are not included in the list of Acronyms and Abbreviations.

**Page 10-37, Line 39:**

Mimus polyglottus should be Mimus polyglottos.

**Page 10-39, Table 10.1.5-1, Column 1; Footnote a:**

The valid name for *Rana capito* is *Lithobates capito*  
E, SE, ST, and T are not included in the list of Acronyms and Abbreviations.

**Page 10-45, Line 7:**

It might be better to include the actual reference in the Chapter 10 references (i.e., DOE (U.S. Department of Energy), 1998, *Savannah River Site Future Use Plan*, Savannah River Operations office, Savannah River Site, Aiken, South Carolina).

**Page 10-49, Line 21:**

SRARP is not included in the list of Acronyms and Abbreviations.

**Page 10-50, Line 4-5:**

Should this Programmatic Agreement be included in the Chapter 10 References.

**Page 10-53, Line 7:**

Should 40 CFR 81.341 be included in the Chapter 10 References?

**Page 10-54, Line 25:**

Should 40 CFR 81.341 be included in the Chapter 10 References?

**Page 10-71, Lines 35 & 36:**

Should 49 CFR 173.441 and 10 CFR 71.47 be included in the Chapter 10 References?

**Page 10-81, Line 20:**

MOX is not included in the list of Acronyms and Abbreviations.

W321-16  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 10-82, Line 15:**

Should 61 FR 40619, August 1996 be included in the Chapter 10 References?

**Page 10-82, Line 16:**

LEU is not included in the list of Acronyms and Abbreviations.

**Page 10-82, Line 20:**

Should the TVA Interagency Agreement with DOE be included in the Chapter 10 References?

**Page 10-82, Lines 30, 35, 36:**

TEF, RHB, TPB and TSB are not included in the list of Acronyms and Abbreviations.

**Page 10-82, Line 40:**

"The TBP" should be "The TPB".

**Page 10-83, Lines 11, 21:**

ARP, MCU and SWPF are not included in the list of Acronyms and Abbreviations.

**Page 10-83, Line 22:**

Should "the tank high-level radioactive waste" be "the tank's high-level radioactive waste"?

**Page 10-83, Line 44:**

DWPF is not included in the list of Acronyms and Abbreviations.

**Page 10-85:**

All authors should be listed for the following references: Aadland, R.K., et al., 1995; Aadland, R.K., et al., 1999; and Brooks, M.J., et al., 1986.

**Page 10-85, Lines 27-28, 40:**

The links do not work.

**Page 10-86:**

All authors should be listed for the following references: Cabak, M.A., et al., 1996 and Cook, J.R., et al., 2004.

**Page 10-86, Lines 8, 32, 43-45:**

The link leads to the White House web page, but not the CEQ Guidance.

The link does not work.

This document is not cited in Chapter 10.

**Page 10-87, Lines 41-45:**

All authors should be listed for Fallaw, W.C., et al., 1992.

**Page 10-88:**

W321-16  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

All authors should be listed for the following references: Gellici, J.A., et al., 1994; Harris, M.K., et al., 1998; Hiergesell, R.A., et al. 2000; and Lewis, M.R., et al., 2004.

**Page 10-89:**

All authors should be listed for Millings, M.R., et al., 2009.

**Page 10-89, Lines 13, 26, 30, 33-34 :**

The links do not work.

**Page 10-90:**

All authors should be listed for Peterson, M.J., et al., 2005.

**Page 10-91:**

All authors should be listed for Swingle, R.F., II, et al., 2008.

**Page 10-91, Lines 4-5, 28-29, 32-33:**

This link does not take you directly to the article cited.  
The links do not work.

**Page 10-92:**

All authors should be listed for the following references: Wike, L.D., et al., 1996; Wike, L.D., et al., 2006; Wyatt, D.E., et al., 2000.

**Page 10-93, Lines 1-4:**

All authors should be listed for Yu, C., et al., 2000.

**Page 11-5, Line 38:**

Should the study done in 1987 by Mariah and Associates be included in the Chapter 11 References?

**Page 11-10, Line 8:**

Should 40 CFR 81.332 be included in the Chapter 11 References?

**Page 11-11, Line 25:**

Should 40 CFR 81.332 be included in the Chapter 11 References?

**Page 11-25, Lines 23-24:**

Should 49 CFR 173.441 and 10 CFR 71.47 be included in the Chapter 11 References.

**Page 11-36, Line 3:**

Should 40 CFR Part 2300 be included in the list of Acronyms and Abbreviations?

**Page 11-36, Lines 8-10:**

All authors should be listed for Barnes, J.D., et al., 1977; however, this reference is not cited in Chapter 11.

W321-16  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page 11-36, Lines 18-20:**

This link does not take you to the Environmental Justice document. The following link does, however: <http://ceq.hss.doe.gov/nepa/regs/ej/justice.pdf>.

**Page 11-37, Lines 1-3:**

EPA 1974 is not cited in Chapter 11.

**Page 11-37, Lines 9-10:**

The link does not take you directly to this information. A better link is: [http://www.epa.gov/statelocalclimate/resources/state\\_energyco2inv.html](http://www.epa.gov/statelocalclimate/resources/state_energyco2inv.html).

**Page 12-1, Line 11:**

Should the *FedBizOpps* solicitation be included in the Chapter 12 References?

**Page 12-3, Lines 38-39, 44:**

Should some indication be given here that a synopsis of DOE Order 5400.5 is available in Chapter 13? Also, should 10 CFR Part 20 be included in the Chapter 12 References? Should 10 CFR Part 835 be included in the Chapter 12 References?

**Page 12-16 Line 26:**

Kd is not included in the list of Acronyms and Abbreviations.  
cm<sup>3</sup> is not included in the Units of Measure.

**Page 13-4, Line 28:**

Should 40 CFR Part 61 be included in the Chapter 13 References?

**Page 13-5, Line 11:**

SARA and EPCRA are not included in the list of Acronyms and Abbreviations.

**Page 13-5, Line 30:**

FIFRA is not included in the list of Acronyms and Abbreviations.

**Page 13-10, Line 31:**

FLPMA is not included in the list of Acronyms and Abbreviations.

**Page 13-11, Lines 8, 12:**

Should 10 CFR Part 50 and 10 CFR Part 72 be included in a References section in Chapter 13?

**Page 13-12, Line 7:**

Should 10 CFR Part 1021 be placed in a Chapter 13 References section; and, should some indication be given here that a synopsis of DOE Order 451.1B is available in Chapter 13?

**Page 13-12, Line 19:**

Should 10 CFR Part 1022 be included in a Chapter 13 References section?

**Page 13-16, Lines 33-34:**

W321-16  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

Should 40 CFR Parts 1500-1508 and 10 CFR Part 1021 be included in a References section for Chapter 13?

**Page 13-17, Line 3:**

Should 49 CFR Parts 100 through 185 be included in a References section for Chapter 13?

**Page 13-18, Line 29:**

HMR is not included in the list of Acronyms and Abbreviations.

**Page 13-21, TABLE 13.6-1, Column 2, Line 2:**

NMSA is not in the list of Acronyms and Abbreviations.

**Page 13-22, TABLE 13.6-1, Row 2:**

This is the second entry for Environmental Oversight and Monitoring Agreement in this table. See last row of table on page 13-21.

**Page 13-22, TABLE 13.6-1, Row 5, Column 2, Line 1:**

SC is not included in the list of Acronyms and Abbreviations.

**Page 13-22, TABLE 13.6-1, Row 5, Column 3, Line 7:**

NSPS is not included in the list of Acronyms and Abbreviations.

**Page 13-23, TABLE 13.6-1, Column 2, Row 4, Line 1:**

RCW is not included in the list of Acronyms and Abbreviations.

**Page 14-1, Line 42:**

Is the statement here correct? "(borehole, all land sites but SRS)"? Of the generic sites considered in the EIS only the western NRC region is evaluated for borehole disposal.

**Page 14-2, Line 5:**

As in comment **Page 14-1, Line 42:**, is the statement here correct? Only Regions II and IV are evaluated for this alternative.

**Page 14-8, Line 4:**

Why is no indication given here of the coverage of NEPA in Chapter 13?

**Page A-1, Line 10:**

ANOI is not included in the list of Acronyms and Abbreviations.

**Page A-5, Column 1, Line 3:**

GNEP is not included in the list of Acronyms and abbreviations.

**Page A-9, Column 1, Row 2, Line 1:**

HOSS is not included in the list of Acronyms and Abbreviations.

**Page A-9 Column 2, Last Row, Line 9:**

W321-17 A Reference list was added for Appendix J.

W321-16  
(Cont.)

W321-17

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

It would be helpful if somewhere in this document a full reference for the London Convention 1972 could be provided. A document provided for review by the Public should be fully reviewable by the Public.

**Page A-11, Column 2, Lines 12 & 21:**

A complete reference should be provided associated with this citation. Although the reference is included in Public Scoping issue 3J on page A-7, it is not likely that anyone seeking this reference would find it there.

**Page A-11, Column 2, Paragraph 2, Lines 3-5:**

The reference for EPA 1999 is available on page G-133 of this document; however, it would probably be better to create another Reference Section for Appendix A, rather than cite the reference on page G-133.

**Page A-12, Column 2, Row 5, Line 2:**

A Reference Section should be provided in Appendix A for the NOI.

**Page A-13, Column 2, Lines 3-4, 7-9, 11:**

Public Law 99-240, DOE's 1987 Report to Congress, and EPAAct 2005 should be included in a separate Reference Section for Appendix A.

**Page B-1, Lines 45 & 46; Page B-4, Lines 17-19:**

On page 1-19 of Volume 1 of the Draft EIS, the following statement is made: "Wastes from the NDA and SDA 13 at the West Valley Site that could potentially be exhumed account for about 3,500 m<sup>3</sup> 14 (120,000 ft<sup>3</sup>) of GTCC LLRW Other Waste." Here (Page B-1) the following statement is made: "...and an additional 4,300 m<sup>3</sup> (150,000 ft<sup>3</sup>) of GTCC LLRW could be generated should a decision be made to exhume the NDA and SDA." And on Page B-4 it is stated "An additional 4,300 m<sup>3</sup> 18 (150,000 ft<sup>3</sup>) of GTCC LLRW and GTCC-like wastes could be generated by the exhumation of 19 the NDA and SDA at the site as part of future decommissioning activities."

**Page B-4, Lines 8 & 10, 46:**

MPPB and WTF are not included in the list of Acronyms and Abbreviations. B&W is not included in the list of Acronyms and Abbreviations.

**Page B-5, Lines 1 & 2:**

MURR and MIPS are not included in the list of Acronyms and Abbreviations.

**Page B-19, Table B-8, Footnote a, Lines 4 & 5:**

EC and IT are not included in the list of Acronyms and Abbreviations. MeV is not included in the Units of Measure.

**Page B-21, Line 8:**

Should 10 CFR 61.55 be included in the Appendix B References?

**Page B-24, Line 23:**

W321-18 Revised per comment.

W321-19 See response to W321-1

W321-17  
(Cont.)

W321-18

W321-19

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

Should 10 CFR Part 71 be included in the Appendix B References?

**Page B-26, Line 17:**

NAC and STC are not included in the list of Acronyms and Abbreviations.

