

**From:** Barbara Warren [REDACTED]  
**Sent:** Tuesday, March 19, 2013 8:20 AM  
**To:** Moira Maloney; Lee M. Gordon  
**Cc:** Bill Logue; Lynette Bennett; Dhananjay Rawal  
**Subject:** QPM 2/27/13

Dear Moira & Lee,

Please see attached memo.

Thank you

Barbara Warren

March 19, 2013

Memo to Lee Gordon, NYSERDA & Moira Maloney, DOE

From Barbara Warren, Joanne Hameister and Diane D' Arrigo

Re: Quarterly QPM February 27th

Since the Agencies have had difficulty handling our memos when they deal with both technical and public process issues, we will try to separate them in this memo to the extent possible. Section A deals with the Public Process, and Section B deals with the Technical Issues.

Lee Gordon's presentation on the ISP review of the Erosion Working Group recommendations was an example of the intersection of technical and public process issues.

## **A. Public Process**

### **QPM Presentations**

#### **ISP review of the Erosion Working Group recommendations**

While the presentation certainly was about technical issues, Lee's presentation is most important because of the way he handled the public process. It is illustrative of the way all presentations should be handled. Lee covered the facts: the What, the How, the Implications and What happens next. His presentation was both honest and straightforward, even though there necessarily had to be uncertainty regarding the future for phase I studies. Lee described a situation in which the Science Panel identified significant problems with the planned erosion work, with the charge to the work group and with the work plans. As a result the Agencies have put a hold on all workgroup activity, including the engineered barriers and exhumation workgroups, and will be evaluating how to proceed. Even though Lee did not tell us exactly what the Agencies will be doing to address these problems, we left the meeting feeling informed, about the presentation and what to expect in the future. It is also true that we want there to be a credible scientific process, so if the Agencies are trying to improve the scientific process, we are supportive.

This is exactly how all presentations to the public should be. Unfortunately we find that most presentations are scrubbed of most useful information and we have to be prepared to ask as many questions as we can fit in just to obtain basic information. We feel like we are always "pulling teeth" to arrive at the truth. We urge the Agencies to use this presentation as a model.

## **The HLW Canister Relocation & Storage Project**

We were glad to receive an overview of this important project. Unfortunately, the difficulties associated with this project and the methods that will have to be employed were not adequately discussed. This project is a critical path that needs to be completed in order to begin addressing the plume. We recommend a future more forthright presentation at a QPM on this important project with a lot more detail.

### **QPM Agenda**

We sent a memo about the Quarterly meeting agenda asking for certain items. The reply we received indicated that 3 of our requests would be honored. However, in reality 2 of the 3 were actually summarily dismissed-- status of work under the CSAP (Characterization, Sampling and Analysis Plan) and an update on the permeable treatment wall.

**CSAP--** We have not received an overview of this entire project and what is being done when. A key report is not done yet. The next planned activities could have been described at the Quarterly meeting. Instead the DOE inserted a incredibly brief report into the UPDATE section of the meeting. The DOE has told us in multiple ways that the public has no role in the CSAP, and we are not pleased.

**The North Plateau Permeable Treatment Wall.** The Plume is a significant issue and the 2011 ASER report shows increasing concentrations in the plume beyond the PTW. There is reason for public concern and for us to request more information.

This was also a brief report as part of the UPDATE. However, Bryan Bower, informed us that he really couldn't provide any information on the PTW until a key report was finished in June-- this would mean it couldn't even be presented at the May QPM.

Yet in the very brief report at this QPM, the DOE reports a 75% decrease in strontium concentrations in down-gradient wells. The Department cannot have it both ways-- it either has information or it doesn't.

If DOE has sufficient detailed information to be able to calculate the decrease in concentration, then that information should have been provided at the meeting. If you don't have that detailed information, because the report is not finished, why are you telling us there is a 75% decrease?

### **Public Participation via Web & Phone**

There have been continuing difficulties regarding sound quality for those attending over the phone. Essentially they are not hearing everything at the meeting. We recommend a portable microphone be used for audience questions and comments.

## **B. Technical Issues arising from this Meeting**

### **Erosion Working Group**

We don't entirely understand why erosion experts should be limited to only studying gully erosion. If massive land movements such as landslides, slumping, etc. are handled in another workgroup such as that looking at seismic events, will that workgroup have the necessary expertise?

### **Work Practices & Air Monitoring**

We would like to better understand all the work practices used for demolition and whether they are all utilized for every demolition or only selectively. We believe there should be daily monitoring for particulate matter-- PM 10 and PM 2.5 at the work site in addition to radiological monitoring. We continue to want offsite air monitoring readings in real time.

### **The Strontium Plume**

We believe that an assessment should be done soon regarding remediation approaches to address the strontium plume that is beyond the permeable treatment wall.

### **The HLW Canister Relocation & Storage Project**

In order to ensure an adequate public process we recommended a more thorough presentation at a future QPM. However, in order to ensure a carefully considered project design and methodology we recommend that additional agency personnel be asked, along with interested members of the public to participate in a detailed discussion of the plans for this critical path. This would be in the interest of avoiding potential problems by having fresh eyes on the plans.

### **Exhumation at the NDA & SDA**

We are recommending exhumations at the 2 radioactive waste burial grounds, NDA & SDA. In order to accomplish this objective we recommend, that the placement of the storage pad not be placed in a way that would interfere with excavation activities .

In addition, the concrete pad associated with the canister relocation should be sized to accommodate additional casks to enable the storage of HLW that is exhumed from on-site. This in no way implies the acceptability of any importation of radioactive waste from elsewhere. The West Valley site always was a terrible site for handling any hazardous materials , because it is highly erodible. Removing waste from unlined pits and trenches will decrease the potential for spread of radioactive contamination at the site. Importing additional waste material would only increase the risks at the West Valley.