APPENDIX A
SUMMARY OF COMMENTS RECEIVED ON THE 1996 DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR COMPLETION OF THE WEST VALLEY DEMONSTRATION PROJECT AND CLOSURE OR LONG-TERM MANAGEMENT OF FACILITIES AT THE WESTERN NEW YORK NUCLEAR SERVICE CENTER

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A.1 Background

In March 1996, the U.S. Department of Energy (DOE) published the *Draft Environmental Impact Statement for Completion of the West Valley Demonstration Project and Closure or Long-Term Management of Facilities at the Western New York Nuclear Service Center (Cleanup and Closure Draft EIS*) (DOE/EIS-0226-D) (DOE 1996a). In accordance with the provisions of the National Environmental Policy Act (NEPA) (42 *United States Code* [U.S.C.] 4321 et seq.) and the related Council on Environmental Quality (CEQ) implementation regulations (40 *Code of Federal Regulations* [CFR] 1500–1508), DOE and the New York State Energy Research and Development Authority (NYSERDA) and the U.S. Environmental Protection Agency (EPA) announced the availability of the document in *Federal Register* (FR) notices (61 FR 11620 [DOE 1996b] and 61 FR 11836 [EPA 1996]) and invited interested parties to provide comments. NYSERDA issued a notice of completion for the 1996 *Cleanup and Closure Draft EIS* in the New York State Environmental Notice Bulletin, pursuant to the regulations implementing the New York State Environmental Quality Review Act (SEQR). Both the DOE and NYSERDA notices appear in Appendix B of this EIS.

A.2 The Public Comment Process

The 1996 *Cleanup and Closure Draft EIS* was distributed to interested individuals and organizations, including appropriate state clearinghouses, regulatory agencies, and American Indian Tribes. NEPA regulations mandate a minimum 45-day comment period after the publication of the EPA notice of availability of a draft environmental impact statement (EIS) to provide an opportunity for the public to comment. The comment period for the *Cleanup and Closure Draft EIS* was 6 months long and began on March 21, 1996. During the public comment period, four information sessions were held in late April during which DOE and NYSERDA were available to explain and discuss topics and issues that pertained to the Draft EIS. Sessions were held in Hamburg and Ashford, New York, for the public, and similar sessions were held in Irving and Salamanca, New York, expressly for members of the Seneca Nation of Indians. During the 6-month comment period, DOE received 113 letters from individuals and organizations. Further, there were three public meetings held in August 1996 in the West Valley area to receive oral comments, which were transcribed by a registered stenographer. Approximately 1,170 comments were identified in the letters and transcripts.

Over a decade has passed since the comments were received, during which time actions have been taken either in response to the public comments on the *Cleanup and Closure Draft EIS* or, while not directly in response to the comments, to help answer some of the issues raised by them. These activities include the development of additional waste characterization information; clarification of some of the regulatory requirements, most notably, the issuance of the U.S. Nuclear Regulatory Commission's (NRC's) *Decommissioning Criteria for the West Valley Demonstration Project (M-32) at the West Valley Site; Final Policy Statement* (Policy Statement) and the 6 New York Code of Rules and Regulations Part 373 and Resource Conservation and Recovery Act regulations as they apply to units on the site; issuance of Records of Decision (RODs) by DOE related to disposal options for various classes of DOE radioactive waste; revision of alternatives for decommissioning and long-term stewardship; and revision of analytical methods and models. A Citizen Task Force was established to provide input to DOE and NYSERDA regarding the Preferred Alternative. The *West Valley*

Citizen Task Force Final Report (CTF 1998) was issued July 28, 1998. In July 2000 DOE and the Seneca Nation of Indians signed a Memorandum of Agreement concerning the shipment of high-level radioactive waste and spent nuclear fuel across their lands (Seneca Nation 2000). Since the 1996 *Cleanup and Closure Draft EIS* was published, there has been ongoing interaction with the local population surrounding the site.

In March 2003, DOE and NYSERDA issued notices in the *Federal Register* (68 *Federal Register* 12044) and the New York State Environmental Notice Bulletin, respectively, of their intent to prepare this *Environmental Impact Statement for Decommissioning and/or Long-Term Stewardship at the West Valley Demonstration Project and Western New York Nuclear Service Center* (DOE/EIS-0226) (*Decommissioning and/or Long-Term Stewardship EIS*), and indicated that the EIS would revise the 1996 *Cleanup and Closure Draft EIS*.

Following the 2003 Notice of Intent and scoping meetings, DOE, with input from NYSERDA and the cooperating agencies (EPA, NRC, and New York State Department of Environmental Conservation [NYSDEC]), refined the definition of five alternatives and prepared a preliminary internal Draft EIS in September 2005 that analyzed the environmental impacts of the five alternatives. The preliminary internal Draft EIS did not present a preferred alternative and did not address the issue of which agency is responsible for specific portions of the Western New York Nuclear Service Center (WNYNSC). The preliminary internal Draft EIS was reviewed by the co-lead (DOE and NYSERDA) and cooperating agencies, and their comments revealed different expectations about the purpose and content of the EIS. To resolve differences about alternatives to be analyzed and the type of analyses, and to help identify a preferred alternative, DOE established a core team comprising the co-lead and cooperating agencies to discuss and, where practical, resolve the issues raised by the review of the September 2005 preliminary internal Draft EIS. The November 2008 Revised Draft *Decommissioning and/or Long-Term Stewardship EIS* reflects discussions with the core team regarding alternatives to be analyzed, the nature of the analyses, and the nature of the Preferred Alternative.

The November 2008 Revised Draft *Decommissioning and/or Long-Term Stewardship EIS*, with revised alternatives including the Preferred Alternative, was prepared with a clearer understanding of the major regulatory requirements, including criteria applied by NRC for decommissioning of the West Valley Demonstration Project (WVDP) and for license termination, and Resource Conservation and Recovery Act regulations as they apply to units on the site. Updated long-term performance assessment models for groundwater and erosion releases, and updated closure designs that include waste isolation barriers have been used in preparation of this *Decommissioning and/or Long-Term Stewardship EIS*. Analyses include short-term and long-term impacts, local impacts, and impacts associated with transportation. The analyses are intended to provide decisionmakers and the public with a fuller understanding of the environmental impacts of each alternative.

The public comment period for the November 2008 Revised Draft *Decommissioning and/or Long-Term Stewardship EIS* ran from December 5, 2008 through September 8, 2009. Initially scheduled for 6 months, the comment period was extended for another 90 days in response to requests from the public. Four public hearings were held on the Revised Draft EIS in the cities of Albany, Ashford, Buffalo, and Irving, New York. In addition, the DOE Assistant Secretary for Environmental Management and the President of NYSERDA held a videoconference on September 4, 2009, with various stakeholders to hear their concerns about some of the alternatives in the Revised Draft EIS, especially after the August 9 and 10, 2009 heavy rainfall events. Comments received during the public comment period, including those presented at the hearings and videoconference, were considered in finalizing this EIS and are addressed in the Comment Response Document, Volume 3, of this EIS. Changes to this EIS made in response to public comments are identified in Chapter 1, Section 1.8.

