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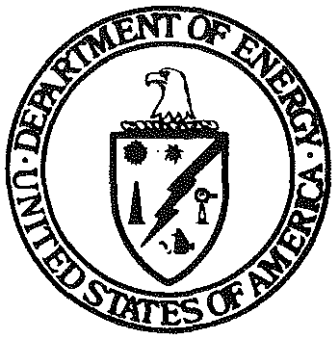
DOE/EIS-0136

Volume 2
Public Comments
and Responses

FINAL
ENVIRONMENTAL IMPACT STATEMENT

SPECIAL ISOTOPE SEPARATION PROJECT

IDAHO NATIONAL ENGINEERING LABORATORY
IDAHO FALLS, IDAHO



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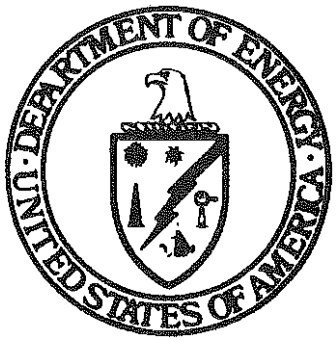

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U.S. DEPARTMENT OF ENERGY

COVER SHEET

RESPONSIBLE AGENCY: U. S. Department of Energy

TITLE: Final Environmental Impact Statement, Special Isotope Separation Project, Idaho National Engineering Laboratory, Idaho Falls, Idaho

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ABSTRACT: The purpose of this Final Environmental Impact Statement (EIS) is to provide environmental input into a U.S. Department of Energy (DOE) decision on the proposed construction and operation of a Special Isotope Separation (SIS) Project using the Atomic Vapor Laser Isotope Separation (AVLIS) process technology and on the selection of a site for such a project. The SIS Project would provide DOE with the capability of segregating the isotopes of DOE-owned plutonium into specific isotopic concentrations. This capability is needed to provide a contingency, flexibility, and technological diversity in DOE's production of weapon-grade plutonium for national defense.

The alternatives considered in detail in this EIS include (1) constructing and operating the SIS Project at the Idaho National Engineering Laboratory (INEL) near Idaho Falls, Idaho (the preferred alternative); (2) constructing and operating the SIS Project at the Hanford Site near Richland, Washington; (3) constructing and operating the SIS Project at the Savannah River Plant (SRP) near Aiken, South Carolina; and (4) no action, or not constructing and operating the SIS Project.

This EIS includes discussion of the SIS facilities and processes; the environmental consequences of constructing and operating the facilities at the alternative sites for routine operations and accidental conditions; and the environmental consequences of no action.

FOREWORD

The purpose of this Final Environmental Impact Statement (EIS) is to provide environmental input into a U.S. Department of Energy (DOE) decision on the proposed construction and operation of a Special Isotope Separation (SIS) Project using the Atomic Vapor Laser Isotope Separation (AVLIS) process and on the selection of a site for such a project. The SIS Project is needed by DOE to provide a prudent level of contingency, flexibility, and technological diversity in DOE's existing production complex for ensuring that approved needs for defense nuclear materials can be met.

The SIS Project would process existing DOE fuel-grade plutonium into weapon-grade plutonium* using the AVLIS and supporting chemical processes. The AVLIS process uses precisely tuned visible laser light to selectively ionize, or excite, specific plutonium isotopes in a vapor stream. The ionized plutonium isotopes are then separated from the plutonium isotope of interest. Chemical processes are required to (1) prepare the AVLIS plutonium feed for processing, remove americium-241, and cast plutonium metal into forms that meet AVLIS processing requirements; (2) recover and, if required, purify the AVLIS plutonium product; and (3) recover and process the AVLIS separated by-products.

The SIS Project would require the construction and operation of a Laser Support Facility, which would house the laser system, and a Plutonium Processing Building. Construction and operation of the SIS Project would not modify (i.e., require changes or modification in operation) existing DOE nuclear material production facilities; the SIS Project would be integrated with existing support and waste management facilities at the selected site. Construction and operation of the SIS Project would be conducted in accordance with all applicable laws and regulations intended to protect the environment and the safety and health of workers and the public.

The DOE fuel-grade plutonium that would be processed by the SIS Project would consist entirely of DOE-owned plutonium. Feedstock for the SIS Facility would not be from commercial reactor spent fuel that is precluded by law or from fuel precluded by DOE policy. The fuel-grade plutonium to be processed includes processed N-Reactor fuel and scrap plutonium currently located at the Hanford Site and a small quantity of scrap plutonium currently at the Savannah River Plant (SRP) which would be transported to the selected site. An additional potential source of fuel-grade plutonium for SIS processing is the DOE-owned plutonium within the Fast Flux Test Facility (FFTF) fuel at the Hanford Site. Currently, DOE is preparing an Environmental Assessment (EA) analyzing the feasibility and environmental impacts of various fuel-decladding techniques that could be used to recover DOE-owned plutonium in the spent fuel from the FFTF. The Final EIS has been modified to include the cumulative risk of transporting all FFTF fuel to the SIS Facility from the Hanford Site--the preferred location for the decladding activity. While no other DOE-owned fuel-grade material is currently available to the SIS Facility, it is possible that future DOE initiatives could provide feedstock for the SIS Facility. Such sources could fall within the bounding analysis of this Final EIS, which has been expanded in response to public comments to analyze impacts of operating the SIS for a full-throughput capacity 30-year mission. While the EIS attempts to bound the impacts by assuming maximum annual processing throughput, year-to-year requirements for weapon-grade material may not require that weapon-grade material be produced at the rated capacity. When and if additional feed materials are identified for processing at the SIS Facility, the Proposed Action would be reviewed in light of the analyses presented in the Final EIS to determine the need for additional National Environmental Policy Act (NEPA) review.

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* "Weapon-grade" plutonium is defined as plutonium-239 nominally containing 6-percent plutonium-240. In this document the term "fuel grade" is used to refer to plutonium containing greater than 6-percent plutonium-240.

After SIS processing, weapon-grade plutonium would be transported to DOE's Rocky Flats Plant, near Denver, Colorado; the by-product material would be stored on an interim basis at the location of the SIS Project. The by-product would be primarily plutonium-239 and 240, with lesser quantities of plutonium-238, 241, and 242. The by-product material would be stored in a storage vault until such time as DOE evaluates its potential applicability for other possible missions. If no missions are identified for the by-product material, it would be rendered into a form that would meet the Waste Acceptance Criteria for, and be transported to the Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico. Storage of the by-product material in the storage vault would not exceed the design life of the storage vault (i.e., 30 years for a new Stand-Alone Storage Vault). To bound the environmental impacts, the transport of by-product to the WIPP has been analyzed in the Final EIS.

Within this Final EIS, all annual consequences are based on the maximum SIS throughput or processing rate as well as the maximum quantities of SIS materials (feed, products, and wastes) that could be handled, generated, and transported in a single year to bound the reasonably foreseeable routine and accidental consequences of SIS operation. The presentation of annual environmental consequences is consistent with current regulatory standards [e.g., the U.S. Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP)] and DOE Orders. It is also consistent with the DOE Defense Program's practice of establishing production goals at its facilities commensurate with annually approved requirements for defense nuclear materials. To bound (i.e., determine the maximum) potential cumulative consequences over the design life of the facility, an analysis of cumulative consequences of SIS operation for 30 years has been conducted in this Final EIS.

The DOE's Preferred Alternative considered in this Final EIS is to construct and operate the SIS Project at the Idaho National Engineering Laboratory (INEL) near Idaho Falls, Idaho. The alternatives to this Proposed Action, which are also addressed in this EIS, are to construct and operate the SIS Project at the Hanford Site near Richland, Washington; construct and operate the SIS Project at the SRP near Aiken, South Carolina; and take no action, or not construct and operate the SIS Project.

The DOE has prepared this Final EIS in compliance with the requirements of NEPA. Copies of this Final EIS were distributed to interested agencies, organizations, and individuals.

Public hearings were held on the Draft EIS. The transcripts from these hearings, accompanying exhibits, and written comments submitted to DOE are available to the public upon request as supplemental volumes (Volumes 3 through 6) to the Final EIS. Volume 2 of the Final EIS contains DOE's responses to all comments received on the Draft EIS. In addition, a summary of the issues and concerns identified by the comments and a discussion regarding how comments are addressed in the Final EIS have been included in Volume 1 and Volume 2.

The most noteworthy changes/enhancements in the Final EIS with respect to the Draft EIS made in response to the comments are as follows:

- The clarification of the need for the SIS Project.
- The incorporation of recently available on-going design data as well as adoption of potential laser and process modifications previously discussed in the Draft EIS.
- The reflection of recent design changes ensuring the separation of process and nonprocess liquid waste streams to ensure that only nonradioactive and nonhazardous liquid effluents would be discharged to a new Idaho Chemical Processing Plant (ICPP) percolation pond.

- The inclusion of an expanded discussion on the number of construction and operational workers associated with the SIS Project and the potential socioeconomic impacts of these workforces.

- The inclusion of transuranic (TRU) wastes, SIS by-product, and onsite low-level waste (LLW), in the analysis of the transport of SIS materials, including the cumulative risk from all shipments over the 30-year facility design life.

- The recalculation of facility accident consequences based on continuing safety analysis studies and the reexamination of potential release fractions.

- The extension of an impact analysis to include the cumulative quantities of wastes and risks for 1 year (annual) and 30 years (facility design life).

The Final EIS has been structured to conform as closely as possible to the format described in the Council on Environmental Quality (CEQ) Regulation 40 CFR Parts 1502.1 through 1502.18. The first volume contains the main body of the Final EIS and additional detailed information in appendices. Vertical lines in the margins of Volume 1 indicate where revisions or additions were made to the Draft EIS. Volume 2 contains a summary of all comments received on the Draft EIS and DOE's responses to these comments as well as all written questions that were submitted at the public hearings. Volumes 3 through 6, which are available on request, contain reproductions of all the comments received. Copies of Volumes 3 through 6 have also been placed in libraries and reading rooms to improve accessibility to the public.

Volumes 1 and 2 of the Final EIS have been sent to those who commented on the Draft EIS and to those who received the Draft EIS, is available to members of the public, and has been filed with the EPA. A notice of availability of the Final EIS has been published by EPA in the Federal Register. DOE will make its decision on whether to construct and operate the SIS Project and on the selection of a site, if the SIS Project is to be constructed and operated, not earlier than 30 days after publication of the EPA notice of availability. DOE will document its decision in a publicly available Record of Decision.

INTRODUCTION

The comment/response and comment (reproduced public input) volumes of the Special Isotope Separation (SIS) Project Final Environmental Impact Statement (EIS) have been prepared in compliance with the Council on Environmental Quality (CEQ) regulations 40 CFR 1503.4 and 1506.6, which provide for the consideration of comments received during the public comment period on the Draft EIS. All comments received are reproduced in Volumes 3 through 6. Volume 2 contains a summary of the responses by the Department of Energy (DOE) to the approximately 12,600 comments from approximately 1,400 individuals received by the DOE during the public comment period, and during six public hearings conducted in March 1988.

Notice of availability of the Draft EIS for the SIS Project, hereafter referred to as the Draft EIS, appeared in the Federal Register on February 19, 1988. The Federal Register notice invited comment on the Draft EIS within the 60-day comment period, which ended April 21, 1988. Six public hearings were held, as follows:

Idaho Falls, Idaho	March 25 and 30, 1988
Twin Falls, Idaho	March 28 and 31, 1988
Boise, Idaho	March 26 and 29, 1988

Copies of the Draft EIS were distributed to individuals and organizations who participated in the scoping meetings; to those who requested copies of the Draft EIS, including reviewers of the October 31, 1986 Notice of Intent; to state and Federal agencies; to legislators; to public libraries; and to the media. In addition, summaries of the Draft EIS were provided upon request.

HANDLING OF COMMENTS AND RESPONSES

At the beginning of the public comment period, a procedure was established to receive, document, identify, and prepare responses to public comments. Each comment (written, oral, or an exhibit) was assigned an identification number and is reproduced in Volumes 3 through 6 of the Final EIS.

The identification numbers assigned were as follows:

IXXX = Oral testimony given at the March 25 Idaho Falls hearing.
I5XX = Oral testimony given at the March 30 Idaho Falls hearing.
TXXX = Oral testimony given at the March 28 Twin Falls hearing.
T5XX = Oral testimony given at the March 31 Twin Falls hearing.
BXXX = Oral testimony given at the March 26 Boise hearing.
B2XX = Oral testimony given at the March 29 Boise hearing.
WXXX = Written testimony sent to DOE during the comment period.
EXXX = Exhibits (i.e., written testimony, letters, pictures, poems) submitted at the hearing.
XXX = Number designating order in which the testimony was received.

Note: The Moscow City Council Commission on Health and the Environment held a public hearing to obtain comment on the Draft EIS for the proposed SIS Project. The transcripts and exhibits received by DOE from this hearing have been entered into the record as written comment W284.

The 12,600 comments received from 1,400 individuals were reviewed, and specific questions/statements within each were identified. Each question/statement was identified by topic, assigned a number (for example 2.2.1) and categorized. For example, major topics included policy, technical, preferences for alternatives, National Environmental Policy Act (NEPA) process, need and purpose of the SIS Project, and so forth.

Some of the comments focused on one topic and contained only one or two specific statements or questions. Others however, addressed a number of issues. With the exception of some editorial comments (which were simply incorporated into the text of the Final EIS), each specific comment identified has been addressed in Volume 2. Frequently, a specific comment was raised by a number of different commentors. In such instances, a single summary and response was provided.

All letters, transcripts of oral testimony, and accompanying exhibits were photostatically reproduced and are included in Volumes 3 through 6 of the Final EIS.

Figure 1 shows how the comments were handled from receipt to inclusion in the Final EIS.

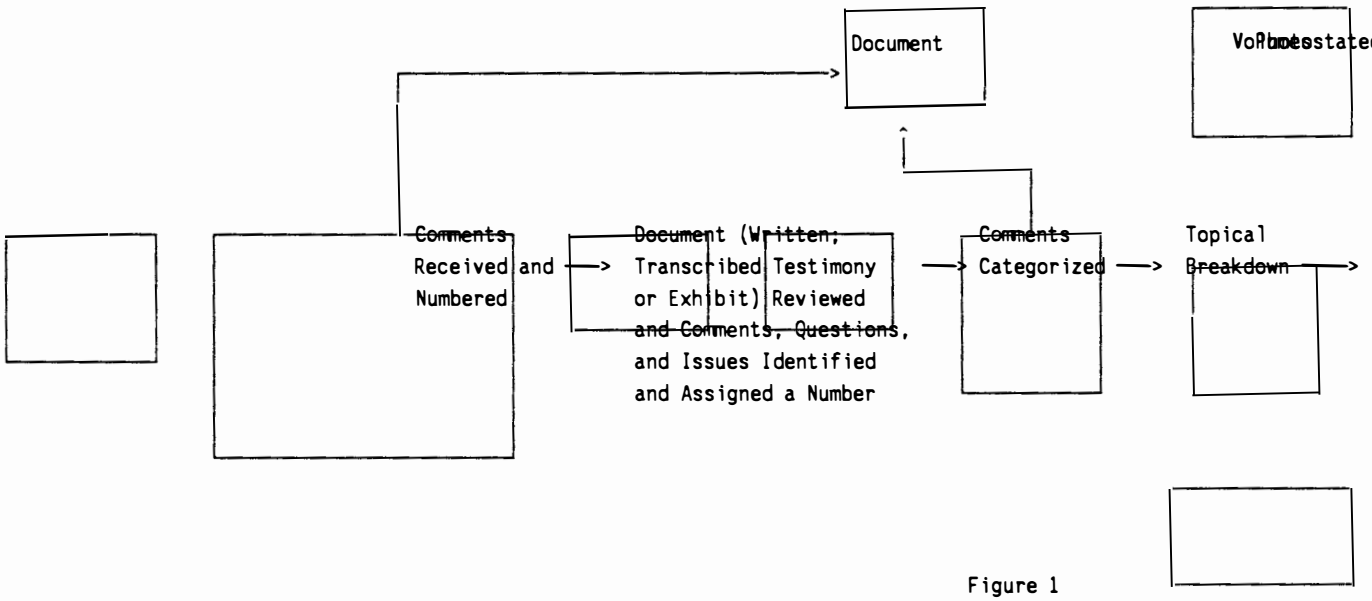

Figure 1
Treatment of Comments

FINDING RESPONSES TO COMMENTS

This volume is one of six volumes comprising the final EIS for the SIS Project. V through 6 were published in response to public comments received on the Draft Environme Statement for the Special Isotope Separation Project. The numbers and corresponding ti volume are as follows:

Volume No.	Title
1	Final Environmental Impact Statement (main text)
2	Responses to Public Comments
3	Proceedings of the Public Meetings (Oral Testimony)
4 and 5	Exhibits of the Public Meetings
6	Letters of Public Interest (Written Testimony)

Appendices are included at the end of Volume 2 to help locate specific questions/stateme letter, exhibit, or transcript of oral testimony and DOE's response. Each paraphrased (comment is assigned a number which is referred to as the comment number; these numbers a margins of Volumes 3 through 6. DOE's response is located with the same number in Volum way, each comment can be traced from the original to a summary comment and DOE's respons

Appendix A is an alphabetical listing of all individuals and organizations who submitted testimony, either in oral or written form. To the right of each name is a list of all the comment numbers assigned to statements or questions made by the commentor and DOE's response, and also the volume and page number where the testimony is located.

Appendices B through D are similar to Appendix A with the exception that the names of the individuals and organizations are listed in the order that their comment was received. Appendix B is a listing of oral testifiers, Appendix C lists exhibits, and Appendix D lists written comments. As in Appendix A, opposite each submitter's name is a listing of the summary comment numbers which identify comments extracted from that person's or organization's testimony, and the volume and page number where the testimony is located.

Appendix E provides a numerical listing of the comment and response numbers contained in Volume 2. Listed opposite each comment number are the submittal numbers of each individual or organization who made a comment which is addressed in that summary comment.

As an aid to the reader in locating information in Volumes 2 through 6, the following instructions are provided:

1. To find your comments and the DOE response

   - Look in Appendix A in the back of Volume 2.
   - Find your name (names are in alphabetical order).
   - Look under the comment number heading (e.g., 2.2.2).
   - Summary comments and responses are identified by numbers located to the right of your name.
   - These comment numbers are in numerical order in Volume 2.
   - Find each comment number in Volume 2, and opposite the number will be a comment summary which represents your comment.
   - The DOE's response to your comment is directly below the comment summary.

2. To find your testimony in Volumes 3 through 6

   - Look in Appendix A in the back of Volume 2.
   - Find your name (names are in alphabetical order).
   - Find the volume number and page number located to the right of your name.
   - Look on the page number within the volume identified.

3. To find the testimony of others who made the same comment

   - Look in Appendix A in the back of Volume 2.
   - Find your name.
   - Look under the comment numbers heading.
   - Find the comment numbers that were extracted from your testimony.
   - Look in Appendix E in the back of Volume 2.
   - Find the comment number in Appendix E that was by your name in Appendix A. Appendix E lists the comment numbers in numerical order.
   - Look at the testimony numbers opposite that comment number. (Each number identifies an individual who made a comment similar to yours.)
   - Go to Appendix B if the number begins with a T, B, or I (i.e., T126, B126, or I126).
   - Go to Appendix C if the number begins with E (i.e., E126).

- o Go to Appendix D if the number begins with W (i.e., W126).
- o Appendices B, C and D have the testimony numbers in numerical order.
- o Find the name of the person or organization and the location of their testimony.
- o Look up the testimony in Volumes 3 through 6 as applicable.

SUMMARY OF COMMENTS AND RESPONSES ON THE DRAFT EIS

During the 60-day public comment period on the Draft EIS, more than 1400 individuals and organizations provided DOE with comments and approximately 13,775 individuals signed petitions on its proposal to construct and operate the SIS Project. Approximately 58 percent of the individuals and organizations providing comments (i.e., about 810 commentors) were opposed to locating the SIS Project at the Idaho National Engineering Laboratory (INEL) or the DOE proposal to construct and operate the SIS Project (i.e., they supported No Action). Of the petitions received from the individuals and organizations providing comments, about 94 percent of the total number of names on the petitions (i.e., about 12,940) supported the DOE's Preferred Alternative of locating the SIS Project at the INEL. Only three commentors of the approximately 1400 providing comments identified a preference for locating or not locating the SIS Project at either the Hanford Site or the Savannah River Plant (SRP).

Numerous comments were submitted during the review period on the Draft EIS supporting the construction and operation of the SIS Project at the preferred location of the INEL and/or the need for the facility. Selected topics raised in support of the Preferred Alternative were centered on: Economic and Employment Benefits, Potential High-Technology Spinoffs, Project's Need for National Defense, Excellent INEL Safety Record, Existing Infrastructure to Support Project, Labor/Management Relationship, and Openness of and Access to INEL Management.

DOE also received numerous comments on a wide range of topics, in written statements, letters, and oral testimony that opposed the Preferred Alternative of constructing and operating the SIS Project at the INEL. The following lists the main issues.