**Page B-33, Line 8:**

All authors should be listed for Carlson, T., et al., 2006.

**Page C-3, Lines 4-6:**

Should Hydrologic conditions (including hydrologic parameters, such as flow volumes [surface water] and hydraulic conductivity [groundwater]) in the vicinity of each site evaluated in this GTCC EIS and are described in the affected environment sections." read "Hydrologic conditions (including hydrologic parameters, such as flow volumes [surface water] and hydraulic conductivity [groundwater]) in the vicinity of each site evaluated in this GTCC EIS and are described in the affected environment sections?"

**Page C-4, Line 45:**

HTO is not included in the list of Acronyms and Abbreviations.

**Page C-11, Line 26:**

Should 10 CFR 61.50 be included in the Appendix C References?

**Page C-12, Line 1:**

Should some indication be given here that a synopsis of DOE M 435.1 is available in Chapter 13?

**Page C-14, Lines 3-17:**

Q, MAR, DR, ARF, RF and LPF are not included in the list of Acronyms and Abbreviations.

**Page C-14, Line 45:**

HVAC is not included in the list of Acronyms and Abbreviations.

**Page C-21, Line 17:**

NAICS is not included in the list of Acronyms and Abbreviations.

**Page C-23, Line 23:**

Should some indication be given here that a synopsis of Executive Order 12898 is provided in Chapter 13?

**Page C-32, Lines 24-25:**

Since no more information is provided in Chapter 13 regarding the Hazardous Materials Transportation Act of 1975, it might be appropriate to include the reference to this Act in the Appendix C References.

**Page C-32, Line 35:**

Should 10 CFR Part 71 be included in the Appendix C References?

W321-19  
(Cont.)



**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page C-33, Lines 6 & 16:**

Should 49 CFR 397.101 and 49 CFR 173.403 be included in the Appendix C References?  
Also, HRCQ is not included in the list of Acronyms and Abbreviations.

**Page C-33, Line 35:**

Would it be better here and in the Acronyms and Abbreviations to refer to TRAGIS as the Transportation Routing Analysis Geographic Information System?

**Page C-36, Line 11:**

Should 49 CFR 173.413 be included in the Appendix C References?

**Page C-36, Line 28:**

See comment for **Page C-32, Line 35:** above.

**Page C-38, Figure C-2, Bottom of Figure:**

"1300 K Fire Duration (hours)" is a confusing label on this figure. It appears that the original figure label was "1300° Kelvin Fire Duration (hours)" as appears in DOE's A Resource Handbook on DOE Transportation Risk Assessment, July 2002.  
Also, K is not included in the Units of Measure.

**Page C-39, Figure C-3, Bottom of Figure:**

See comment **Page C-38, Figure C-2, Bottom of Figure:** above.

**Page C-41, Line 6:**

Should 49 CFR 173.441 and 10 CFR 71.47 be included in the Appendix C References?

**Page C-43, Table C-10, Footnote b:**

The footnote "Fraction of rural and suburban travel on freeways is assumed to be 1. Thus, the rural speed is used for both urban and suburban zones in RADTRAN for truck transport." is quite confusing. Perhaps what is being done here should be more clearly explained.

**Page C-47, Lines 26-27:**

Should "President Obama's Memorandum on Tribal Consultation (dated November 5, 2009)" be included in the Appendix C References?

**Page C-47, Lines 27 & 30:**

Should some indication be given that synopses of Executive Order 13175 and DOE Order 144.1 are available in Chapter 13?

**Page C-49, Line 8:**

All authors should be listed for Biwer, B.M., et al., 1997.

**Page C-49, Line 13:**

The link does not work.

**Page C-50, Line 30:**

W321-19  
(Cont.)

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

All authors should be listed for Dubrin, J.W., et al., 1997.

**Page C-51, Lines 17, 25 & 39:**

The following references should have all authors listed: Fischer, L.E., et al., 1987; Hanson, C.E., et al., 2006; and, Menge, C.W., et al., 1998.

**Page C-51, Line 28:**

The link does not work.

**Page C-52, Lines 1 & 35:**

The following references should have all authors listed: Napier, B.A., et al., 1988; and, Sprung, J.L., et al., 2000.

**Page C-52, Line 41:**

The link "<http://factfinder.census.gov/>" does not work. It should be "<http://factfinder.census.gov/>".

**Page C-53, Lines 1, 15 & 19:**

The following references should have all authors listed: Weiner, R.F., et al., 2006; Yuan, Y.C., et al., 1995; and, Yu, C., et al., 2007.

**Page D-6, Lines 21-23:**

Perhaps a picky detail; however, could "The casing would provide stability to the borehole walls and ensure that waste packages would not snag and plug the borehole as they were lowered and would not sit in an upright position when they reached the bottom." be misconstrued to mean that the casing is meant to ensure that the waste packages would not sit in an upright position when they reach the bottom of the borehole?

**Page D-19, Table D-1, Footnote a:**

S/C is not in the list of Acronyms and Abbreviations.

**Page D-20, Table D-3, Project Management Labor Column, Row 3:**

QA/QC is not in the list of Acronyms and Abbreviations.

**Page D-20, Table D-4, Cost Summary Column, Row 3:**

ODC is not in the list of Acronyms and Abbreviations.

**Page D-27, Table D-11, Footnote a:**

USG and Mef are not included in the Units of Measure.

**Page D-29, Table D-14, Footnote a:**

Should 40 CFR Part 50.0 et seq. be included in the Appendix D References?

**Page D-35, Table D-21, Footnote a, Lines 3-4:**

The link does not work; however, <http://greet.es.anl.gov/> will.

W321-20 Link has been corrected.

W321-21 The reference list was reviewed against the citations in the EIS and was corrected, as appropriate. Conventional format holds that public laws are named but not provided as references. Argonne's default style is largely based on the University of Chicago Style Guide, whereby, if there are multiple authors of a reference, the last name of the first author is cited, followed by "et. al". This is the format followed in this and other EISs.

W321-22 The link has been corrected.

W321-23 See response to W321-1

W321-19  
(Cont.)

W321-20

W321-21

W321-22

W321-23

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

**Page D-36, Table D-24, Footnote a:**

It is unclear what reference Sandia 2008 refers to. Appendix D References contain both Sandia 2008a and Sandia 2008b. Is this Sandia 2008 either of those references?

W321-24

**Page D-39, Line 8:**

All authors should be listed for Denson, R.H., et al., 1987.

W321-25

**Page E-2, Line 29:**

"...latent cancer facility (LCF) risks..." should read "...latent cancer fatality (LCF) risks...".

W321-26

**Page E-7, Line 35-37:**

BIOMOV II, EMRAS and IAEA are not included in the list of Acronyms and Abbreviations.

W321-27

**Page E-17, Line 23:**

NAS is not included in the list of Acronyms and Abbreviations.

W321-28

**Page E-21, Lines 25-29:**

Why was a grout stability period of less than 500 years not considered?

**Page E-36, Table E-5, Value Selection Rationale Column, Fourth Entry, Lines 6-7:**

IDF is not included in the list of Acronyms and Abbreviations.

**Page E-41, Table E-6, Source Column, Row 5, Lines 1-2:**

Previous entries for Sheppard and Thibault 1990 did not include parentheses around the 1990.

**Page E-43, Table E-7, Source Column, Row 1, Line 8:**

The link does not work.

**Page E-64, Table E-18, Footnote c, Line 3:**

UZ and SZ are not included in the list of Acronyms and Abbreviations.

**Page E-83:**

All authors should be listed for the following references: Adler Flitton, M.K., et al., 2004; Baes, C.F., et al., 1984; Beyeler, W.E., et al., 1999; and, Birdsell, K.H., et al., 1999.

W321-29

**Page E-84:**

All authors should be listed for the following references: Campbell, A.R., et al., 1996 and Cook, J.R., et al., 2004.

**Page E-85:**

All authors should be listed for the following references: Duncan, J.P. (editor), et al., 2007 and Flach, G.P., et al., 2005.

**Page E-86:**

W321-24 Revised per comment.

W321-25 The reference list was reviewed against the citations in the EIS and was corrected, as appropriate. Conventional format holds that public laws are named but not provided as references. Argonne's default style is largely based on the University of Chicago Style Guide, whereby, if there are multiple authors of a reference, the last name of the first author is cited, followed by "et. al". This is the format followed in this and other EISs.

W321-26 Revised per comment.

W321-27 The intent of the acronym list in the Final EIS was to focus on providing those acronyms that were of most benefit to facilitate the understanding of the content of the EIS; it was not intended to be all inclusive. Many abbreviated terms are defined in the adjacent discussion.

W321-28 A sensitivity analysis was included so that the results for other number of years could be extrapolated.

W321-29 See response to W321-1.

**Wojtowicz, John, Commenter ID No. W321 (cont'd)**

All authors should be listed for the following references: Krier, D., et al., 1997; Krupka, K.M., et al., 2004; Last, G.V., et al., 2006; Longmire, P., et al., 1996; Mattigod, S.V., et al., 2002; and MMES et al., 1994.

**Page E-87:**

All authors should be listed for the following references: Phifer, M.A., et al., 2007; Powers, D.W., et al., 1978; Shott, G.J., et al., 1998; and Stauffer, P.H., et al., 2005.

**Page E-87, Line 41:**

The link does not work; however, the information may be found at [http://www.sercc.com/climateinfo/historical/historical\\_sc.html](http://www.sercc.com/climateinfo/historical/historical_sc.html).

**Page G-6, Line 1:**

GRCC is not included in the list of Acronyms and Abbreviations.

**Page G-20, Line 9:**

AIWS is not included in the list of Acronyms and Abbreviations.

**Page G-20, Line 42:**

BARA is not included in the list of Acronyms and Abbreviations.

**Page G-21, Figure A-1, near center of figure:**

NAFR and TTR are not included in the list of Acronyms and Abbreviations.

**Page G-23, Figure A-2, figure caption:**

NESDIS is not included in the list of Acronyms and Abbreviations.

**Page G-32, Line 42:**

AITC is not included in the list of Acronyms and Abbreviations.

**Page G-33, Line 25:**

IM EA is not included in the list of Acronyms and Abbreviations.

**Page G-56, Line 11:**

ERDF is not included in the list of Acronyms and Abbreviations.

**Page G-57, Line 33:**

OWL is not included in the list of Acronyms and Abbreviations.

**Page G-66, Line 3:**

CLUP and CCP are not included in the list of Acronyms and Abbreviations.

**Page G-67, Line 1:**

FWS is not included in the list of Acronyms and Abbreviations.

**Page G-67, Line 21:**

W321-30 The intent of the acronym list in the Final EIS was to focus on providing those acronyms that were of most benefit to facilitate the understanding of the content of the EIS; it was not intended to be all inclusive. Many abbreviated terms are defined in the adjacent discussion.

The tribal narratives in Appendix G were provided by the organizations indicated on page G-1. The text was included as received without editorial changes. The abbreviation is defined within the text of the sentence.

W321-29  
(Cont.)

W321-30

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

OU is not included in the list of Acronyms and Abbreviations.

**Page G-76, Line 43:**

OMB is not included in the list of Acronyms and Abbreviations.