This appendix contains summaries of the oral and written comments received on the 1996 *Cleanup and Closure Draft EIS*, and explanations of how comments that relate to the scope and analysis of this *Decommissioning and/or Long-Term Stewardship EIS* were considered, and where practical, incorporated into this EIS.

A.3 Categorization of Issues Raised During the 1996 Public Comment Period

All the documents received during the public comment period on the 1996 *Cleanup and Closure Draft EIS*, as well as the transcripts from the formal hearings, were reviewed. Specific comments were delineated and organized into the following 13 major categories for which responses are presented in Section A.4 of this appendix:

1. Inadequate or inaccurate characterization of the site, waste, contamination, or presentation of data in the EIS
2. Reasonableness of alternatives
3. Design or operational details
4. Near-term impact analysis issues
5. Long-term erosion analysis issues
6. Long-term hydrologic transport analysis issues
7. Erosion control strategies
8. Long-term performance assessment issues
9. Preferences for or against a particular alternative
10. Specific recommendations for the Preferred Alternative
11. Regulatory compliance
12. Understanding the purpose and content of the EIS and its relationship to decisionmaking and agency involvement
13. Out-of-scope comments

The remainder of this appendix contains the 13 summarized categories of comments, responses to those comments, and an explanation of how those comments were considered in the development of the November 2008 Revised Draft *Decommissioning and/or Long-Term Stewardship EIS*. For the out-of-scope comments, an explanation is provided as to why they were placed in that category.

A.4 Summary of and Response to Comments by Category

A.4.1 Inadequate or Inaccurate Characterization of the Site, Waste, Contamination, or Presentation of Data in the Environmental Impact Statement

Specific aspects of characterization discussed in the comments include contamination levels for soils, sediments, vegetation, and animals; characterization of facilities and buried waste; geologic characterization, including bedrock and till fractures; structural geology fault data and unresolved geology issues; seismic characterization; and understanding of hydrologic and erosion processes that could move contamination from its existing location to potential receptors. Some commentors stated that full characterization and categorization of wastes was needed for a thorough analysis of regulatory compliance. Other commentors questioned the accuracy or presentation of data in the 1996 *Cleanup and Closure Draft EIS*.

Response: More than a decade of additional scientific study, environmental monitoring, and characterization data for the environment and conditions at WNYNSC and the surrounding region since preparation of the 1996 Cleanup and Closure Draft EIS, including data compiled in Annual Site Environmental Reports, have been taken into consideration in this Decommissioning and/or Long-Term Stewardship EIS and have contributed to understanding the impacts of natural phenomena at the site. Studies have been performed to improve understanding of chemical and radiological contamination levels for soils, sediments, vegetation, and animals; to characterize facilities and buried waste; and to improve the understanding of hydrologic, hydrogeologic, and erosion processes capable of transporting contamination to potential receptors. Revised estimates of the radiological and hazardous chemical inventories for major facilities on the site were made. Geologic characterization, including bedrock and till fracture data and more-recent seismic characterization data, has been reviewed, analyzed, and added as appropriate. For example, the following reference documents were used to enhance geologic and seismologic characterization at the site: Fakundiny and Pomeroy 2002; Gill 2005; Jacobi and Fountain 2002; Ouassaa and Forsyth 2002; Tuttle, Dyer-Williams, and Barstow 2002; URS 2002, 2004; and USGS 2002, 2008. Chapter 3 of this EIS, Affected Environment, provides site characterization by resource area, and cites references used in developing the chapter.

Chapter 4, Section 4.3, of this EIS includes a specific discussion of incomplete and unavailable information and its effect on the environmental impact analysis. The state of characterization of the site, waste, and contamination would be considered by the co-lead agencies when they make their respective decisions and would also be considered by the regulatory authorities during their approval process for any actions.

Comments on the 1996 Cleanup and Closure Draft EIS that identified inconsistent, incomplete, or inaccurate presentation of data have been reviewed, and changes or clarifications have been made, as appropriate. These comments are reflected in revised descriptions of the affected environment in Chapter 3 and in the descriptions of impact methodologies in the appendices associated with Chapter 4 of this EIS.

A.4.2 Reasonableness of Alternatives

Some commentors did not consider alternatives in the 1996 *Cleanup and Closure Draft EIS* to be reasonable or questioned their underlying assumptions. In particular, some commentors stated that the EIS did not offer any realistic alternatives for the disposal of radioactive waste at WNYNSC or that the proposed alternatives were overly simplistic and did not adequately protect the public and environment.

Some commentors called for specific detail or description of the various alternatives, requesting clarification or additional information on how (or why) a particular alternative would be implemented in the manner described. In some instances, the commentors suggested variations on the alternatives to make them more protective of people and the environment. Comments were received questioning or requesting clarification on the specific short-term actions proposed for the alternatives to manage the North Plateau Groundwater Plume. Other comments included the following:

1. Questioning why the reservoirs would be removed for Alternatives I (Removal) and II (Removal and Decay), which would destroy rose pink habitat

2. Questioning why onsite permanent disposal as an option under Alternative II was not considered

3. Suggesting the use of existing vitrification and cement solidification facilities for treatment of sludge and liquids generated during decontamination and decommissioning under Alternatives I and II, or for other identified wastes currently on site

4. Suggesting that the description, design, and method of waste removal, storage, and disposal needed clarification or updating to ensure protection of the population and environment

5. Defining ownership of the wastes and identifying potential offsite disposal facilities and timing of disposal for each identified waste type

6. Questioning how mitigation measures could be generally the same for all alternatives

7. Questioning why the *Cleanup and Closure Draft EIS* did not evaluate alternatives for the remediation of groundwater contamination on the North Plateau, because, in the commentor's opinion, the system in use at the time of the *Cleanup and Closure Draft EIS* did not adequately capture the contamination plume or efficiently remove radionuclides from the groundwater

8. Questioning potential locations for new waste storage and treatment facilities in relation to floodplains and long-term erosion considerations

9. Suggesting that waiting 100 years for decommissioning may be appropriate for some Waste Management Areas (WMAs), but the beta plume (North Plateau Groundwater Plume) should be remediated immediately.

Response: Following the Notice of Intent and scoping meetings of early 2003, DOE, with input from NYSERDA and the cooperating agencies, identified differences among the agencies regarding their expectations about the purpose and content of the EIS. To resolve the differences about alternatives to be analyzed and the type of analyses, and to help identify a preferred alternative, DOE established a core team comprising the co-lead and cooperating agencies to discuss and, where practical, resolve the issues. This Decommissioning and/or Long-Term Stewardship EIS reflects discussions with the core team regarding alternatives to be analyzed, the nature of the analyses, and the nature of the Preferred Alternative.

