

To: West Valley Citizen Task Force  
From: Bill Logue, Citizen Task Force Facilitator  
Date: March 19, 2018  
Subject: **Summary of the March 2, 2018 Conference Call of the Ad Hoc Scoping Work Group**

## **CTF Members and Alternates Attending**

Barbara Frackiewicz, Paul Kranz, Ray Vaughan. Guest: Andrew Goldstein assisting Paul Kranz

## **Agency Participants**

**Department of Energy (DOE):** Bryan Bower

## **DISCUSSION**

The CTF members discussed the SEIS comment process and potential topics. Mr. Bower provided information as requested during the call. At the conclusion of the call, the group agreed that the following items be raised in discussion during the CTF March meeting:

- **Restricted v. Unrestricted Release.** Assess the sentiment of the group with respect to restricted or unrestricted release. Those on the call favored the latter. If restricted release is an alternative that is considered, the CTF should offer recommendations on partial exhumation. In discussing the range of alternatives and prior to taking any position, the CTF should review the position stated in the 1998 Final Report.
  - Unrestricted release is important because it provides greater potential for site re-use and economic development, which in turn may serve as an economic “engine” for the local community and region. Unrestricted release would also facilitate reuse of site infrastructure improvements which has been substantial during the course of the project and is unique for the local area.
  - Later in the discussion Mr. Bower reminded the group what was contained in the Notice of Intent and the role of the scoping process in determining what will be analyzed in the SEIS. The SEIS will analyze each end of the spectrum – no action to site-wide removal – and may include other intermediate/hybrid alternatives including close-in-place, partial exhumation, and delayed exhumation. For example, partial exhumation might target longer-lived radionuclides for removal and allow much of the shorter-lived cesium-137 and strontium-90 to decay in place to essentially undetectable levels during the next 300 years or so. For alternatives other than unrestricted release, there is an assumption of loss of institutional controls at some point in the future. Depending on the alternative, passive and active controls may be included, and Mr. Bower also mentioned options such as re-routing of streams. In looking at hybrids and the impacts and costs, Neptune and Company will break down source areas into units such that a cost benefit analysis can be performed that includes selective removal or delayed removal. A hypothetical situation is a cost comparison of full removal with selective removal addressing various cost increments and improvement in performance. For example, is there a scenario where 80% of the risk could be removed for 20% of the cost?
  - Questions about unrestricted release and ongoing funding were raised. If DOE and NYSERDA made a commitment to perform full exhumation so that unrestricted release could be achieved, what if there was a future loss of funding? Would this cause delays that would increase the total cost? The former question depends on future Congressional action and cannot be answered with certainty. Regarding the latter question, it was noted that part of the cost of full exhumation (even without unexpected delays) would be the so-called “hotel costs” needed to maintain some level of site facilities for the duration of the exhumation work.
- **Including Community Character and Defining Community.** In the SEQRA process, but perhaps not under NEPA, community character is one of the criteria to be addressed. For any alternatives where wastes are left in place, the suggestion is that the impacts on community character should be considered in at least three communities:
  1. Ashford residents and business with respect to the stigma of radioactive waste;
  2. The Seneca Nation, especially if detectible radioactive contamination will move through Cattaraugus

Creek, and;

3. Erie County/Buffalo should detectible radioactive contamination move through Cattaraugus Creek and along the waterfront.

The question was also raised as to whether this analysis should include Canada. In addition, it was suggested that there may be other “non-tangible” impacts to nearby communities and natural resources (including the Great Lakes, for example) that could be identified and should be vetted as scoping issues for any site closure alternative other than full exhumation.

- **MEI Dose Analysis.** The dose analysis to the Maximum Exposed Individual (MEI) scenario should include the resident farmer or other person living on the SDA or NDA.
  - As possible guidance on the magnitude of such dose, the question was raised as to whether measurements could be taken in the near future for radon, iodine and other chemically volatile radionuclides under the burial ground geomembrane covers. Mr. Bower was not sure about the gas permeability of the XR-5 material and indicated he would inquire about that and as to whether any current sampling measured daughter products of the radionuclides mentioned.
- **Other Issues**
  - Mr. Vaughan stated that in the future he might consider suggesting that the CTF could suggest testing be performed in the injection wells (dating from about 1970, located east of Buttermilk Creek).
  - As a possible climate-related scoping issue, questions were raised about prevailing winds off Lake Erie and associated precipitation in the “shadow” of the lake, particularly whether the winds and/or precipitation levels have changed in the past 1000 years or so.