1. Need and Justification for the SIS Project
2. SIS Feed Material and Period of Operation
3. Geologic Hazards
4. Waste and Waste Management
5. Atmospheric Emissions
6. Facility Accidents
7. Transportation Safety
8. Emergency Preparedness
9. Health Effects
10. Socioeconomics
11. NEPA Process
12. INEL Mission
13. Independent Monitoring

For each of the topics listed above which did not support the Preferred Alternative, the following pages list the topic, specific comments under the topic, and a summary of DOE's response to the specific comments.

1. Nonsupportive Statements and Comments on Need and Justification for the SIS Project

- o The SIS Project and the weapon-grade plutonium it would produce are not needed because (1) there are already enough plutonium and nuclear weapons, (2) reductions in nuclear weapons resulting from arms agreements would provide additional quantities of plutonium, and (3) plutonium, unlike tritium, does not have to be replaced.

- o The SIS Project is contrary to efforts to reduce nuclear weapons.

- o Construction and operation of the SIS Project would violate the Nuclear Non-Proliferation Treaty or would increase the potential proliferation risk.

- o The Secretary of Energy stated that the nation is "awash" in plutonium.

- o Other alternatives [blending, weapons recycling, restarting N-Reactor, and the Atomic Vapor Laser Isotope Separation (AVLIS) demonstration facility at the Lawrence Livermore National Laboratory (LLNL)] would provide the redundancy and flexibility DOE requires for plutonium production, and enriched uranium or fuel-grade plutonium rather than weapon-grade plutonium could be used directly in nuclear weapons.

- o The EIS should have a classified appendix that supports the need for the Project.

DOE Summary Responses to the Previous Comments:

The national policy on nuclear weapons, their deployment, and their number is a policy decision which is made by the President of the United States and approved through the authorization and appropriation process of the United States Congress. Although DOE and the Department of Defense provide input to the President through the National Security Council on this national policy and implement such policy, approval of the policy is the responsibility of the President and the United States Congress. The quantities of weapon-grade plutonium from retired nuclear weapons and those dismantled as a result of nuclear weapon agreements are included in an annually prepared document known as the Nuclear Weapons Stockpile Memorandum (NWSM), and are accounted for in the determination of any new weapon-grade plutonium required for national defense. Plutonium, unlike tritium, does not decay rapidly; however, modernization programs approved by the President and Congress require replacing older warheads that used uranium enriched in the isotope uranium-235 with new warheads that use weapon-grade plutonium.

The SIS Project is needed by DOE to provide a prudent level of contingency, flexibility, and technological diversity, given the current age of and limitations on existing production facilities and reactor-based issues which have impacted the nation's capability to produce plutonium. It is not being proposed to satisfy a specific requirement for the production of new weapon-grade plutonium. Both the President and the United States Congress, as reflected by approved authorizations and appropriations, have supported the need for the contingency, flexibility, and technological diversity that the SIS Project would provide.

The United States will continue to pursue verifiable agreements to reduce nuclear weapons while maintaining the capability of producing special nuclear materials for national defense. Until verifiable agreements have been reached to eliminate nuclear weapons, the capability of producing special nuclear materials for national defense must be maintained as an integral part of the nation's nuclear deterrence policy.

Construction and operation of the SIS Project would not violate the Treaty on the Non-Proliferation of Nuclear Weapons or increase the potential proliferation risk. The SIS Facility, like all United States facilities engaged in the production of special nuclear materials for national defense, would not be a candidate for International Atomic Energy Agency (IAEA) inspection, and sensitive nuclear technology would not be available to assist a foreign country in the design or operation of a facility for producing nuclear weapon material. All information contained within this EIS and its publicly available support documents has been reviewed to exclude sensitive nuclear technology and classified information.

Energy Secretary Herrington's statement that the nation is "awash in plutonium" was made during budget deliberations early in 1988. Secretary Herrington (in later testimony before the Senate Committee on Armed Services Subcommittee on Strategic Forces and Nuclear Deterrence) characterized his earlier comment as an "overstatement" and clarified the issue by stating that adequate supplies of plutonium are available in the short term, but over the longer term (i.e., by 1995) there is no assurance that plutonium needs can be met. It is important to note that a new production reactor would have the primary mission of tritium production and would not provide a technologically diverse source of weapon-grade plutonium. Such diversity is required as reflected in the need statement for the SIS Project.

Blending of fuel-grade plutonium with plutonium of higher-than-weapon-grade purity is entirely dependent on the existing SRP production reactors that were constructed in the early 1950s. The reactors at the SRP are currently the subject of several safety concerns and are also the nation's only source of tritium production. Although the N-Reactor could be restarted, the years of potential future operation are limited by the distortion of the reactor's graphite moderator. Recycling of weapon-grade plutonium from retired weapons has occurred and will continue to occur, and recovered material is accounted for in the need for new weapon-grade plutonium; however, recycling and recovery of material from weapons cannot provide a source of new weapon-grade plutonium and is dependent on approved schedules for retirements and uncertainties with respect to future agreements on nuclear weapons. The SIS demonstration facility at LLNL has been designed to demonstrate the AVLIS technology and system capabilities and is unsuitable for production. While fuel-grade plutonium or enriched uranium could be used directly in nuclear weapons, such use is contrary to the currently approved modernization programs for nuclear weapons. Potential national emergencies that might require the use of any of these alternatives are speculative and not within the scope of this EIS.

A discussion of the need and underlying purpose for which DOE is proposing the project was presented in Section 1.1.1 of the Draft EIS, in accordance with CEQ's regulations (40 CFR 1502.13), and has been expanded in the Final EIS in response to comments received. The SIS Project is not being proposed to meet identified requirements for weapon-grade plutonium, but rather is being proposed to provide a prudent level of contingency, flexibility, and technological diversity. A classified appendix on supply capability is, therefore, not considered to be needed.

2. Nonsupportive Statements and Comments on SIS Feed Material and Period of Operation

- o DOE plans to use commercial spent fuel as a feed for the SIS Project.
- o Sufficient feed material does not exist to justify the cost and operation of the SIS Project.
- o The Draft EIS did not assess the environmental impacts of the processing of the Fast Flux Test Facility (FFTF) fuel.
- o Impacts should be assessed for the 30-year life of the facility.

DOE Summary Responses to the Previous Comments:

DOE has not considered nor does it plan to use commercial spent fuel precluded by law as feed for the SIS Project. Current law (Hart-Simpson-Mitchell Amendment) prohibits the recovering of plutonium from spent U.S. commercial fuel for use in weapons. DOE complies with the law and has no intention of requesting Congress to change the law. The Draft EIS clearly identified in its "Foreword" that sources of SIS feed material would not include plutonium derived from such spent commercial fuel.

DOE has identified an initial quantity of feed material that would result in only several years of SIS operation (currently estimated as 8-10 years in contrast to the 6-8 years as previously reported), if the SIS Project were operated at maximum throughput capacity. This includes DOE-owned, Defense Program origin material in the FFTF located at the Hanford Site, were it to become available. Additional sources of DOE-owned feed material, but not including plutonium derived from spent commercial fuel precluded by law, may be available depending on additional DOE production initiatives and the limitations on existing production facilities. DOE believes that the feed material currently identified provides, without relying on the availability of material from FFTF, a sufficient basis to proceed with the SIS Project to provide a prudent level of contingency, flexibility, and technological diversity. The specific quantities of fuel-grade material available are classified; however, Chapter 1 of the EIS has been updated to state that the current quantities identified provide for only several years (currently estimated as 8-10 years) of SIS operation assuming full throughput capacity.

Currently, DOE is preparing an Environmental Assessment (EA) analyzing the feasibility and environmental impacts of various fuel-decladding techniques that could be used to recover DOE-owned plutonium in the spent fuel from the FFTF. The Foreword to the Final EIS has been modified to reflect this consideration. The annual impacts of potentially transporting the processed FFTF fuel would be the same as those for transporting N-Reactor fuel-grade plutonium to SIS facilities. Section 4.5.1 and the summary of the Final EIS have been modified to include the cumulative risk of transporting all FFTF fuel to the SIS Facility from the Hanford Site, the preferred location for the decladding activity. However, it should be noted that in addition to its potential use as feed for SIS, the FFTF spent fuel could be blended to produce weapon-grade plutonium, and a decision to build the SIS Project does not foreclose options concerning use of FFTF fuel.

Consistent with current regulatory standards [e.g., the U.S. Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP)] and DOE Defense Program's practice of establishing production goals at its facilities commensurate with annually approved requirements for defense nuclear materials, the Draft EIS presented the potential environmental consequences of the SIS Project based on its maximum annual throughput or process rate. To bound (i.e., determine the maximum) potential cumulative consequences over the design life of the facility, an analysis of cumulative consequences of SIS operation for 30 years has been included in this Final EIS.

3. Nonsupportive Statements and Comments on Geologic Hazards

- o The INEL area is geologically active and therefore unsuitable as a location for the SIS Project.
- o The Draft EIS underestimated the frequency of volcanic activity on the Snake River Plain.
- o Data suggest that volcanic eruptions could occur.
- o The Draft EIS presented an unrealistically low estimate of the probability of the occurrence of high-magnitude earthquakes in the INEL area.
- o The INEL should be designated as a seismic risk Zone 3 (major damage) area rather than a Zone 2 (moderate damage) area.

DOE Summary Responses to the Previous Comments:

Chapter 3 of the Final EIS has been expanded to include a detailed discussion of seismic and volcanic hazards in the INEL region. Although the Eastern Snake River Plain has a geologic history of volcanic activity, the potential threat from volcanic eruptions is considered low. During a period of

eruptive activity at a particular fissure eruption zone, the interval between eruptions (once eruptions have begun) may be 2000 to 3000 years. The interval between the major eruptive cycles measured on the INEL is between 80,000 and 225,000 years.

Chapter 3 of the Final EIS has also been expanded to discuss predictions of future earthquake activity along potential faults (Arco and Howe segments) with magnitudes of 7.3 to 7.5 with a recurrence interval of approximately 30,000 years. Anticipated accelerations resulting from this postulated event indicate that the Design-Basis Earthquake (DBE) standards used for the Plutonium Processing Building and By-Product Storage Vault are appropriate and would not be exceeded.

The Uniform Building Code seismic zone map is frequently updated, normally every 3 years, based on new or additional earthquake data. In light of the 1983 Mt. Borah earthquake and other data, the area included in Zone 3 in the 1987 version of the map was expanded over the 1981 version. However, the INEL is still in Zone 2B, consistent with the data recorded from the 1983 Mt. Borah earthquake. Another approach of seismic hazard zoning is even more useful, as it takes into account earthquake frequency. The map developed for this approach shows the SIS site in the lowest zone of earthquake potential, based on historic data (Keller, E.A., 1987, Environmental Geology, 5th ed., Merrill Publishing Co., p. 157).

4. Nonsupportive Statements and Comments on Waste and Waste Management

- The availability and disposal capacity of the Waste Isolation Pilot Plant (WIPP) are uncertain and the Draft EIS did not assess alternatives if the WIPP is not available. The INEL would become a de facto storage location in the event that the WIPP is unavailable.

- Long-term storage of radioactive waste at the INEL is unacceptable.

- The INEL has already contaminated the Snake River Plain aquifer and is a candidate Superfund site.

- Storage of radioactive waste at the INEL poses a threat to the Snake River Plain aquifer.

DOE Summary Responses to the Previous Comments:

DOE plans to transport all stored and newly generated transuranic (TRU) waste to the WIPP in New Mexico, as stated in its Record of Decision prepared on the Final EIS for the WIPP (DOE/EIS-0026). DOE is currently working with the National Academy of Sciences (NAS) to address experimentation and research activities supporting the performance assessment being conducted to demonstrate compliance with EPA disposal standards for TRU waste (40 CFR 191). In addition, WIPP will comply with all applicable requirements of the Resource Conservation and Recovery Act (RCRA). DOE is currently working with the EPA and the State of New Mexico to resolve uncertainties regarding the procedures for obtaining a RCRA permit for WIPP.

Recent discussions on the storage capacity limitations of TRU waste at the WIPP have been focused on the amount of TRU waste that would be initially received by the WIPP for experimental purposes to support performance assessment studies prior to a decision to making WIPP fully operational as a disposal facility. These discussions are unrelated to the design capacity for TRU waste emplacement at the WIPP. Reports of the WIPP's leaking involve the intertwining of two separate issues: (1) water that ran down the walls of shafts, before grouting was completed, from water-bearing strata in the rocks overlying the salt beds; and (2) brine migration within the salt beds themselves. With respect to water from overlying strata, the flow has been eliminated by grouting the shaft walls above the salt to seal off the water. When the facility is decommissioned, the shafts will be entirely backfilled and sealed at several locations with engineered materials designed to minimize any

leakage. Inflow from this source will then be inconsequential. With respect to brine migration within the salt beds, actual measurements to date indicate that brine migration can be absorbed by backfill materials, preventing the accumulation of liquids. The amount of brine migration is less than originally contained in the salt mined out of the room. DOE will continue to coordinate with the NAS to resolve and conduct those studies required to initiate operations at the WIPP.

In the unlikely event that the WIPP performance assessment indicates that the WIPP is unsuitable for the disposal of TRU waste, DOE would undertake studies and evaluations to determine acceptable alternatives. These alternatives would be covered by a separate NEPA review as the DOE would be faced with a general issue regarding disposal of TRU wastes from several sources, of which the TRU waste generated by SIS would be a small part. In summary, assessments of alternatives to the WIPP as part of the SIS Project are not considered appropriate, as (1) DOE has received no evidence, nor has it been made aware of any scientific study which negates continuing to plan for the disposal of TRU waste at the WIPP, and (2) the WIPP has been and would continue to be the subject of a separate NEPA review, as part of an independent decision-making process.

If the SIS Project were located at the INEL, the only radioactive wastes that would be stored or disposed of at the INEL would be low-level radioactive waste (LLW) and mixed wastes. The maximum amount of LLW that would be generated by the SIS Project and disposed of at the INEL would represent less than 1 percent of the quantities currently being disposed of at the INEL. A bounding (i.e., using extremely conservative assumptions) analysis of LLW included in the Draft EIS and Final EIS clearly indicates that the disposal of SIS-generated LLW would not result in contamination (i.e., concentration above drinking water standards) of the Snake River Plain aquifer beneath the disposal area. While the quantities of SIS-generated mixed waste that would be stored at the INEL represent a greater percentage of total mixed wastes (i.e., about 15 percent), all mixed waste would be stored in a facility meeting RCRA requirements. All storage facilities for mixed waste are subject to inspection by the EPA to ensure that storage practices are being followed which prevent potential contamination of groundwater.

In addition to LLW and mixed waste, SIS by-product material, which is highly radioactive but not considered a waste, would be stored onsite in a specially designed storage vault. The storage vault is designed to contain canisters of the by-product material without releasing radioactive material.

Currently, only three sites at the INEL require corrective action under RCRA: the Test Reactor Area (TRA) Warm Waste Pond, Test Area North (TAN) groundwater, and the Radioactive Waste Management Complex (RWMC). The Final EIS in Section 3.1.4.4 includes an expanded discussion of these three sites. Studies and corrective action plans for each of these sites are being prepared. In all cases, those practices which resulted in the need to undertake corrective action have been stopped or changed (e.g., the use of chromate-based algicide and corrosion inhibitors for the TRA Warm Waste Pond, which resulted in chromium being detected in perched groundwater underneath the pond, was stopped after 1970). The construction and operation of the SIS Project would not affect the implementation of any required corrective action.

The primary source of radionuclide contamination in the Snake River Plain aquifer resulted from the previous practice of using an injection well. This practice, similar to those which resulted in hazardous contamination, has been stopped. DOE is planning to plug the well with cement in 1989 (this process is called abandonment in legal terms) and will meet the requirements set forth in the State of Idaho Rules and Regulations for Construction and Use of Injection Wells published in August of 1984.

Storage of SIS-generated radioactive waste and by-product would not pose a threat to the Snake River Plain aquifer, and corrective actions are being implemented to protect groundwater resources.

5. Nonsupportive Statements and Comments on Atmospheric Emissions

- o Releases of Freon to the environment pose an unacceptable environmental and health risk, and recycling/reuse/substitution should be considered.

- o The cumulative impact of radioactive releases into the environment on humans and the environment was not adequately assessed.

- o The INEL has already contaminated wildlife and the EIS should assess the radioactive impacts on wildlife.

- o The EIS should state that a Prevention of Significant Deterioration (PSD) permit will be required prior to the operation of the SIS Project.

DOE Summary Responses to the Previous Comments:

Section 4.1.2.2 of the Final EIS has been modified to include the estimated number of skin cancers that could potentially result from the emissions of Freon resulting from the refurbishment of laser electronic packages in the SIS. SIS emissions of Freon would represent only about 0.006 percent of the consumption of Freon in the United States (approximately 6.7×10^{8} lb/year) and would result in an annual calculated increase in the risk of a fatal skin cancer to an individual in the United States of only about 2.7×10^{-12}. Ongoing engineering development is being pursued to further reduce Freon emissions through the use of chiller and condensate systems to reduce evaporation and vapor recovery systems for recycling Freon. In addition, the SIS Project personnel are working with commercial Freon manufacturers to identify and/or develop substitute dielectric coolants that will have no adverse impact on the environment. These potential substitutes are being evaluated and will be used when available.

Releases of radioactivity to the atmosphere from DOE facilities must comply with the EPA's NESHAP. The NESHAP standard is an annual standard applicable to the cumulative atmospheric releases of radioactive emissions from all sources at a particular DOE facility (e.g., the INEL). Sections 4.5.1.4 and 4.5.2 of the Final EIS discuss the cumulative radiological impacts (i.e., from the SIS Project, authorized projects, and existing facilities) and compare them to this standard. An analysis of accumulated releases and of risks of radioactive releases has been included in Section 4.5.1 of the Final EIS for 30 years (facility design lifetime).

The concentrations of radioactive materials in the wildlife near the Idaho Chemical Processing Plant (ICPP) have been studied. Although data indicate some levels of contamination in wildlife species, the levels of contamination are extremely low [e.g., using the highest cesium concentrations in pronghorn antelope collected within 10 kilometers (6 miles) of the ICPP, the resultant exposure was 10 percent of that from naturally occurring potassium-40 in their bodies and less than 2 percent of that from natural external sources in their surrounding environment]. The atmospheric emissions of radioactivity from the SIS Project would be less than 1.4×10^{-7} percent of the applicable EPA standards, and would not pose any radiological risk or threat to wildlife.

Section 5.4 of the Final EIS has been modified to include a brief discussion of 40 CFR 82 concerning stratospheric ozone protection, and Section 5.6.3 has also been modified to indicate that a PSD permit for the SIS Project is being developed, including any regulated emission for which there is not an EPA de minimis level under Idaho's PSD regulations.

6. Nonsupportive Statements and Comments on Facility Accidents

- o Since the SIS Project is a unique facility and has yet to be demonstrated, designs or design criteria do not exist upon which to adequately assess safety.
- o The Draft EIS did not sufficiently consider propagating accidents or externally initiated accidents.
- o Assumptions used in the Draft EIS accident analysis were not conservative, and an independent analysis indicates that accident consequences would exceed Nuclear Regulatory Commission (NRC) standards.
- o The costs of accidents such as losses in the value of agricultural products sold and to the tourism and recreation industries were not identified in the Draft EIS.
- o The Draft EIS did not include a worst-case accident as required by NEPA.

DOE Summary Responses to the Previous Comments:

The AVLIS technology represents a new technology but one that has been demonstrated experimentally to verify the analytical design models at each step. Other systems and processes such as pyrochemical and aqueous processing, waste handling, and plutonium processing utilize proven technologies that are used in other DOE Defense Program facilities. While it is true, based on preliminary designs and safety evaluations, that not all values used can be precisely defined, bounding values (e.g., maximum quantities available for release) were used in the EIS to determine the upper range of potential environmental consequences. NEPA requires the assessment of potential environmental consequences early within the planning process for a project; preparation of an EIS after completion of a final design for a project would not allow or provide the opportunity for incorporation of environmental considerations into the potential implementation of the project.

The Draft EIS and the Final EIS discuss the potential environmental consequences from a DBE followed by fire, which is an externally initiated natural phenomenon. Other externally initiated natural phenomena such as a tornado, tornado-driven missiles, and snow load would have lower consequences and were therefore not presented in the EIS. Propagating accidents (one accident which results from the consequence of a preceding accidental event) are normally considered to be those accidents which are initiated by a sequence of events that lead to an accidental release of radioactive material. The EIS addresses quantities of plutonium at risk (the amount of plutonium which could be dispersed as a result of a hypothetical accident) that maximize the potential release and consequences independent of whether the accident is initiated by a single event or a series of events. Whether the accident is of a propagating nature or not, it would not affect the maximum quantities of plutonium at risk.