**Page G-78, Line 9:**

NPTEC is not included in the list of Acronyms and Abbreviations.

**Page G-78, Line 38:**

DOE-RL is not included in the list of Acronyms and Abbreviations.

**Page G-82, Line 6:**

TIMS is not included in the list of Acronyms and Abbreviations.

**Page G-86, Line 30:**

NIMS is not included in the list of Acronyms and Abbreviations.

**Page G-89, Line 25:**

DARHT is not included in the list of Acronyms and Abbreviations.

**Page G-94, Line 26:**

NWPA is not included in the list of Acronyms and Abbreviations.

**Page G-94, Line 46:**

NE and SC are not included in the list of Acronyms and Abbreviations.

**Page G-96, Line 9:**

ITA is not included in the list of Acronyms and Abbreviations.

**Page G-96, Line 16:**

FERC is not included in the list of Acronyms and Abbreviations.

**Page G-97, Line 12:**

OPA is not included in the list of Acronyms and Abbreviations.

**Page G-111, Line 4:**

FEP is not included in the list of Acronyms and Abbreviations.

**Page G-111, Table, Column 3, Row 1, Line 2:**

QALY is not included in the list of Acronyms and Abbreviations.

**Page G-112, Table, Column 3, Row 3, Line 1:**

NRDA is not included in the list of Acronyms and Abbreviations.

**Page G-112, Table, Column 3, Row 12, Line 1:**

TCP is not included in the list of Acronyms and Abbreviations.

W321-30  
(Cont.)

**Woitowicz, John, Commenter ID No. W321 (cont'd)**

**Page G-116, Line 8:**

EJ is not included in the list of Acronyms and Abbreviations.

**Page G-119, Line 21:**

QOL is not included in the list of Acronyms and Abbreviations.

**Page G-125, Line 1:**

RME is not included in the list of Acronyms and Abbreviations.

**Page G-129, Line 33:**

In the units of measure on Page xxxiii, gpd is indicated to mean gallon(s) per day. Here it is used for grams per day.

**Page G-129, Footnote 37, Line 1:**

UNEP/UNCHS and BTF are not included in the list of Acronyms and Abbreviations.

**Page G-132, Lines 9, 12, 18:**

CHAD, CARB and USACHPPM are not included in the list of Acronyms and Abbreviations.

**Page G-132, Footnotes 41 & 46, Line 1:**

OSWER and RAC are not included in the list of Acronyms and Abbreviations.

**Page G-139, Line 31:**

APE is not included in the list of Acronyms and Abbreviations.

**Page G-140, Line 32:**

IC is not included in the list of Acronyms and Abbreviations

W321-30  
(Cont.)

**Wood, Phyllis, Commenter ID No. W66**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Monday, May 23, 2011 5:27 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10066

Thank you for your comment, Phyllis Wood.

The comment tracking number that has been assigned to your comment is GTCC10066. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 23, 2011 05:26:43PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10066

First Name: Phyllis  
Middle Initial: E  
Last Name: Wood  
City: Portland  
State: OR  
Zip: 97206  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
As a private citizen I fail to understand why sending nuclear waste through cities is being seriously considered as an option.

W66-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W66-1

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

**Wright, Maureen, Commenter ID No. L54**

June 20, 2011

Mr. ARNOLD M Edelman, EIS Document Manager  
US Dept of Energy  
GTCC EIS  
CLOVERLEAF BLDG EM-43  
1000 INDEPENDENCE AVE. SW  
WASHINGTON, DC 20585

received  
JUN 27 2011

Dear MR Edelman,  
I STRONGLY OPPOSE CONSIDERATION of  
any site in NM for the disposal  
of any of the 100,000,000 curies of  
commercial GTCC WASTE. IN SPITE OF  
OUR "WIPP" SITE BEING TOUTED AS  
AS A PROPER SITE, THERE ARE MANY  
WEAKNESSES TO THIS THEORY. ASIA  
WE IN NM HAVE BEEN PROMISED WIPP  
WOULD BE A REPOSITORY FOR 'LOW LEVEL'  
NUCLEAR WASTE ONLY.  
IT WOULD BE MORE FEASIBLE TO  
BURY THE HIGH LEVEL WASTE NEAR THE  
PLACE OF DEVELOPMENT. MORE JUDICE  
IS NEEDED TO CARE FOR WASTE, NOT  
MORE DOLLARS & THOUGHT FOR WEAPONS.  
THANK YOU FOR CONSIDERING MY COMMENTS  
Yours truly,  
Maureen Wright  
2816 Kentucky ST NO

L54-1

L54-2

L54-1

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

L54-2

DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would, in most case, not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.



**Wyers, Juliet, Commenter ID No. L410**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)**

U.S. Department of Energy

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

Mr. \_\_\_ Mrs. \_\_\_ Ms. \_\_\_ Mr. & Mrs. \_\_\_ Dr. \_\_\_

Name: JULIET WYERS

Title: \_\_\_\_\_

Organization: U.S. Citizen

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_ E-Mail Address: \_\_\_\_\_

*Comment: Your dose estimates are incorrect - they're based only on external exposure to radiation, not internal exposures from drinking, eating, inhaling or otherwise taking radioisotopes into one's body, and don't consider health impacts other than lethal cancers.*

L410-1

*Stop producing nuclear waste, and*

L410-2

*Please use other side if more space is needed.*

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtcecis@anl.gov](mailto:gtcecis@anl.gov)

- L410-1 DOE recognizes that modeling potential releases of radionuclides from the conceptual disposal sites far into the future approximates what might actually occur. Sufficient detail was included in these designs for use in the EIS analyses, consistent with the current stage of this process. Some of the input values may change in the future and could result in higher impacts (such as from increased precipitation at some sites due to climate change), while others could result in lower impacts (due to decreased precipitation).
- L410-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

J-1703

January 2016

Wyers, Juliet, Commenter ID No. L410 (cont'd)

don't consider bringing it here.

~~Lead us~~

We need your leadership towards  
conservation. And solar, hydro, & wind.

L410-2  
(Cont.)

**Wyse, Scott, Commenter ID No. W365**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 3:35 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10365

Thank you for your comment, Scott Wyse.

The comment tracking number that has been assigned to your comment is GTCC10365. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 03:35:00PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10365

First Name: Scott  
Middle Initial: C  
Last Name: Wyse  
Address: 4309 SW Twombly Avenue  
City: Portland  
State: OR  
Zip: 97239  
Country: USA  
Email: [scw@wysekadish.com](mailto:scw@wysekadish.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
I am opposed to trucking radioactive waste through the Columbia Gorge to Hanford. The risks arising from such an activity are simply too high to be tolerated.

W365-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W365-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Yarbrough, Carol, Commenter ID No. W503**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 6:03 PM  
**To:** mail\_gtceisarchives; gtceiswebmaster@anl.gov; gtceis@anl.gov  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10503  
**Attachments:** Nuclear\_Waste\_transport\_comments\_GTCC10503.docx

Thank you for your comment, Carol Yarbrough.

The comment tracking number that has been assigned to your comment is GTCC10503. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 06:03:06PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10503

First Name: Carol  
Last Name: Yarbrough  
Organization: Citizens for Quality Living  
Address:  
City:  
State:  
Zip:  
Country: USA  
Privacy Preference: Withhold address only from public record  
Attachment: C:\fakepath\Nuclear Waste transport comments.docx

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**Yarbrough, Carol, Commenter ID No. W503 (cont'd)**

Greater than Class C Waste  
Office of Technical and Regulatory Support EM-43  
US Department of Energy  
1000 Independence Avenue, N.W.  
Washington DC 20585-01198

To whom it may concern,

We are writing this letter to express our deep concern and opposition to adding more highly radioactive wastes to the immense quantities of waste already stored at Hanford, Washington. The USDOE has not retrieved and treated the existing material fulfilling the required cleanup and compliance with existing laws. Expanding the use of Hanford as a nuclear waste depository and recycling facility puts the Columbia River, along with the downstream towns, cities, farms, ranches and wildlife in jeopardy. Ground water contamination from existing liquid nuclear waste is moving closer every year to the Columbia River.

Backers of the Global Nuclear Energy Partnership (GNEP) are supporting the use of Hanford in Washington State as the Nation's depository for high level nuclear waste. It would appear that the nuclear power industry continues to promise what has failed to deliver that nuclear power is clean and safe. They, of course, continue to ignore the waste disposal issue as they have been doing for the past 50 years. No informed person who doesn't have a vested interest in promoting nuclear power believes that the waste disposal problem will merely go away. They promise and promise and continue to fail to deliver.

We urge the US DOE to find ways to reduce the amount of radioactive waste, not plan for expanding more nuclear power reactors. Our concern is not with a meltdown of the reactor core. Many public relations pieces promoting expanding nuclear power cities the safety features of new design reactors, but they all fail to deal with the waste disposal problem. Our concern regarding expanding nuclear power is the disposal of the spent radioactive waste. Presently, military waste is stored in New Mexico and non-military waste disposal at that site is banned. Nevada doesn't want the waste stored in their state. For several decades the National Academy of Science has suggested that deep geological disposal in the stable Granite Shield of North America as the most viable nuclear waste disposal site, yet the DOE continues to ignore their advice. In addition to the waste disposal problem expanding nuclear power in the United States presents increased risk in transportation of radioactive waste from around the country to the Hanford site. Increase truck, train and barge traffic carrying radioactive waste comes with increased risk in accidents and potential hi-jacking the material for use in terrorism.

Other countries that have extensive nuclear programs are now reconsidering nuclear power. Japan, due to the recent earthquake and tsunami and damaged their reactors, is looking to the other power sources according to the Bloomberg Business Week. The June 67, 2011 Oregonian reported that Germany is now rethinking their energy strategy and plan to phase out nuclear power plants. The United States needs to rethink its energy policy without nuclear power.

USEOE's nuclear waste cleanup track record at Hanford is unsatisfactory, incomplete and calls into question their ability to handle even more waste.

In 2004 Washington voters passed bill I-297, by the highest vote to date in state history, which required the cleanup and compliance before adding more waste.

W503-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

W503-2 Stopping the generation of nuclear waste, ensuring the safety of nuclear power plants, and promoting alternative energy sources are outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluates the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes in compliance with the requirements specified in NEPA, the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240), and Section 631 of the Energy Policy Act of 2005 (P.L. 109-58). The GTCC EIS evaluates the potential environmental impacts of the proposed disposal alternatives for GTCC LLRW and GTCC-like wastes. Based on the evaluation, DOE has determined that there are safe and secure alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS provides information that supports this determination, and, as discussed in Section 1.1, Purpose and Need for Agency Action, DOE is responsible for the disposal of GTCC LLRW and GTCC-like wastes.

W503-3 DOE is performing environmental restoration activities at the Hanford Site.

W503-1

W503-2

W503-3

**Yarbrough, Carol, Commenter ID No. W503 (cont'd)**

We are concern citizens, not "the sky is falling" type of people. We recognize the need for a strong defense and energy independence, but do not support nuclear power because of the waste disposal problem

We urge you take a positive and proactive stand against the proposal to store and or reprocess any additional nuclear waste at the Hanford site.

