

***Authorize DOE Idaho to act on critical items
in order to make it possible for AMWTP to
process waste from around the complex***

The Idaho Cleanup Project (ICP) Citizens Advisory Board (CAB) appreciates DOE's consideration of our request to share the results of the business case study that evaluates the benefits and effects of utilizing the Advanced Mixed Waste Treatment Project (AMWTP) to process waste from other generator sites across the DOE complex against the costs of constructing similar facilities at those sites. We acknowledge that the timeline to complete the project is continuing.

As our board noted in our April letter, we are extremely proud of the highly trained team and the comprehensive resources available at AMWTP for the processing and repackaging of waste. The manner in which they have operated over the past 15 years has been exemplary and is indicative of the efficiency with which they can complete such a complex task in a safe manner.

We continue to recognize the issues which must be addressed, including:

- Requirements of the 1995 Idaho Settlement Agreement
 - Temporary storage of waste (six months in/six months out) while awaiting shipment to the Waste Isolation Pilot Plant (WIPP)
 - Priority of Idaho waste shipments to WIPP
- Amounts and types of waste that could be processed at AMWTP
- Packaging requirements for transporting waste from generating sites
- Public involvement from potential stakeholders

As an advisory board, we recognize our inability to determine policy and provide solutions for each and every hurdle, yet in a larger sense, we recognize the value of the workforce and the capabilities which have been assembled.

Recognizing that there is an already short and narrowing timeline, the ICP CAB respectfully urges DOE to authorize DOE Idaho to act on these critical items in order to make it possible for AMWTP to continue to process waste from around the complex. It is our hope that you will make this decision as soon as possible in order to assimilate the continuing mission without a loss of the trained personnel in our existing AMWTP workforce.

Dissenting Opinion

The ICP CAB recently voted 7-4 to recommend to you to continue the mission of the AMWTP. This letter is to accompany the majority opinion and reflect the dissenting opinion.

The dissenters oppose this recommendation due to the following concerns:

- 1) A backlog of shippable waste already exists. If more waste arrives at INL for treatment at AMWTP and is processed faster than waste is shipped to WIPP, the six-months-in/six-months-out requirement of the Idaho Settlement Agreement cannot be met and there will be a build-up of new waste at INL.
- 2) No stipulations have been made in the majority opinion letter concerning how new waste will be transported to Idaho. This is of particular concern for waste being transported across tribal lands, as well as through communities across America on the transportation corridors.
- 3) Protection of the Eastern Snake Plain Aquifer--which remains the ICP CAB's highest priority—and of Idaho's natural and cultural resources is not reflected in the recommendation.