Assumptions used in the Draft EIS, with two exceptions, were representative and/or conservative for the SIS Project. The major conservative assumptions include postulating releases based on maximum quantities of plutonium at risk; using degraded high-efficiency particulate air (HEPA) filter efficiencies (i.e., down to 0 percent efficiency); postulating accident scenarios which do not take credit for engineered safety features and administrative controls. With respect to the assumptions made in the Draft EIS, two assumptions were either not representative or conservative and have therefore been revised for this Final EIS. These two assumptions were (1) the inclusion of a plateout factor of 2 (a factor accounting for the fallout of plutonium in ductwork was inadvertently used twice) and (2) the quantities of plutonium at risk for the design-basis fire in a single area and uncontrolled chemical reaction events. For the Final EIS, the redundant plateout factor of 2 has not

been used and the quantities of plutonium at risk for the design-basis fire in a single area and the uncontrolled chemical reaction have been increased. While the revisions resulting from these two changes result in higher calculated consequences for postulated accidents, the releases still do not result in any projected cases of early offsite fatalities or any early offsite injuries, and the calculated offsite maximum individual dose for locating the SIS Project at the INEL for the postulated severe accident with complete loss of filter efficiency is 0.28 rem to the whole body, or a small fraction of the NRC's siting criteria of 25 rem to the whole body (10 CFR 100) for commercial reactors.

Although an independent analysis of the potential consequences of the SIS Project was submitted as part of the comments received on the Draft EIS, the analysis provided was flawed with respect to several assumptions, the most significant of which was the utilization of inventories and source terms based on a pressurized water reactor. The processes, sources of dispersion energy, and quantities of plutonium that would be used at the SIS Project are much different from those of a reactor or other nuclear industry facilities and cannot be compared either directly or indirectly with respect to source terms or release fractions. The independent analysis was therefore considered as not providing "credible scientific evidence" and was not discussed in the Final EIS.

For those accidents considered in the EIS, including the postulated severe accident with complete loss of HEPA filtration, the resulting releases of radioactivity are not of sufficient magnitude to require costs for mitigation including costs of evacuation, milk and crop disposal, decontamination, and land-use prohibition. Potential economic costs, including economic losses to agriculture and tourism, were therefore not presented.

The severe facility accident presented in the EIS is considered to be a bounding impact analysis meeting the criteria set forth in CEQ regulations for implementing the procedural provisions of NEPA, as amended (40 CFR 1502.22). As stated in the Draft EIS, for the postulated severe accident to occur, five conditions are assumed: (1) facility-wide fire must in some fashion occur; (2) the building fire suppression system, which will be Design-Basis Accident (DBA) qualified, is assumed to be not effective; (3) the final filtration systems, including fire protection systems, both of which will be DBA-qualified, are not effective; (4) no mitigative action (such as immediately placing plutonium into protected storage upon detection of a fire) is taken; and (5) no response is made by the ICPP fire brigade and INEL fire department. The severe accident has an estimated probability of occurrence of less than 1×10^{-6} per year. (Note: estimated probabilities of the occurrence of accidents have been presented in the Final EIS to emphasize the remote chances of occurrence. Inclusion of these probabilities is not a CEQ requirement.) While other potential accident scenarios can be postulated, it is not believed that an accident, which is based on "credible scientific evidence" as required by 40 CFR 1502.22, can be postulated that would result in higher consequences.

7. Nonsupportive Statements and Comments on Transportation Safety

- The SIS Project would dramatically increase the number of local shipments required for plutonium.
- The Draft EIS did not adequately identify/assess many problems associated with the DOE transport containers.
- The transportation analysis within the Draft EIS did not contain a sensitivity analysis of the input parameters such as stop times, and used nonconservative assumptions such as national accident statistics, and did not utilize route and location-specific accident data.
- The transportation analysis in the Draft EIS did not discuss the impacts of the transport of SIS-generated by-product material.

DOE Summary Responses to the Previous Comments:

The SIS Project would not dramatically increase the number of plutonium shipments. Although the number of shipments is classified, the Final EIS on the transportation of radioactive material by air and other modes (NUREG-0170) indicates that in 1975 more than 4200 packages of plutonium were transported by truck in Type B containers nationwide. The number of plutonium packages transported in Type B containers associated with the SIS Project would comprise only a very small fraction of those indicated in the referenced document.

Certified or approved Type B shipping containers would be used for the transport of feed, product, and by-product to and from the SIS Project; the TRUPACT II will be used for the shipment of TRU waste (in drums) and potentially by-product (in Type B containers) to the WIPP. Extensive testing of the Type B container presently in use by DOE (the model 1518 6M) is described in references that have been added to the Final EIS. The inner and outer containers of each Type B container are individually leak-tested during fabrication, and must be inspected prior to each shipment. The TRUPACT II is currently undergoing NRC certification tests.

An analysis of the sensitivity of RADTRAN risk calculations to variations in parameters was performed in 1986 for a sample truck transport case (SAND85-1001) by Sandia National Laboratories. The stop times used in the analysis presented in the Draft EIS and the Final EIS are based on actual operational requirements for safe secure transport (SST) shipments. The reference provided for this assumption was a personnel communication with a DOE individual knowledgeable about SST requirements. The requirements are classified. The decreased stop time results in a decrease in incident-free risk, but has no effect on accident risk calculations.

The transportation impact assessment in the Draft EIS and the Final EIS uses both route-specific and national average transportation data. The route-specific data include total distance, adjacent population, and fraction of the route on various types of roads (e.g., rural, urban, or suburban). The road-type fractions are combined with national average truck accident data for each road type. The national average data used in the analysis described in the Draft EIS and the Final EIS provide the most representative risk estimates for cross-country routes to which they were applied. Sandia National Laboratories has conducted a number of tests to demonstrate the validity of this conclusion. Data included in the Final EIS in Appendix A, Section A.3, indicate that the national average combination truck accident rate on interstate highways is about 3.1×10^{-7} accident per kilometer. The average for only those states through which representative SIS shipments would pass is 3.2×10^{-7} accident per kilometer. State average accident rates along the nine separate representative routes for SIS shipments range from 2.0×10^{-7} to 4×10^{-7} accident per kilometer. These rates are for all property-damage accidents involving combination trucks and are much higher than the rates for severe accidents. The limited variability in accidents rate supports the use of national average data for SIS shipments.

The transport analysis presented in the Draft EIS did not include the impacts of the transport of by-product material to the WIPP, as the Draft EIS indicated that the by-product material may be a resource applicable for other possible DOE missions. Although DOE intends to evaluate the usefulness of the by-product material for other possible missions, the analysis of SIS materials transport contained in this Final EIS has been modified to analyze the potential consequences of the transport of by-product material. The transport of all SIS-generated TRU waste for each of the potential SIS locations has also been included in the Final EIS. Inclusion of the transport of by-product materials and SIS-generated TRU waste to the WIPP results in higher routine and accident risks (e.g., for locating the SIS Project at the INEL, the annual radiological dose under routine conditions to the population sharing the road and residing along the transport routes increases from 0.2 person-rem to 12 person-rem, and the annual radiological risk of a latent cancer fatality and genetic effect increases from 4.4×10^{-5} to 4.9×10^{-3}, respectively).

8. Nonsupportive Statements and Comments on Emergency Preparedness

- o The Draft EIS did not discuss the emergency preparedness plans that would be required in the event of a facility or transport accident.

- o In the event of an accident, local and state agencies are inadequately trained and do not have sufficient resources.

- o Local officials have not been informed of the types and quantities of hazardous materials for which they must be prepared pursuant to Title III of the Superfund Amendments and Reauthorization Act (SARA).

DOE Summary Responses to the Previous Comments:

Section 4.6 of the Final EIS has been expanded in its discussion of the responsibilities of DOE, the State of Idaho, and local counties for emergency preparedness response to potential offsite incidents, including those involved in the transport of materials. As stated in the Draft EIS and Final EIS, it is the responsibility of state and local emergency planning agencies to develop adequate emergency response plans that cover all natural and man-made disasters. The DOE Idaho Operations Office has provided the DOE-Idaho Emergency Planning, Preparedness, and Response Plan to the state and local agencies to assist them in developing plans as they relate to the INEL. DOE is willing to assist these agencies by reviewing existing plans as they interact with the INEL and is also willing to enter into negotiations to establish a stronger Memorandum of Understanding to delineate areas where assistance can be provided to the state and local response agencies by DOE and DOE emergency response teams.

The responsibility for training of state and local emergency response personnel also rests with the state and local agencies. To assist the state and local personnel, DOE has provided training to these groups on several occasions, as exemplified by training conducted by the DOE Albuquerque Operations Office on TRU waste shipments. Each year since 1983, the State of Idaho has participated in site-wide emergency preparedness exercises. During each of the previous years, DOE has also exercised its interface with one of the local Idaho counties to minimize the impact on the budgets of local emergency response planning agencies.

DOE has provided the State of Idaho with data on the quantities and types of hazardous materials used at the INEL in compliance with Title III of SARA. Information on hazardous materials associated with the SIS Project will also be provided where applicable as part of the ongoing SARA Title III reporting process. Acknowledgment of this requirement has been included in Table 5-1 of the Final EIS.

9. Nonsupportive Statements and Comments on Health Effects

- o Plutonium is one of the most deadly materials known to man and is pyrophoric.

- o The Draft EIS underestimates the potential health effects from radioactive releases.

- o The use of the National Academy of Sciences Committee on the Biological Effects of Ionizing Radiation (BEIR) III Report is outdated because of the issuance of BEIR IV.

- o The EIS should discuss the results of existing health effects studies and the reported high number of cancers around the INEL and use these as a basis for the assessment of potential impacts.

DOE Summary Responses to the Previous Comments:

Plutonium is recognized as an extremely hazardous material; however, in recognition of its hazards, design, safety features and extensive controls are used to provide the highest level of safety to reduce potential health, safety, and environmental impacts. The pyrophoric character of plutonium has been fully considered in the design of the SIS Project.

The potential radiological dose and health effects (fatal cancers and genetic effects) presented in the Draft EIS and the Final EIS are based on scientifically accepted methods and studies. The health effects presented in the Draft EIS and the Final EIS are calculated using risk estimators based on the BEIR III Report. As discussed in Appendix A of the Draft EIS, by assuming all radiation from the SIS Project to be high-linear-energy-transfer (LET) radiation and using risk estimators associated with the linear extrapolation model, the number of health effects presented is conservative. At the low levels of radiation associated with the SIS Project, it is plausible that the potential health effects could be zero because the extrapolated potential cancer risks associated with the SIS Project were based on cancer risks for higher dose rates than those projected for the SIS Project.

Although the BEIR IV Report has been issued since the preparation of the Draft EIS, its primary focus is on health effects from radon. All of the health risk estimators for transuranics provided in the BEIR IV Report for fatal lung and liver cancers and for genetic effects are less than those presented for high-LET radiation based on the data presented in the BEIR III Report.

Counties surrounding the INEL demonstrate lower, not higher, rates, based on the Idaho Tumor Registry, than do those in more remote locations. The small population and small number of specific cancer cases result in large statistical variations in yearly rates without any associated significance. Some investigators have selectively separated apparent increases in specific cancers without noting the overall low averages and the statistical variability to be expected. The EIS calculates potential health effects on the basis of widely accepted scientific information and does not utilize local health effects data because of their lack of statistical and control validity.

10. Nonsupportive Statements and Comments on Socioeconomics

- The potential economic gains (or number of jobs) do not outweigh the potential risks or costs of the Project, and personnel and financial resources should be put to a more productive or beneficial use.

- The Draft EIS did not assess impacts of the SIS Project on agriculture or tourism/recreation.

- The beneficial impacts of the SIS Project on the economy are overstated, and most of the workers for the Project will either be from out of state or will only receive low-paying service jobs.

- The EIS does not assess the impact of shutting down the SIS Project or the boom-bust impacts that would be associated with it.

- The Draft EIS was wholly inadequate with respect to assessment of socioeconomic impacts by not providing a detailed assessment of impacts to local communities and services and should have used an impact model.

DOE Summary Responses to the Previous Comments:

The objective of an EIS is to assess the potential environmental consequences of the Proposed Action and the reasonable alternatives to the Proposed Action, including no action. The EIS provides

a basis upon which the responsible Federal official weighs the potential environmental consequences and risks in relation to the need to proceed with the project. The basis for the responsible Federal official's determination and reasons for proceeding or not proceeding are published in a publicly available Record of Decision. The use of personnel and financial resources for other Federal actions, including impacts on the Federal budget, is not within the scope of this EIS. The CEQ's regulations regarding the procedural provisions of NEPA exclude requests for appropriations.

The Final EIS in Chapter 3 and Appendix B includes indicators of the importance of agriculture and tourism/recreation to the economy in areas of the alternative locations for the SIS Project. The results of a recent study of travelers in Idaho, prepared by the University of Idaho, have also been referenced in the Final EIS. No adverse impacts from the SIS Project to either the tourism/recreation or agriculture sectors of the economy are expected to occur, as all releases are significantly below all applicable standards. Even in the event of an extremely unlikely severe facility accident, the release is not of sufficient magnitude to require offsite cleanup or mitigation including decontamination and destruction of milk and food crops. Based on the survey conducted by the University of Idaho in April 1988 of Idaho travelers, which indicates that about 33 percent of those coming to Idaho come to visit friends and relatives, the construction and operation of the SIS Project may have a small beneficial impact on the tourism industry in Idaho because of the employment opportunities associated with the Project.

The beneficial impacts associated with the SIS Project that were identified in the Draft EIS were the indirect employment opportunities associated with direct employment for the SIS Project and employee contributions to taxes. The beneficial impacts presented at best are understated, as they do not include induced employment opportunities that would arise from indirect and direct employment opportunities, direct and indirect expenditures for materials and services associated with the construction and operation of the SIS Project, or taxable revenues derived from the purchases of materials and services.

As discussed in the section entitled "SIS Feed Material and Period of Operation," DOE has identified an initial quantity of feed material that would result in only several years (currently estimated as 8-10 years) of SIS operation if the SIS Project were to be operated at maximum throughput capacity. Additional sources of DOE-owned feed material may be available but depend on future DOE production initiatives and the limitations on existing production facilities. Since the Proposed Action being considered in this EIS is the construction and operation of the SIS Project and the period of future operation is dependent on both the need for weapon-grade plutonium and the quantities of feed material that may be available in the future, a specific assessment of shutdown impacts is not included. It is highly unlikely, however, that in the event the SIS Project were to be stopped, a "boom-bust" scenario would result, as total employment associated with the SIS Project would be only a small percentage of total INEL employment.

The Draft EIS referenced several specific documents which contained an extensive discussion of the regional infrastructure surrounding the INEL, the Hanford Site, and the SRP. The employment associated with the construction and operation of the SIS Project at the three alternative locations comprises only a very small percentage of existing employment at each of the regions and, as contained in the referenced documents, each region has an adequate infrastructure to absorb additional growth. The Final EIS provides an amplified discussion of existing infrastructure based on these referenced documents. The use of a socioeconomic impact model for the assessment of potential socioeconomic impacts is not considered appropriate because of the relatively small size of the workforce associated with the SIS Project as well as the existing infrastructure's abilities to accommodate additional growth.

11. Nonsupportive Statements and Comments on the NEPA Process

- The Draft EIS was inadequate and should be reissued.

- o DOE mismanaged the hearing process, causing the citizens to miss the opportunity to submit verbal testimony, and refused to hold hearings in other locations as requested.

- o The Draft EIS included an unprecedented disclaimer denying DOE's responsibility for the Draft EIS.

- o The Draft EIS did not assess the moral consequences or psychological effects associated with the SIS Project.

DOE Summary Responses to the Previous Comments:

The Draft EIS was reviewed by the EPA in accordance with its responsibilities under NEPA . The EPA rating system concerning adequacy has three Categories: 1-adequate, 2-insufficient information, and 3-inadequate. The Draft EIS was given a rating of category 2 "with environmental concerns" which basically means that additional information, as specified by the EPA, needs to be incorporated in the Final EIS to fully address environmental impacts. EPA specifically requested that additional information on the accident analysis be included.

While a number of specific issues and concerns were raised on the Draft EIS as identified in the specific comments and responses, none of the issues or concerns have identified new reasonable alternatives requiring assessment or have directly resulted in a significant change in the analysis of the potential environmental consequences. DOE believes that it has fulfilled its obligations under NEPA for the preparation of a Draft EIS. Accordingly, DOE has determined that the Draft EIS does not need to be reissued.

Implementing regulations for NEPA require Federal agencies to encourage public input on a Draft EIS but do not require Federal agencies to conduct public hearings. For the SIS Project, however, DOE concluded that public hearings were appropriate. Three public hearings were originally scheduled, one each in Boise, Twin Falls, and Idaho Falls, Idaho. The decision to schedule hearings at these locations was based in part on the level of public participation from the alternative sites with respect to the EIS scoping process and in part on the proximity of areas to the INEL that would most likely be affected by the Project and their accessibility for the conduct of public hearings.

Because 504 persons preregistered to speak at the scheduled hearings, DOE investigated extending each of the scheduled hearings and announced extensions of each of the hearings at the originally scheduled locations to accommodate those persons who preregistered. A review of the individuals who provided oral testimony at the hearings indicates that only a limited number of individuals providing oral testimony did not also provide written comments as part of the public hearing record or directly to DOE. Every individual and organization had the opportunity to provide written comments directly to DOE. Because of this fact, DOE does not consider that it abrogated its responsibilities for public participation under NEPA when preregistered individuals or organizations could not provide oral testimony at the desired time.

Inclusion of the disclaimer in the Draft EIS was an error. Disclaimers are generally required by DOE to be included in technical reports prepared by DOE's contractors but are not included in reports prepared in compliance with NEPA. The DOE has no intention of asserting such a disclaimer with respect to its responsibilities under NEPA nor for this Final EIS. Recognizing that the disclaimer was an oversight, the Hearing Officer very early in the public hearings stated for the record that DOE considered the disclaimer's inclusion to be incorrect. The extensive public outreach program and publicity generated by DOE's seeking input from the public on the Draft EIS indicate DOE's responsibility for the Draft EIS.

Several commentors on the Draft EIS were concerned with the potential moral or psychological impacts of the potential construction and operation of the SIS Project or the potential use of nuclear weapons. While DOE is sympathetic to these concerns, moral and psychological impacts are not within the scope of the NEPA process and accordingly are not included in the Final EIS for the proposed SIS Project.

12. Nonsupportive Statement and Comment on the INEL Mission

- o Locating the SIS Project at the INEL would change the INEL's mission or image from peaceful uses of the atom.

DOE Summary Response to the Previous Comment:

The first facilities at the INEL reflected both defense-related and non-defense-related activities. The percentage of the total effort dedicated to defense or non-defense activities at the INEL has changed in the past and will continue to change in the future. The ICPP, which is adjacent to the proposed location of the SIS Project at the INEL, has the mission of recovering uranium-235 from spent Government-owned fuel for use in defense programs. The SIS Project, while adding a new defense mission to the INEL, would not change the character/image of the INEL, as INEL's activities encompass both defense-related and non-defense-related activities.

13. Nonsupportive Statement and Comment on Independent Monitoring

- o Independent monitoring should be performed by Idaho.

DOE Summary Response to the Previous Comment:

The State of Idaho has a working agreement with DOE whereby Idaho may obtain monitoring samples collected by the DOE or the U.S. Geological Survey (USGS) onsite or offsite. In addition, DOE, in consultation with the state, is establishing a contract with Idaho State University (ISU) to provide independent verification of the monitoring program at the INEL. The DOE will fund the contract, and the University will furnish the results simultaneously to the state and DOE. The data will be fully available to the regulatory bodies of the state and to the public.

RESPONSES TO COMMENTS

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1.0 PREFERENCE FOR ALTERNATIVES

1.1 Comment:

Reviewers stated preferences among the four alternatives under consideration in this National Environmental Policy Act (NEPA) action. Specifically, the alternatives are the U.S. Department of Energy's (DOE's) preferred alternative of siting and operating a Special Isotope Separation (SIS) facility at the Idaho National Engineering Laboratory (INEL) near Idaho Falls, Idaho; the alternatives of siting and operating an SIS facility at either the Hanford Site near Richland, Washington, or the Savannah River Plant (SRP) near Aiken, South Carolina; or the no-action alternative, i.e., not constructing or operating the proposed SIS Project. Several requested that the preferences for alternatives be tabulated and characterized.

Response:

The DOE has reviewed the testimony, exhibits, and written comments received during the Draft Environmental Impact Statement (EIS) public comment period consisting of 60 days ending April 21, 1988. A total of 504 oral testimonies were recorded, supplemented by approximately 803 exhibits entered in the hearing record. In addition, approximately 630 written comments were received during the comment period. Several petitions were also entered into the hearing record as exhibits, as well as received by DOE during the comment period.

DOE did not request comments regarding preferences for alternatives, and in fact, encouraged comments on the contents of the Draft EIS, rather than opinions of the project itself. However, in response to reviewers' request to do so, the DOE has attempted to quantify the total response in terms of preference for alternatives. Although the vast majority of preferences are clear-cut, a fraction (less than 3 percent) required judgment on DOE's part as to intended preference (e.g., not siting at INEL has been construed as a preference for the no-action alternative unless another preference was stated) and the number of individuals represented (e.g., reference to one's family of eight, my neighbors and I, etc.) has been counted, as in the case of organizations, as a single preference. Similarly, in written correspondence (as in petitions), signed names were considered as one respondent preference per name. Although attempts were made to eliminate duplications, duplications between oral/exhibit/written testimony and names on petitions do occur.

