

## General comments as of 5/5/2009

These will be integrated into the comments from the February document "Overarching Goals and Core Response" discussed in February.

Possible Location	Status	Comment
Preamble	General agreement to be edited	If the Phased Decisionmaking Alternative is selected, a FINAL EIS and ROD cannot be issued. A Phased Alternative would be tantamount to an Interim Remedial Action. A determination of impacts for issue of a FINAL EIS is not possible without a comprehensive determination of action and subsequent impacts.
General comments section or policy comments	To be discussed	<p>The DEIS regularly mentions that the impacts for the preferred alternative lie somewhere between the close in place and complete removal alternatives. Basically, it assumes that the possible range of impacts have been identified and defined by the two extremes. However, on page 2-45, under the heading of Evaluations to Determine the Phase 2 Approach, the first bullet states that the approach will be based upon "The results of analysis to estimate the impacts of residual radioactivity that would remain after completion of the Phase 1 activities."</p> <p>It may be academic, or just a bad choice of wording, but there seems to be an inherent contradiction in assuming that all the possible impacts have been identified while saying that the direction of Phase 2 is based upon some future impact analysis.</p>
General Comments	<b>New as 5-6-2009</b>	<p>We are concerned that, if the Phased-Decision Making Alternative is selected and the Phase 1 work is completed, that the DEIS states only that DOE will only be required only to perform "operations, monitoring and maintenance....lesser in magnitude to what is currently in place at the site." (Page C-115, Paragraph C.3.3.)</p> <p>The DEIS regularly refers to the "Close in Place Alternative" impacts as either the upper or lower limit for impact assessment. We are unable to find where the document specifically states that any WMA's not addressed in Phase 1 will be addressed, as a minimum, as specified in the Closed in Place alternative. While existing laws may dictate that course, given the unknowns for final disposition of certain waste streams, and the uncertainties associated with the passage of 30 years time, the document should specifically state that "Close in Place", and not "No Further Action", will be the default Phase 2 option should other options involving more cleanup actions not be selected. That being said the CTF does not support the Close in Place option.</p>

General comments section or policy comments	√	<p>DEIS can be interpreted as a rationale for Site Wide Removal for a number of reasons:</p> <ul style="list-style-type: none"><li>• Institutional controls will probably not hold for as long as expected</li><li>• Dose modeling seems understated</li><li>• Erosion estimates seem understated</li><li>• Impacts to engineered barriers can be unpredictable</li><li>• There is an inherent danger when dealing with radionuclides and hazardous materials</li><li>• Any event that causes a major release of material from the site will contaminate the water supply for most of Western New York</li><li>• Monitoring should be increased as the work progresses</li></ul>