ENVIRONMENTAL MANAGEMENT SITE-SPECIFIC ADVISORY BOARD

Hanford Idaho Northern New Mexico

Oak Ridge Paducah Portsmouth Savannah River

February 28, 2020

Mr. William "Ike" White Senior Advisor U.S. Department of Energy (DOE) Office of Environmental Management (EM) 1000 Independence Avenue, SW Washington, DC 20585

Dear Mr. White:

On October 30, 2019, the Chairs and Vice-Chairs of the EM Site-Specific Advisory Board (SSAB) passed the following recommendation concerning **the Disposition and Transport of Nuclear Material**. This recommendation was subsequently approved by seven of the eight of the local boards (excluding the Nevada SSAB).

The Waste Isolation Pilot Project transport program has been incredibly successful in helping accomplish the task of safe movement of transuranic (TRU) waste, to Carlsbad, New Mexico, from multiple Department of Energy's Environmental Management (DOE-EM) sites, beginning in the spring of 1999.

As members of the EM Site-Specific Advisory Board (EM SSAB), we laud the collaborative work between DOE and the Western states in the development and execution of this plan and the ongoing cleanup, transportation and disposition of TRU waste and other shipments thus far. We understand that the program includes common sense elements that exceed regulatory requirements.

The EM SSAB Chairs agree that safe transport of waste material to its permanent disposition addresses one of the most important goals that the DOE-EM complex has undertaken. We urge you not to undervalue the importance of this program which will be needed far into the future in order to address remaining TRU at all DOE-EM sites.

DOE activities are funded by Congress through its annual appropriation process. Within that appropriation framework, DOE requests funds necessary to support long-term obligations within its statutory and regulatory requirements.

It is important to the EM SSAB Chairs that DOE-EM, when dispositioning waste off-site, strive to move all DOE-EM regulated waste material, including TRU waste, once to its final disposition.

We appreciate this opportunity to share our observations and applaud DOE-EM's continued focus on solutions for nuclear waste disposition and safe transport to permanent repositories.

It is recommended that DOE-EM:

- Prioritize development of final disposition sites with the goal of reducing the interim storage footprint at each of the sites.
- Specify Waste Acceptance Criteria for all forms of waste and Spent Nuclear Fuel in a manner that will allow all sites to proceed with waste processing confidently, efficiently, and without delay.
- Continue to insist on a compliant budget that will provide sufficient funding to act without delay, nor impediment, to prepare waste for shipment.
- Create a transportation program for the safe and uneventful shipment of all EM waste material.

Who We Are

The EM SSAB is the DOE-EM's most effective vehicle for fostering two-way communication between DOE-EM and the communities it serves. The EM program is the world's largest environmental cleanup program, and the EM SSAB its only citizen advisory board. For more than 20 years, the volunteer citizens of the EM SSAB have partnered with EM officials at both the local and national levels to ensure that the public has a meaningful voice in cleanup decisions.

Public participation is required/recommended as part of a number of environmental regulations. It is also good business practice, resulting in better decisions that often result in improved cleanup. Over the past two decades, EM SSAB members have volunteered over 48,000 hours of their time and submitted to EM officials over 1500 recommendations, 88% of which have been fully or partially implemented, resulting in improved cleanup decisions.

The EM SSAB comprises approximately 200 people from communities in Georgia, Idaho, Kentucky, Nevada, New Mexico, Ohio, Oregon, South Carolina, Tennessee and Washington. The Board is cumulatively representative of a stakeholder population totaling millions of people who are affected by generator sites, transportation routes and disposal sites. As we move forward, the EM SSAB welcomes the opportunity to highlight the value of this unique volunteer board and discuss its priorities during the months and years ahead.

Susan Leckband, Chair Hanford Advisory Board

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Shell Lohmann, Chair Oak Ridge SSAB Don Barger, Chair Paducah CAB

Gil Allensworth, Chair Savannah River Site CAB

Max Baca, Chair Northern New Mexico CAB

Bob Berry, Chair Portsmouth SSAB Trilby McAfee, Chair Idaho Cleanup Project CAB

cc: David Borak, Designated Federal Officer, EM-4.32