The alternatives evaluated in this Decommissioning and/or Long-Term Stewardship EIS include the Sitewide Removal Alternative, which would allow unrestricted release of the entire WNYNSC; the Sitewide Close-In-Place Alternative, under which all existing facilities and contamination would be managed in their current locations, and engineered barriers would be used to control contamination in areas with higher levels of long-lived contamination; the Phased Decisionmaking Alternative, under which there would be initial (Phase 1) decommissioning actions for some facilities and a variety of activities intended to expand the information available to support later additional decommissioning decisionmaking (Phase 2) for those facilities and areas not addressed in Phase 1; and the No Action Alternative.

The comments on the 1996 Cleanup and Closure Draft EIS, which included comments from the public as well as the agencies involved in the core team discussions, have helped to inform the development and clarification of the approaches, analyses, and descriptions of alternatives presented in this Decommissioning and/or Long-Term Stewardship EIS. For example, comments about long-term performance assessment were among the factors leading to the development of the Phased Decisionmaking Alternative. Potential short- and long-term impacts from implementation of the alternatives have been analyzed and results updated in this Decommissioning and/or Long-Term Stewardship EIS. For example, details on managing the North Plateau Groundwater Plume are provided in Appendix C of this EIS. The description, proposed design, and method of waste removal, storage, and disposal for each alternative has been updated and revised for clarity. The alternatives presented and analyzed in this Decommissioning and/or Long-Term Stewardship EIS are considered to represent reasonable alternatives consistent with the guidance of NEPA and SEQR.

A.4.3 Design or Operational Details

Comments were submitted related to design and operational details of the proposed decommissioning actions. A commentor suggested the use of an existing facility rather than the construction of a new facility. Another commentor questioned the basis for the cost estimate and the discussion of the cost differences, and another requested more information on how a specific alternative would be implemented. In other instances, commentors asked for more information on the monitoring and maintenance activities that would occur if waste remained on site, or what the consequences of an accident during operations would be. Commentors called for site management, including visible markings, to ensure protection of humans and the environment.

Some commentors called for additional information on the institutional controls that would be in place if waste remained on site, including identification of mechanisms for implementing long-term controls and monitoring plans. Some questioned the effectiveness of and reliance on long-term institutional controls. Others questioned whether long-term institutional controls could be guaranteed, especially in light of past failures to prevent releases of radioactive materials into the environment. Some commentors called for modification or restructuring of the environmental monitoring plan. Others stated an opinion on how a particular portion of the site, such as the North Plateau Groundwater Plume, should be managed or maintained. In particular, some questioned the strategy that relies on dilution to bring contamination to within acceptable limits.

Response: Comments on the 1996 Cleanup and Closure Draft EIS related to the proposed design elements and operational aspects associated with implementation of the alternatives were reviewed and considered in the development and clarification of the approaches, analyses, and description of design and operational details presented in this Decommissioning and/or Long-Term Stewardship EIS, including environmental monitoring programs described in the technical reports prepared to support each of the alternatives, postulated accident scenarios, and the design and effectiveness of long-term institutional controls.

The purpose of the engineering documents (called technical reports) that support this Decommissioning and/or Long-Term Stewardship EIS is to provide a basis to estimate environmental impacts, which includes providing a preliminary estimate of the cost for monitoring systems. The engineering data contained in these reports are preliminary. After an alternative is selected, more-detailed engineering analysis would be performed, and detailed monitoring plans would be developed in consultation with regulators, as appropriate. The technical reports explain the need for the construction of new facilities, particularly if there is an existing facility that does or could perform the same service. The technical reports also have a more-extensive discussion and characterization of the monitoring and maintenance activities than is contained in this EIS and an expanded discussion of the implementation actions, particularly if the information is relevant to the environmental impact analysis. The technical reports also provide the basis for the cost estimates presented in this Decommissioning and/or Long-Term Stewardship EIS. They are available in public reading rooms, on the DOE Decommissioning and/or Long-Term Stewardship EIS website (http://www.westvalleyeis.com), and upon request.

A.4.4 Near-term Impact Analysis Issues

Some commentors requested additional explanation of the assumptions, assessment methods, models, and parameters used for the near-term impact analysis. Specific comments were made on the transportation analysis, including the concern that the impact analysis (e.g., accident risk models, radiation exposure pathways, latent and acute cancer fatalities) was much more conservative than the nontransportation radiological impact analysis. Other commentors questioned the adequacy of the socioeconomic impact analysis or the environmental justice analysis or requested a more-detailed assessment of airborne emissions. Still other commentors recommended different measures of consequences or requested a discussion of impacts on fish

and wildlife resources or their habitats and an ecological risk assessment. Comments were also made on the evaluation of radiological doses and their associated health effects.

Response: The near-term impact analysis in this Decommissioning and/or Long-Term Stewardship EIS is based on the revised description of the proposed project and alternatives, new data, and standard NEPA analytical tools and methods. Assumptions, assessment methods, and models used for analysis of near-term impacts are presented in Chapter 4 and applicable appendices of this EIS. Section 4.3 contains a discussion of incomplete and unavailable information and its relevance to the evaluation of transportation and environmental impacts. The transportation analysis was revised between the Revised Draft and Final EISs to reduce the conservatism where possible: state-specific accident and fatality rate data replaced the national mean accident and fatality rates, and the possibility of under-reporting of truck accident and fatality data has been accounted for by using published correction factors. The impacts of air emissions, both radiological and nonradiological, were analyzed. Both the methods and results of these analyses are discussed in the body of this EIS, as well as in appropriate appendices. The socioeconomic impact analysis has been updated to reflect current data from the U.S. Department of Commerce about economic multipliers and the location of low-income and minority populations. The potential dose to the public and workers from each of the four alternatives is presented in Chapter 4, Section 4.1.9, of this EIS. The level of detail for presentation of impacts in this EIS is consistent with CEQ and DOE guidance to discuss impacts "in proportion to their significance," focusing attention on significant environmental issues.

A.4.5 Long-term Erosion Analysis Issues

Commentors called for the erosion analysis to include recognition of the uncertainty in such analysis. Other commentors called for the EIS to include identification of specific erosion processes, such as gully advancement and the potential for stream capture, and a discussion of Buttermilk Creek erosion issues. Several commentors called for analysis of the impacts of erosion on downstream populations. Still other commentors called for a specific duration of the long-term performance assessment in the context of erosion or questioned the timeframe used in the analysis. Some commentors questioned the appropriateness of the use of average precipitation rates in the development of erosion predictions. One commentor offered a Monte Carlo–based erosion model. Multiple commentors expressed concern regarding impacts from the erosion collapse scenario or the reasonableness of the erosion assumptions, estimates, and modeling efforts.

Response: Analyses in this Decommissioning and/or Long-Term Stewardship EIS use different erosion models than were used for the 1996 Cleanup and Closure Draft EIS. The CHILD model is a landscape evolution model recognized by geomorphology professionals, and was calibrated using longer-term data consistent with recommendations from erosion experts. The CHILD model provides gully advancement predictions that are used for the long-term performance assessment. The CHILD model is discussed in Appendix F of this EIS. The dose consequences of long-term erosion predictions (erosional collapse) are presented in Chapter 4, Section 4.1.10 and Appendix H. This long-term analysis estimates timing and magnitude of peak annual dose commitment for various receptors including downstream populations. The uncertainty in the long-term dose estimates is discussed in Chapter 4, Section 4.3. This discussion also lists the factors that contribute to the conservatism in the long-term dose estimate.

