

Expedited "Way Ahead"

West Valley Citizen Task Force

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New York State Energy Research and Development Authority

Expedited "Way Ahead"

EIS Dilemma:

EIS modeling needs additional scientific study

EIS laden with controversial issues with significant policy implications

- HLW tank closure / exhumation
- Waste Incidental to Reprocessing
- Burial ground closure / exhumation
- WVDP Completion
- Long-term Stewardship

Final decommissioning decisions at West Valley will likely be delayed:

- Cutting edge science
- National policy implications for federal agencies and environmental groups
- NYS / DOE disagreements
- Court challenges to decommissioning EIS decisions may stop or impede work

Issue: Managing EIS risks so that important clean-up work can proceed

NYSERDA Proposal:

2 EISs

Initiate another EIS or EA for agreed upon removal actions

Facility Removal & Groundwater Remediation EIS

Continue with Decommissioning EIS

Decommissioning and/or Long-Term Stewardship EIS
(reduced scope)

NYSERDA Proposal:

Ongoing Decommissioning and/or Long-Term Stewardship EIS

Removal of MPPB & Ancillary Facilities Remediation of Groundwater Plume Balance of Site Removal Actions

HLW Tanks NDA SDA Residual Soil & Groundwater Contamination

Removal Actions in the "Way Ahead" Facility Removal & Groundwater Remediation EIS

Deferred Decisions in the "Way Ahead" Decommissioning and/or Long-Term Stewardship EIS

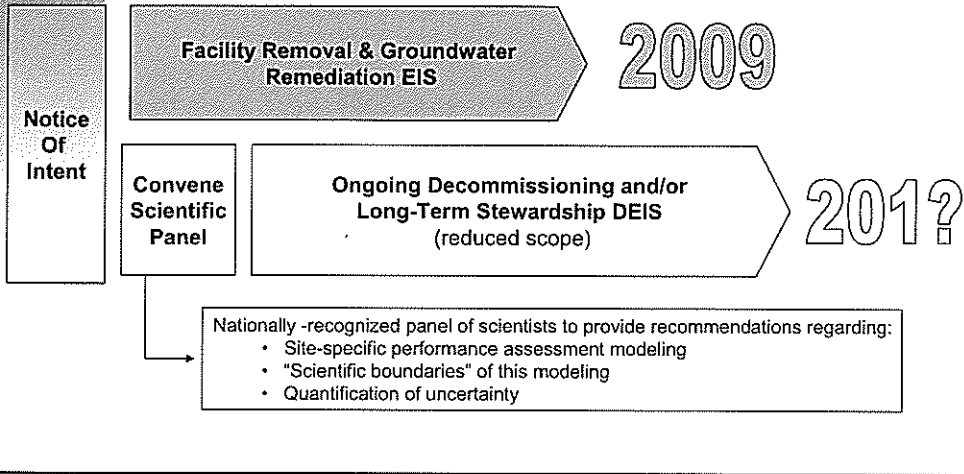
- Areas of Agreement
- Significant Environmental Remediation
- Source term removal actions
- Provides jobs
- Provides justification for continued funding
- Less likely to be held up in court

- Controversial Areas
- Areas Requiring More Study
- Areas of Disagreement
- WVDP Completion Issues
- Responsibility Issues
- Performance Assessment Modeling Issues
- Decommissioning Issues

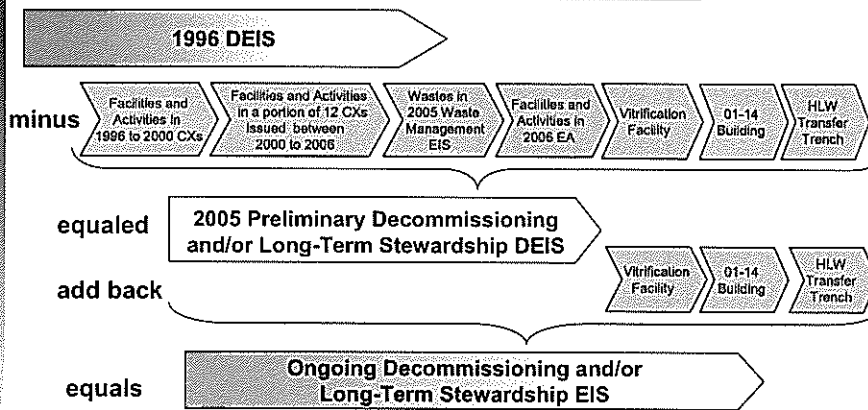


How it Would Work:

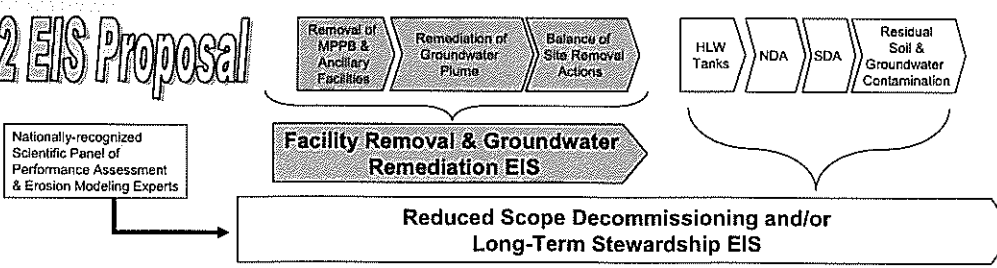
2 EISs



EIS Scope Has Changed Many Times



2 EIS Proposal



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Advantages:

Decouples agreed upon work scope from controversial policy and technical issues associated with decommissioning.

Provides DOE and contractor with work scope for several years...

- groundwater plume remediation
- process building removal
- jobs
- funding

Decommissioning EIS process would proceed with the benefit of recommendations from a mutually agreed upon panel of nationally-recognized scientific experts

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Discussions with Agencies:

NYS Governor's Office and NYS Department of Environmental Conservation

- 100% supportive
- NYS proposal

U.S. Department of Energy

- Interested in stakeholder input
- Concerned about improper segmentation challenge

U.S. Environmental Protection Agency

- Sympathetic to decoupling Main Process Plant Building removal from long-term performance assessment.
- Offered NEPA analysis support

U.S. Nuclear Regulatory Commission

- Concerned about proceeding with process building removal without performance assessment – we would be proceeding at risk
- DOE / NYSERDA decision
- Supportive of the creation of a scientific panel for the decommissioning EIS

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Discussions with Various Stakeholders:

Town of Ashford Representatives

- Interested in progress toward clean-up
- Offered support

Cattaraugus County Representatives

- Interested in progress toward clean-up
- Supportive of proposal – offered to pass a resolution

West Valley Coalition on Nuclear Wastes

- Sympathetic to our desire to proceed with cleanup
- Concerned about protecting their interests
- Would like to have further discussions with NYSERDA and DOE

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Next Steps:

Want to hear CTF's reaction to the proposal.

Discussions at Interagency Roundtable on July 10th.

DOE response to proposal.

In the meantime, NYSERDA is willing to discuss this idea with anyone who is interested.