Thank you,

John and Carol Yarbrough  
Citizens for Quality Living  
38 Cimmiyotti Road  
Lyle, WA 98635

W503-4

W503-4 Stopping the generation of nuclear waste, ensuring the safety of nuclear power plants, and promoting alternative energy sources are outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluates the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes in compliance with the requirements specified in NEPA, the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240), and Section 631 of the Energy Policy Act of 2005 (P.L. 109-58). The GTCC EIS evaluates the potential environmental impacts of the proposed disposal alternatives for GTCC LLRW and GTCC-like wastes. Based on the evaluation, DOE has determined that there are safe and secure alternatives for the disposal of GTCC LLRW and GTCC-like wastes. The GTCC EIS provides information that supports this determination, and, as discussed in Section 1.1, Purpose and Need for Agency Action, DOE is responsible for the disposal of GTCC LLRW and GTCC-like wastes.

**Yates, Patricia, Commenter ID No. W353**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 1:43 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10353

Thank you for your comment, Patricia Yates.

The comment tracking number that has been assigned to your comment is GTCC10353. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 01:42:55PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10353

First Name: Patricia  
Middle Initial: L  
Last Name: Yates  
Address: 3111 N.E. Edelweiss Ct.  
City: Vancouver  
State: WA  
Zip: 98682  
Country: USA  
Email: [phunngurl07@yahoo.com](mailto:phunngurl07@yahoo.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Dear Janice,

Protect our Columbia River and prevent cancer in the children who will drink the contaminated water from the Energy Department's (USDOE's) latest plan to use Hanford as a National Radioactive Waste Dump for extremely radioactive wastes.

W353-1

12,600 truckloads of extremely radioactive waste would come through Oregon and Spokane to Hanford, if Hanford is chosen as the national radioactive waste dump for extremely radioactive (GTCC) wastes.

W353-2

This is in addition to the 17,000 truckloads with 3 million cubic feet of other radioactive and radioactive chemical wastes which USDOE decided in 2004 to ship to Hanford for disposal - Heart of America Northwest continues legal efforts and organizing to overturn. This would total 4 trucks a day, every day for 20 years.

W353-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W353-2 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

**Yates, Patricia, Commenter ID No. W353 (cont'd)**

Truck routes include I-5 through Eugene, Salem, Portland; I-84 over the Blue Mountains; and I-90 through Spokane.

In 2008, USDOE admitted that trucking similar highly radioactive wastes to Hanford would cause as many as 816 fatal cancers in the public exposed to the radiation from the trucks along the routes - even if there are no accidents or terrorist attacks.

This is due to the fact that the casks used for trucking cannot shield all of the radiation without being too heavy to truck.

Highly radioactive Plutonium shipments are a prime target for terrorists - especially when the US government is trucking them through the center of cities such as Portland or Spokane.

In the event of a foreseeable accident with fire or a terrorist attack on a truckload of highly radioactive Plutonium waste en route to Hanford on I-205 and I-5 or I-90, an independent analysis commissioned by Heart of America Northwest Research Center found that hundreds of square miles of either Portland or Spokane would be contaminated and over a thousand fatal cancers would result.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W353-2  
(Cont.)



**Yun, Christine, Commenter ID No. W285**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 11:32 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10285

Thank you for your comment, Christine Yun.

The comment tracking number that has been assigned to your comment is GTCC10285. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 11:31:28PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10285

First Name: Christine  
Last Name: Yun  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Why does nuclear waste have to be stored at Hanford? To endanger a national treasure, the Columbia River Gorge, with possible nuclear contamination and thereby denying people of the ability to enjoy such a natural wonder does not seem right.

W285-1

Hanford is already the most polluted area in the Western Hemisphere, with 53 million gallons of high level nuclear and chemical waste stored in aging, leaky tanks near the Columbia River. This deadly waste is currently leaking underground and flowing slowly into the Columbia. The number one priority should be to stop more waste from leaking into the river and clean up the existing waste and contaminated soil.

W285-2

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W285-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W285-2 See response to W285-1

**Zega, Leslie, Commenter ID No. L416**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)**

U.S. Department of Energy

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

Mr. \_\_\_ Mrs. \_\_\_ Ms. X Mr. & Mrs. \_\_\_ Dr. \_\_\_

Name: LESLIE ZEGA

Title: \_\_\_\_\_

Organization: Rosemere Neighborhood Association

Address: PO Box 6430

City: Vancouver State: WA Zip Code: 98668

Phone: \_\_\_\_\_ E-Mail Address: lesliezega@yahoo.com

Comment: ① I oppose the transportation of nuclear waste through our portland metro area & the Gorge

L416-1

② Hanford is already a mess with radioactive contamination that is not presently adequately contained. It is leaching into groundwater & the Columbia River. Hanford needs to be cleaned up we certainly do not need any more dangerous waste.

L416-2

*Please use other side if more space is needed.*  
**STOP the plan to bring in more waste.**  
**WITHHOLDING OF PERSONAL INFORMATION!** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtcccis@anl.gov](mailto:gtcccis@anl.gov)

- L416-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.
- L416-2 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Zimbelman, Martha, Commenter ID No. W297**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 17, 2011 12:02 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10297

Thank you for your comment, Martha Zimbelman.

The comment tracking number that has been assigned to your comment is GTCC10297. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 17, 2011 12:01:30PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10297

First Name: Martha  
Middle Initial: S  
Last Name: Zimbelman  
Country: USA  
Privacy Preference: Don't withhold name or address from public record

**Comment Submitted:**

Please do not allow any more radioactive waste to be deposited at Hanford Nuclear Site in Washington State. I live in the Columbia River Gorge and fear for our environment and the river itself if there were to be any spills or accidents along the route for delivery. The Hanford site is already designated for clean-up and should therefore not be used for more deposits of radioactive waste. The Columbia River Gorge is a National Scenic Area and should not be subjected to possible catastrophic spills of toxic waste that could and would endanger the lives of people who live here and the wildlife that we so truly love and cherish. Thank you for your serious consideration of not allowing radioactive waste to be deposited at Hanford. Sincerely, Martha Zimbelman

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W297-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W297-1

**Zotter, Mary, Commenter ID No. W75**

From: gtceiswebmaster@anl.gov  
Sent: Wednesday, June 01, 2011 4:18 PM  
To: gtceiswebmaster@anl.gov  
Subject: Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10075

Thank you for your comment, mary zotter.

The comment tracking number that has been assigned to your comment is GTCC10075. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 1, 2011 04:18:20PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10075

First Name: mary  
Middle Initial: s  
Last Name: zotter  
Address: 5403 SW Thomas  
City: Portland  
State: OR  
Zip: 97221  
Country: USA  
Email: [suszot@aol.com](mailto:suszot@aol.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
Dear Director, USDOE,

Please do not even consider sending more nuclear waste to Hanford.

As you well know, over \$30 billion has already been spent to try to clean up the existing waste at Hanford, and that job is far from complete. Meanwhile persistent contamination is shown in testing at the site, threatening the health of the three native tribes along the Columbia River, as well as all life in and near the river.

W75-1

The USDOE plan to truck 12,000 truckloads of extremely radioactive GTCC wastes to dump at Hanford, in addition to the 17,000 truckloads already being shipped there, is beyond ridiculous. It would provide huge danger to all areas along the trucking routes, and simply CANNOT be safely handled at Hanford.

W75-2

You need to consider better alternatives for the GTCC wastes, such as a deep geologic repository rather than landfills, trenches, boreholes, and vaults which leach into groundwater and threaten the health of so many.

W75-3

You also need to consider ways to greatly reduce nuclear waste before proceeding to produce more.

It is totally unconscionable to plan to transport and dump more highly radioactive waste at Hanford, now or in the future.

W75-4

Sincerely,

W75-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W75-2 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities. (see Section 6.2.9.1).

W75-3 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W75-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Zotter, Marv, Commenter ID No. W75 (cont'd)**

Mary Susan Zotter  
Portland, Oregon

---

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

**Zucker, Marguery, Commenter ID No. W245**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 12:03 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10245

Thank you for your comment, Marguery Zucker.

The comment tracking number that has been assigned to your comment is GTCC10245. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 12:02:30PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10245

First Name: Marguery  
Middle Initial: L  
Last Name: Zucker  
Address: 1966 Orchard St.  
City: Eugene  
State: OR  
Zip: 97403  
Country: USA  
Email: [lee@thelocomotive.com](mailto:lee@thelocomotive.com)  
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:  
NO nuclear waste in our gorge!!!!

W245-1

That's the bottom line.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W245-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W526**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 8:52 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10526

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10526. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 08:51:51AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10526

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
This is absolutely unacceptable!

Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.  
2. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.  
3. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.  
4. USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W526-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W526-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W526-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W526-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

W526-1

W526-2

W526-3

W526-4

**Name Withheld, Commenter ID No. W59**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Sunday, May 22, 2011 10:19 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10059

Thank you for your comment.

The comment tracking number that has been assigned to your comment is GTCC10059. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 22, 2011 10:18:57AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10059

**First Name:**  
**Last Name:**  
**Address:**  
**City:**  
**State:**  
**Zip:**  
**Country:** USA  
**Email:** [ericladman@gmail.com](mailto:ericladman@gmail.com)  
**Privacy Preference:** Withhold name and address from public record

**Comment Submitted:**

Please consider the following comments from HOANW, which I completely agree with, regarding waste storage and shipment:

1. Deep Geologic Repository: Highly radioactive and long-lived wastes should be disposed deep under-ground in stable geologic formations, NOT in landfills, trenches, boreholes and vaults which threaten groundwater and health.
2. USDOE should consider how to reduce the amount of highly radioactive wastes created. More than 55% of the wastes considered for disposal in the Draft GTCC EIS are from reactors which are not even built. The National Environmental Policy Act (NEPA), requires that environmental impact statements consider all reasonable alternatives, including how to avoid making as much waste.
3. Dispose of these wastes along with High-Level Nuclear Waste (e.g., used fuel rods) in one or more deep geologic repositories. For decades, the National Academy of Science and other scientific consensus has been that the best geologic disposal would be in the stable Granite Shield of North America.
  - USDOE does not really consider geologic disposal because its only deep underground alternative is to expand the WIPP salt mine used for Plutonium wastes in New Mexico, which is not designed or sited for these highly radioactive and "hot" wastes, and is legally barred from taking non-defense wastes.
  - USDOE failed to consider long term hardened on site storage of the reactor GTCC wastes.
4. Disclose and consider the total (cumulative) impacts of all USDOE'S proposals to use Hanford as a national radioactive waste dump along with proposals to leave High-Level Waste tank residues and leaks in the soil, and all the risks from both proposals to truck wastes to Hanford, including the actual truck routes, in one environmental impact statement.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W59-1 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W59-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W59-3 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

W59-4 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).



DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

**Name Withheld, Commenter ID No. W59 (cont'd)**

**Name Withheld, Commenter ID No. W458**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 1:43 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10458

Thank you for your comment, I

The comment tracking number that has been assigned to your comment is GTCC10458. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 01:43:18AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10458

First Name:  
Last Name: /  
Country: USA  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

Please do not make any plans to send radioactive waste into the Columbia River Gorge. As a frequent Columbia River Gorge visitor (about 3-6 times/month), I can say that I have shared that road with many a truck, strange-shaped load, and wide load. All of these cause me to slow down and consider the options of all the surrounding traffic. Knowing that radioactive waste may be passing beside, behind, or before me create potentially unsafe conditions for me, my passengers, the community residents, and the creatures who call this stunning, preserved place "home." As a volunteer in the scenic area, I have the opportunity to speak with folks from all over this country and the world. I can say that they, too, would be endangered. Their visitor experience, often initiated because of awe for this area, could become a gamble against the odds of a mishap. Please keep our (your) Gorge safe for all travelers and residents by not agreeing to ship radioactive waste. Please do all you can to clean up the waste that already contaminates at Hanford. Thank you.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W458-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

W458-1

**Name Withheld, Commenter ID No. W465**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 10:11 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10465

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10465. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 10:11:01AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10465

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Hanford needs help, not more waste to really make the mess worse. The Gorge is a national Scenic area, not a dumping ground. Please keep it that way.

W465-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W465-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W494**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 12:55 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10494

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is GTCC10494. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 12:54:40PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10494

First Name: /  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [ammibrooks@gmail.com](mailto:ammibrooks@gmail.com)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
To whom it may concern,  
These are the reasons I am concerned about the Hanford waite.

Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.

Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.

USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.

USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W494-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W494-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W494-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W494-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

W494-1

W494-2

W494-3

W494-4

**Name Withheld, Commenter ID No. W462**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 9:08 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10462

Thank you for your comment, i

The comment tracking number that has been assigned to your comment is GTCC10462. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 09:07:19AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10462

First Name:  
Middle Initial:  
Last Name:  
Organization:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [brookdancer@hotmail.com](mailto:brookdancer@hotmail.com)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

No, no, no! We cannot track nuclear waste through pristine countrysides or populous urban areas. This lack of a solution for disposing of nuclear waste has always been the perfect reason NOT to use nuclear power. Only the short-sightedness of politicians, and Conservatism, could have brought us to this moment, when we would even consider such desperate measures. Please, stop this foolishness and immediately begin disassembling all nuclear power plants, particularly those on fault lines and tsunami potential zones!

W462-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W462-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

**Name Withheld, Commenter ID No. W538**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 1:59 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10538

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10538. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 01:58:54PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10538

First Name:  
Middle Initial:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [mjchristopher@olivagroup.net](mailto:mjchristopher@olivagroup.net)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

I do not want radioactive waste trucked through the greater Portland Area. It's challenging enough to battle the toxic air challenges we have in the city, dealing with more toxic waste will just make things worse and harder for every day citizens to have a voice and feel safe about living in this area. I really hope one day I'm not forced to leave a place I love because we can't get these types of issues addressed.

W538-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W538-1 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

**Name Withheld, Commenter ID No. W473**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 12:18 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10473

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10473. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 12:17:55PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10473

First Name:  
Last Name:  
Country: USA  
Email: [lcristman@hotmail.com](mailto:lcristman@hotmail.com)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

I am adamantly against the trucking of nuclear waste to the Hanford site for obvious reasons that I'm sure a multitude of citizens have already stated. In addition, I strongly oppose nuclear plants as a source of energy. We are an intelligent species and must use our minds and our hearts for decisions of conscience. There are safer energy sources available than nuclear, optimally the sun.

Is it greed, laziness, fear or a combination thereof when we human beings don't consult the best aspects of ourselves for wise, compassionate choices? I implore those in positions of governmental power to consult their hearts and use their intelligence to look past short-sighted goals and make a shift in their consciousness. Then the right action around this issue will be obvious, and a ripple effect will transpire to gratify all.

Voice for the truth in Portland, OR

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W473-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W12**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Tuesday, May 10, 2011 4:13 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10012

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10012. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 10, 2011 04:12:53PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10012

First Name:  
Last Name:  
Address:  
City:  
State:  
Country: USA  
Email: [dewelle@gm.slc.edu](mailto:dewelle@gm.slc.edu)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Trucking waste, with the amount that leaks even without mishap, is unconscionable. To even consider it, is to be in denial. Please wake up, to the death that is guaranteed to take place as a result plus the extraordinary death and suffering that is risked. It is murder, quite literally.

W12-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W12-1 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.



**Name Withheld, Commenter ID No. W18**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, May 13, 2011 11:40 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10018

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10018. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 13, 2011 11:39:16AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10018

First Name: :  
Last Name:  
City:  
State:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
There is a huge cleanup job at Hanford that is decades away from being finished. Trucking more waste there at this point would be adding insult to injury. We don't need level 3 waste on our roads en route to, or at Hanford. Finish the cleanup first, and DO NOT SHIP MORE WASTE TO HANFORD.

W18-1

Thank you.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W18-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W527**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 9:40 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10527

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10527. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 09:39:33AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10527

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Withold name & address from public record.

I grew up in Richland, having moved there in the 50's. The magnitude of problems with storage of radioactive materials was seemingly not known then - but it is now. The slow work & difficulty of accomplishing clean up at Hanford is reason enough not to bring more waste there. Transporting it through Portland & Spokane is unacceptable, as is depositing more of it adjacent to the Columbia River. Public and environmental safety must be primary in the decision process. Releases there in the 50's are proof that was not the case in the past. Likely my thyroid disease is a personal testament to that. Please let us learn from the past & move ahead more wisely. Thank you.

W527-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W527-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W271**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 4:32 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10271

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10271. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 04:31:32PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10271

First Name:  
Middle Initial:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA

Email: [dindamcp4@yahoo.com](mailto:dindamcp4@yahoo.com)

Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

Columbia River Gorge is a national treasure that should be protected--not farther endangered by daily truckloads of radioactive waste.

W271-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W271-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Name Withheld, Commenter ID No. W349**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 10:14 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10349

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10349. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 10:13:45AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10349

First Name:  
Last Name:  
Organization:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:

Are you ALL out of your minds!!!!

W349-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W349-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Name Withheld, Commenter ID No. W516**

**From:** gtccseiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 12:26 AM  
**To:** gtccseiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10516

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10516. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 12:26:13AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10516

First Name:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [gandanga@dsl-only.net](mailto:gandanga@dsl-only.net)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

I am very opposed to this proposal. By adding more radioactive wastes, in this case extremely radioactive, the DOE would be endangering public health and the Columbia River. It would be playing with danger to people living and driving along the routes that 12,600 truckloads will be going with additional danger from possible accidents (they do occur), fire and terrorist attacks. Hanford is already trying to clean up and this would make that fruitless. Don't approve this. Very bad idea.

W516-1

Questions about submitting comments over the Web? Contact us at: [gtccseiswebmaster@anl.gov](mailto:gtccseiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W516-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Name Withheld, Commenter ID No. W498**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 2:08 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10498

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10498. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 02:07:44PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10498

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

1. This is a very bad plan, let's not jump from the frying pan into the fire. This issue definitely needs to be addressed, but the current proposal is NOT the solution and has many unintended & horrifying consequences.
2. Hanford can not be cleaned up if USDOE adds any more waste to be buried in landfills or boreholes - the wastes in existing soil trenches and ditches and from tank leaks need to be removed.
3. Extremely radioactive wastes belong in deep underground repositories, not in landfills, boreholes or vaults.
4. USDOE needs to consider in the EIS how to avoid making more of these highly radioactive wastes.
5. USDOE has to disclose and consider the total (cumulative) impacts of both of USDOE's separate proposals to use Hanford as a national radioactive waste dump, and all the risks from trucking wastes to Hanford, in one environmental impact statement for the public to review and comment on the full picture. The GTCC EIS needs to disclose that USDOE is also proposing to add 3 million cubic feet of radioactive and chemical wastes to be disposed at Hanford, in addition to the GTCC wastes.

W498-1

W498-2

W498-3

W498-4

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W498-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W498-2 DOE agrees that use of a geologic repository would be a protective and safe method for the disposal of the entire inventory of GTCC LLRW and GTCC-like wastes. The GTCC EIS evaluation for the WIPP geologic repository alternative supports this statement. However, the degree of waste isolation provided by a geologic repository may not be necessary for all of the GTCC LLRW and GTCC-like wastes evaluated in the GTCC EIS. The GTCC EIS evaluation indicates that certain wastes (e.g., those containing short-lived radionuclides such as Cs-137 irradiators) could be safely disposed of in properly designed land disposal facilities at sites with suitable characteristics, such as low precipitation rates, high soil distribution coefficients, and sufficient depths to groundwater.

While 10 CFR Part 61 identifies one NRC-approved method for GTCC LLRW disposal (disposal in a geologic repository), these regulations also indicate that other disposal methods could be approved. The GTCC EIS evaluates three land disposal methods (i.e., trench, borehole, and vault). The GTCC EIS evaluation indicates that land disposal methods employed at sites with suitable characteristics would be viable and safe alternatives for the disposal of GTCC LLRW.

W498-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W498-4 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated.

The GTCC EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although one fatality directly related to an accident might occur (see Section 6.2.9.1).

In addition, Chapter 6 of the TC&WM EIS also has evaluated cumulative impacts addressing disposal of potential future wastes (including GTCC LLRW and GTCC-like waste) at the Hanford site.

**Name Withheld, Commenter ID No. W561**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 27, 2011 10:06 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10561

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10561. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 27, 2011 10:05:20PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10561

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
I am opposing the use of Hanford as a national radioactive waste dump for extremely radioactive wastes. Or any radioactive wastes for that matter.

W561-1

Thank You

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W561-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W600**

---

**From:**  
**Sent:** Monday, June 27, 2011 11:15 PM  
**To:** gtcceis@anl.gov  
**Subject:** Hanford Nuclear Waste Proposal

Dear Manager at the Department of Energy,

I am writing to implore you to stop considering Hanford as the national nuclear waste dump for greater than class C nuclear waste.

Please re-consider your current proposal. The decision for nuclear waste disposal, has very, very, long-term consequences, 10,000+ years into an unforeseen future. Lets not rush this decision. Surely, there are better, more thoughtful, and socially responsible solutions to these future wastes.

By your own document, the majority of these proposed wastes don't even exist yet. Please come up with better ideas, possibly like Onkola, in Finland, before you create these wastes! We heard on CNN this week, that some 48 nuclear facilities in our country are leaking into the groundwater. Stop contaminating our waters! Don't dump more wastes, into, the already filthy Hanford site, and potentially turn this incredibly beautiful corner of the country into a nuclear sacrifice zone for the nation!

Thank you

PLEASE WITHHOLD MY NAME AND ADDRESS FROM PUBLIC RECORD

W600-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W600-2 See response to W600-1.

W600-1

W600-2



**Name Withheld, Commenter ID No. W276**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 7:14 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10276

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10276. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 07:13:46PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10276

First Name:  
 Last Name:  
 Address:  
 Address:  
 City:  
 State:  
 Zip: :  
 Country: USA  
 Email: [dakramer1@yahoo.com](mailto:dakramer1@yahoo.com)  
 Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

I don't suport having radio active waste going through the gorge. They need to find a safer route, regardless of cost.