A.4.6 Long-term Hydrologic Transport Analysis Issues

Specific commentors raised concerns about the effects of till fractures and bedrock hydrology on the hydrology of contaminant transport. Commentors also pointed out the potential for sediment transport to be an element of hydrologic contaminant transport. Some commentors called for consideration of the "bathtub" scenario, as occurred in the past. Other comments requested a mass balance as part of the hydrologic analysis.

Response: This Decommissioning and/or Long-Term Stewardship EIS uses groundwater models (numerical and analytical) both for flow and transport analyses. The revised analyses make use of available hydrologic and contaminant transport information. A description of the updated groundwater modeling effort is provided in Appendix E of this EIS. Water balances were performed as part the modeling and comparisons made with existing data. Sensitivity analyses were conducted to provide insight into the uncertainty in the long-term impact estimates. Geohydrological analysis of a bathtub scenario was not performed because improvements in the structure and maintenance of the burial area caps make it unlikely that this scenario would occur. However, in the long-term performance assessment, lateral transport through a weathered Lavery till saturated zone was modeled using groundwater velocities estimated in the geohydrological modeling.

A.4.7 Erosion Control Strategies

Several commentors questioned the erosion control strategies, and some viewed the global erosion strategy, which was intended to be maintenance free, as impractical and potentially harmful. Some commentors stated that erosion control measures should be justified, and that backup systems should be provided to prevent the possible release of contaminants.

Response: This Decommissioning and/or Long-Term Stewardship EIS relies on a strategy consistent with what was termed "local erosion control" in the 1996 Cleanup and Closure Draft EIS. This Decommissioning and/or Long-Term Stewardship EIS considers only a local erosion control strategy and no longer proposes or evaluates the global erosion strategy that was discussed in the 1996 Cleanup and Closure Draft EIS. The erosion control features for the engineered covers evaluated for the Sitewide Close-In-Place Alternative (see Appendix C, Section C.4.13) have been developed consistent with NRC guidance.

A.4.8 Long-term Performance Assessment Issues

Some commentors requested additional explanations of the assumptions, models, and parameters used for the long-term impact analysis. Commentors called for consideration of the impacts on all users of potentially contaminated surface waters used as sources for drinking water. Other commentors stated that a 1,000-year analytical timeframe was too short, and a 10,000-year timeframe should be used. Commentors also requested a discussion of long-term environmental and health and safety impacts in the event of immediate loss of institutional controls. Several commentors called for an analysis of the effects of erosion on downstream water users. Other commentors called for inclusion of an analysis of the impacts of hazardous material releases in the long-term performance assessment. One commentor discussed the sensitivity of the dose predictions to the solubility of radionuclides. Several commentors questioned the groundwater and surface-water flow paths and hydrologic properties. Other commentors called for additional explanation of natural phenomena expected over the long term, such as loading due to high winds and earthquakes. Other commentors raised concerns about the long-term structural performance analysis of selected reinforced concrete structures.

Response: The long-term performance assessment was updated between issuance of the 1996 Cleanup and Closure EIS and this Decommissioning and/or Long-Term Stewardship EIS. The analysis examines the effects of short-term and long-term releases on a spectrum of downstream water users including Lake Erie and Niagara River water users. The analysis also identifies the year of peak annual exposure for each receptor regardless of whether that peak occurs in the early years or more than 10,000 years in the future. This Decommissioning and/or Long-Term Stewardship EIS also includes an analysis of the impacts from the release of hazardous materials, and an assessment of high winds and earthquakes. With respect to the long-term performance assessment, high winds are not expected to have a significant role, while the influence of earthquakes on erosional processes is implicitly addressed in the revised calibration of the erosion model covering the entire post-glacial period. Also, given the revised alternatives, the concern about the long-term structural performance of reinforced concrete structures is no longer applicable. The level of presentation for

the impacts in this Decommissioning and/or Long-Term Stewardship EIS is consistent with CEQ and DOE instructions to discuss impacts "in proportion to their significance."

All available data were reviewed, including the identification of potential contaminant flow paths and path properties. In addition, DOE and NYSERDA solicited the technical assistance of the cooperating agencies in the review of the long-term performance assessment methods and results. DOE and NYSERDA also solicited input from independent technical experts who assessed several other aspects of the EIS. The long-term human health impacts are presented in Chapter 4, Section 4.1.10, and the methods, models, and results of this assessment are discussed in detail in Appendices D, E, F, G, and H of this EIS. As previously discussed, this Decommissioning and/or Long-Term Stewardship EIS involves the use of revised models and includes long-term performance assessment of the alternatives where residual radioactivity remains on site. The long-term performance assessment estimates impacts out to year of peak impact for both radioactive and hazardous constituents. A number of different scenarios were analyzed for different offsite receptors, possible intruders, and the general population.

A.4.9 Preference For or Against a Particular Alternative

In some instances, commentors expressed a preference for a specific alternative analyzed in the 1996 *Cleanup and Closure Draft EIS*. A number of commentors expressed a preference for either the Removal Alternative or the On-Premises Storage Alternative. In other instances, commentors stated their opposition to the Sitewide Close-In-Place Alternative or the No Action Alternative. Some commentors stated in general terms that the Preferred Alternative could involve a "combination" alternative that would treat different portions of the site differently. Many comments were received expressing a preference for or opposition to one or more of the alternatives.

A number of commentors supported Alternative I (Removal) over Alternative II (On-Premises Storage), while some expressed support for a combination of the two alternatives to address the responsibility of stewardship and to avoid the risk of transporting wastes off site into somebody else's backyard. Some favored safely exhuming and packaging all radioactive and mixed waste and storing it so that it could be easily retrieved and monitored, while others just wanted the wastes properly packaged and transported off site as soon as possible to a less populated and more-geologically stable location. Other commentors cited reasons for favoring initial on-premises storage to provide protection of the surrounding communities, to allow time for the radioactive wastes to continue to decay, and to use the time to explore technology that would eventually solve the contamination problem. There was also a preference for Alternative IV (No Action), as it was believed by some to afford the highest level of protection. A number of commentors specifically opposed Alternative III (In-Place Stabilization), while others supported either Alternative I or II. Many were opposed to the idea of backfilling contaminated facilities and leaving radioactive wastes buried. The most frequently cited reasons for opposition included concerns about the following:

1. Human health risks posed by the radioactive waste left in the ground without the option of retrieval and exacerbated by long-term erosion, loss of institutional control, and seismic activity

2. Long-term consequences for downstream communities and the human health risk of contaminated drinking water

3. Cost being the primary factor in selecting a preferred alternative

4. Unacceptable, adverse, and irreversible effects on the environment

Other commentors voiced opposition to Alternative IV (No Action) because of unacceptable risks to the health and safety of present and future generations. Many others opposed Alternative V (Discontinue Operations), citing that it was not considered a viable alternative by DOE or NYSERDA.