The quantification by DOE yielded the following breakdown of preferences by alternative:

	Comments	Petitions
		12,943 (94.0%)
Preferred Alternative (INEL)	390 (27.9%)	0
Siting at Hanford	3 (0.2%)	0
Siting at SRP	0 (0.0%)	831 (6.0%)
No-action alternative	806 (57.7%)	0
No expressed opinion	198 (14.2%)	
TOTALS	1397 (100%)	13774 (100%)

A characterization of the reasons expressed while stating a preference for alternatives is summarized below. Each reason has been addressed on a more detailed basis in the comments and responses that are contained in the remainder of this volume.

Comments Concerning DOE Preferred Alternative of Siting an SIS Facility at the INEL near Idaho Falls, Idaho

Reviewers expressed support for new technology deployment at the INEL with benefits to higher education, technology transfer potential to industry and universities, increased national and worldwide awareness of INEL capabilities, potential for increased laser research, and potential spin-offs to other areas such as medicine. Others supported INEL siting based on economic benefits of jobs, increased tax base, economic diversification within the state, opportunities in support of the business infrastructure, opportunities for children in the future, as a magnet for future growth, and to avert possible loss of jobs due to decline in new projects at the INEL. Numerous respondents stated the need for strong national defense, the value of a nuclear deterrent to maintain the peace, and the need to protect freedom. Numerous reviewers supported this alternative based on confidence in DOE capabilities and safety/environmental considerations at the INEL including training programs, favorable labor climate, existing technical expertise, safety records, economic advantages (i.e., lower construction cost) of preferred alternative, and supporting infrastructure (i.e., waste handling, security). Others indicated that SIS would not adversely impact the quality of life in Idaho.

Comments Concerning Siting an SIS Facility at the Hanford Site near Richland, Washington

Reasons stated for the preference for this alternative included need for jobs at Hanford, lower population exposures and seismicity, proximity to feedstock, and Hanford is "already polluted."

Comments Concerning Siting an SIS Facility at the SRP near Aiken, South Carolina

No comments were received that were specifically directed at this alternative.

Comments Concerning No-Action Alternative, in effect, Not Siting an SIS Facility

Reviewers supporting no action stated that SIS would increase international tensions, further chance of war, and hurt the country's image, and that nuclear war was a no-win situation. Additionally, reviewers expressed opinions that the nation has enough plutonium, that life on earth could already be destroyed many times over with existing weapons, that DOE should concentrate on peace rather than war, and that environmental effects of nuclear war were not considered. A number indicated that the costs of the project could be better spent on useful goods, decreasing poverty, fighting disease, studying global concerns such as climate changes, and aiding crumbling institutions. Others stated concerns over environmental consequences that would threaten quality of life, adverse impacts on tourism and agriculture due to potential news of accidents (real or rumored), and the need to promote nonpolluting industries. Morality, ethics, and fears prompted concerns over the INEL's becoming a military target, weapons produced in one's backyard, destruction of children's heritage, future generations, INEL security forces imposing a police state, and the threat of nuclear holocaust, and led to comparisons to Nazi concentration camps. Environmental considerations resulting in no-action preference included concerns over pollution of the Snake River Plain aquifer, air and soil pollution, uncertainty over the viability of the Waste Isolation Pilot Plant (WIPP) repository to receive waste stored at the INEL, and the cleanup costs of all existing DOE waste. Concerns were expressed about DOE's ability to handle plutonium safely. In addition, there were concerns expressed as to plutonium toxicity (i.e., most dangerous substance known to man) and health effects (both short

and long term) from normal operation of SIS as well as postulated accident consequences. Concerns were expressed about transporting feed, weapon-grade plutonium, by-product, and transuranic (TRU) waste during normal operations, about potential accidents, and about potential terrorism.

Socioeconomic impacts were judged as negative based on benefits versus risks, with concern expressed over a limited 7 to 8-year mission life, i.e., boom-or-bust cycle. Additionally, there were concerns over the geologic acceptability of the INEL site, which centered on volcanism and seismic considerations. Less frequently cited bases for preference of the no-action alternative are addressed throughout this comment and response volume.

2.0 NEPA-RELATED COMMENTS AND RESPONSES

2.1 EIS PRESENTATION

2.1.1 Comment:

It was stated by some reviewers that the Draft Environmental Impact Statement (EIS) was well organized, considered all possible hazards and environmental impacts, presented a fair comparison of alternatives, and complied with National Environmental Policy Act (NEPA) requirements. Others stated just the opposite: that the Draft EIS did not adequately address environmental concerns, effects on the human environment, or nuclear arms buildup, and that it did not meet the requirements of NEPA.

Response:

The Draft EIS addresses the potential environmental consequences of the Special Isotope Separation (SIS) Project on man and his environment, including potential health effects from routine and accidental releases, impacts to ecology, socioeconomic impacts from potential in-migrating workers, potential effects on workers, as well as an assessment of all nonradiological releases. Neither the Draft nor this Final EIS has addressed issues or concerns that are not within the scope of the proposed action, such as a nuclear arms buildup. The U.S. Department of Energy (DOE) believes that it has fulfilled its obligations and responsibilities in accordance with the NEPA. DOE has responded in the following portions of this document to specific deficiencies stated by reviewers.

2.1.2 Comment:

Reviewers indicated that the EIS is biased to promote a project wanted by DOE, Department of Defense (DOD), Westinghouse, and their Southeast Idaho political constituents, and the document shows a bias to the nuclear industry over the concerns of people.

Response:

The SIS Project is being proposed by the DOE to provide contingency, flexibility, and technological diversity in its production of weapon-grade plutonium required for defense programs.

In accordance with the requirements of NEPA, DOE is responsible for the preparation of the EIS to provide environmental input into DOE's decision as to whether or not to proceed with the proposed project. The Draft EIS was distributed to interested individuals and organizations, including state and Federal agencies having required environmental expertise, to ensure that all environmental issues and concerns are adequately addressed.

2.1.3 Comment:

It was stated that DOE has misstated and misinterpreted critical facts "and wrapped the whole document in language so obtuse" as to effectively classify information and eliminate meaningful public review and comment.

Response:

Although the comments lack specificity as required by 40 CFR 1503.3, and as a result, are difficult to answer directly, DOE considers that it has not misstated or misinterpreted critical facts in its preparation of the Draft EIS and has not used obtuse language to effectively eliminate or classify information. Although it is unclear if the comment is referring to the need for the

project, it should be stated that the underlying assumption of many commentors that the SIS Project is needed to provide specific quantities of weapon-grade plutonium is incorrect. Rather the need for the SIS Project is directly based on the limitations of existing DOE production facilities for new weapon-grade plutonium and the need to maintain an adequate capability to respond to future approved requirements for this material.

In response to specific comments on the complexity of this document, DOE has attempted to improve the clarity and readability of the Final EIS.

2.1.4 Comment:

It was stated that the EIS contains so little solid data that it falls short of NEPA requirements. It was stated that there is a need to clarify, amend, revise, and augment the Draft EIS.

Response:

DOE has carefully reviewed all of the comments submitted on the Draft EIS to ascertain where clarifications or additional data or analyses would assist the public or organizations in understanding the potential environmental consequences of the proposed action and alternatives and has provided such clarifications, data and analysis as appropriate in the Final EIS. Additionally, DOE has updated the description of the SIS Project to reflect the most current design and safety evaluations. DOE does not consider the Draft EIS to be inadequate with respect to its analyses or level of information; modifications made to the Draft EIS as reflected by the Final EIS are fully in accordance with modifications provided by the Council on Environmental Quality's (CEQ) Regulations. For more information, see the response to comment 2.1.6.

2.1.5 Comment:

It was noted that the Draft EIS is one of the worst EIS documents seen by the reviewers; it was incomplete, misleading, confusing, and a "sham."

Response:

DOE considers that the Draft EIS addressed the potential environmental impacts of the SIS Project in accordance with CEQ's regulations for implementing the procedural provisions of NEPA (40 CFR 1500-1508) and DOE guidelines for compliance with NEPA (December 15, 1987, 52 FR 47662), as amended. Any specific, categorical deficiencies or shortcomings alleged have been addressed on an individual basis as appropriate.

2.1.6 Comment:

It was stated that the Draft EIS is inadequate, and unacceptable, omits critical data, that many of the impact discussions need to be redone, that it violates the NEPA requirements and should go back to the scoping process, and that it needs to readdress the impact of the length of time jobs would be available because of the short 7 to 8-year mission. As required by Federal regulations, the addition of supplemental information in the Final EIS cannot resurrect an insufficient impact statement. It was further stated that the inadequate Draft EIS must be reissued for comment before the Final EIS.

Response:

Response:

2.2 PROPOSED ACTION

2.2.1 Comment:

The INEL's experience with plutonium was questioned by some. Conversely, others stated that the Idaho National Engineering Laboratory (INEL) has an able and available workforce which was a key factor in the decision to site the Special Isotope Separation (SIS) at the INEL.

Response:

The INEL has substantial experience with plutonium, having operated the INEL breeder reactors from 1964 to the present (Experimental Breeder Reactors I and II, and the Zero Power Plutonium Reactor), and INEL has extensive analytical experience in the measurement of both high and low levels of plutonium in a variety of environments and media. The SIS Project will utilize the considerable experience of the INEL employees who have experience with plutonium; for example, the experience in handling highly radioactive materials resulting from reprocessing fuels was a factor in selecting the INEL as the preferred site for the SIS Project. See the response to comment 2.12.5 for additional information on the designation of a preferred site.

2.2.2 Comment:

Reviewers noted the use of the SIS for plutonium separation and stated that the weapon-grade material produced will be worth three times the cost of the SIS. Others stated that the SIS Project was a way of reducing the overall production of plutonium by better utilizing currently available stocks.

Response:

The cost of weapon-grade plutonium that would be provided by the SIS Project is substantially lower than the cost of producing plutonium in reactors. Furthermore, utilization of existing fuel-grade plutonium better utilizes the available of the U.S. Department of Energy (DOE) plutonium inventory.

2.2.3 Comment:

It was noted that the Draft Environmental Impact Statement (EIS) should address the intent for the INEL to be a production- scale plutonium facility, i.e., additional missions. For example, there will be increased receipts and resulting increased transportation risks in receiving more waste and scrap as raw materials, handling much greater volumes of weapon-related materials, and very likely, providing indefinite long-term storage of scrap and refuse resulting from the nation's weapons program.

Response:

The Forewords of both the Draft EIS and the Final EIS identify the SIS feed sources as including fuel-grade plutonium from the N-Reactor, small quantities of scrap from the Hanford Site and the Savannah River Plant, and potentially Fast Flux Test Facility (FFTF) fuel. Currently, DOE is preparing an Environmental Assessment (EA) analyzing the feasibility and environmental impacts of various fuel-decladding techniques that could be used to recover DOE-owned plutonium in the spent fuel from FFTF. Other DOE-owned fuel-grade material may also become available later. Section 4.5.1 and the Summary of the Final EIS have been modified in response to public comments to include cumulative impacts from 30 years of SIS operation at maximum capacity, and the cumulative risk of transporting

FFTF fuel to the SIS Facility from the Hanford Site, the preferred location for the decladding activity. Additional non fuel-grade to weapon-grade plutonium missions proposed by DOE for the SIS Project or the INEL would be implemented only after the appropriate technical and National Environmental Policy Act (NEPA) evaluations are completed. Considerations of potential additional missions for the SIS Project or the INEL are not within the scope of this EIS.

This EIS presents the transportation risks for SIS feed, weapon-grade plutonium product, and potentially by-product materials and transuranic (TRU) waste generated by the SIS Project. The risks are very small, and the number of increased shipments in Idaho and the Northwest resulting from operations of the SIS Project is also small. To assure the environmental impacts have been fully bounded, the summary and Section 4.5 of the Final EIS include cumulative impacts for the design life (30 years) of the SIS Project. Also see the response to comment 5.30.3.1 for further information on waste disposal.

2.2.4 Comment:

Reviewers stated that construction of the SIS Project at the INEL should not be started until the full-scale demonstration at Lawrence Livermore National Laboratory (LLNL) has been completed and final design approved.

Response:

Major SIS Project construction activities would not begin until after the full-scale unit demonstration at LLNL has been completed. Plant performance verification (PPV) testing in the engineering demonstration system (EDS) at LLNL is scheduled to be completed by spring 1990. The EDS will test the full-scale modular units proposed for the production plant, but will not have the throughput capacity of the SIS Production Plant. Construction of both the Laser and Plutonium Processing Buildings would not begin until after the completion of the PPV tests. Procurement of major equipment for the Plutonium Process Building (PPB) and the Laser Support Building (LSB) would not begin until after completion of the PPV testing. Final design approval will be provided in accordance with DOE Orders.

2.2.5 Comment:

Reviewers suggested that there is a hidden agenda with the approach taken in the EIS; i.e., another plant at the INEL, use of commercial fuel, building another reactor, irradiation of food.

Response:

There are no hidden agenda items supporting or complementing the identified purpose and need for the SIS Project. As stated in the Foreword of the Final EIS, all of the plutonium that would be processed is "DOE-owned material that is neither derived from U.S. commercial reactor spent fuel precluded by law nor fuel precluded by current DOE policy." Unrelated to the SIS Project, the INEL has been identified as the preferred site for a second new production reactor (NPR) using the modular high-temperature gas-cooled reactor (MHTGR) concept to assure that tritium production needs can be met. This proposed action will undergo separate review. Irradiation of food has not been identified as a new initiative for the INEL in the latest INEL Institutional Plan. None of the suggested items are a part of the proposed action in this EIS, although it is now conceivable that spent fuel from present and future DOE reactors other than that previously identified as SIS feedstock could become available for SIS plutonium processing and could be bounded by the impact analysis discussed in this Final EIS.

2.2.6 Comment:

Reviewers stated that the EIS should discuss the safety of commercial reactors if plutonium derived from them is processed in the SIS Project.

Response:

The fuel-grade plutonium that SIS facilities would process is entirely DOE-owned and is not derived from U.S. commercial reactor spent fuel precluded from defense programs by law.

2.2.7 Comment:

Reviewers stated that parts of an atomic bomb would be built at the INEL, and others stated that the EIS should mention the catastrophic environmental effects when a nuclear weapon explodes at the facility.

Response:

The SIS Project would not produce completed parts for an atomic bomb; it would, rather, only provide weapon-grade plutonium that would be transported elsewhere for further processing/ fabrication. The weapon-grade plutonium handled in the SIS Facility would not be in a form which could result in a nuclear explosion.

2.2.8 Comment:

Reviewers stated that the SIS Facility will be a factory that produces "weapon-grade uranium."

Response:

The purpose of the SIS Project, as stated in Chapter 1 of the EIS, is to convert fuel-grade plutonium into "weapon-grade plutonium and not to produce "weapon-grade uranium."

2.2.9 Comment:

Reviewers stated that the EIS should address (1) full capabilities of the SIS (spinoff technologies), (2) recycle of warheads for cleanup (e.g., removal of Pu-241), (3) environmental impacts of burning satellites (on reentry) using Pu-238 as a power source, and (4) the question that the SIS Facility would recycle weapons stockpile, not add to it.

Response:

The potential for technological spinoffs and follow-on missions is acknowledged in the Final EIS in Section 1.1.2; however, both the Draft EIS and the Final EIS state that the SIS mission evaluated is to process fuel-grade plutonium to produce weapon-grade plutonium. Other missions are not proposed for the SIS Project and therefore are not within the scope of this EIS. If a new mission were proposed for the SIS Project, the need for a supplement to this EIS would be considered. A discussion of burning satellites is beyond the scope of this EIS since a satellite or its power source are not proposed or considered actions.

2.2.10 Comment:

It was noted that the SIS Project is not a factory. Concerns were expressed about the SIS Project supporting the making of weapons (bombs) that would cause mass destruction.

Response:

Response:

Response:

Response:

Response:

activities would continue at those sites. It should also be noted that alternatives to locating the SIS Project at the INEL which are analyzed in this EIS include locating the project at the Hanford Site or the SRP.

2.2.15 Comment:

Reviewers stated that SIS Project will not produce more plutonium but will process existing plutonium.

Response:

This statement is correct. As stated in the Foreword and Chapter 1 of the Draft EIS and the Final EIS, the SIS Project would receive fuel-grade plutonium that already exists and refine it to produce plutonium meeting weapon-grade requirements. The SIS Project would not produce new plutonium. See the response to comment 2.2.13.

2.2.16 Comment:

It was asked if the government was thinking of moving manufacturing operations from Rocky Flats to Idaho, since the SIS Project was being built away from the source of raw material and the point of manufacture of bombs.

Response:

A discussion of moving Rocky Flats operations (to Idaho or elsewhere) is beyond the scope of this EIS. The DOE production complex, which consists of several facilities at different locations, requires the transport of nuclear materials (e.g., fuel-grade plutonium transported from the Hanford Site to the SRP for use in blending as discussed in Section 2.4 of the Draft EIS and Final EIS and the transport of weapon-grade plutonium from the Hanford Site and SRP to Rocky Flats). Locating the SIS Project at the INEL rather than at either Hanford or SRP would be closer to both the source of fuel-grade plutonium and destination of the product.

2.2.17 Comment:

It was stated that DOE has repeatedly refused to inform the public of its long-term plans for the SIS Project.

Response:

This EIS assesses the potential environmental impacts for constructing and operating the SIS Project to process DOE-owned fuel-grade plutonium into weapon-grade plutonium. Although the SIS Facility may have the capability to perform additional missions, none has been formally proposed by DOE. Therefore DOE has not withheld plans from the public. Any future proposal would be fully subject to the necessary technical, environmental, and safety evaluations and the requirements of NEPA. To assure the environmental impacts have been fully bounded, the summary and Section 4.5 of the Final EIS include cumulative impacts for the design life (30 years) of the SIS Project.

2.3 DRAFT EIS DISCLAIMER

Comment:

Concern ranging to outrage was expressed regarding the disclaimer located on the inside front cover of the Draft Environmental Impact Statement (EIS) document. These concerns included questioning the credibility of the document and of the U.S. Department of Energy (DOE) due to a perception that DOE was not taking responsibility for the contents or accuracy of the document. Reviewers stated the disclaimer was not appropriate and that DOE should not have included it. It was asked that an explanation of why the disclaimer was printed be included. It was also stated that the existence of the disclaimer made the Draft EIS flawed, useless, or invalid under NEPA, requiring that it be reissued. It was also noted that inclusion of the disclaimer was a mistake, that it was inadvertently included, and that the DOE would still be responsible for EIS contents despite the presence of the disclaimer.

Response:

Inclusion of the disclaimer was a mistake. Disclaimers are generally required by DOE to be included in technical reports prepared by DOE's contractors as required by DOE. However, they are not to be included in EISs since these are DOE documents. DOE has no intention of asserting such a disclaimer in any manner to escape its responsibilities for the contents of the EIS. As required by Council on Environmental Quality (CEQ) regulations, DOE reports are in fact independently evaluated and approved. In spite of the mistaken inclusion of the disclaimer in the printing of the document after approval by DOE, DOE takes responsibility for the scope and contents of both the Draft and the Final EIS. Recognizing that the inclusion of a disclaimer in the Draft EIS was an obvious error, the majority of reviewers criticized the inclusion of the disclaimer and then proceeded to identify their comments on the substance of the Draft EIS. The Hearing Officer very early in the hearings, after the inappropriateness of the disclaimer was identified, stated for the record that DOE considered the disclaimer's inclusion to be incorrect. The extensive public outreach program and the extensive publicity by DOE seeking input from the public on the Draft EIS rebut any argument that DOE was not in fact taking responsibility for the document. The large number of comments submitted by the public also reflects that the public was not precluded from commenting by the presence of the disclaimer. Erroneous inclusion of the disclaimer does not invalidate the Draft EIS. A disclaimer is not included in this Final EIS.

2.4 DRAFT EIS PRESENTATION -- GENERAL

Comment:

It was stated that the Draft Environmental Impact Statement (EIS) was very hard to read and comprehend and was too technical; it was anything but clear and to the point, as required by NEPA and the CEQ requirements (40 CFR 1502.1); and that it was full of bureaucratic gobbledygook. It was also noted that common terms, e.g., furnace and glove box, when used in a way that differs from common usage, should be explained to avoid confusion.

Response:

The characterization and assessment of the Special Isotope Separation (SIS) Project necessitate the analysis and presentation of technical data. The U.S. Department of Energy (DOE) has attempted to present sufficient detail and documentation of the environmental impacts in order to permit meaningful review. Based on specific public comments on the Draft EIS, certain sections in the Final EIS have been revised and amplified to enhance readability. Both the Draft EIS and the Final EIS contain a glossary (Section GL), which defines terminology to promote the readability of the document. "Glove box" was defined in the Draft EIS, and the term "furnace" has been replaced with "specially designed tilt-pour furnace" in the Final EIS.

