

Jan.31, 2013

Memo to Moira Maloney, DOE &  
Lee Gordon, NYSERDA

From Barbara Warren, Diane D'Arrigo, Joanne Hameister and Lynda Schneekloth

Re: Agenda for February Quarterly Public Meeting

We are writing to make recommendations for the Agenda. The November QPM was definitely an improvement over previous meetings with more substantive issues discussed. We appreciated the discussion of the Characterization, Sampling and Analysis Plan (CSAP) work completed thus far and would like to continue that discussion.

#### Recommendations

- Presentation of the Characterization, Sampling and Analysis Plan (CSAP) report that was due Dec. 2012, on activities to date and particularly on next scheduled activities. Please provide a copy of the report ahead of time.
- Science Panel (ISP) Progress Discussion
  - a) Report on Erosion Work ( We understand the Agencies are planning to discuss this.)
  - b) Report back from ISP on their response to our recommended list of Phase I studies. See Attached List, provided to DOE & NYSERDA in Mar. 2011. Agencies said they would refer to the ISP.
- Plans for HLW Canisters An in-depth discussion of the plans for decontaminating and moving the HLW canisters, preparation of the pad, the casks etc. The Citizens Task Force (CTF) was requesting this presentation for their March meeting, however this is the kind of substantive presentation that should be provided to everyone at a QPM.
- Project Updates
  - Status Report on Engineered Barriers & Exhumation workgroups
  - Report on the effectiveness of the Permeable Treatment Wall
- Air Monitoring was also discussed at the last QPM, although we were not provided with any handouts on this topic. We would appreciate a written document describing the air monitoring program underway now and planned for before, during and after the demolition of the reprocessing building and placement of the high level radioactive logs outside the building. Also please let us know if and how this information will be publicly reported in as close to real time as possible.

Regarding the Climate Change Guidance document, we intend to submit comments on this document.

- a) Soil erosion
- b) Groundwater flow and contaminant transport
- c) Catastrophic release of contamination and impact on Lake Erie
- d) Slope stability and slope failure
- e) Seismic hazard
- f) Probabilistic versus deterministic dose and risk analysis
- g) Alternate approaches to, costs of, and risks associated with complete waste and tank exhumation
- h) Viability, cost, and benefit of partial exhumation of waste and removal of contamination
- i) Exhumation uncertainties and benefit of pilot exhumation activities
- j) In-place closure containment technologies
- k) Engineered barrier performance
- l) Additional characterization needs
- m) Cost discounting and cost benefit analyses over long time periods

- During the EIS process, DOE claimed it did not have enough data to make a full cleanup decision, so collectively the studies must provide enough scientific information to help us make a decision about exhumation.
- Real actual pilot exhumation of waste, not a paper exercise (including methods).
- Climate change and severe weather events could impact items a-d in unusual ways. Climate change was assumed not to occur for 10,000 years in the recent EIS. Studies need to make up for this notable deficiency during Phase I.
- Emergency Preparedness, Prevention and Response are subjects very important to public involvement, trust and protection of the public from harm. Clear and defensible plans must be developed around likely emergencies at this site. This is a study with an immediate activity—and implementation at the site.
- Characterizing site contamination, sampling and analyses must evaluate adequately major site facilities-- High Level Waste (HLW) tanks, Nuclear Regulatory Commission Disposal Area (NDA) and State Disposal Area (SDA)-- and associated contamination issues. If phase I studies are not now planned to address these facilities, this needs to be corrected.
- Improved long-term analysis of all factors that impact containment of site radioactive materials and improved exposure and dose assumptions. Costs of Cleanup Delays. Costs of early cleanup of the spill associated with the strontium plume versus ultimate actual costs of planned cleanup and long term maintenance, including useful life and replacement of permeable treatment wall.

- Analysis of the efforts needed to adequately protect the Sole Source aquifer
- Better characterization of sediment in creeks and movement of contamination off site, particularly via the Cattaraugus Creek and impacts to the Seneca nation territory.
- More realistic estimate of long term containment costs vs. early exhumation of buried wastes
- Analysis of achieving regulatory compliance with all relevant standards including 40 CRF 191.
- All modeling must be grounded using real, on-site conditions as input parameters. We need to understand the basic conceptual models and ensure that they represent likely future conditions.
- Modeling of Groundwater and contaminant transport. The significance of subsurface contamination must be better accounted for in relation to risks to the public.
- Steps or methods in developing exposure, dose scenarios and derived concentration guideline level values for radionuclides (DCGLs) must be fully described for public understanding and all assumptions documented, to support the claim that conservative assumptions have been used.
- All radionuclides and daughter products should be included in risk estimates.
- Drinking water must be given greater importance in exposure and dose scenarios.
- The lack of conservatism in analyses thus far and the underprediction of actual and future risks is a major public concern. For example we don't believe assuming zero erosion or basing risk analysis only on existing contamination are conservative assumptions.

**From:** Barbara Warren [REDACTED]

**Sent:** Thursday, January 31, 2013 10:34 AM

**To:** Moira Maloney; Lee M. Gordon

**Cc:** Bryan Bower; Paul J. Bembia

**Subject:** Memo regarding Feb QPM Agenda

Moira & Lee,

We have attached a memo regarding recommendations for the February QPM Agenda.

Thank you,

Barbara Warren