Response: The comments on the 1996 Cleanup and Closure Draft EIS, which included comments from the public as well as the agencies involved in the core team discussions, have helped to inform the development and clarification of the approaches, analyses, and description of alternatives presented in this Decommissioning and/or Long-Term Stewardship EIS. For example, comments about long-term performance assessment were among the factors leading to the development of a Phased Decisionmaking Alternative. Potential short- and long-term impacts from implementation of the alternatives have been analyzed and the results updated in this Decommissioning and/or Long-Term Stewardship EIS. For example, details about managing the North Plateau Groundwater Plume are provided in Appendix C. The description, proposed design, and method of waste removal, storage, and disposal for each alternative have been updated and revised in this EIS. The alternatives presented and analyzed in this EIS are considered to represent reasonable alternatives consistent with the guidance of NEPA and SEQR.

A.4.10 Preferred Alternative

Some commentors called for more than one preferred alternative. Many commentors indicated that a preferred alternative should have been presented in the 1996 *Cleanup and Closure Draft EIS* to give interested parties ample opportunity to review and comment on the methodology and data used in its development. A commentor stated that New York State law and regulations require description of the Proposed Action, and identification of the Preferred Alternative is needed prior to issuance of the ROD and SEQR findings.

Response: At the time the 1996 Cleanup and Closure Draft EIS was issued, a Preferred Alternative had not been determined by the lead agencies. Since then the lead agencies have reviewed the various comments, suggestions, and recommendations on actions that should be taken at WNYNSC, including recommendations of the Citizen Task Force. This information was considered as they developed the alternatives that are analyzed in this Decommissioning and/or Long-Term Stewardship EIS. To resolve the differences about alternatives to be analyzed and the type of analysis, and to help identify a Preferred Alternative, DOE established a core team comprising the co-lead and cooperating agencies to discuss and, where practical, resolve these issues. The Preferred Alternative is described (see Chapter 2, Section 2.4) and analyzed in this Decommissioning and/or Long-Term Stewardship EIS.

A.4.11 Regulatory Compliance

Several commentors made statements about whether a specific alternative complied with the regulations based on information in the 1996 *Cleanup and Closure Draft EIS* and the individual commentor's assertion of applicable regulations. Other commentors asked for clarification on how specific alternatives would comply with RCRA regulations, while others pointed out the uncertainty of compliance given lack of West Valley decommissioning criteria, as called for in the WVDP Act (Public Law 96-368). Many commentors used information in the 1996 *Cleanup and Closure Draft EIS* to support a position about how a specific alternative complied with regulations that they thought were applicable. Two frequently cited regulations were 10 CFR Part 60 (NRC requirements for disposal of high-level radioactive waste) and 10 CFR Part 61 (NRC requirements for disposal of low-level radioactive waste). Comments were made about State-Licensed Disposal Area and NRC-Licensed Disposal Area issues and meeting existing NRC regulations regarding site suitability requirements for land disposal of radioactive material. Other commentors based their assessment of acceptability on RCRA regulations or the 15-millirem-per-year standard in the proposed NRC Decontamination and Decommissioning Rule that was available at the time of the 1996 *Cleanup and Closure Draft EIS*. Others pointed out that some of the alternatives may not comply with all applicable guidance, laws,

regulations, and settlements, including the WVDP Act, Safe Drinking Water Act, and New York standards for fresh groundwater, while others were concerned that not all applicable Federal and state regulatory and permit requirements were identified.

Response: NRC issued decommissioning criteria for WVDP after the 1996 Cleanup and Closure Draft EIS was issued. The NRC Policy Statement and License Termination Rule provide several options for decommissioning and, if appropriate, license termination. Appendix L of this Decommissioning and/or Long-Term Stewardship EIS includes a discussion of compliance with the dose standards in the License Termination Rule, as prescribed in the Policy Statement. NRC's assessment of compliance with the Policy Statement/License Termination Rule would occur only when the entire plan for completing WVDP is established and the actions to implement that plan are documented in a Decommissioning Plan. A Decommissioning Plan for Phase 1 of the Phased Decisionmaking Alternative, the Preferred Alternative identified in this EIS, has been submitted to NRC. The Phase 1 Decommissioning Plan is currently under review.

Appendix L also includes a discussion of compliance with RCRA. Official determination of compliance would occur through the regulatory review process, which would occur as part of the implementation of the selected alternative. It is possible that the regulatory review process would identify additional information needed to support regulatory determinations for the selected alternative. If this is the case, the additional information would be collected and provided to the regulatory authority.

A.4.12 Understanding the Purpose and Content of the Environmental Impact Statement and Its Relationship to Decisionmaking

A commentor asked who chose the five alternatives. Others commentors stated that the EIS process should be slowed down, with more time provided for commenting. A commentor asked who would issue the Final EIS as well as the ROD and SEQR findings, and another expressed concern that a decision had already been made. One commentor included requests for clarification of the responsibilities of DOE and NYSERDA as they relate to decisionmaking at the site and funding of the decommissioning work. A commentor suggested DOE should establish criteria to address the safe hand-off of responsibility for the site from DOE to NYSERDA. Another requested that DOE and NYSERDA work together to share in the cost and expertise required to effectively clean up the site. Commentors expressed concern about the criteria that the agencies would use in their decisionmaking. Concern was expressed that decisions would be made to minimize near-term cost or offset cost by accepting offsite wastes and would not adequately consider long-term hazards. Some commentors wanted NRC's role in the decisionmaking process clearly stated. Others want to be involved or kept informed about actions and decisions concerning the site.

Response: DOE, with input from NYSERDA and the cooperating agencies, has refined the definition of the alternatives. A sequence of steps is prescribed by NEPA and SEQR, including public involvement and comment periods (see Chapter 1, Figure 1–2). DOE and NYSERDA agreed to a 6-month public comment period for the Revised Draft Decommissioning and/or Long-Term Stewardship EIS, which exceeds the 45-day comment period required by CEQ regulations. In addition, in response to requests from the public, the comment period was extended another 90 days, making the public comment period for this EIS 9 months long.

As the EIS process has progressed, the various agencies involved in EIS preparation have developed a clearer understanding of the major regulatory requirements, including the criteria prescribed by NRC for decommissioning of WVDP and for license termination, along with RCRA regulations as they apply to the site. Chapter 1 of this Decommissioning and/or Long-Term Stewardship EIS contains information that clarifies the purpose of this EIS and the relationship between the Final EIS and agency decisionmaking.

The lead agencies have noted the concerns expressed in the comments, will keep the public informed through the EIS process, and will consider the comments expressed on impacts on the public, workers, and the environment in their decisionmaking.

A.4.13 Out-of-Scope Comments

Comments on the 1996 *Cleanup and Closure Draft EIS* that were considered "out of scope" were not addressed specifically in the *Decommissioning and/or Long-Term Stewardship EIS*. The term "out of scope" refers to comments that do not directly affect or pertain to the alternatives, affected environment or analyses performed as part of the preparation of this EIS. Comments related to the lead agencies' decision processes or the basis for selecting an alternative are considered out of scope because those issues will be addressed in the decision documents (i.e., the ROD or the Findings Statement) that follow the completion of this EIS. Comments relating to the funding or operation of WNYNSC were also categorized as out of scope. The following comments have been considered out of scope. Responses are provided following each comment.