The discussions in the Final EIS have also been reviewed and edited in an effort to facilitate readability and understanding by the general public.

2.5 DRAFT EIS PREPARATION

2.5.1 Comment:

Concern was expressed about the appropriate use of references. On the one hand, the Draft Environmental Impact Statement (EIS) was labeled "incestuous" and most likely fraudulent because references were mostly the U.S. Deparment of Energy (DOE) documents with no independent sources utilized. On the other hand, it was stated that the Draft EIS failed to consider DOE studies, particularly those covering the cost and problems associated with transportation risks.

Response:

The reference section in the Draft EIS contained 91 references, of which 33 were not issued by DOE. References included in the Final EIS include documents prepared by the American Association of Petroleum Geologists, U.S. Geological Survey (USGS), National Academy of Sciences (NAS), International Atomic Energy Agency (IAEA), U.S. Bureau of Census, U.S. Nuclear Regulatory Commission (NRC), U.S. Department of Commerce, a geology textbook written by W. M. Davis, Radiation Protection Proceedings of the 1st International Congress, U.S. Environmental Protection Agency (EPA), Idaho State University Center for Business Research and Services, International Commission on Radiological Protection (ICRP), National Safety Council, and the Journal of Geophysical Research. In Appendix A of the Draft EIS there were 44 references, of which 25 were not DOE documents; these have been further expanded in the Final EIS. In the Final EIS, issuers of references include the National Academy of Sciences, IAEA, EPA, ICRP, NRC, and Radiation Protection Proceedings of the 1st International Congress.

Reference documents on the risk of transportation are included in the response to comment 5.29.81.

2.5.2 Comment:

It was noted that the Draft EIS did not identify who prepared Section 1, and that none of the authors was qualified to address the need for the Special Isotope Separation (SIS) Project.

Response:

DOE is solely responsible for the preparation and content of the EIS, whether in draft or final form. Although NUS was used to assist with the preparation of the document for DOE, DOE furnished input and guidance throughout, including the preparation of Chapter 1. All data, analyses, and methodologies in the Draft EIS and the Final EIS were independently evaluated and approved by DOE. The DOE staff that assisted in the preparation, independent evaluation, and approval of this EIS are qualified to address the need for the SIS Project.

2.5.3 Comment:

It was stated that the EIS was prepared by qualified people who prepared an objective evaluation.

Response:

No response required.

2.5.4 Comment:

It was stated that the Draft EIS is fraudulent and was prepared and reviewed by those with a vested interest, and it should be rewritten by an independent group.

Response:

The NEPA and DOE implementing procedures specify responsibilities for preparation and review of an EIS. The consultant used by DOE to prepare the EIS filed an appropriate conflict of interest disclaimer in accordance with Council on Environmental Quality (CEQ) regulations. The Draft EIS was independently reviewed and approved by DOE's office of Environment, Safety, and Health to ensure the document's accuracy and adequacy.

2.5.5 Comment:

It was suggested that Dr. Gibson of Howard Medical School be included as a consultant on the Final EIS.

Response:

The DOE has utilized the services of a consultant to prepare the EIS for the SIS Project. The EIS (both Draft and Final) has undergone extensive reviews by experts within DOE to verify completeness and accuracy. As required by the NEPA process, the EIS is available for public review and comment.

2.6 CLASSIFIED INFORMATION

2.6.1 Comment:

It was stated that too much information is classified, and that there is insufficient information available to make a decision or to oppose Special Isotope Separation (SIS) on technical grounds.

Response:

Quantitative information on defense material requirements, inventories, and production capacity is classified in accordance with law; however, the need for the SIS Project is based on having an on-line capability to produce weapon-grade plutonium as a contingency, given limitations in the existing U.S. Department of Energy (DOE) production complex, and is not based on a requirement for specific quantities of new weapon-grade plutonium. The Environmental Impact Statement (EIS) contains sufficient information for the purpose of analysis required by National Environmental Policy Act (NEPA). For information on the NEPA requirements with respect to need, see the response to comment 4.11.1.

2.6.2 Comment

It was noted that independent research is needed to evaluate risks, since much information is classified.

Response:

The technology necessary for the SIS Project, including all classified aspects, has been reviewed by a team of independent experts. The Final EIS bounds the reasonably foreseeable potential environmental impacts. For additional information on classification, see the response to comment 4.11.1. Both the Draft EIS and Final EIS discuss the risks and potential environmental impacts for normal operation and severe accidents in Section 4.1 for the three alternative sites as required by CEQ regulations.

2.6.3 Comment:

It was noted that classified documents were referenced, that they are unavailable to the public, and that only documents available to the public should be referenced. Further, it was noted that, by denying public information, DOE has assumed decision-making power for the SIS Project and has a vested interest in and is biased toward the SIS Project.

Response:

The only classified documents referenced in the Draft EIS were two documents cited in Appendix A that are specific to the DOE safe secure transports (SSTs). These documents were available to a number of independent experts who reviewed the Draft EIS and the Final EIS, and to specific government officials who possess the proper security clearances. See the responses to comments 2.1.2, 2.6.1, and 3.4.

2.6.4 Comment:

It was stated that the EIS provides sufficient detail for Russians to copy the technology.

Response:

2.7 OUT-OF-SCOPE ISSUES

2.7.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) does not discuss any impact of the Special Isotope Separation (SIS) Project on prospects for nuclear arms control and disarmament.

Response:

The impact of the prospects for nuclear arms treaties are speculative and outside the scope of this EIS. Also refer to the responses to comments 4.3 and 2.12.3 for additional information on treaties.

2.7.2 Comment:

Concern was expressed about potential psychological, moral, and emotional impacts from the siting of an SIS Facility. Specifically, fear of nuclear weapons, dying in a nuclear war, and the hatred that weapons represent were mentioned. Furthermore, it was stated that fear of communism is an unnecessary fear. It was indicated that there would be a resultant decline in moral standards and mental health in the community at large, with particular mental anguish and negative effect on children.

Response:

The above concerns are not appropriate factors for consideration in the National Environmental Policy Act (NEPA) process. The U.S. Supreme Court held, in Metropolitan Edison v. People Against Nuclear Energy, 103 S. Ct. 1556 (1983), that psychological effects caused by risk are not within the scope of the NEPA process. Analyses of moral, emotional, psychological (including mental health of the community, fear, stress, mental anguish, negative effects on youth, hatred, and diminished fear of communism) issues are therefore not included in the Final EIS for the SIS Project.

2.7.3 Comment:

It was noted that ethical and legal (specifically the concept of ownership of plutonium) issues were not discussed or referenced.

Response:

Ethical and legal issues with respect to the concept of ownership of plutonium are not within the scope of this NEPA process, which was established for consideration of the potential environmental impacts of a proposed action. The proper forum for identification and resolution of legal issues is the judicial system. With respect to ownership of N-Reactor fuel, the N-Reactor fuel (regardless of operating mode) is DOE-owned plutonium. N-Reactor is not an U.S. Nuclear Regulatory Commission (NRC)-licensed facility. For additional information regarding government policy and litigation, refer to the responses to comments 2.7.2 and 3.4.

2.7.4 Comment:

Reviewers requested that the impact of diverting money from social programs be addressed, and stated that the SIS Project is an inappropriate allocation of resources to national security. Conversely, it was stated that the SIS Project shows national defense is important regardless of cost to the national budget.

Response:

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Response:

2.7.12 Comment:

It was noted that some INEL workers may be uncomfortable working for defense projects but may not support the peace movement for monetary reasons.

Response:

Workers at the INEL generally are aware that the INEL has been and continues to be involved in defense projects. The SIS Project would be a relatively small incremental addition to defense- and non-defense related activities taking place at the INEL. Addressing concerns about support of the peace movement is beyond the scope of this EIS. Additional information on counseling services for INEL employees is included in the response to comment 2.7.11.

2.7.13 Comment:

It was mentioned that the SIS Project could be used as a tool for bargaining and negotiating in future arms control talks to prevent such technology deployment internationally.

Response:

Speculation on future arms control talks or any role that the SIS Facility deployment might play in these talks is beyond the scope of this EIS.

2.7.14 Comment:

It was noted that national management of stockpiles appears to take a back seat to military targeting requirements and arbitrary deadlines for deploying new weapons.

Response:

Weapon deployment and targeting requirements are outside the scope of this EIS.

2.8 DRAFT EIS HEARINGS

2.8.1 Comment:

It was noted that the Environmental Impact Statement (EIS) hearings are a waste of money. It was also stated that the EIS hearings are a demonstration of democracy in action.

Response:

The National Environmental Policy Act (NEPA) requires preparation of an EIS for assessment of the potential environmental effects of proposed major Federal actions which may significantly affect the quality of the human environment. Although public hearings are not required by Council on Environmental Quality (CEQ) regulations, based on public interest the U.S. Department of Energy (DOE) held public hearings to obtain input on the scope of the EIS and to receive comments on the Draft EIS. DOE believes the EIS hearings were useful. It is believed that the final EIS is improved in several areas over the Draft EIS due to input provided at the hearing and in written comments.

2.8.2 Comment:

It was noted that the hearings should focus on environmental and safety issues and evaluation of alternatives, and not on other issues. Others considered the hearings a sham because not all of the issues were in scope.

Response:

In the interest of maximizing public involvement and participation in the Special Isotope Separation (SIS) hearings, all comments were accepted and made part of the official public record, even if the issues or concerns raised were outside the scope of the EIS. DOE is not obligated, under NEPA, to analyze or respond to issues that are outside the scope of the EIS. However, where such comments were received, they have been noted in this comment and response volume.

2.8.3 Comment:

Reviewers stated that the hearings were poorly handled, not enough hearings were held, and people were inconvenienced and could not testify.

Response:

Although public hearings are not a requirement, the DOE initially scheduled public hearings on the Draft EIS on March 25th at Idaho Falls, March 26th at Boise, and March 28th at Twin Falls. Due to an unexpectedly large public response, additional hearing time was scheduled on March 29th, 30th, and 31st at Boise, Idaho Falls, and Twin Falls, respectively. In addition, the written comment period was extended from the minimum 45-day period to a 60-day period. Every effort was made to avoid any inconvenience. Written comments received equal consideration with oral testimony. Those inconvenienced by hearing dates or locations had the full opportunity to participate in the NEPA process by submitting written comments.

2.8.4 Comment:

Reviewers noted that all four options--specifically, the no-action alternative--were not identified in the notice of public hearings or discussed at the hearings.

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comments on the merits of alternatives and adequacy of the Draft EIS. No hearings are required in the CEQ regulation for a Final EIS, and DOE does not intend to conduct such hearings.

2.8.13 Comment:

It was noted that the DOE waited until the morning of the first hearing to deal with the problem of "70 hours of testimony and only 24 hours in which to hear it."

Response:

Implementing CEQ regulations for NEPA require an agency to encourage public input on a Draft EIS but do not require the agency to conduct public hearings. The DOE nevertheless concluded that public hearings were appropriate and conducted an extensive public outreach effort (as itemized in exhibit 4 of the hearing record) to encourage public knowledge and involvement. Contrary to the assertion that the DOE refused to schedule additional hearings, the DOE began to consider arrangements for extended public hearings prior to the conduct of the initial hearing at each location. A review of all the written and oral comments (including exhibits) indicates that the vast majority of those who provided written comments also submitted oral comments. The ability to make an oral presentation did not significantly limit public participation in the NEPA process. Further, the Public Hearing Officer provided all individuals who may have been inconvenienced because of the hearing extensions an opportunity to present oral comments, as contained in the records of the public hearings. All those in attendance who had not signed up to testify prior to or at the hearings were likewise offered the opportunity to speak upon the completion of the preregistered speaker lists, and substitute speakers were permitted to speak for those called as preregistered but not in attendance.

2.8.14 Comment:

It was stated that DOE rescheduled the public hearings and did not publicize the new dates adequately. It was also stated that the hearing announcements placed in newspapers appeared after the last date to preregister--specifically, that the notice in the Wood River Journal appeared on March 23, 1988.

Response:

The public hearings on the Draft EIS were rescheduled at public request to avoid a conflict with the public hearings on the Wilderness Bill, in order to allow maximum public participation at both hearings. The rescheduling of the SIS public hearings was announced in a press release, and the new dates were well publicized by the electronic and print news media. One of the means of providing notice of the public hearings was a display advertisement placed in nine papers of general statewide circulation or regions of specific interest. Another was a legal notice placed in five of the nine newspapers. The specific newspapers are listed in the response to comment 2.8.4. Notice of the public hearings was provided in Federal Register notices dated February 19, 1988 (53FR5032) and (to announce the rescheduled hearings) March 4, 1988 (53FR7227). The DOE made every reasonable effort (including an extensive public outreach program) to maximize public awareness of the proposed action.

With respect to the appearance of hearing announcements in the newspapers after the last date to preregister, all notices were placed in newspapers in a time frame appropriate for an upcoming hearing. The notices were specific as to the availability of the option of signing up at the door to

present comments in addition to preregistration. The Wood River Journal is a weekly newspaper, and publication in the March 23, 1988 issue was probably consistent with their next issue after receipt of the advertisement. Publication of a display advertisement notice in the Wood River Journal is further evidence of the DOE's attempt to maximize awareness of this NEPA action in localized areas of expressed interest.

2.9 DRAFT EIS DISTRIBUTION

Comment:

Reviewers perceived a Department of Energy (DOE)reluctance to make copies of the Environmental Impact Statement (EIS) available; they stated that the EIS should be sent on the day a request is received and summaries should not be sent in the place of an EIS unless requested. Others noted that copies of the Draft EIS were not sent to libraries around the INEL. It was further stated that names of people who requested copies were lost by DOE.

Response:

Copies of the Draft EIS were placed in the INEL, Hanford, Savannah River, and DOE Headquarters (Washington, D.C.) reading rooms. In addition, the Draft EIS was sent to all individuals who requested a Draft EIS, city and college libraries, mayors' offices, chambers of commerce offices, legislative offices, and newspaper offices throughout the state. Exhibit 4 of the hearing record lists those places where copies of the Draft EIS were delivered for public availability and local pickup in addition to the extensive mailings. In excess of 1,800 copies of the Draft EIS were distributed. The Final EIS is available at these locations and has been sent to individuals who made written or oral comments during the Draft EIS 60-day comment period and to those who received copies of the Draft EIS. Requests for the Draft EIS were processed as rapidly as was practical. Summaries of the Draft EIS were sent only to individuals who specifically requested the summary in place of or in addition to the Draft EIS. Address verification forms were mailed to verify addresses and denote changes prior to mailing of the Final EIS. DOE is not aware of any lost request for copies of the EIS.

2.10 CONSIDERATION OF DRAFT EIS COMMENTS

Comment:

Concern was expressed regarding the proper consideration of public comments (pro and con) received by the Department of Energy concerning the proposed action. Concerns were also expressed over the merits of various comments given at the hearings. It was also stated that it was appropriate for national groups and people from outside Idaho to comment.

Response:

All comments, regardless of origin, received during the 60-day public comment period have been carefully reviewed and considered by the DOE in its preparation of the Final Environmental Impact Statement (EIS). It is not within the scope of the National Environmental Policy Act (NEPA) process to pass value judgments as to the relative merit of comments. All comments have been responded to if they were within the scope of this EIS.

2.11 DRAFT EIS PRESENTATION -- SPECIFIC

2.11.1 Comment:

It was questioned whether the models were correct, if mistakes were made, and whether all relevant factors were taken into account. It was also stated that the U.S. Department of Energy (DOE) should reconsider the effects of the Special Isotope Separation (SIS) Project on people, the environment, and animals.

Response:

DOE has carefully reviewed the Draft Environmental Impact Statement (EIS) based on the public comments received as well as the current design level of the SIS Project. DOE has independently evaluated this Final EIS and is confident that all relevant factors were taken into account and that the Final EIS accurately reflects the environmental consequences of the SIS Project.

2.11.2 Comment:

It was stated that the conclusions on modeling were generated first and then the data needed to support the conclusions were generated.

Response:

In preparation of the Draft EIS, information on the preliminary design of the SIS Project was evaluated and modeled to determine the potential environmental consequences. Conclusions were not generated prior to the analysis of the environmental consequences. Environmental evaluations have been used to confirm or modify the SIS design.

2.11.3 Comment:

It was stated that the Draft EIS fails to define "background radiation," "natural radiation," and "natural background radiation."

Response:

Definitions of "natural background radiation," "natural radiation," and "background radiation" have been included in the glossary of the Final EIS. Additionally, Table 3-3 of the Final EIS has been modified to clarify natural background radiation.

2.11.4 Comment:

It was stated that the N-Reactor status on page 1-2 should be updated.

Response:

The status of the N-Reactor has been updated in Sections 1.1 and 1.1.1 of the Final EIS. Additionally, the resultant employment effects are accounted for in Section 3.2.2 of the Final EIS.

2.11.5 Comment:

It was noted that most of the references are unavailable to the general public and should be placed in Idaho public libraries, that the Draft EIS lacks many primary references, and that something better than 1980 standards should be used.

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Response:

The value in Table 2-4 should have been $<1.4 \times 10^{-2} \mu$Ci. The Final EIS has been changed to reflect this typographical omission.

2.11.10 Comment:

It was stated that DOE research was sloppy, in that Hofman was misspelled three times.

Response:

Corrections have been made to imprecise or inaccurate words where specifically identified. The noted spelling error has been corrected in the Final EIS.

2.11.11 Comment:

It was noted that the Final EIS should address the fact that a significant number of people live outside the 50-mile radius of the INEL. If the 50-mile radius were extended, Hanford would be the preferred site.

Response:

As required by Council on Environmental Quality (CEQ) regulations for implementing the procedural provision of NEPA, the Draft EIS identified the preferred location of the proposed action (the SIS Project) as the INEL. The basis for the selection of the INEL as the preferred site was discussed in Section 1.4 of the Final EIS. Extending the 50-mile radius, commonly used for many environmental impact assessments, around the SIS Project site at the INEL would not increase the population sufficiently to offset the more than 200,000-person difference that currently exists between the INEL and the Hanford Site.

2.11.12 Comment:

It was stated that the Draft EIS does not address impacts on humans (other than cancer deaths), and does not mention the cost to humans of the effects on other living things, water or land.

Response:

Other than radiological impacts, the Draft EIS discussed nonradiological impacts such as the impacts on ecology, the use of water, socioeconomics, historic resources, as well as compliance with appropriate standards which take into account health effects not related to radioactivity. No attempt has been made to assign a cost to potential impacts; however, their importance is reflected by the assessment of these types of impacts in the Draft EIS and the Final EIS.

2.11.13 Comment:

It was stated that DOE intends to power the SIS Project with coal-generated power. It was also stated that the Draft EIS fails to consider the cumulative effects of coal usage on the Pacific Northwest's clean air.

Response:

As stated in the Draft EIS and the Final EIS, in Section 4.1.2.2, coal usage would be for the generation of steam rather than electric power. As also stated in the same section, incremental emissions from the burning of this coal would be well within existing Prevention of Significant Deterioration (PSD) de minimis levels.

2.12 RECORD OF DECISION

2.12.1 Comment:

It was stated that resources should not be committed until a decision is made to proceed.

Response:

National Environmental Policy Act (NEPA) regulations do not allow commitment of resources that would prejudice selection of alternatives or have an adverse environmental impact before the agency issues a Record of Decision. However, NEPA does allow for the development of plans or designs or the performance of other work necessary to support obtaining permits for the project (40 CFR 1506.1). No commitment of resources for the Special Isotope Separation (SIS) Project has been made that is not allowed pursuant to the Council on Environmental Quality (CEQ) regulations.

2.12.2 Comment:

It was stated that the decision has already been made to build the SIS Project in Idaho and it was questioned whether the NEPA process will have any input in the decision.

Response:

The publicly available Record of Decision based in part on the Environmental Impact Statement (EIS) will state the U.S. Department of Energy's (DOE's) decision whether or not to proceed and, if the SIS Project is to be constructed and operated, where it will be located. These decisions have not yet been made and will not be made until completion of the NEPA process.

2.12.3 Comment:

It was stated that the decision to proceed with the SIS Project should be delayed pending outcome of the Strategic Arms Reduction Treaty (START) treaty negotiations or until it is evaluated by the next presidential administration.

Response:

Although future verifiable treaties, such as START, are speculative, it is acknowledged that further treaties could result in additional weapon-grade plutonium being made available from retired weapons. As stated in Section 1.1.1 of the Draft EIS and the Final EIS, the existing DOE production complex for new weapon-grade plutonium is constrained by facilities that were constructed in the early 1950s and are operationally limited. The SIS Project needs to be implemented without delay to provide an on-line capability for new weapon-grade plutonium in the mid-199Ds if a prudent level of contingency, flexibility, and technological diversity is to be provided in meeting approved nuclear defense requirements. A project delay would also result in cost escalation and deny the needed capability during a period of maximum vulnerability to material supply.