W276-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W276-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

If DOE decides to implement its preferred alternative for the TC&WM EIS, GTCC LLRW and GTCC-like wastes would not be shipped through the Columbia River Gorge for disposal at the Hanford Site until the waste treatment plant is operational. However, regardless of where the GTCC waste disposal facility is ultimately located, a relatively small amount of GTCC LLRW and GTCC-like wastes may be transported through the Columbia River Gorge on their way to the disposal facility. The waste would be generated within the states of Oregon and Washington and would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

**Name Withheld, Commenter ID No. W341**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, June 22, 2011 7:06 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10341

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10341. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 22, 2011 07:05:59PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10341

**First Name:**  
**Middle Initial:**  
**Last Name:**  
**Address:**  
**City:**  
**State:**  
**Zip:**  
**Country:** USA  
**Email:** [greeniefrost@yahoo.com](mailto:greeniefrost@yahoo.com)  
**Privacy Preference:** Withhold name and address from public record

**Comment Submitted:**

Please! Hanford is NOT the place for 12,000 truckloads of nuclear wastes. Workers at the site have NOT CLEANED UP THE WASTE from years ago! Work has progressed so slowly that is it ludicrous to even consider putting more and more waste at Hanford.

W341-1

We travel throughout the west often and it seems to me there are many more geologically stable places to put this waste and treat it. There are more and more people living downwind from Hanford. Tri-Cities grows amazing FOOD, for heaven's sake! All downwind crops will be contaminated sooner or later.

W341-2

And the Columbia River accommodates salmon, which we need for food. It's really important to make a different decision NOW. The people of Washington spoke clearly and the government needs to listen.

Our son, daughter-in-law and grandchildren spend time in Richland, so we have a very real interest. That area is wonderful and we need it to be protected.

Thank you for placing these wastes in a vastly safer zone. One where there are not THREE VOLCANOES that could rain down ash, mud, and water and completely disrupt any kind of safety for the area. It actually could happen any day!

Frosty K.

W341-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W341-2 See response to W341-1.

**Name Withheld, Commenter ID No. W11**

---

**From:** gtccelswebmaster@anl.gov  
**Sent:** Tuesday, May 10, 2011 11:21 AM  
**To:** gtccelswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10011

Thank you for your comment

The comment tracking number that has been assigned to your comment is GTCC10011. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 10, 2011 11:20:32AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10011

First Name:  
Middle Initial:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email:  
Privacy Preference: Withhold address only from public record

**Comment Submitted:**

I am VERY concerned about the plan to truck SO MUCH radioactive waste to Hanford! I have a personal interest because our grandchildren spend at least 10 days a year in Richland and drink the water there. Also, their grandparents live there year-round.

I have been following the Hanford issue for at least 30 years. During that time all the existing wastes have NOT BEEN PROCESSED to anyone's satisfaction. There remain about 30 more years to do the job.

How can it be possible to add MORE wastes to that equation? Wastes have been stored so they leak into the ground and spread via air to nearby food fields. Tanks burp and toxics of all kinds spew into the area. We were just making a small bit of progress when these new proposals surfaced. The people of Washington said a clear "no" to adding more waste. Yet our federal government wants to bring HUGE amounts of new waste to an area that grows wonderful food.

Surely there are areas in the US that are better suited for waste storage and processing. We have driven through such lands many times.

My friend, Marilyn Harrison, a downwinder from Walla Walla, died from a brain tumor. I miss her. She was a funny, delightful, smart, loving person.

My next door neighbor in Seattle had serious thyroid cancer. She was a downwinder. When I knew her she could hardly walk and she was relatively young. A gracious and wonderful person.

W11-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W11-2 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

W11-1

W11-2

**Name Withheld, Commenter ID No. W11 (cont'd)**

Nuclear waste issues affect real people and I urge the federal government to stop this madness!

W11-3

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W11-3 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Name Withheld, Commenter ID No. W137**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 8:32 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10137

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10137. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 08:31:27PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10137

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
2008 Department of Energy study predicts over 800 adult cancer deaths along the trucking routes as a result of radiation leaking from the trucks during normal operation, even if no accidents occur! And this "best case scenario" study only includes adults, excluding children who are even more susceptible to the dangers of radioactive waste. An accident resulting in the spillage of highly radioactive waste would be catastrophic for the Columbia River Gorge and its residents.

W137-1

Even one cancer-related death due to this is unacceptable and I urge you not to approve this action.

Thank you.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W137-1 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

**Name Withheld, Commenter ID No. W427**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Friday, June 24, 2011 10:36 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10427

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10427. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 24, 2011 10:35:38AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10427

First Name:  
Middle Initial:  
Last Name:  
State:  
Zip: . .  
Country: USA  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

Please clean up and seal Hanford so it doesn't leak. Put waste in deep underground repositories not landfills, boreholes or vaults. Consider long term hardened on-site storage until then. Reduce and eliminate waste. Don't have trucks on our roads & freeways. Have one EIS with full disclosure. Publicize hearings.  
Nuclear Power is dangerous. Don't make more. See [www.newenergymovement.org](http://www.newenergymovement.org) to see many alternatives.

W427-1

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W427-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

**Name Withheld, Commenter ID No. W501**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, June 26, 2011 4:50 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10501

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10501. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 26, 2011 04:49:53PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10501

First Name:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [elasek@hotmail.com](mailto:elasek@hotmail.com)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Nuclear energy is not clean. It is not a viable solution to energy problems. It's use is irresponsible. There are no containers durable enough to contain it; it is unstable for far too long.

Shipping radioactive waste around the country is dangerous. No one should die of radiation poisoning.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W501-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials.

Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

W501-1

**Name Withheld, Commenter ID No. L144**

---

**From:** gtceiswebmaster@anl.gov  
**Sent:** Wednesday, June 15, 2011 8:56 PM  
**To:** mail\_gtceisarchives; gtceiswebmaster@anl.gov; gtceis@anl.gov  
**Subject:** Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10144  
**Attachments:** Secretary\_Ch\_6-15-11\_GTCC10144.doc

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10144. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 15, 2011 08:55:31PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10144

First Name:  
Last Name:  
Country: l  
Privacy Preference: Withhold name and address from public record  
Attachment: Secretary Chu 6-15-11.doc

Comment Submitted:  
See attached Word document/ letter.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.



**Name Withheld, Commenter ID No. L144 (cont'd)**

June 15, 2011

Secretary Chu and Mr. Edelman:

Please remove the Hanford Nuclear Reservation from the U.S. Department of Energy's list of candidate sites for a permanent nuclear waste dump site to store radioactive materials coming across the United States. Hanford is the wrong place to transport and dispose of more highly dangerous radioactive material.

Hanford is already the most contaminated site in the Western Hemisphere and the Department of Energy is already engaged in one of the largest and most complex cleanup projects in U.S. history at Hanford. The number one priority should be to stop waste from leaking into the Columbia River and clean up the existing waste at Hanford. No new nuclear waste should be stored at Hanford.

**This proposal means that thousands of trucks with dangerous radioactive waste would be traveling along interstate routes, passing through our cities and the Columbia River Gorge National Scenic Area. I-84 travels the length of the Gorge and is often within a few feet of homes, schools, critical wildlife habitat and the Columbia River. The risk of an accident is simple too great, and the environmental and human health costs are unacceptable.**

The Draft Environmental Impact Statement (DEIS) fails to consider the risks involved in transporting these waste materials to Hanford. The DEIS does not include a 2008 USDOE study estimated 800 adult cancer deaths would occur due to ambient radiation from the transport vehicles alone. Nor does the DEIS include the unimaginable number of deaths and environmental damage resulting from a truck accident, an earthquake or an intentional attack.

Finally, on the 25th Anniversary of the Columbia River Gorge National Scenic Area Act, we should celebrate the past and future protection of the Columbia Gorge--not propose more dangers to this national treasure.

I am joined in opposition to transporting more nuclear waste to Hanford by Friends of the Columbia Gorge, Heart of America Northwest, Columbia Riverkeeper, 17 Oregon legislators, Congressman Earl Blumenauer, U.S. Senator Merkley, U.S. Senator Wyden and many others.

Thank you for your time and consideration.

Sincerely,

L144-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

L144-2 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

L144-3 A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

L144-4 See response to L144-1.

L144-1

L144-2

L144-3

L144-4

**Name Withheld, Commenter ID No. W474**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 25, 2011 12:34 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10474

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10474. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 25, 2011 12:33:29PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10474

First Name:  
Middle Initial:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [terry.masters@gmail.com](mailto:terry.masters@gmail.com)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

I believe everyone involved is a good person, whatever their role or point of view. When I was designing weapon systems for the Vietnam War, I ignored the protests outside. But new information expanded my awareness of what was really going on, and I quit that job and helped start a preschool. My life's work is to increase the chances of future generations continuing to live healthy lives, free of illness and fear. I invite you to consider your role, if any, in the pursuit of short-term benefits at the potential long-term cost to our children and their children...

W474-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W474-1 Comment noted.

**Name Withheld, Commenter ID No. W58**

---

**From:** gtccseiswebmaster@anl.gov  
**Sent:** Saturday, May 21, 2011 11:25 PM  
**To:** gtccseiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10058

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10058. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 21, 2011 11:25:16PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10058

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
The development of nuclear energy for the creation of power or warheads is a little boys game. Talk to the grandmothers and listen. They would not condone such reckless behavior. And now you want to depose of your waste in a facility has repeatedly promised to clean up. Stop making waste and you won't have to clean it up!

W58-1

Questions about submitting comments over the Web? Contact us at: [gtccseiswebmaster@anl.gov](mailto:gtccseiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W58-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

**Name Withheld, Commenter ID No. W203**

---

**From:** gtccseiswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 8:43 AM  
**To:** gtccseiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10203

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10203. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 08:43:22AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10203

First Name:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [guitarsong88@earthlink.net](mailto:guitarsong88@earthlink.net)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
NO to Toxic Waste in the Gorge!!! And near a large metro area and a highly traveled scenic route??? You must be kidding!

GTCC waste is dangerous to human health and the environment for more than 500 years. A 2008 Department of Energy study predicts over 800 adult cancer deaths along the trucking routes as a result of radiation leaking from the trucks during normal operation, even if no accidents occur! And this "best case scenario" study only includes adults, excluding children who are even more susceptible to the dangers of radioactive waste. An accident resulting in the spillage of highly radioactive waste would be catastrophic for the Columbia River Gorge and its residents.

NO to Toxic Waste in the Gorge!!!

Questions about submitting comments over the Web? Contact us at: [gtccseiswebmaster@anl.gov](mailto:gtccseiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W203-1 There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017), because DOE is no longer pursuing domestic commercial reprocessing.

W203-1

**Name Withheld, Commenter ID No. W320**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Monday, June 20, 2011 12:59 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10320

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10320. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 20, 2011 12:59:12AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10320

First Name:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [oneness@porge.net](mailto:oneness@porge.net)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
PLEASE answer this question:  
Why is more waste being proposed to be sent to Hanford when there are still so many unresolved (and unresolvable) issues already there?

Radioactive waste does not belong in trenches, tanks or anywhere above a water table!

It has been 70 years since the US nuclear program was launched and STILL there is no solution to the waste problem! The only viable solution is to stop making more radioactive waste.