1. Concerns were expressed about the criteria for decisionmaking, how alternatives could be evaluated or selected without fully understanding regulatory requirements, and how the alternatives compared with the requirements.

   Response: This EIS is only one of several factors that will be considered by decisionmakers when making decisions that will be announced in the ROD and Findings Statement. The bases for the decisions will be explained in those documents. This EIS provides a preliminary discussion of compliance with regulations in Appendix L, but regulatory compliance will be determined by the regulators during implementation of the selected alternative.

2. Concerns were expressed about the availability of funding and about the Federal Government unfairly burdening the State of New York; requests were made for financial assistance to local communities.

   Response: Funding decisions for activities at WNYNSC are made through Federal and New York State budget processes. While the analyses and results in this EIS may be used by the agencies to support the budget processes, discussion of those processes is not within the scope of an EIS, which is a document focused on identifying the environmental impacts associated with implementing alternatives for accomplishing a proposed action.

3. Request was made for funding for an unbiased technical consultant to serve on a citizen's committee.

   Response: Both DOE and NYSERDA have involved independent technical experts in the development and review of this Decommissioning and/or Long-Term Stewardship EIS and have met routinely through the course of its development with the cooperating agencies, the Citizen Task Force, and the general public in the vicinity of WNYNSC.

4. Request was made for a comprehensive operational plan and Program Evaluation Review Technique chart every 2 years.

   Response: A request for a periodically updated and published schedule of activities related to the implementation of the decision(s) coming out of the EIS process is not within the scope of the EIS analysis. As part of their ongoing site management responsibilities, DOE and NYSERDA will address mechanisms to involve and communicate with the public during implementation of the EIS decision(s).

5. Request was made for DOE to analyze compliance with treaty rights of the Seneca Nation of Indians.

   Response: The site is not on the Seneca Nation of Indian's land, so discussion of compliance with Seneca Nation of Indians treaty rights is not within the scope of this EIS. However, DOE does have a Memorandum of Agreement with the Seneca Nation of Indians regarding transportation of high-level radioactive waste and spent nuclear fuel across tribal land. On July 21, 2008, DOE sent a letter to the Seneca Nation of Indians requesting consultation regarding preparation of this EIS, and met with the Tribal Council on December 18, 2008, for the formal consultation. A public meeting on the 2008 Revised Draft EIS was held at the William Seneca Building on March 31, 2008, during which the Seneca Nation resolution stating the Tribe's position on the EIS was read. This resolution, submitted on the record as formal comment on the November 2008 Revised Draft EIS, completed the consultation process.

6. Request was made for the Seneca Nation of Indians to be included in cultural resource and traditional use surveys and cultural resource planning.

   Response: Activities analyzed in this EIS would occur primarily on the WNYNSC site. The State Historic Preservation Office will be consulted as necessary concerning specific compliance requirements and cultural resource preservation planning during activities implementing decisions that will be announced in the Record of Decision for this EIS. Consultation with the Advisory Council on Historic Preservation may also be required and extended to appropriate local historical organizations and interested individuals. Should any traditional cultural resources be discovered during these activities, representatives of the appropriate American Indian Tribes will be notified. This process is not a specific function of this EIS, however, the requirement for and status of such consultations is discussed in Chapter 5 of this EIS. Potential impacts on cultural resources from the proposed decommissioning alternatives are discussed in Chapter 4, Section 4.1.7, of this EIS.

7. A commentor suggested that cleanup criteria for radiological contamination should be set at background radiation levels.

   Response: Decommissioning criteria for the WNYNSC have been set by NRC in its License Termination Rule (10 CFR 20, Subpart E) and its Policy Statement on Decommissioning Criteria for the West Valley Demonstration Project. The License Termination Rule includes criteria for both unrestricted and restricted use of the site. The License Termination Rule and Policy Statement are discussed in Chapter 5, Section 5.2, of this EIS. A Decommissioning Plan for Phase 1 of the Phased Decisionmaking Alternative, the Preferred Alternative identified in this EIS, has been submitted to NRC and is currently under review.

8. A request was made for a low-income population representative to be added to a working group of agencies and be provided with technical assistance to participate.

   Response: Both DOE and NYSERDA have involved independent technical experts in the development and review of this Decommissioning and/or Long-Term Stewardship EIS and have met routinely through the course of the development of this EIS with the cooperating agencies, the Citizen Task Force, and the general public in the vicinity of WNYNSC. The NEPA process requires and incorporates public involvement through scoping and public meetings and allows for comment submittal (both oral and written) and consideration of those comments in preparing both the Draft and Final EISs.

9. It was suggested that disposition of radioactive wastes become a national program in which all appropriate Federal and state agencies work together as one organization to isolate nuclear waste as long as possible, to eliminate duplication of effort, and to avoid spending money needlessly.

Response: The focus of this EIS remains on the environmental impacts of decommissioning WVDP and the long-term management or stewardship of WNYNSC. Suggestions for different approaches to the issue of radioactive waste disposition are best suited to national, state, or local political processes.

10. It was suggested that after the site has been cleaned up, the land be developed into a tourist attraction with a national park and museum that focuses on the atomic age.

    Response: Future potential land uses for the site are being explored by NYSERDA.

11. It was suggested that safe disposal is not possible, and we should stop making nuclear waste.

    Response: This comment is beyond the scope of this EIS. Policies regarding nuclear waste are decided through national political processes. However, WNYNSC is not an active nuclear operations site. Radioactive wastes generated at WNYNSC now and in the future would result from site decommissioning and removal of wastes and facilities contaminated from previous nuclear operations.

12. A commentor suggested preparation of a supplement to the Draft EIS after the Preferred Alternative is selected, followed by an ecological risk assessment to address ecological impacts in more detail.

    Response: A Preferred Alternative was identified in the 2008 Revised Draft EIS, and as required by NEPA regulations, in this Final EIS. A screening level ecological risk assessment was performed for the 2008 Revised Draft EIS and has been refined for this Final EIS. Results of this assessment are described in Chapter 4, Section 4.1.6 of this EIS.

13. It was suggested that DOE and NYSERDA identify any short-term activities which, if not performed, could significantly increase the difficulty of site closure, for example, immediate efforts needed to prevent the spread of contamination in the North Plateau Groundwater Plume.

    Response: As reported at Citizen Task Force and quarterly public meetings, actions are being taken to increase the isolation of the North Plateau Groundwater Plume, the NRC-Licensed Disposal Area, and the Waste Tank Farm. The agencies have not, however, identified any actions which, if not performed, would significantly increase the decommissioning effort.

14. Transportation-related comments were made regarding the following: (1) the need for inclusion of design and safety detail on the high-level radioactive waste transportation containers; (2) selection of a transportation method and route; and (3) when and how the first "test" shipment of low-level radioactive waste via truck is going to take place, what prior involvement local representatives are going to have, and what advance notification will be made.

