

June 30, 2003

West Valley
Citizen
Task
Force

Daniel Sullivan
NEPA Compliance Officer
WVDP WMEIS
10282 Rock Springs Road, WV-49
West Valley, NY 14171-9799

Dear Mr. Sullivan:

The West Valley Citizen Task Force (CTF) has already expressed concerns about splitting the environmental impact statement (EIS) for the West Valley site, since both the National Environmental Policy Act (NEPA) and the West Valley Demonstration Project (WVDP) Act seem to call for one process.

Now that the EIS has been split, we believe the decommissioning EIS will be the most important issue to be addressed. This waste management EIS appears to deal with lesser issues. We trust it will not distract the Department from the more important task of completing the decommissioning EIS.

As we expressed in our scoping comments in 2001, we continue to be concerned that the decommissioning phase could get bogged down if the DOE/NYSERDA disagreements continue.

There are two issues in Alternative B that we would like to address. We disagree with the proposal to put grout into the underground tanks. However retrievable the grout may seem at the moment, it will prejudice the choices in the decommissioning EIS. The grout would make future tank removal more difficult, and would unfairly facilitate in-place closure of the tanks.

Our other concern with Alternative B is the proposal to use interim storage at other sites. Interim storage will involve many more shipments, costs and risks, and create unnecessary public controversy.

We call your attention to an obvious oversight. Figure 3-5 improperly excludes residents of Canada living within a 50-mile radius of the site. The map suggests that over 500,000 people live on the American side of the Niagara River and places a zero on the Canadian side. The figure should be revised to show more than 100,000 people living between Port Colborne, on Lake Erie, and Niagara Falls, Ontario.

Very truly yours,



Lee Lambert
on behalf of the
West Valley Citizen Task Force