I strongly object to sending radioactive waste over our nation's roads. As past accidents have proven, industry assurances of safety are not to be believed. Accidents DO happen and we cannot tolerate the extreme toxicity of radioactivity to be released onto our homes, schools, workplaces, environment or where ever the error occurs.

Please cease this relentless quest to make an insane technology "safe". Leave uranium in the ground. There are much safer (and ultimately cheaper) ways to produce electricity than nuclear power and coal! Renewable sundishes like Solar Pioneers and SES have the technology for are without ANY waste and never cause cancer from exposure, proximity and accidents.

Sincerely, Chandra Radiance

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W320-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W320-2 Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

W320-3 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves.

W320-4 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W320-1

W320-2

W320-3

W320-4

**Name Withheld, Commenter ID No. W50**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Saturday, May 21, 2011 5:32 AM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10050

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10050. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 21, 2011 05:31:38AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10050

First Name:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [LR486@hotmail.com](mailto:LR486@hotmail.com)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Please do not allow Greater-Than-Class-C Low-Level Radioactive Waste to be shipped to the Hanford site in Washington state. More effort and existing funds needs to be used to thoroughly clean up the leaking radioactive waste that exist there now. The Columbia River is too close to this site and water from it is used for food crops. Site is far from most of the waste point of origin, leading to unnessesary trucking distance and hazard exposure. Low level waste is still radioactive for thousands of years and no containment will hold it long enough to keep it from reaching the Columbia River, along with active faults in area.

Questions about submitting comments over the Web? Contact us at: [gtcceiswebmaster@anl.gov](mailto:gtcceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W50-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

Based on the GTCC EIS evaluation, the disposal techniques described would isolate radionuclides for a sufficient period of time to allow for significant radioactive decay to occur.

W50-1

**Name Withheld, Commenter ID No. W4**

**From:** gtcceiswebmaster@anl.gov  
**Sent:** Friday, April 29, 2011 6:27 AM  
**To:** gtcceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10004

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10004. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: April 29, 2011 06:27:02AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10004

First Name:  
Last Name:  
State:  
Zip:  
Country: USA  
Email: [dianeschmidt22@hotmail.com](mailto:dianeschmidt22@hotmail.com)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

Higher-level Nuclear Waste headed to New Mexico – The zombies are coming!  
By Diane J. Schmidt April 29, 2011 Albuquerque Judaism Examiner A good friend, who is a very smart engineer, recently introduced me to a computer game, Plants and Zombies, that I find utterly addicting. As I learn strategy and progress to higher levels I see how I have to use both offensive and defensive plant weapons against the zombies, protect my plant-making factory, and strategically choose and place a larger number of small, inexpensive but lethal plants vs. squandering my resources on big one-shot plant-bombs. Once in a while, when all fails, the zombies make it past my marigolds and pea-shooters and eat my brains.

This feels a lot like the current fight we are waging against the relentless onslaught of the nuclear power industry. New Mexico is not, I hope, ready to roll over and proclaim itself a third world country, we have to do something more to stop the zombies coming towards us. Just when we thought we had slowed them on one front, lo and behold, a larger wave is coming. When Nevada got the government to suddenly stop all funding for Yucca Mountain as the country's nuclear waste site, the Department of Energy was tasked with a new mission – find another place to put the stuff. And guess what? It's headed straight for Carlsbad, New Mexico.

Last night I attended a public hearing so the Department of Energy could pro forma take public comment and hear what the people of New Mexico think about sending higher level nuclear waste to WHIPP. Their presentation shows they think it is the best and only site in the country, and they clearly have no intention of developing any other site. Most shocking to me, the meeting was so poorly announced there were fewer than seventy-five people there, and sadly, only a handful were young people. This, that will decide the future of our state and the health of our grandchildren? How dare they send their nuclear waste here to bury it? If it's so dangerous that they don't want it, they shouldn't make it, and if they do make it, they should keep it in their own facilities in their own states. Right now the country is looking for a place to bury what is called higher level greater-than-class-c nuclear waste, from commercial and industrial operations. So it may not be that the really hot spent fuel rods from nuclear reactors are headed to New Mexico today,

W4-1

Disposal of GTCC LLRW and GTCC-like wastes at WIPP or the WIPP Vicinity site is included in the range of reasonable alternatives and is evaluated in this EIS. DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 104-201) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. Furthermore, the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

W4-2

Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

W4-1

W4-2

**Name Withheld, Commenter ID No. W4 (cont'd)**

but eventually they are going to have to put them somewhere aside from storing them onsite, and twenty years down the road I'm afraid that's exactly what we are going to see when they have to decommission these power plants.

Public comments can still be sent in writing to DOE until June 27th. We need to let the country know we're not their uranium whore, and we're sure as heck not ready to be the entire country's nuclear waste backyard dump. Because the zombies really are coming. And they don't care about us.

W4-3

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W4-3

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement. See also W4-1.



**Name Withheld, Commenter ID No. W197**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 3:08 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10197

Thank you for your comment, :

The comment tracking number that has been assigned to your comment is GTCC10197. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 03:08:05AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10197

First Name:  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Please remove all toxic waste from Hanford. Do not put one more spec of toxic waste there.

Thank you

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W197-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W197-1

**Name Withheld, Commenter ID No. W409**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 23, 2011 9:44 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10409

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10409. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 23, 2011 09:43:58PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10409

First Name  
 Middle Initial:  
 Last Name:  
 Address:  
 City:  
 State:  
 Zip:  
 Country: USA  
 Email: [jsterett@hughes.net](mailto:jsterett@hughes.net)  
 Privacy Preference: Withhold name and address from public record

Comment Submitted:  
 Please believe this, the Hanford reservation must be a cleanup sight, not a repository for more nuclear waste.

The nuclear contamination at Handford is already leaching into the Columbia River, and will become much worse as the waste gets into other ground water sources making it's way into the river.  
 This nuclear material will be polluting the waterways flowing through major salmon fishing grounds, major source of Salmon for the NW and for the Indiginous indian tribes that rely on the fish as their main source of food.  
 The river is used for commercial, and supports many water activities. Sail boarding, water skiing, sport fishing, sailing, swimming, and in some cases home use.  
 The demand for Columbia water to irrigate crops is growing, and the water will be needed as Oregon reclaims it's hi desert for aditiOna farming land.

Second, do not truck tons of nuclear waste up the Columbia River highways. It's not safe. Accidents are unavoidable along that stretch up to the Hanford reservation. Sooner or later the will be a major accident and dump of material, and then what?

Please do not approve this plan.  
 The Hanford is a major disaster as is, don't add to it, but clean it up please.

Sincerely,

W409-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W409-2 See response to W409-1.

W409-3 The GTCC EIS evaluates the transportation impacts from the shipments that would be required to dispose of the entire inventory of GTCC LLRW and GTCC-like wastes at the Hanford Site and all the other sites being evaluated. The EIS evaluates collective population risks during routine conditions and accidents, radiological risks to the highest exposed individuals during routine conditions, and consequences to individuals and populations as a result of transportation accidents, including the release of radioactive or hazardous chemical materials. For the truck option, it is estimated that about 12,600 truck shipments resulting in about 50 million km (30 million mi) of travel would be required. This transport of GTCC LLRW and GTCC-like wastes would not result in any LCFs, although The GTCC EIS estimates one fatality directly related to an accident might occur (see Section 6.2.9.1).

W409-1

W409-2

W409-3

**Name Withheld, Commenter ID No. W301**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Friday, June 17, 2011 2:39 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10301

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10301. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 17, 2011 02:39:01PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10301

First Name: .....  
Middle Initial:  
Last Name:  
Address:  
City: .....  
State:  
Zip: :  
Country: USA  
Email: [arranedmonstone@care2.com](mailto:arranedmonstone@care2.com)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**  
The US Department of Energy has recently proposed trucking highly radioactive waste (Greater Than Class C or GTCC waste) to the Hanford site in Washington state -- and 10-20% of the 12,600 toxic shipments would travel through the Columbia River Gorge. That's 1,260 to 2,520 trucks of radioactive waste passing through the Gorge near homes, schools, critical wildlife habitat and the Columbia River.

GTCC waste is dangerous to human health and the environment for more than 500 years. A 2008 Department of Energy study predicts over 800 adult cancer deaths along the trucking routes as a result of radiation leaking from the trucks during normal operation, even if no accidents occur! And this "best case scenario" study only includes adults, excluding children who are even more susceptible to the dangers of radioactive waste. An accident resulting in the spillage of highly radioactive waste would be catastrophic for the Columbia River Gorge and its residents.

Hanford is already the most polluted area in the Western Hemisphere, with 53 million gallons of high level nuclear and chemical waste stored in aging, leaky tanks near the Columbia River. This deadly waste is currently leaking underground and flowing slowly into the Columbia. The number one priority should be to stop more waste from leaking into the river and clean up the existing waste and contaminated soil.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W301-1 Shipments of GTCC LLRW and GTCC like waste to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments over 60 years would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

There is a relatively small amount of waste which would be transported through the Columbia River Gorge regardless of the final decision as to the disposal site selected for GTCC LLRW. The waste would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

A number of commenters indicated they believed shipping offsite waste would result in 800 LCFs. This value for transportation risk does not exist in this GTCC EIS. DOE believes that the value of approximately 800 LCFs, cited in the public comments, is from the results provided in the *Draft Global Nuclear Energy Partnership Programmatic Environmental Impact Statement (GNEP PEIS)* regarding transportation of spent nuclear fuel (SNF) and HLW. This value represents the maximum impacts associated with 50 years of transportation activities supporting the operations of all existing U.S. commercial light-water reactors if they all were replaced with high-temperature, gas-cooled reactors. The *GNEP PEIS* was canceled by DOE on June 29, 2009 (74 FR 31017).

The GNEP PEIS involved many more shipments than those for disposal of GTCC LLRW and GTCC-like wastes. Because of this, the resulting estimated impacts for that program (now terminated) were much greater than those given in this EIS. The same types of analyses were done in both the GNEP PEIS and this EIS, but no LCFs are expected to result from transportation of the GTCC LLRW or GTCC-like wastes to the potential disposal sites considered in the GTCC EIS due to the much lower shipment numbers.

W301-2 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W301-1

W301-2

**Name Withheld, Commenter ID No. W311**

---

**From:** gtcciswebmaster@anl.gov  
**Sent:** Saturday, June 18, 2011 7:04 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10311

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10311. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 18, 2011 07:04:17PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10311

First Name: ·  
Last Name:  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Please ensure this area is protected for the safety & health of all community members.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W311-1

W311-1 The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like wastes. This range is consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and the WIPP Vicinity) as well as generic commercial locations. DOE has determined that it was reasonable to analyze these federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as needed and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

**Name Withheld, Commenter ID No. W39**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Wednesday, May 18, 2011 9:18 PM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10039

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10039. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 18, 2011 09:17:49PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10039

First Name:  
Middle Initial:  
Last Name:  
City:  
State: ....  
Zip:  
Country: USA  
Email: [freewil2k@yahoo.com](mailto:freewil2k@yahoo.com)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
handford is not a stabile place to store nuclear waste. more will end up in the columbia river. please clean up what is there now. trucking high level waste is not an acceptable risk either.

