

534 Delaware Ave., Suite 302
Buffalo, NY 14202
December 20, 2019

Karyn Hanson
NYSDEC Headquarters
625 Broadway
Albany, NY 12233
Karyn.Hanson@dec.ny.gov

Re: Water withdrawal permit to U.S. Dept. of Energy (DOE), application ID 9-0422-00005/00112

Dear Ms. Hanson:

Thanks for your reply dated December 19, 2019. We may have to agree to disagree on whether 6 NYCRR 601.10(e)(10) has been met with respect to the “analyses of results” that are part of the required report. As pointed out in my comments, there are major contradictions (orders of magnitude) between the generally accepted hydrologic characterization of the West Valley site and the “analyses of results” submitted with the required report. The contradictions involve both the thickness and the hydraulic conductivity of the weathered bedrock that is assumed to deliver most of the water to the two withdrawal wells. Perhaps, as you suggest, the resolution of such hydrologic contradictions is beyond the scope of what an applicant is typically required to provide as support for a withdrawal permit – but resolution is certainly needed in the larger context of the West Valley site closure decisions that DOE and NYSERDA are preparing to make. I appreciate DEC’s ongoing support role in this complex decisionmaking process and recognize that much of the work is outside the immediate scope of your Division.

I hereby withdraw my objection to the issuance of the water withdrawal permit.

Sincerely,



Raymond C. Vaughan, Ph.D., P.G.
Professional Geologist/Environmental Scientist

cc: Bryan Bower, U.S. Dept. of Energy
Paul Bembia, NYSERDA
Amy Snyder, U.S. NRC
West Valley Citizen Task Force