    Response: Potential impacts from transportation of wastes generated as a result of activities proposed in this EIS are addressed in Chapter 4, Section 4.1.12 and Appendix J of this EIS. Both rail and truck transport have been evaluated using routes selected using regulatory criteria for the specific waste type. Low-level radioactive waste is routinely shipped from WNYNSC, and is done so in accordance with Federal and state regulations, including those for advance notice, although advance notification is not required for most low-level radioactive waste shipments.

    No high-level radioactive waste is anticipated to be generated as a result of activities evaluated in this EIS. Disposition of high-level radioactive waste generated by previous activities at WNYNSC was evaluated in the Final Environmental Impact Statement, Long-Term Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Service Center, West Valley

(DOE/EIS-0081) (DOE 1982). Chapter 1, Section 1.6, of this EIS identifies other NEPA documents relevant to this EIS. A number of NEPA documents included in Section 1.6 address disposition and transportation of high-level radioactive waste. In particular, transportation of high-level radioactive waste has been addressed in the following NEPA documents: (1) Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250), February 2002; (2) Final Supplemental Environmental Impact Statement for Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250F-S1), June 2008; (3) Final Supplemental Environmental Impact Statement for Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada – Nevada Rail Transportation Corridor and Final Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250F-S2 and DOE/EIS-0369), June 2008).

15. Commentors requested that DOE make a commitment that the site will not become a dumping ground for other DOE, commercial, or imported radioactive or hazardous wastes. There were also inquiries about the availability of (and need for selection of) an offsite waste disposal area and removal of the WVNS (sic) from the Federal list of possible sites for a mixed waste repository.

    Response: From a DOE perspective, these concerns were addressed in the Final Waste Management Programmatic Environmental Impact Statement for Managing Treatment, Storage, and Disposal of Radioactive and Hazardous Waste (DOE/EIS-0200-F, May 1997) (DOE 1997). Table 1.6-1 of that document states that WVDP is designated as a waste site, but wastes from other sites will not be shipped there for treatment or disposal.

16. A request was made for setting required timeframes for regular inspections of site storage and temporary weather structures over excavation areas.

    Response: Official determination of timeframes for compliance inspections will occur through the regulatory review process, which will occur as part of the implementation of the selected alternative.

17. Commentors requested that DOE consider the special concerns and needs (including legal assistance, technical training, and managing potential problems related to waste) of the local communities.

    Response: Partially in response to these types of comments, NYSERDA established the Citizen Task Force, which has served both as a source of community input to the NEPA process and as a venue for DOE and NYSERDA to convey updated technical and status information related to this EIS. DOE and NYSERDA continue to provide financial assistance to help the Citizen Task Force review and comment on the information provided.

Some of these issues (e.g., clarification of responsibilities, considerations in decisionmaking, and review frequencies) may be addressed in the DOE ROD or the NYSERDA Findings Statement for the *Decommissioning and/or Long-Term Stewardship EIS*.

Table A–1, "Index of Commentors," lists the comment documents that were received, including the hearing transcripts, and identifies in which of the preceding summary categories or subcategories the comments were included.

Table A–1 Index of Commentors

		Comment Categories
Federal Agencies		
U.S. Department of the Interior Andrew L. Raddant	37	4.4, 4.9, 4.10, 4.11, 4.13
U.S. Environmental Protection Agency, Region 2 Robert W. Hargrove	106	4.1, 4.2, 4.3, 4.4, 4.2(7), 4.9, 4.9(1)(4), 4.10, 4.11, 4.13(5)
U.S. Nuclear Regulatory Commission Gary C. Comfort, Jr.	113	4.1, 4.2, 4.2(4)(8), 4.4, 4.5, 4.6, 4.8, 4.9, 4.10, 4.11
State and Local Officials, State Agencies, American Indian Tribal Governments, and Nongovernmental Organizations		
Allegany County Board of Health, Ronald Truax	40	4.9
Ashford Concerned Citizens, Machias, New York	72	4.1, 4.2, 4.2(4), 4.2(5), 4.3, 4.5, 4.9, 4.11, 4.12, 4.13(2)(3)
Biomedical Metatechnology, Inc., Irwin D. Bross	23	4.1, 4.2, 4.8, 4.9
Buffalo, New York, City Clerk's Office	38	4.5, 4.9
Cattaraugus County Legislature (New York) Donald E. Furman & Messrs. Felton, Fitzpatrick, Gowan, Haberer, Hall, Zimbardi, Ellis, Mack, Williams, Anastasia, Eade; Mrs. McLaughlin, Ms. Blake; and Ms. Ginter	32	4.9, 4.13(2)
Cattaraugus County Legislature, Little Valley, New York, D. John Zimbardi	107	4.1, 4.2, 4.8, 4.9, 4.13
Cattaraugus County Legislature, Little Valley, New York, Richard E. Haberer	83	4.9(3), 4.13(2)
Chenango North Energy Awareness Group (Chenango North) South Plymouth, New York, Susan B. Griffin	44	4.3, 4.9, 4.13
Citizens Against Radioactive Dumping, Cincinnatus, New York, Jim Weiss	91	4.2, 4.3, 4.9
Citizens' Environmental Coalition, Albany, New York, Anne Rabe and Michael Purcell	64	4.3, 4.9
Coalition on West Valley Nuclear Wastes, Raymond C. Vaughan, Carol Mongerson, Betty J. Cooke, James L. Pickering	66	4.9, 4.13(4)
Coalition on West Valley Nuclear Wastes, East Concord, New York, Carol Mongerson	78	4.1, 4.2, 4.2(1) 4.3, 4.4, 4.6, 4.7, 4.9, 4.9(3), 4.11, 4.13(9)
Coalition on West Valley Nuclear Wastes, Raymond C. Vaughan	98	4.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8, 4.11
Coalition on West Valley Nuclear Wastes, Raymond Vaughan	8	4.1, 4.5, 4.6, 4.9, 4.11, 4.12
Coalition on West Valley Nuclear Wastes, James Rauch	76	4.1, 4.2, 4.4, 4.9, 4.9(3), 4.11, 4.13, 4.13(2)
Concerned Citizens of Clarence, Inc., Pat Melancon, Lois Bono, Robert McLean, Aldine Tarbell, Calvin Tarbell	17	4.9(1)(3)
Environmental Coalition on Nuclear Power, State College, Pennsylvania	108	4.2, 4.3, 4.9, 4.12, 4.13, 4.13(2)
Great Lakes United, Margaret Wooster	42	4.3, 4.8, 4.9, 4.13
New York State Department of Environmental Conservation	94	4.1, 4.2, 4.2(4)(6)(7)(9), 4.3, 4.4, 4.5(4), 4.7, 4.8, 4.10, 4.11, 4.12, 4.13
Niagara Swim League, Colin J. Adams	89	4.9

