



Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory

05-CAB-016

January 25, 2005

Rick Provencher
 Assistant Manager for Environmental Management
 U.S. Department of Energy, Idaho Operations Office
 1955 Fremont Avenue, MS 1220
 Idaho Falls, ID 83415-1220

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Subject: **INEEL CAB Recommendation #119 on the Cleanup and Closure of the Radioactive Waste Management Complex**

Dear Mr. Provencher:

The Site-Specific Advisory Board (SSAB) for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

Attached is the INEEL CAB's recommendation #119, developed through consensus at the CAB's January 2005 meeting, transmitting comments on the cleanup and closure of the Radioactive Waste Management Complex.

Thank you, in advance, for your prompt response.

Sincerely,

Larry Knight, Vice Chair
 INEEL CAB

cc: Elizabeth Sellers, DOE-ID
 Paul Golan, DOE-HQ
 Jeff Perry, DOE-ID
 Sandra Waisley, DOE-HQ
 Governor Dirk Kempthorne
 Larry Craig, U.S. Senate
 Mike Crapo, U.S. Senate

Mike Simpson, U.S. House of Representatives
Butch Otter, U.S. House of Representatives
Robert L. Geddes, President Pro Tem, Idaho Senate
Gary Schroeder, Chair, Idaho Senate Resources and Environment Committee
Bruce Newcomb, Speaker, Idaho House of Representatives
Bert Stevenson, Chair, Idaho House Resources and Conservation Committee
Dell Raybould, Chair, Idaho House Environmental Affairs Committee
Shannon Brennan, DOE-ID
Bill Leake, DOE-ID
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**Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory**

Cleanup and Closure of the Radioactive Waste Management Complex

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) focused its November 2004 meeting on the cleanup and closure of the Radioactive Waste Management Complex (RWMC). After receiving numerous presentations and participating in a full Board discussion, the CAB agreed to submit the following comments to the U.S. Department of Energy regarding the material that was presented.

The INEEL CAB recommends a measured balance between a bias for action and the sufficiency of information supporting selection of the final remedy for the buried waste.

- The INEEL CAB supports DOE's stated "bias for action," particularly as it relates to the reduction of risks to humans and the environment. It appears that there may be adequate information to support some actions, and DOE should not delay taking those actions until after the Record of Decision for the overall cleanup.
- The INEEL CAB believes it may be appropriate for DOE and the regulators (Region 10 of the U.S. Environmental Protection Agency and the Idaho Department of Environmental Quality) to agree to a less aggressive schedule for the Comprehensive Record of Decision (ROD) for the cleanup at the RWMC. There should be no rush to complete the Comprehensive ROD until DOE and its regulators are more confident in their understanding of the contents and characteristics of the buried waste at the RWMC and the risks that are posed by that waste.
- This combined approach would allow for selected interim remedial actions taken to provide immediate protection for human health and safety and the environment, with a more measured approach to determining the ultimate remedy for the site.

The INEEL CAB recommends that DOE complete a rigorous risk assessment addressing risks associated with possible remedies before selecting the final remedy.

- The INEEL CAB understands that the risk assessments conducted to date are not complete. Further, it appears that the risks associated with leaving much of the waste in place may not be higher than the risks associated with removing the waste. Therefore, DOE and the public need more thorough analysis of the risks to the workers versus the long-term risks to the public and the environment to support sustainable decisions.
- The INEEL CAB does not want to see anything left behind that could cause unacceptable risks to humans and the environment.

The extent to which the excavated materials confirm the accuracy of the shipping and disposal records regarding what was buried in the RWMC correlates with the degree of public confidence in those records. If excavation efforts repeatedly confirm what is documented in the records, greater public confidence can be expected in decision-making based on the records. If further excavation efforts fail to confirm what is known from the records, then confidence in the records will decrease.

The INEEL CAB recommends that DOE continue to rigorously confirm its records before expecting the public to accept decisions based on those records.

The Accelerated Retrieval Project (Pit 4) samples targeted waste, untargeted waste, and the underburden. **The INEEL CAB recommends that the sampling program be applied to future excavations, which could raise public confidence in DOE's decision-making.** Additional sampling may also support subsequent decisions related to cleanup if/when new technologies emerge.