2.12.4 Comment:

It was stated that a decision to proceed with the SIS Project should be based on actual technical, economic, and environmental merit and not on emotional issues. It was also stated that the decision to build the SIS Project should consider philosophical issues (for example, escalation of the arms race and encouragement of weapons proliferation), not just economic issues, and should weigh all alternatives equally.

Response:

The decision to proceed or not to proceed with the construction and operation of the SIS Project will be documented in a publicly available Record of Decision on this EIS. The Record of Decision will identify and discuss all factors, including any essential considerations of national policy that were used by DDE in making its decision.

2.12.5 Comment:

It was noted that the location decision was made outside the NEPA process. Questions were also asked concerning the method of selecting the preferred site.

Response:

The Record of Decision on this EIS will identify whether DOE will or will not construct and operate the SIS Project and, if it is to be constructed and operated, its location. In accordance with the Council on Environmental Quality (CEQ) Regulations for implementing the procedural provisions of NEPA (40 CFR 1502.14), the INEL was identified in the Draft EIS as DOE's preferred site commensurate with the recommendation of the site evaluation team as discussed in Section 1.1.4 of the Draft EIS and the Final EIS.

2.13 NEPA GENERAL

2.13.1 Comment:

Appreciation was expressed over Federal agencies' considering environmental impacts in their actions and of the U.S. Department of Energy's (DOE's) dedication to fulfilling its National Environmental Policy Act (NEPA) obligation.

Response:

DOE acknowledges the comments and its responsibility to the NEPA process.

2.13.2 Comment:

It was stated that the process DOE has followed in pursuing this project is flawed and the process should be terminated.

Response:

DOE believes that it has followed all the appropriate requirements of NEPA. Pursuant to NEPA, DOE has conducted a scoping process to elicit comments on the scope of the Environmental Impact Statement (EIS), prepared and distributed a Draft EIS for public comment, conducted public hearings on the Draft EIS, and fully considered the comments on the Draft EIS. DOE has found no basis for terminating the process.

2.13.3 Comment:

It was stated that the reviewers did not believe claims of low impacts and sufficient safeguards; that the EIS cannot guarantee no accidents or contamination at INEL; and that the EIS was written only to produce pro-SIS propaganda. On the other hand, it was also stated that DOE is requesting public input not only to comply with the law but is concerned that Special Isotope Separation (SIS) is the correct action to implement.

Response:

The analysis and data in the EIS and the supporting conclusions of low impacts and sufficient safeguards have been prepared and reviewed by qualified professionals and also subjected to independent review. See response to comment 3.2.18 for more information on independent review. Both the Draft EIS and the Final EIS address the consequences of postulated severe accidents that have an extremely low probability of occurrence. The EIS is not intended (nor does NEPA require) to guarantee no accidents or contamination. The Draft EIS and the Final EIS provide an adequate assessment of potential impacts. With respect to preparing the EIS for "pro-SIS propaganda," this is incorrect. DOE believes that the analysis of potential impacts to aid in the decision of whether to proceed with the proposed action is the legal and actual reason for preparation of NEPA documentation and performs these analyses conservatively and discusses them fairly. Public impact is and has been considered important in this process.

2.13.4 Comment:

It was noted that questions raised during scoping hearings were not addressed in the Draft EIS. Specifically, the following should be addressed: (1) identify the quantity of feed and product, (2) identify the efficiency of product recovery, (3) include the fate of the product and wastes in the environment, (4) include the environmental effects of nuclear war, (5) include the effects of the

negative publicity of an accident on the market for potatoes, (6) include the effects of volcanic action on the SIS Project, and (7) include an examination of 160 companies doing business with the Soviet Union to determine whether these companies, in collusion with U.S. Government officials, are profiting from arms sales to both the U.S. and its adversaries.

Response:

Questions raised during the scoping hearings were addressed in the Draft EIS and the Final EIS to the extent that they were within the scope of this NEPA process. Quantities of plutonium processed and process efficiencies are classified. However, unclassified information presented in the Final EIS provides an adequate basis for evaluating potential environmental effects of the SIS Project. The environmental effects of product and waste, if due to normal operation and postulated accidental releases to the atmosphere, were addressed in Sections 4.1.2 and 4.1.3 of the Draft EIS and the Final EIS. Potential volcanic activity is discussed in Section 3.1.4.3 of the Draft EIS and the Final EIS. Evaluations of nuclear war, negative publicity, and investigations of private companies are outside the scope of this EIS.

2.13.5 Comment:

It was stated that a request was made at the scoping hearings that the EIS should assess radiation effects on workers, and the Draft EIS fails to do so.

Response:

Section 4.1.4, Occupational Safety, of the Draft EIS presented a discussion of radiation effects on workers. In Section 4.1.4.2 of the Final EIS, an expanded discussion of potential worker exposures due to both radiological and nonradiological conditions is presented. An assessment of worker exposures from accident conditions was discussed in the Draft EIS (Section 4.1.4.3) and is included in Section 4.1.4.3 of the Final EIS.

2.13.6 Comment:

It was noted that a request was made at the scoping hearings that the Draft EIS should address the radiation exposure impact on the environment and on wildlife, specifically for the INEL, and the Draft EIS fails to do so.

Response:

The radiation exposure impact on wildlife and plant life from existing INEL operations is addressed in Section 3.1.6 of the Final EIS. The radiation in exposure on the public is addressed in Section 4.1.2. The Final EIS notes that releases from the SIS Project would be well below applicable radiation standards to protect man and the natural environment, including wildlife.

2.13.7 Comment:

It was stated that a request was made at the scoping hearings that the Draft EIS should address transportation safety and routes and emergency response; however, the Draft EIS does not address these issues adequately.

Response:

Response:

Response:

Response:

2.13.11 Comment:

It was stated that the discussion of transportation impacts in the Draft EIS failed to account for cumulative impacts from transporting and processing feed materials such as Fast Flux Test Facility (FFTF) fuel.

Response:

Currently, DOE is preparing an Environmental Assessment (EA) analyzing the feasibility and environmental impacts of various fuel-decladding techniques that could be used to recover DOE-owned plutonium in the spent fuel from the FFTF located at the Hanford Site. The Foreword to the Final EIS has been modified to reflect this consideration. The annual impacts of potentially transporting the processed FFTF fuel would be the same as those for transporting N-Reactor fuel-grade plutonium to SIS facilities. Section 4.5.1 and the Summary of the Final EIS have been modified to include cumulative impacts from 30 years of SIS operation at maximum capacity, including the accumulated risk of transporting FFTF fuel to the SIS Facility from the Hanford Site, the preferred location for the decladding activity. However, it should be noted that in addition to its potential use as feed for SIS, the FFTF spent fuel could be blended to produce weapon-grade plutonium, and a decision to build the SIS Project does not foreclose options concerning use of FFTF fuel.

2.13.12 Comment:

It was stated that the discussion on waste handling/disposal in the Draft EIS was fragmented because of references to NEPA documents and that the disposal of waste should be fully included in this EIS.

Response:

The Draft EIS identified all of the wastes that would be generated by the proposed SIS Project and their planned disposition. Referencing of other EIS documents such as the Final EIS on the Waste Isolation Pilot Plant (WIPP) is appropriate and consistent with the policy of reducing duplication and paperwork (see 40 CFR 1502.2 and 1502.21).

2.13.13 Comment:

It was stated that technical details in the EIS, such as computer models, should be independently reviewed.

Response:

All technical details, including the applicability of computer models, and any assumptions used were independently evaluated within DOE. Copies of the Draft EIS were also provided to other Federal and state agencies having expertise in the analysis and modeling of potential environmental consequences as well as to members of the public for their review and comments; the resulting comments have been considered in preparation of the Final EIS.

2.13.14 Comment:

It was stated that the EIS does not comply with NEPA requirements to establish a need for the project; specifically, there is no support in statutes/cases for implying a national defense exemption from NEPA requirements.

Response:

Comment:

Response:

Response:

2.13.17 Comment:

It was stated that the Draft EIS failed to assess a full range of alternatives, such as Intermediate Nuclear Force (INF) weapons' return and the "plutonium challenge."

Response:

NEPA requires that reasonable alternatives be addressed. Section 2 of the EIS describes reasonable alternatives, including the no-action alternative.

Weapon-grade plutonium from the INF is fully accounted for in the Nuclear Weapons Stockpile Memorandum (NWSM) and the identification of requirements for the production of new weapon-grade plutonium. The SIS Project would provide the DOE with a prudent level of contingency, flexibility, and technological diversity in its production complex for new weapon-grade plutonium. As agreements such as the INF do not provide new sources of weapon-grade plutonium, the INF is not a reasonable alternative to the SIS Project. The "plutonium challenge" (i.e., no production of plutonium) is not within the scope of this EIS.

2.13.18 Comment:

Copies of specific references cited in the Draft EIS were requested. A request for information, dated January 19, 1988, was submitted as an exhibit.

Response:

All references cited in the Draft EIS are available in the DOE Public Reading Rooms at the INEL, SRP, and Hanford. The letter dated January 19, 1988, was previously responded to by DOE in writing.

2.13.19 Comment:

It was stated that the Shoshone-Bannock tribes want more information and an in-depth analysis of water, socioeconomic, waste transportation, and safety factors so they can assess risks to the tribes' homeland and treaty rights.

Response:

The Draft EIS presents information and discussions of the impacts to water, socioeconomics, and transportation of wastes. Additional information on socioeconomics has been incorporated into the Final EIS as appropriate. The Final EIS discusses impacts under normal operating and postulated severe accidents. Also see the response to comment 5.24.14 on safety, the response to comment 5.12.2 and 5.12.3 on water, the responses to comments 5.27.14.2, 5.27.14.3 and 5.27.14.4 for additional information on tribal lands and 5.29.82 on transport risks.

3.0 POLICY COMMENTS AND RESPONSES

3.1 DOE AUTHORITY AND RESPONSIBILITY

3.1.1 Comment:

It was noted that an apparent contradiction exists between the U.S. Department of Energy (DOE) commitment to protect public health and safety and the Atomic Energy Act (AEA) of 1954 exemption of liability for injuries sustained from nuclear weapons production and testing.

Response:

DOE does not agree that there is a contradiction because of the AEA of 1954, as amended. As a successor agency to the Atomic Energy Commission, DOE, pursuant to the AEA, has issued extensive standards and requirements covering worker and public safety.

3.1.2 Comment:

It was asked why DOE is exempt from the Occupational Safety and Health Act (OSHA) and state taxes and why military weapons are produced by a civilian agency.

Response:

The DOE has adopted and enforces the occupational, safety, and health protection requirements (DOE Order 5480.1B) which are equivalent to those issued by OSHA. See the response to comment 5.20.10 for information on OSHA and DOE regulations.

DOE is exempt from state taxes; however, sales/use taxes are paid on all construction materials for buildings and associated equipment [such as the Special Isotope Separation (SIS)] by fixed price subcontractors. County tax assessors have been assisted in visits to construction job sites to identify property within the county subject to the county's property taxes. At the Idaho National Engineering Laboratory (INEL), contractors pay a franchise tax and/or corporate income taxes. They also pay millions of dollars in sales use taxes on procurements of supplies, equipment, rentals, etc. The State of Idaho receives about 8 percent of its personal income taxes from site employees. The INEL bus system pays a fuel excise tax for its use of state highways. In addition, the 10,000 INEL employees pay real property taxes, sales taxes, income taxes, and all other taxes paid by other Idaho residents.

For a discussion on DOE defense material responsibility, see the response to comment 3.1.3.

3.1.3 Comment:

Reviewers suggested that DOE's activities should be limited to nondestructive actions that are environmentally safe and beneficial to the people.

Response:

DOE's responsibilities for developing and maintaining a capability to produce special nuclear materials for national defense programs are mandated by Congress as part of the Atomic Energy Act of 1954, as amended.

3.1.4 Comment:

Reviewers noted that private enterprise, not DOE, should build and operate the SIS Project, including subsequent fabrication of weapons.

Response:

All responsibility for the production of special nuclear materials for weapons in accordance with the Atomic Energy Act of 1954 is the responsibility of the Federal Government and cannot be undertaken by private enterprise.

3.1.5 Comment:

Reviewers advocated that DOE should develop more responsible radioactive/toxic waste handling policies to include: developing and testing dual-purpose or universal casks, developing at-reactor rod consolidation capabilities, developing onsite waste processing and storage technologies, upgrading utility rail access and cask handling facilities, standardizing a waste package design, and analyzing an optimized, nonmonitored retrievable storage option.

Response:

Anticipated waste generation, handling, storage, and transportation activities for the SIS Project are described in Chapter 2.3.2 of the Final Environmental Impact Statement (EIS). These activities are based on currently available technology which complies with current regulatory requirements. However, DOE continuously evaluates the feasibility of options that will improve its overall waste handling activities. Establishment of additional policies regarding radioactive waste treatment, standardization of waste package design, transportation, and improved storage options in general is outside the scope of this EIS.

3.2 DOE AND GOVERNMENT CREDIBILITY

3.2.1 Comment:

Reviewers expressed a general lack of confidence that the U.S. Department of Energy (DOE), in operating the materials production complex, will properly protect local community safety and the environment. They cited its poor safety record, maintaining that DOE is self-serving (i.e., places national interests over those of the community), that it fails to confine radioactivity, and that it has admitted to $100 billion damage at other weapons sites. Other reviewers cited inept performance, resulting in lack of trust in DOE's past and present operations. Some expressed concern over a decline in the Idaho National Engineering Laboratory (INEL's) safety record with the advent of increased defense involvement.

Response:

DOE's responsibility to carry out missions that support national defense is statutorily imposed by Congress. In carrying out these missions, the safety and welfare of the public constitute a primary concern, and the safety record of many of DOE's sites, including the INEL, continues to improve. DOE is undertaking aggressive initiatives to identify problems and solutions at its sites and is allocating monies on a priority basis to correct past practices associated with the handling and disposal of hazardous wastes.

3.2.2 Comment:

Several reviewers expressed a general lack of confidence in DOE, and based on previous history, stated that DOE would not properly manage the Special Isotope Separation (SIS) Facilities or protect the environment, health, safety, or private rights of the people. Others were of the opinion that DOE has a history of creditable management, has been a good neighbor that would respond to the questions raised in the Draft EIS, and is committed to the maintenance of safety and health standards.

Response:

The proposed facility, as described in the Final EIS, would be designed and operated with a safety-in-depth approach (i.e., multiple safety features) to minimize any impact to its workers, the public, and the environment. The DOE has stipulated that safety is the overriding consideration for all its projects at all sites, and that safety will not be compromised for schedules, economics, or expediency.

3.2.3 Comment:

It was stated that the INEL should not be involved with invisible radiation or classified research that people cannot monitor.

Response:

The methods for detecting and measuring nuclear radiation are well developed, and radiation monitors with alarms are provided so that workers can monitor and be warned of radiation in their workplace. Any radiation releases are monitored and reported to the State of Idaho. The state can check on the validity of these values through the State of Idaho Working Agreement with the DOE, whereby the state may obtain concurrent samples collected by the DOE or the U.S. Geological Survey (USGS), onsite or offsite. Monitoring reports for each of the three alternative sites are published on an annual basis and are publicly available.

Some research is classified for reasons of national security. There are stringent controls in place to monitor and account for classified information, thus protecting important technology. For additional information see response to comment 2.6.1.

3.2.4 Comment:

A reviewer noted that DOE has a poor track record of handling radioactive/hazardous waste, which does not inspire confidence concerning future handling; also that the INEL seems unwilling to fully disclose environmental impacts.

Response:

Much of the contamination of DOE's sites is the result of waste management practices acceptable at the time they were in use, but which do not meet current standards. Current DOE waste management practices have been and continue to be improved to meet current environmental standards and to correct the contamination resulting from prior practices. Remedial actions and detailed investigations to determine further actions are underway at each of DOE's sites. The Waste Management for Groundwater Protection EIS (DOE/EIS-0120) extensively discusses the potential contamination of sites located at the Savannah River Plant (SRP) and identifies potential strategies and project-level actions that would be undertaken to comply with current standards. At the INEL, where the primary cause of radioactivity in groundwater was the use of an injection well, that practice has been discontinued. At each of the three sites considered in the EIS, shallow land burial of transuranic (TRU) wastes was stopped in the early 1970s, facilities are planned to retrieve and package the previously buried TRU waste, and all newly generated TRU wastes since the early 1970s are retrievably stored aboveground and monitored.

As stated in response to comment 3.2.3, each of the DOE locations for producing nuclear defense materials publishes an annual environmental monitoring report that is publicly available. In addition to these monitoring reports, DOE, in compliance with several environmental statutes (e.g., Clean Water and Air Acts and Resource Conservation and Recovery Act or (RCRA), submits monitoring reports, studies, and evaluations to state and Federal agencies for these agencies to ascertain compliance with their permit limitations and conditions. These reports, studies, and evaluations are also publicly available.

3.2.5 Comment:

It was stated that the INEL record of contamination is not favorable. The bad record suggests that DOE, Nuclear Regulatory Commission (NRC), and the nuclear industry do not know what they are doing and by preventing the cleanup of present pollution, DOE has demonstrated a lack of responsibility.

Response:

Contamination at DOE sites is the result of early waste management practices acceptable at the time they were in use, but which do not meet current standards. Section 3.1.4 of the Draft Environmental Impact Statement (EIS) briefly discussed existing contamination at the INEL, and the Final EIS in the same section has been updated to reflect the current results and status of activities, including the three sites at the INEL for which corrective actions for previous hazardous waste practices are likely. The responses to comments in Sections 3.2.1 and 3.2.4 provide examples of activities that DOE has initiated which demonstrate its responsibility in protecting the environment from waste contamination.

DOE has not prevented the cleanup of present pollution. Although the question of legal jurisdiction with respect to responsibilities for certain wastes has been raised, DOE believes that it is moving aggressively in identifying existing and potential problems and undertaking the necessary corrective actions on a priority basis. While many of the previous practices associated with hazardous waste have been stopped or changed to comply with current standards, implementation of corrective actions frequently requires more time because of the detailed studies necessary to ascertain the most effective approach in correcting contamination.

3.2.6 Comment:

Concern was expressed over DOE's capability to operate facilities safely. It was noted, for example, that INEL already has a history of meltdowns that cause exposures and injuries to workers. Several criticality incidents at the Idaho Chemical Processing Plant (ICPP) were also noted.

Response:

The DOE recognizes its responsibilities to design and operate its facilities in a safe manner. Since its beginning, the INEL has been a national test site for advanced reactor design and concepts. Earlier testing involved operations at the boundaries of known technology with respect to core disruptive accidents involving rapid reactivity inspection. Later extensive testing of prototype reactor fuel under accident conditions was routine at test reactors such as Loss of Fluid Test Power (LOFT), Power Burst Facility (PBF), and Transient Reactor Facility (TREAT). The PBF and TREAT tests were done in a controlled environment inside a test vehicle which precluded damage to the test reactor.

There have been only nine occurrences at the INEL since 1949 that involved test reactor core damage. Only five of those occurrences were unplanned, and those occurred prior to 1963. None of the occurrences resulted in radiological injury to the public. In normal reactor operation, cladding failure can be detected early enough to allow timely replacement of the defective fuel element before a significant release of fission products into the primary system occurs.

Also see the response to comment 5.1.46 regarding criticality incidents.

3.2.7 Comment:

Reviewers made general comments citing INEL and DOE as having a good safety record and caring for the environment; conversely, it was stated that the INEL's and the DOE's ability to safely operate the SIS Project is questionable, given the history of operations of INEL, Hanford, and other facilities.

Response:

The operations at the INEL, Hanford Site, and other DOE facilities involve many diverse facilities and missions that are being conducted in aging facilities. Significant changes in operating DOE facilities have been and are continuing to be made to further emphasize safety and environmental protection.

The SIS Project is being designed to provide the highest level of safety based on the accumulated experience of DOE's operation of similar facilities. DOE has stipulated that adequate safety and protection of the environment will be an overriding consideration for all DOE projects, and that safety will not be compromised for schedules, economics, or cost. To ensure the safety of the SIS Project, DOE also requires that an approved and independently verified safety analysis report be a preprequisite to the construction of the project. Therefore, the SIS Project would be operated in a safe manner.

3.2.8 Comment:

Reviewers stated that the DOE has a poor record of environmental protection and management of wastes at the Hanford Site.

Response:

Since 1965, Battelle's Pacific Northwest Laboratories have been monitoring Hanford's effects on its environment. Battelle's environmental surveillance program covers air, Columbia River water, groundwater, soil, vegetation, natural background radiation, agricultural products including beef, milk, eggs, wheat, fruit and poultry, and wildlife including animals, fish and game birds. Each year thousands of samples are taken in the area.

In its most recent report on environmental monitoring at Hanford, Battelle's Pacific Northwest Laboratories reported to the DOE that no significant changes in levels of radiation exposure received by Hanford workers or offsite populations were detected. Calculated radiation doses to humans from the Hanford plant remained below 1.0 millirem in 1987. This dose is a small fraction of the exposure the average American receives each year from natural and man-made sources (according to the National Council on Radiation Protection and Measurements). In 1986, the State of Oregon released a 25-year study of the Columbia River which confirmed the DOE data showing that the purity of the Columbia River was being maintained and protected.