		Comment Categories
Nuclear Awareness Project, Ontario, Canada, Irene Kock	22	4.2, 4.3, 4.5, 4.13(4)
Nuclear Information and Resource Service, Diane D'Arrigo	80	4.3, 4.9, 4.9(1)(3), 4.13
Presbyterian Women, Presbytery of Western New York, Ruby Sentman	82	4.9
Seneca Nation of Indians, Michael W. Schindler	109	4.1, 4.2, 4.3, 4.4, 4.5, 4.7, 4.9, 4.9(1)(2), 4.10, 4.11, 4.12, 4.13, 4.13(2)(6)
Springville Youth, Inc., Springville, New York, E. Joseph Giroux, Jr.	68	4.9
Square Y Consultants, Lynn C. Yuan	67	4.1, 4.4, 4.6
State of New York Environmental Protection Bureau, William S. Helmer	99	4.11, 4.12
State of New York, Office of the Attorney General, William S. Helmer (with comments from the New York State Law Department)	112	4.3, 4.11
The State University of New York at Buffalo, Fred M. Snell	39	4.3
The State University of New York at Buffalo, Department of Ecology, Robert Jacobi, John Fountain	93	4.1, 4.4
Town of Ashford, New York, William King	75	4.1, 4.12, 4.13(2)
Town of Concord, Springville, New York	63	4.9
Town of Ellicottville, New York, John Widger	104	4.9, 4.12, 4.13(2)
Town of Ellicottville, New York, Rodney G. Sergel, Cathy Stokes	69	4.9
Village of Springville, New York, Deborah A. Murphy	31	4.9
Individuals		
Betty J. Cooke	10	4.9
Betty Stephan	74	4.9
Beverly Horozko	19	4.3, 4.9, 4.9(1)
Beverly Spross	96	4.2, 4.9
Brenda Ticen Runk	25	4.9
Charles Couture	34	4.13(2)
Cynthia Dayton	79	4.1, 4.2, 4.3, 4.9
Delone Scharf	15	4.9
Dennis and Violet Dick	9	4.9, 4.9(1)(2), 4.13
Dennis and Violet Dick Norbert and Gladys Kruse Donald and Vivian Mosher Jeff Dick Sonya Vura Norman Uliedeman Robert Kruse Susan Dick	35	4.9, 4.13
Donna Ebel	30	4.9
Elizabeth A. Obad	29	4.9
Elizabeth and Dave Buckley	70	4.2, 4.9, 4.11
Elizabeth Kay Keffe	4	4.9(4)

		Comment Categories
Emil and Dorothy Lacs	14	4.9
Emil Zimmerman	101	4.8, 4.9
Gail Hall	5	4.8, 4.9
Gary R. and Sharon J. Mathe	71	4.2, 4.9
Gary W. Bauer	2	4.9, 4.9(1)
H. M. Gerwitz	97	4.3, 4.7, 4.9, 4.13(2)
Helen Feraldi	28	4.9, 4.13(11)
Ivan S. Fifield	65	4.9
James L. Pickering	62	4.1, 4.2, 4.3, 4.4, 4.9, 4.11, 4.12, 4.13
James R. Wolf	18	4.11, 4.12
Janis J. Lathrop	33	4.9(3)
Jenny Weide and Craig R. Weide	26	4.9(1)
Jerry S. Helfer	3	4.9, 4.9(3)
Joanne E. Hameister	85	4.1, 4.9
John A. Pfeffer	84	4.1, 4.2, 4.2(5), 4.9, 4.12, 4.13(2), 4.13
John M. Burn	24	4.3
John M. Cairns and Dorothy Cairns	61	4.5, 4.9
John T. Thompson	20	4.13
John T. Thompson	21	4.13
Kathleen Duwe	105	4.9
Kathy Hussein	27	4.2, 4.9
Kathy Kellogg	81	4.1, 4.13(8), 4.5, 4.9
Kim Labarbera	59	4.9
Linda Spors	60	4.9
M. John Winston	92	4.9
Marianne Isbister and David Isbister	110, 111	4.9
Mary Plonka	43	4.2, 4.9, 4.12
Maureen Kelley	16	4.9(3)
Michael Kelly	1	4.3
Michael P. Wilson	95	4.4, 4.5, 4.7, 4.9, 4.9(1)
Nancy E. Ryther	13	4.9, 4.9(1)(2)
Philip D. Feraldi	41	4.9
Phyllis J. Hanson	6	4.9, 4.13(11)
Richard Steinberg	11	4.2, 4.9
Robert C. Hurd	102	4.2, 4.3, 4.5, 4.8, 4.9, 4.9(1)(3)(4)
Robert L. Potter	73	4.1, 4.9, 4.10, 4.12, 4.13(2)
Robert W. and Barbara M. Engel	90	4.9
Ruth M. Stratton	100	4.9
Sally Coleman and Sara B. Coleman	49	4.9
Sharon Myers	36	4.9
Stephen Koscherak	7	4.9, 4.9(1)
Suzanne M. Pfleger	12	4.2, 4.9(1)(2)
The Dunbar Family	114	4.9

		Comment Categories
Campaigns and Petitions		
Strongly Oppose Alternative III		4.9, 4.9(1)
Margaret J. Leyonmark	58	
Glenda Leyonmark and Pete Leyonmark	46	
Margaret E. Woolley	47	
Mary Stalskesky	48	
Elizabeth E. Winegar	50	
Gordon (last name illegible)	51	
Marilyn Monckton	52	
Dorothy F. Harrington	53	
Kase D. Danforth	54	
Wayne F. Nolan	56	
Donald W. Robinson	57	
Timothy Miller	45	
Support for Alternative I		4.9, 4.13(4)
Coalition on West Valley Nuclear Wastes		
Nelson W. Hegeman	86	
Thomas P. O'Conner	87	
Roberta Hegeman	88	
Sandra P. Galac	103	
Public Hearings, August 6, 1996		
10:00 Session	115	
Bauer, Gary H.	115	4.9, 4.13(9)(15)
Dibble, Bill	115	4.9, 4.13(10)
Margrey, Kenneth	115	4.9, 4.13, 4.13(15)
Snell, Fred	115	4.3, 4.13(9)
2:00 Session	116	
Burlingham, Gilly	116	4.9
Gifford, Gladys	116	4.1, 4.11
Keil, Angelici	116	4.9
Kennedy, Elizabeth	116	4.9
Lambert, Leonore	116	4.9
Mongerson, Carol	116	4.1, 4.2, 4.2(1), 4.3, 4.7, 4.9
7:00 Session	117	
Blake, Karen	117	4.9
Chisolm, Larry	117	4.9
Dibble, Bill	117	4.9, 4.13(14)
Gilpin, George	117	4.5, 4.6, 4.8, 4.9
Goldstein, Andrew	117	4.13(11)
Kaiser, Sam	117	4.9
Lercher, Aaron	117	4.9
Mongerson, Carol	117	4.9
Pfleger, Sue	117	4.6, 4.9
Vaughan, Ray	117	4.1, 4.5, 4.7, 4.9, 4.13(1)
Vaughan, Ray	117	4.9
Shelly, Patricia	117	4.9

A.5 References

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