W39-1

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W39-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. W73**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Tuesday, May 31, 2011 12:10 AM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10073

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10073. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 31, 2011 12:09:48AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10073

First Name:  
Last Name:  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [2rkwood@comcast.net](mailto:2rkwood@comcast.net)  
Privacy Preference: Withhold name and address from public record

**Comment Submitted:**

Please do not go ahead with plans to store GTCC waste at Hanford. The place is already a toxic mess, with cleanup running well over budget and schedule. Increasing the load of hazardous materials at this site is a ludicrous proposal and will put the populations in Oregon and Washington at risk.

The USDOE undermines all its credibility for cleanup when it keeps proposing to dump more waste at Hanford and refuses to withdraw the 2004 decision to use Hanford as a national radioactive waste dump.  
"Put Clean-Up First" USDOE can't cleanup Hanford by adding nearly as much radioactivity to Hanford's soil above groundwater as in ALL the High-Level Nuclear Waste tanks.

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W73-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

W73-2 See response to W73-1.

W73-1

W73-2

**Name Withheld, Commenter ID No. W205**

**From:** gtcciswebmaster@anl.gov  
**Sent:** Thursday, June 16, 2011 9:03 AM  
**To:** gtcciswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10205

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10205. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: June 16, 2011 09:02:48AM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10205

First Name:  
Last Name:  
Organization: Friends of the Columbia River Gorge  
Country: USA  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
I do not want to see nuclear waste transported through the Gorge! Please work to protect this scenic beauty and treasure.

Questions about submitting comments over the Web? Contact us at: [gtcciswebmaster@anl.gov](mailto:gtcciswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W205-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational.

If DOE decides to implement its preferred alternative for the TC&WM EIS, GTCC LLRW and GTCC-like wastes would not be shipped through the Columbia River Gorge for disposal at the Hanford Site until the waste treatment plant is operational. However, regardless of where the GTCC waste disposal facility is ultimately located, a relatively small amount of GTCC LLRW and GTCC-like wastes may be transported through the Columbia River Gorge on their way to the disposal facility. The waste would be generated within the states of Oregon and Washington and would include actinide sealed sources and Cs-137 irradiators from local medical institutions, research facilities, universities, and other NRC and Agreement State licensees.

W205-1

**Name Withheld, Commenter ID No. W22**

**From:** gtceiswebmaster@anl.gov  
**Sent:** Sunday, May 15, 2011 3:47 PM  
**To:** gtceiswebmaster@anl.gov  
**Subject:** Receipt: Greater-Than-Class-C Low-Level Radioactive Waste EIS Comment GTCC10022

Thank you for your comment,

The comment tracking number that has been assigned to your comment is GTCC10022. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: May 15, 2011 03:47:13PM CDT

Greater-Than-Class-C Low-Level Radioactive Waste EIS Draft Comment: GTCC10022

First Name:  
Middle Initial:  
Last Name:  
Organization: SEIU  
Address:  
City:  
State:  
Zip:  
Country: USA  
Email: [peacefulpresence@gmail.com](mailto:peacefulpresence@gmail.com)  
Privacy Preference: Withhold name and address from public record

Comment Submitted:  
Protect Columbia River and Drinking Water:

Using Hanford as a national radioactive waste dump for the extremely radioactive GTCC wastes would result in annual radiation doses of 48 millirem per year to the people who will be drinking the groundwater - which flows straight to the Columbia.

That's a radiation level which would cause fatal cancers in approximately 1 to 2.5% of the Native American children living in the area under Yakama, Umatilla and Nez Perce Treaty Rights.

W22-1

Those cancer risks and radiation doses do NOT include the doses from the adjacent landfill which we sued USDOE for adopting a separate proposal to use as a national radioactive waste dump. Nor does it include the risk from the adjacent state operated UNLINED, leaking soil trenches of the commercial radioactive waste dump at Hanford.

W22-2

Questions about submitting comments over the Web? Contact us at: [gtceiswebmaster@anl.gov](mailto:gtceiswebmaster@anl.gov) or call the Greater-Than-Class-C Low-Level Radioactive Waste EIS Webmaster at (630) 252-5705.

W22-1 Disposition of the GTCC LLRW and GTCC-like wastes will be handled in a manner that is protective of human health and the environment and in compliance with applicable requirements and regulations. Doses to workers and the public will be minimized to the extent practical. The methodology used to estimate the radiological human health impacts in the EIS is based on standard practices that are subject to revision as our understanding of the effects of radiation on humans evolves. The same methodology is used in the evaluation of all alternatives; thus, any modification of this methodology would not affect the comparisons among alternatives and the identification of the preferred alternative.

A dose of 48 mrem in one year is approximately 15% of the annual natural background radiation received by an individual. A more site and scenario-specific analysis would have to be conducted to assess any potential impacts to children.

W22-2 DOE has considered cumulative impacts at the Hanford Site in this GTCC EIS. The disposal of GTCC LLRW and GTCC-like waste at the Hanford Site could result in environmental impacts that may warrant mitigation for Tc-99 and I-129 through limiting receipt of these waste streams (see Table 6.2.4.2 and Figure 6.2.4.1 in this EIS).





**Name Withheld, Commenter ID No. L412**

**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)  
U.S. Department of Energy**

**WRITTEN COMMENT FORM**  
*Must be received on or before June 27, 2011*

Mr. \_\_\_ Mrs. \_\_\_ Ms.  Mr. & Mrs. \_\_\_ Dr. \_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_ E-Mail Address: concordiasalus@hotmail.com

*Comment: Hanford needs less nuclear wastes, not  
more, bringing greater than Class C wastes  
to Hanford is a terrible idea -  
The Columbia River is at risk -*

L412-1

*Please use other side if more space is needed.*

**WITHHOLDING OF PERSONAL INFORMATION:** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtcecis@anl.gov](mailto:gtcecis@anl.gov)

L412-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

**Name Withheld, Commenter ID No. L407**



**DRAFT ENVIRONMENTAL IMPACT STATEMENT for the  
DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL  
RADIOACTIVE WASTE AND GTCC-LIKE WASTE  
(DOE/EIS-0375-D)**

U.S. Department of Energy

**WRITTEN COMMENT FORM**

*Must be received on or before June 27, 2011*

Mr. \_\_\_ Mrs. \_\_\_ Ms. \_\_\_ Mr. & Mrs.  Dr. \_\_\_

Name: \_\_\_\_\_

Title: CITIZENS

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: ALBUQ. State \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: (505) 266-2136 E-Mail Address: \_\_\_\_\_

*Comment: We are totally and completely against  
proliferating nuclear energy, and producing  
more nuclear waste! We are against  
moving waste to N.M.*

*Nuclear activities are never safe, and  
they will continue to be unsafe. Forever!  
No storage at Los Alamos - they are  
proven to be unreliable at safety.*

*Please use other side if more space is needed.  
We have always thought that "nuclear" was insane!*

**WITHHOLDING OF PERSONAL INFORMATION** Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking **one** of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- Withhold my name and address from the public record.
- Withhold only my address from the public record

Comment forms may be mailed to:  
Mr. Arnold Edelman  
Document Manager  
Office of Regulatory Compliance (EM-43)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Comment form may be faxed to:  
(301) 903-4303

or sent by electronic mail to:  
[gtcceis@anl.gov](mailto:gtcceis@anl.gov)

L407-1 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

J-1760

January 2016

L407-1

**Name Withheld, Commenter ID No. L407 (cont'd)**

Stop producing nuclear waste. Period.

No radiation is safe.

No more permits, no more funding of  
new nuclear plants.

L407-1  
(Cont.)

Name Withheld, Commenter ID No. L404



DRAFT ENVIRONMENTAL IMPACT STATEMENT for the DISPOSAL OF GREATER THAN-CLASS C (GTCC) LOW-LEVEL RADIOACTIVE WASTE AND GTCC-LIKE WASTE (DOE/EIS-0375-D)

U.S. Department of Energy

WRITTEN COMMENT FORM

Must be received on or before June 27, 2011

Mr. \_\_\_ Mrs. \_\_\_ Ms. \_\_\_ Mr. & Mrs. [X] Dr. \_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: (505) 842-1627 E-Mail Address: \_\_\_\_\_

comment: We oppose all forms of nuclear proliferation especially nuclear weapons and nuclear power plants. We totally oppose transporting any nuclear and radioactive waste anywhere at all. Policy should be that nuclear waste from nuclear power plants shall be stored at or near the power plant. The same policy should apply to contaminated materials and GTCC "low-level" radioactive waste and GTCC-like waste. over ->

L404-1

WITHHOLDING OF PERSONAL INFORMATION: Information you provide on this form may be published as part of the public record for this project, including publication on the Internet. Individual respondents may request confidentiality by checking one of the two boxes below. The DOE will honor such requests to the extent allowed by law. All submission from organizations and businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses, will be available to the public in their entirety.

- [X] Withhold my name and address from the public record.
[ ] Withhold only my address from the public record

Comment forms may be mailed to: Mr. Arnold Edelman, Document Manager, Office of Regulatory Compliance (EM-43), U.S. Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585-0119

Comment form may be faxed to: (301) 903-4303 or sent by electronic mail to: gtcceis@anl.gov

L404-1 DOE is responsible under the Low-Level Radioactive Waste Policy Amendments Act (P.L. 99-240) for the disposal of GTCC LLRW. The purpose of the EIS is to evaluate alternatives for the safe and secure disposal of GTCC LLRW and GTCC-like wastes. Continued storage of GTCC LLRW at the generating facilities was evaluated as part of the No Action alternative. Transportation of GTCC LLRW and GTCC-like wastes from generating facilities to a GTCC LLRW disposal facility is a required component of the disposal process that would be identified for the GTCC LLRW and GTCC-like wastes because the disposal site(s) or location(s) would not be the same as the generator sites for reasons provided in the EIS. DOE believes that the transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences.

J-1762

January 2016

Name Withheld - L404

Final GTCC EIS

Appendix I: Comment Response Document

Name Withheld, Commenter ID No. L404 (cont'd)

STOP granting <sup>permits</sup> and funding Nuclear Power Plants. Stop generating waste at Nuclear Power plants and begin funding green, renewable energy such as solar, wind and even thermal.

Transporting waste puts everyone along transportation routes at risk as well as at beginning and end points.

New Mexico already bears a heavy burden storing nuclear waste at WIPP as well as what is stored at Los Alamos Labs and Sandia Labs. NO MORE!

L404-2

L404-3

L404-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

L404-3 Shipments of GTCC LLRW and GTCC LLW to a disposal facility would be on preferred routes, which are interstate highways or alternative routes designated by a state routing agency in accordance with DOT regulations (49 CFR Part 397, Subpart D). The GTCC EIS evaluation indicates that transportation of GTCC LLRW and GTCC-like wastes to a more centralized disposal facility would result in lower overall human health risks compared to managing the wastes at multiple locations and can be conducted in a safe manner based on compliance with comprehensive regulatory requirements and past experiences. About 12,600 truck shipments would be required to transport all of the GTCC LLRW and GTCC-like wastes to the Hanford Site for disposal. This would result in about 50 million km (30 million mi) of highway travel, with no expected latent cancer fatalities (see Section 6.2.9.1).

*This page is intentionally left blank.*