In April of this year, the DOE issued a Record of Decision for the Environmental Impact Statement (DOE/EIS-0113) on disposal of Hanford defense high-level, transuranic, and tank waste defense waste. The Record of Decision states that DOE can move forward with final treatment and disposal of three types of waste while deferring processing on the remainder of the waste types until further development is accomplished. This, in fact, was the course recommended by the Northwest Citizens Forum on Defense Waste and by the States of Washington and Oregon.

As with other DOE sites, DOE is undertaking studies and evaluations of the previous practices of the disposal of hazardous and mixed waste (i.e., low-level radioactive and hazardous) at the Hanford Site. Practices that do not conform to current RCRA requirements will be stopped and the appropriate remedial/corrective actions undertaken.

3.2.9 Comment:

Reviewers stated that DOE has promised to be a safe neighbor, yet they have polluted the water table, resisted state attempts to halt environmental contamination, and have a poor record for polluting the environment at the SRP. Additionally, the NAS studies indicate SRP problems.

Response:

A recent EIS (DOE/EIS-0120) on waste management activities for the groundwater protection at the SRP extensively discusses and evaluates potential environmental consequences associated with hazardous, mixed, and low-level radioactive wastes. As stated in this EIS, several corrective actions have already been undertaken at the SRP to prevent contamination of groundwater, and the EIS further identifies actions and new facilities to protect groundwater resources. The DOE is actively participating with the State of South Carolina's Department of Health and Environmental Control and EPA in determining priorities for further corrective actions and the permitting of new facilities meeting all RCRA requirements. Also see the response to comment 3.2.4.

Recent studies by the NAS as well as the Independent Nuclear Facility Advisory Board have indicated safety concerns with respect to the production reactors at the SRP. DOE is vigorously pursuing resolution of these issues and has placed constraints on the reactors to ensure their safe operation. Continued operation of the reactors at the SRP, which were constructed in the early 1950s, and the constraints imposed on their operation are factors in DOE's need to provide a prudent level of contingency, flexibility, and technological diversity in its production complex as represented by the SIS Project and discussed in Chapter 1 of the Draft EIS and the Final EIS.

3.2.10 Comment:

Reviewers stated that the DOE is not qualified to operate the SIS Project and that other agencies will not certify DOE work.

Response:

The responsibility for production and safeguarding of special nuclear materials (and activities such as the SIS Project) has been assigned by the Congress to the DOE and its predecessors [the Energy Research and Development Administration (ERDA) and Atomic Energy Commission (AEC)] by the Atomic Energy Act of 1954, as amended. Although the Nuclear Regulatory Commission (NRC) has no licensing jurisdiction over DOE facilities, DOE will comply with all the applicable requirements of other agencies. For example, for transportation of hazardous materials (e.g., plutonium, uranium waste), DOE complies with U.S. Department of Transportation (DOT) regulations and uses DOT or NRC-approved shipping containers.

3.2.11 Comment:

Reviewers stated that DOE has a history of coverups regarding safety and health, and the military will lie to cover up activities and should not be trusted where the consequences are death.

Response:

Within the Federal Government, DOE is a separate department from the Department of Defense (i.e., DOE is not the military). It is DOE's policy to identify and correct any inadequate practices concerning safety and health arising from operation of its facilities. In this regard, accidents and accidental releases are required to be reported, and accidents resulting in significant releases from DOE facilities are included in annual monitoring reports that are publicly available.

3.2.12 Comment:

Reviewers noted that in spite of repetitive assurances of no problems (for example, the disposal and testing of radioactive material by NRC/DOE), the government does not have a good track record and is not responsible or cannot be trusted.

Response:

As stated in response to comment 3.2.4, the primary sources of environmental contamination resulting from DOE operations are due to previous practices that were acceptable at the time of their implementation, but that do not meet current standards. As also discussed, DOE has changed or is in the process of changing practices associated with radioactive waste disposal (e.g., TRU waste no longer is placed in shallow land burial facilities, facilities to immobilize high-level wastes have been or are being implemented, disposal of effluents at the INEL through an injection well has been discontinued). The purpose of an EIS is not to provide assurances of no problems but rather to assess potential environmental consequences. Within the Draft and the Final EIS, conservative assumptions are used to identify potential environmental consequences, taking into account postulated problems

(e.g., the Draft EIS and the Final EIS include in Section 4.1.2.3 an analysis of the upper range of potential consequences of the potential disposal of SIS-generated low-level waste, and Section 4.1.3.2 discusses a severe facility accident which precludes the operation of designed safety features).

3.2.13 Comment:

It was stated that the fact that DOE cannot account for all the plutonium already produced gave the commentor little comfort that DOE could conduct the SIS activities safely.

Response:

The responsibility for production and safeguarding of special nuclear materials for weapons has been assigned by Congress to the DOE and its predecessors (ERDA and AEC) by the Atomic Energy Act of 1954, as amended. The DOE operations, including the SIS, incorporate a rigorous system of material accountability, which incorporates the latest technology in sensing and control. As with any processing cycle, fractional losses in trace quantities do occur. Each facility is divided into material-balance areas (MBAs), where inventory is taken and strict accountability of materials between each MBA is required. Past and current inventory differences have been evaluated and explained, and DOE continues to pursue more stringent safeguards for the accountability of special nuclear materials.

3.2.14 Comment:

It was stated that the DOE has lied before and that DOE is lying now about the need for the SIS Project.

Response:

The opinion that the DOE has "lied before" is subjective and as such cannot be addressed. Information on the need for the SIS Facility is contained in the response to comment 4.1.1.

3.2.15 Comment:

It was stated that Idaho should proceed with caution, given other states' experience with DOE.

Response:

The State of Idaho and DOE (and its predecessors ERDA and AEC) have worked together to assure safety in the operation of INEL facilities since the early 1950s and will continue to do so.

3.2.16 Comment:

It was noted that, based on past experiences at the INEL and other DOE sites, radionuclide releases will occur and that the DOE track record for handling radioactive material is one of disdain. For example, DOE utilized potentially dangerous containers for many years without recalling them and resisted efforts to oversee and critique its activities.

Response:

Although much of the present contamination at DOE sites is the result of early waste management practices which would not meet current standards, DOE's current waste handling procedures are required to prevent or minimize releases of hazardous and radioactive materials.

DOE works with both the EPA and the states to review and obtain prior approval for any modifications or new construction entailing radionuclide emissions or effluents. All such releases are maintained below applicable EPA or state regulatory limits. DOE is also taking aggressive steps to improve its waste handling systems to eliminate or minimize discharges of radionuclides to the soil or groundwater. All sources of drinking water are carefully monitored to ensure that drinking water standards are met. The transport of waste materials meets applicable regulatory requirements (including those of DOT/NRC) and/or DOE Orders. These include hazardous wastes, which are subject to EPA's RCRA requirements and DOT requirements, as well as radioactive materials, which are subject to DOE/NRC and DOT requirements. Although DOE cannot guarantee that releases will never occur, dedicated adherence to current standards and a commitment to working with the U.S. Environmental Protection Agency (EPA) and the states when problems do occur have established a positive record for DOE in handling such material. For additional information on the use of the LLD-1 container, see the response to comment 5.29.44. For information on additional oversight, see the response to comment 3.2.18.

3.2.17 Comment:

It was stated that the DOE covered up the Reed report for the General Electric (GE) nuclear reactors, so it is not qualified to run SIS.

Response:

The allegation concerning the Reed Report on GE commercial nuclear reactors has no relationship to this proposed action and therefore is outside the scope of this EIS.

3.2.18 Comment:

It was stated that the government loses credibility by failing to regulate DOE performance in a tough, fair manner.

Response:

Both DOE and Congress have taken action to satisfy the public's desire for independent oversight of DOE operations. Early in July 1988, a Senate-House conference committee approved the creation of an independent oversight board for DOE weapons facilities. This proposal for an independent oversight board was attached to the Department of Defense authorization bill, which was signed. Within 120 days following the enactment of the bill, the President has the responsibility to name board members, who in turn must be confirmed by the Senate.

DOE's Advisory Committee on Nuclear Facility Safety, chaired by former Nuclear Regulatory Commissioner John Ahearne, was formed after the National Academy of Sciences recommended that independent safety oversight of DOE facilities was desirable. The Committee is in the process of visiting all DOE sites and issuing reports and recommendations.

3.2.19 Comment:

A lack of believability was stated concerning claims of low impacts, no accidents, and sufficient safeguards associated with operation of the SIS Project. Verifying such claims is precluded by the high security of the INEL area.

Response:

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Response:

Response:

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Response:

3.2.23 Comment:

It was stated that the NRC/DOE has misled the public over the years. The effects of the Nevada bomb tests on people in Utah and Nevada were cited. It was also stated that there were increased leukemia victims based on personal investigative team experience.

Response:

The DOE presently maintains active outreach, public affairs, and communication policies and seeks to make responsible disclosure of operational situations as they potentially relate to the public sector. Past practices at the Nevada Test Site and any potential effects of such practices are not within the scope of this EIS.

3.2.24 Comment:

Reviewers stated that the NRC is scandalized by ineptness and coverups to protect industry and thus is unable to regulate the SIS Project. It was also stated that the NRC has recently endangered the public by increasing the permissible level of worker exposures.

Response:

The proposed SIS Project will be constructed and operated in accordance with DOE Orders and requirements, as well as applicable EPA and state regulations. It will not be licensed by NRC. The expressed concerns with the NRC are beyond the scope of this EIS. The current DOE radiation protection standards for workers are contained in DOE Order 5480.1B, Chapter XI, and will be reissued as DOE Order 5480.11 which is currently in final draft form. DOE Order 5480.11 as currently drafted does not increase permissible worker exposures, but rather provides for more definitive monitoring requirements, stochastic and nonstochastic effects, and the incorporation of specific radiological dose definitions.

3.2.25 Comment:

It was stated that because so much information is classified, the DOE practices are hard to change and DOE is not responsive to external audit but polices itself.

Response:

The DOE's responsibility for the production of special nuclear materials, as required by law, does involves classified information and operations. DOE, however, often invites outside expertise, such as the National Academy of Sciences, to audit or independently review operational concerns as they arise. As discussed in the responses to comments 3.2.18 and 3.2.19, classification does not preclude independent evaluations and reporting of data by which impacts can be independently analyzed.

3.2.26 Comment:

It was stated that the Draft EIS is flawed and needs an independent review of DOE's methods and findings.

Response:

In accordance with the National Environmental Policy Act (NEPA), comments were requested from Federal agencies which have jurisdiction by law or special expertise with respect to "any

environmental impact involved or which are authorized to develop and enforce environmental standards" (40 CFR Chapter 1503.1). The Federal agencies that review the EIS have the experience and knowledge to provide an independent review of DOE's methods and findings. In addition, appropriate state and local agencies that are authorized to develop and enforce environmental standards were requested to comment and have commented on the Draft EIS. The public also was asked to, and did, review and provide input on the proposed action. These multiple reviews help to ensure that the methods and findings are appropriate.

3.2.27 Comment:

Reviewers noted the lack of independent oversight of the DOE/INEL/SIS environmental monitoring program, as well as independent monitoring by experts of the design and construction phase.

Response:

The DOE has an environmental monitoring program that analyzes air, water, soil, biota, and foodstuffs collected on and off of its sites, including the INEL, to ensure that applicable Federal and state environmental protection regulations are met. At the INEL, USGS has a comprehensive groundwater monitoring program. The State of Idaho has a working agreement with DOE whereby the State may obtain samples collected by DOE or the USGS, onsite or offsite. DOE expects the agreement to continue and has requested suggestions for revisions from the state. In addition, the DOE, in consultation with the State, is establishing a contract with Idaho State University (ISU) to provide independent verification of the environmental monitoring program at the INEL. The DOE will fund the contract and ISU will furnish results to the state and to DOE. The data will be fully available to the regulatory bodies of the state and to the public.

3.2.28 Comment:

Reviewers stated that if DOE had to comply with NRC requirements, it would lose its license, and questioned why citizens are required to obey NRC rules but DOE is not.

Response:

Under the Atomic Energy Act of 1954, as amended, DOE is solely responsible for the production of special nuclear materials for weapons and, in accordance with the law, is not required to obtain a license from the NRC. The DOE requirements for the design and operation of its production facilities are, however, comparable to those of the NRC, recognizing that there are differences from the types of facilities which are licensed by the NRC (i.e., primarily the nuclear power plants for the generation of electric power) and those for which DOE is responsible which are used for the production of special nuclear materials for national defense. It is speculative to conclude or to assert that DOE would not be able to obtain an NRC license if required to do so.

3.2.29 Comment

It was stated that the DOE safety record should be questioned, since there is no outside review.

Response:

The DOE contracts with private firms to operate the government-owned facilities under DOE direction and oversight. These operating contractors comply with applicable requirements, including

DOE orders, which are equivalent to the Occupational Safety and Health Act (OSHA). The safety records of the operating contractors are reported and are available to the public. Also see responses to comments 3.2.18 and 3.2.19 for additional information on independent oversight and independent review.

3.2.30 Comment:

It was stated that the state budget has been cut, so there is no environmental oversight.

Response:

The DOE maintains a continuous environmental monitoring program to analyze air, water, soil, biota, and foodstuffs on and off the INEL site. The results are monitored against applicable Federal and state environmental protection regulations. In addition, the DOE anticipates funding a contract with ISU, in consultation with the state, to provide independent verification of the environmental monitoring program. For further information, see response to comment 3.2.19.

3.2.31 Comment:

Reviewers addressed the need for a permanent oversight committee as a "full partner" in cooperation with the state for managing potential environmental health and safety consequences of the project.

Response:

The State of Idaho has a working agreement with DOE whereby the state may obtain samples collected by DOE or the USGS, onsite or offsite. See the response to comment 5.19.5. In addition, the DOE, in consultation with the state, is establishing a contract with Idaho State University to provide independent verification of the environmental monitoring program at the INEL. For additional information, see response to comment 3.2.19. Congress has also taken action to create an independent oversight board. See the response to comment 3.2.18.

3.2.32 Comment:

Reviewers stated that the NRC and the state should oversee plutonium shipments, because DOE would not adequately police itself, and that states should consider levying fees on DOE for such services as approved by DOT rulings.

Response:

Congress has placed regulatory authority for transportation of materials with the DOT. DOE is solely responsible for the transport of special nuclear materials that include plutonium, and must adhere to DOT requirements with respect to the transport of special nuclear materials and comparable NRC requirements with respect to transport containers and casks. For the SIS Project, DOE has committed to using only containers or casks that have been certified by the NRC and meet DOT specifications for all shipments of plutonium. The levying of shipping fees is not within the scope of this EIS.

3.3 INEL MISSION

3.3.1 Comment:

Reviewers commented concerning the effect of the Special Isotope Separation (SIS) Project on the mission of Idaho National Engineering Laboratory (INEL). These comments ranged from stating that the SIS Project (i.e., production of weapons material) is not consistent with the present research (peaceful) mission of the INEL, to saying that the INEL has been involved in defense-related work since it was established. It was also stated that the SIS Project would conflict with the INEL missions as stated on page 3-1 of the Draft Environmental Impact Statement (EIS).

Response:

The mission of any DOE national laboratory is to provide engineering and scientific leadership and support for national programs. Consequently, the laboratories are obligated to respond to the changing needs in national priorities. There have always been both defense-related and non-defense-related activities at the INEL. At any given time, the mix reflects the national needs and changes in national priority.

The first facilities at the INEL [Experimental Breeder Reactor (EBR), Naval Reactor Facility (NRF), Material Testing Reactor (MTR), Idaho Chemical Processing Plant (ICPP)] reflected both types of activities. Subsequent programs changed as priorities changed; for example, the Aircraft Nuclear Production Project, the Reactor Safety Program [Special Power Excursion Reactor Test (SPERT), Loss of Fluid Test (LOFT), Power Burst Facility (PBF)], an expansion of the Breeder Program Argonne National Laboratory (ANL) waste management activities for Three Mile Island (TMI) and West Valley, and others. The relative effort dedicated to defense-related versus non-defense-related activities has changed in the past and will continue to change in the future. Thus, the SIS Project would not present a significant change to the INEL mission.

The ICPP, the proposed SIS location at the INEL, currently has the main mission of recovering uranium-235 from spent government-owned fuel for use in defense programs and safely managing the resulting waste. Thus, the SIS Project complements the ICPP mission in that it recovers plutonium-239 from DOE-owned fuel-grade plutonium for defense programs. Specific acknowledgment of defense missions at the INEL has been added to Section 3.1.1 of the Final EIS.

3.3.2 Comment:

Reviewers were concerned over the possible social, psychological, and spiritual impacts of doing nuclear weapons-related work at the INEL. Specific concerns included psychological impacts on the local populace, jobs lost because of converting the INEL from research to advancing the arms race, incompatibility with what Idaho stands for (unspoiled wilderness and clean living), and changes in the INEL image.

Response:

Socioeconomic impacts are addressed in Section 4.1.1.1 of the Draft EIS and the Final EIS. Based on the information presented, the SIS Project may have modest, beneficial impacts on employment and the general economy. The arms race and potential spiritual and psychological impacts are beyond the scope of this EIS (see the response to comment 2.7.2).

The INEL has been involved in both defense- and non-defense-related activities since its beginning, and the SIS Project would therefore not change Idaho's image or what the INEL stands for. Also see the response to comment 3.3.1 for additional information on the INEL's missions.

3.3.3 Comment:

Reviewers were concerned about an increased military emphasis at the INEL. It was noted that the INEL should conduct exclusively nonmilitary research and development.

Response:

In addition to nonmilitary research and development, the INEL has been involved in defense-related activities since its beginning. For example, facilities for the Naval Reactor Program were established in the early 1950s, and the ICPP began operation for recovering uranium from spent military and other fuels in 1953. The SIS Project does not constitute a significant shift in the emphasis of the INEL. See also responses to comments 3.3.1 and 2.7.7. Using the INEL for exclusively nonmilitary research and development is not within the scope of this EIS.

3.4 NUCLEAR DETERRENCE POLICY

Comment:

Statements were made ranging from an understanding and support for maintaining the nuclear deterrent to statements that nuclear deterrence has not worked or has outlived its usefulness and therefore the Special Isotope Separation (SIS) Project is not needed. The role of the SIS Project in maintaining a nuclear deterrent was also discussed, as well as its impact on current arms negotiations.

Response:

The ongoing policy of the United States, supported by all administrations and congresses since World War II, is to maintain our military strength, including a strong nuclear deterrent to prevent military conflict among the major world powers. The United States is actively pursuing verifiable and equitable reductions in nuclear arms. This nuclear deterrence policy has successfully prevented war between the major powers for over 40 years and has contributed to the successful negotiations and ratification of the recent Intermediate Nuclear Force (INF) Treaty. Until further reductions in nuclear arms are mutually agreed upon, the United States policy is to maintain its capabilities and to modernize its nuclear deterrence force structure. The SIS Project is consistent with that policy. A brief statement (as required by NEPA) of the need for the SIS Project is included in Section 1.1.1 of both the Draftand the Final Environmental Impact Statement (EIS). However, specific discussions on the effectiveness of nuclear deterrence and arms control negotiations are beyond the scope of this EIS.

3.5 NON-PROLIFERATION

3.5.1 Comment:

It was stated that the Special Isotope Separation (SIS) Project will increase the risk of proliferation and increase the risk of weapons falling into the wrong hands, and the impacts of this are not discussed in the Draft Environmental Impact Statement (EIS). Others stated that the SIS Project technology may be used by other countries to enhance weapons production.

Response:

Foreign and domestic policy discussions concerning arms control and SIS technology utilization abroad are outside the scope of this EIS. It should be noted that sensitive defense-related aspects of the SIS technology are classified and protected as such. See the responses to comments 2.6.4, 3.4.1 and 3.5.2.

3.5.2 Comment:

It was stated that the SIS Project will violate the Non-Proliferation Treaty or that it indicates to the world that the United States does not intend to honor the Non-Proliferation Treaty.

Response:

A discussion of the extent to which construction and operation of the SIS Project would increase the potential proliferation risk is beyond the scope of this EIS. The construction of the SIS would not violate the Non-Proliferation Treaty.

3.6 PRICE-ANDERSON ACT

3.6.1 Comment:

Concerns were expressed about the effect of the Price-Anderson Act on the liability of the U.S. Department of Energy (DOE) and/or its contractors for damages as a result of an accident at the Special Isotope Separation (SIS) Facility. It was also stated that the Price-Anderson Act was unconstitutional and leaves the public to assume the costs associated with an accident and environmental damages.

Response:

Although the Price-Anderson Act, which was found to meet Constitutional standards in Duke Power Company v. Carolina Environmental Study Group, Inc., 438 U.S. 59 (1978), is the primary means for compensating the public for damages from nuclear incidents, other remedies exist for claims not falling within the purview of Price-Anderson. For example, claims against the Department of Energy or its employees may be cognizable under the Federal Tort Claims Act, and claims for environmental damage may fall within the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). These and other laws afford any injured party mechanisms for seeking recovery for damages relating to the operation of the SIS Project. See also response to comment 3.6.2.

3.6.2 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) did not adequately discuss DOE's responsibility for liability as a result of an accident, including liability for unanticipated onsite or offsite impacts over the lifetime of the project.

Response:

DOE will utilize the statutory indemnity contemplated by the Price-Anderson Act (42 U.S.C. 2210) to assure ready and prompt availability of funds to compensate the public for injuries and damages resulting from a nuclear incident arising from SIS activities. Compensation provided under the Act would cover nuclear incidents arising at the INEL site as well as nuclear incidents arising during the transportation of material to and from the site.

Price-Anderson Act coverage has existed since 1957. In order to provide a mechanism for prompt and assured compensation to the public in the unlikely event of a nuclear incident, Congress extended Price-Anderson coverage with some modification during 1988. The Act authorizes the Department to indemnify its contractors, subcontractors, and suppliers for losses caused by a nuclear incident. The amount of the indemnity (currently $7 billion) is not perceived as a ceiling on recovery for damages, in light of Congress' commitment in 42 U.S.C. 2210(e) to "thoroughly review the particular incident" and to "take whatever action is deemed necessary and appropriate to protect the public from the consequences of a disaster of such magnitude." The Supreme Court has noted this commitment in Duke Power Company v. Carolina Environmental Study Group, Inc., 438 U.S. 59 (1978) and also noted the Congressional view that the limitation of liability serves primarily as a device for facilitating further Congressional review of such a situation, rather than as an ultimate bar to further relief of the public. Thus, any comparison of potential damages to the public vis-a-vis the current Price-Anderson authorized indemnity provides no useful decisional information in addition to the potential damage calculations themselves.

The payment mechanism under the Act provides for claims against any subcontractor, supplier, vendor, or any person who may be liable, to be channeled through the prime contractor to assure expeditious claims settlement. In the event of an extraordinary nuclear occurrence (a substantial dispersal causing substantial damage [10 C.F.R. Part 840]), the waiver of certain normally existing defenses available to government contractors and others who may be liable, as required in the Act, such as short statute of limitations and the need for a claimant to show negligence, provides the public with extensive assurance that valid claims will be paid. Price-Anderson indemnity is a contractual indemnity, which means that coverage is available only if the nuclear incident arises out of or in connection with the activities of DOE contractual activities.

4.0 NEED AND PURPOSE

4.1 DRAFT EIS PRESENTATION

Comment:

Statements were made concerning the adequacy of the Draft Environmental Impact Statement (EIS) in addressing the purpose and need of the Special Isotope Separation (SIS) Project. It was stated that the need for more plutonium and the need for the SIS Project as presented in the Draft EIS are inadequate and the EIS must support the need for the SIS Project. It was further stated that the Draft EIS is fatally flawed because the need for the SIS Project is not justified and a new draft should be written. It was stated that the EIS should provide assurance that the SIS Project is needed before the state and local communities are put at risk. Conversely, it was noted that the need and purpose of the SIS Project and the alternatives were clear, concise, and succinct as presented in the Draft EIS.

Response:

In accordance with Council on Environmental Quality (CEQ) regulations (40 CFR 1502.13), the Draft EIS and the Final EIS in Section 1 present a brief statement of the need and underlying purpose to which the U.S. Department of Energy (DOE) is responding in proposing the SIS Project. The Final EIS within this same section has been amplified to provide a clearer background with respect to the need for the SIS Project. As reflected by many of the more specific comments on the need for the SIS Project, there appeared to be a perception that the SIS Project was being proposed either because DOE wants to build more nuclear weapons or that more weapon-grade plutonium is required for national defense. In brief, the underlying purpose for which DOE is proposing the SIS Project is the need to maintain a prudent level of contingency, flexibility, and technological diversity to provide the on-line capability of responding to (1) limitations in its existing production complex, which was constructed more than 30 years ago; and (2) requirements approved by the President and Congress for weapon-grade plutonium that are beyond the capability of the DOE production complex for a period commencing in the mid-1990s. As discussed in Sections 1.1.1 and 2.5.2 of the Draft EIS and the Final EIS, existing facilities within DOE's production complex have become limited in their capabilities. The President, through approval of the Nuclear Weapons Stockpile Memorandum (NWSM), and the Congress, as reflected by approved authorizations and appropriations, have supported the need to maintain the capability of producing weapon-grade plutonium through a technologically diverse (i.e., nonreactor) means. See the responses to comments in Sections 4.7 and 4.15.

4.2 "AWASH IN" PLUTONIUM STATEMENT

4.2.1 Comment:

It was stated that we do not need the plutonium because the Secretary of Energy was quoted as saying that we are "awash in plutonium."

Response:

Energy Secretary Herrington's statement that we are "awash in plutonium" was made during budget deliberations early in 1988 and has been widely quoted by the news media and others. Secretary Herrington (in later testimony before the U.S. Senate Committee on Armed Services Subcommittee on Strategic Forces and Nuclear Deterrence, March 31, 1988) characterized his earlier comment as an "overstatement". Mr. Herrington clarified the statement to mean that in the short term we have adequate supplies of plutonium; however, over the longer term (commencing in the mid-1990s), we do not have assurance that our plutonium needs can be met. See the responses to comments 3.4 and 2.12.3.

4.2.2 Comment:

It was stated that the need for the Special Isotope Separation (SIS) Project was the most frequent concern raised at the scoping hearings, and yet the U.S. Department of Energy (DOE) only provided a page and a half of discussion. Additionally, it was noted that in light of current plutonium supplies the DOE has reversed itself and now states that the SIS Project is needed only as an insurance policy.

Response:

As stated in response to comment 4.1, Chapter 1 of the Draft and Final Environmental Impact Statement (EIS) includes a brief statement of the need and underlying purpose for which DOE is responding in proposing the SIS Project, in accordance with CEQ regulations (40 CFR 1502.13). DOE has not reversed itself in its statement of the need and purpose of the SIS Project. The proposed SIS Project has consistently been supported by DOE on the basis of the need to provide a prudent level of contingency, flexibility and technological diversity.

4.3 AGREEMENTS AND TREATIES

Comment:

It was noted that the Intermediate Nuclear Force (INF) Treaty will result in increased plutonium being available from retired weapons, and thus the Special Isotope Separation (SIS) Project isn't needed. Others commented that the Strategic Arms Reduction Treaty (START) will result in two to three times more plutonium than is scheduled to be produced by the SIS Project and will result in the availability of large quantities of plutonium, thus making the SIS Project necessary.

Response:

While arms reduction treaties, namely the recently ratified INF treaty and potential future treaties, such as START, can increase the amount of weapon-grade plutonium for recycle, they do not constitute a source of additional weapon-grade material. Consistent with normal practice, the requirements for new defense nuclear materials, as reflected by the Nuclear Weapon Stockpile Memorandum (NWSM), are delineated on an annual basis, taking into account materials which become available from weapon retirements. The determination of need for additional material, and thus the requirement for the SIS Project, already assume the availability of materials from the INF treaty. In any case, as is discussed in Section 1 of the Final EIS, such returns do not provide the required contingency, flexibility, and technological diversity required for assurance of material security.

4.4 ALTERNATIVES

4.4.1 Comment:

It was stated that enriched uranium could be used in weapons instead of plutonium.

Response:

Highly enriched uranium can be and is used in weapons. However, many modern weapon designs require an assured source of weapon-grade plutonium and do not permit the use of uranium as a substitute.

4.4.2 Comment:

It was maintained that the U.S. Department of Energy (DOE) contradicts itself by stating that we have more plutonium than needed, while the Draft Environmental Impact Statement (EIS) claims there are alternative ways, such as blending, to produce plutonium needed for national security. It was also stated that there are less expensive ways to produce weapon-grade plutonium, and that the nuclear weapons stockpile has actually decreased 3 percent in the last five years; therefore, the Special Isotope Separation (SIS) Project is not needed.

Response:

See the response to comment 4.2.1 for discussion of the remark by Energy Secretary Herrington, which is presumably the reference or basis upon which statements were made attributing to DOE an assertion that it already has more plutonium than needed.

While Section 2.5.2 of the Draft EIS and the Final EIS identify several alternative ways of producing plutonium, Section 2.5.2 also discusses why none of the alternatives presented either separately or in combination is considered a reasonable alternative to the SIS Project in accordance with Council on Environmental Quality (CEQ) regulations [40 CFR 1502.14(b)]. DOE considers the SIS Project to be a cost-effective means to provide weapon-grade plutonium, while meeting the objectives of contingency, flexibility, and technological diversity. See also response to comment 4.12. Blending of fuel-grade plutonium with plutonium of higher-than-weapon-grade purity does not meet the same objectives as represented by the SIS Project, in that: (1) it is entirely dependent on the existing reactors at the SRP which were constructed in the early 1950s (i.e., contingency and technological diversity); and (2) blending does not provide sufficient flexibility, because the same reactors at the SRP which would be used to provide the plutonium of higher-than-weapon-grade purity must also be used to produce tritium on a higher priority basis. Increases or decreases in the nuclear weapons stockpile are beyond the scope of this EIS. However, as noted in the response to comment 4.3, weapon retirements from treaties are already assumed in material requirements. This applies to other retirements as well.

4.4.3 Comment:

It was stated that more efficient management of the pipeline (the production system) would lower the requirements for plutonium.

Response:

The existing DOE production complex is being upgraded to take full advantage of modern techniques developed for materials processing. See the response to comment 4.4.7.

4.4.4 Comment:

It was stated that not enough emphasis was placed on nonreactor sources of plutonium and that more realistic projections of future plutonium requirements, more rational schedules for deployment and retirements, and more efficient plutonium processing requirements would allow the U.S. to forgo almost all plutonium production, including constructing the SIS Facility.

Response:

Sections 1 and 2.5.2 of the Final EIS discuss alternative sources of weapon-grade plutonium such as retirements and scrap recovery and the rationale as to why none of the alternatives was considered to be a reasonable alternative to the SIS Project, as required by CEQ regulations [(40 CFR 1502.14(b)]. All sources of plutonium are entirely derived from the operation of a reactor, and in this sense there is no nonreactor source of plutonium. With respect to weapon-grade plutonium (i.e., plutonium which meets specific isotopic characteristics), nonreactor sources of weapon-grade plutonium can only include either existing weapon-grade plutonium and that which may be derived by upgrading existing plutonium to weapon-grade specification. The isotopic separation of plutonium as represented by the SIS Project is the only known nonreactor means of upgrading existing plutonium to weapon-grade specification. The SIS Project in its use of existing plutonium represents an efficient means of plutonium processing.

The SIS Project, as stated in the Draft EIS and the Final EIS, is required to provide a prudent level of contingency, flexibility, and technological diversity in DOE's production complex for the production of weapon-grade plutonium. Nonreactor sources of plutonium in the context of existing weapon-grade plutonium--whether in existing weapons or that which may be provided from the scheduling of retirements of weapons--are not a reasonable alternative to the SIS Project or to plutonium production in general because their availability was fully taken into account in determining the criteria for plutonium production discussed in Section 1 of the Final EIS.

The Nuclear Weapon Stockpile Memorandum (NWSM) takes into account weapon-grade plutonium that is derived from weapon retirements, scheduled as well as from arms agreements and backlog scrap recovery, in its determination of the quantities of weapon-grade plutonium that may be required. In addition to weapon retirements, the NWSM also takes into account in its annual approval cycle changes resulting from Congressional action on modernization programs recommended by the Department of Defense. The NWSM accurately reflects future plutonium requirements as approved by the President, but is subject to modification dependent on Congressional actions.

4.4.5 Comment:

It was stated that too much emphasis is placed on nonreactor production, and that several reactors could produce plutonium. It was also stated that the SIS Project is needed because scrap processing facilities and reactor facilities are old and will need extensive upgrading or replacement.

Response:

As discussed in response to comment 4.4.4, DOE has not placed an undue emphasis on nonreactor production. Such reactor-independent capability is required as presented in Section 1 of the Final EIS. The N-Reactor at the Hanford Site has produced plutonium but currently is in cold standby condition. It has a limited service life that is governed by distortion of the graphite moderator. DOE is currently assessing the feasibility of modifying the N-Reactor for potential production of tritium which may at some point make the reactor unavailable as a plutonium source. It is not a substitute for the 30 years of contingency afforded by SIS. Reactor production facilities are over 30

years old and are not a prudent source of plutonium. Scrap recovery facilities are outside of the scope of the EIS since scrap recovery had already been accounted for fully in demand assumptions in the NWSM. As discussed in Section 1.1.1 of the Draft EIS and the Final EIS, production of weapon-grade plutonium or plutonium of higher than weapon-grade for use in blending by existing SRP DOE production reactors is also limited, even though the reactors have the capability of producing plutonium. The existing operating production reactors at the SRP were constructed in the early 1950s. Limitations on their production capability include (1) operating constraints that have been placed on the existing reactors due to safety concerns; and (2) the higher priority need for the production of tritium.

Scrap processing also is conducted mostly in aging facilities. Plutonium recovery from scrap processing has been and will continue to be a major source backlog of weapon-grade plutonium. However, as noted in the response to comment 4.4.7, the quantity of scrap to be recovered is limited and it will largely have been recovered by the time the SIS Project is started up. Acceleration of the rate of plutonium recovery from scrap is being pursued in existing facilities and future projections of material need already take this into account. DOE has been developing plans for two new production reactors aimed at meeting future tritium needs; however, these will not be available until after the year 2000. the SIS Project, as a contingency, is needed to provide the necessary reliability to the plutonium supply for its 30-year design life and regardless of tritium demands placed on reactors. See the response to comment 5.2.6 on the impact of the no-action alternative.

4.4.6 Comment:

It was stated that a glut of plutonium could be obtained at the end of the 1990s by recycling obsolete, retired weapons, by scrap processing, and from Savannah River reactors.

Response:

Weapon retirements and scrap processing have been and will continue to be two major sources of plutonium for weapons manufacture. Future plutonium availability from the Savannah River Plant (SRP) production reactors is very uncertain. See the responses to comments 4.4.7 (scrap recovery), 5.2.14, and 5.2.15 (alternative sources of plutonium).

4.4.7 Comment:

It was stated that a large backlog of scrap or residue material is available that could be processed to supply the needed plutonium. For example, a scrap backlog twice the current amount scheduled to be processed in SIS facilities is available and accelerated scrap processing is planned.

Response:

Scrap processing has been and will continue to be one of the major sources of weapon-grade plutonium. DOE has initiated a program to increase the rate at which plutonium scrap can be processed. DOE plans to recover the plutonium from all weapon-grade scrap, but some of the material is difficult to process and corresponding rates of recovery are relatively low. Accelerated scrap processing is not an acceptable alternative to the SIS Project in that the readily accessible backlog should be exhausted between now and the beginning of SIS operations and in that it is not a reactor-independent source; rather it has already been fully accounted for in the determination of need for additional weapon-grade plutonium. The difficult-to-recover material represents only a small fraction of the scrap inventory and, therefore, even when or if it is processed it could not provide the same level of contingency, flexibility, and technological diversity, as the SIS. Specific information on stockpiles and SIS production capabilities is classified.

4.5 EXISTING CAPABILITIES

Comment:

It was noted that justification for the Special Isotope Separation (SIS) Project includes more than meeting materials requirements, in that the SIS Project provides the leading edge of technology, supplements the service life of reactors, fills a gap in defense needs, and provides a reliable source of plutonium.

Response:

While the SIS Project is on the leading edge of technology, fills a gap in defense needs, and can provide a reliable source of weapon-grade plutonium, the useful life of the existing production reactors cannot be supplemented by the SIS Project. However, the SIS Project will supplement reactor production in that it will process material not currently suitable for weapons production use. It is important to note, however, that the SIS Project is not being proposed to meet specific materials requirements. Rather it is to provide a prudent level of contingency, flexibility, and technological diversity in the production complex. See also responses to comments in Section 4.15.

4.6 N-REACTOR STARTS AND RESTARTS

Comment:

It was stated that the N-Reactor was shut down for safety reasons and because plutonium was not needed, even though workers were assured there was a continued need for plutonium; the Draft Environmental Impact Statement (EIS) did not show a real need for plutonium, and therefore the Special Isotope Separation (SIS) Project is not needed. It was also noted that there are no easy solutions to the plutonium supply problem and that the same opponents of the SIS Project sued for N-Reactor shutdown.

Response:

The N-Reactor was placed in cold-standby status because of the adequate near-term availability of weapon-grade plutonium and because of budget considerations. See the response to comment 5.2.14 regarding the N-Reactor as an alternative to the SIS Project. Construction and operation of the SIS Project would provide an assured contingent capability beginning in the mid-1990s to produce weapon-grade plutonium. Although current needs for weapon-grade plutonium do not require the SIS Project to produce weapon-grade plutonium in the near term, construction and operation of the SIS Project are essential to ensuring that DOE has the online capability of responding to: (1) limitations in its existing production complex, which was constructed more than 30 years ago; and (2) requirements approved by the President and Congress for weapon-grade plutonium that may be beyond the capability of the DOE production complex in the mid-1990s. Chapter 1 of the Draft and Final EIS was prepared pursuant to CEQ regulations, which require a brief statement of the underlying purpose and need to which the agency is responding in proposing the proposed action and alternative (40 CFR 1502.13). For additional information on defense needs, please refer to the responses to comments 3.4, 5.2.14, and 4.6. Litigation involving the N-Reactor is beyond the scope of this National Environmental Policy Act (NEPA) process.

4.7 REDUNDANCY/FLEXIBILITY/DIVERSITY

4.7.1 Comment:

Support was noted concerning the need for redundancy, flexibility and technological diversity in the U.S. Department of Energy (DOE) production complex which would be provided by the Special Isotope Separation (SIS) Project. Conversely, it was also stated that the need for redundancy, flexibility, and technological diversity was too vague and did not justify the SIS Project. It was requested that the EIS should define this terminology and provide supplemental information.

Response:

Section 1.1.1 of the Final Environmental Impact Statement (EIS) has been expanded to amplify the discussion on the need for the SIS Project as a contingent source of weapon-grade plutonium with respect to redundancy, flexibility, and technological diversity.

Contingent capacity, or contingency, is production capacity which is in place but not specifically required by known production needs in order to respond to uncertain events such as the shutdown of other facilities. Technological diversity is the provision of a variety of technological approaches to a situation to increase the likelihood of a satisfactory solution. One technology may be precluded, but if others are readily available, the requirement may still be fulfilled. Flexibility is adaptability to changing circumstances such as increases in approved production requirements or diversion of facilities to other missions. Redundancy is possible in all of these concepts, meaning in excess of known requirements. It is required to protect against unacceptable loss of capability in the future.

4.7.2 Comment:

It was noted that the SIS Project is cost effective and would provide needed flexibility to the production complex. Conversely, it was also stated that we don't need flexibility in producing a deadly toxin.

Response:

Flexibility in the DOE production complex for nuclear defense materials is essential to ensuring that competing demands for both tritium and plutonium can be met. As discussed in Section 1.1.1 of the Draft EIS and the Final EIS, currently both tritium production and new plutonium production, including blending, are entirely dependent on the existing operating reactors at the Savannah River Plant (SRP) that were constructed in the early 1950s. Even with new reactors in place, flexibility to respond to changing material production requirements is necessary. Also, see the response to comment 5.24.27 for information on the handling of plutonium.

4.7.3 Comment:

It was stated that redundancy in production cannot be justified and is a waste of taxpayers' money. It was also stated that the current plutonium inventory and needs must be documented in the EIS.

Response:

The need for redundancy within the DOE nuclear defense materials production complex is exemplified by the imposition of a reduction in the power operating levels of the SRP reactors to

ensure the continued safety of their operation. Redundancy is essential to ensuring that the approved needs for weapon-grade plutonium are met without being singularly reliant on such facilities. The current age of the existing operational production reactors, upon which the existing DOE production complex is singularly dependent, further requires that a prudent level of contingent and technologically diverse production capability be initiated now so that it is available in the future to meet approved requirements for nuclear defense materials.

Alternate allocations of the Federal budget are not in the scope of this EIS. The inventory and quantitative requirements for weapon-grade plutonium are classified and are not directly involved in the justification for the SIS Project; therefore, they are not included in this Final EIS nor has a classified appendix been prepared. Also see responses to comments 4.6, 4.7.1, and 5.2.6 and Section 1 of the Final EIS.

4.7.4 Comment:

It was stated that redundancy could be provided by N-Reactor, using SIS development facilities at Lawrence Livermore National Laboratory (LLNL) or using fuel-grade plutonium in its present form directly in weapons, and thus DOE already has plutonium production flexibility/redundancy.

Response:

As stated in Section 2.5.2 of the EIS, production of weapon-grade plutonium in the N-Reactor does not provide sufficient technological diversity. Further, the useful service life of N-Reactor is limited by the distortion of its graphite moderator.

The SIS Facility at LLNL has been designed to demonstrate the ALVIS technology and system capabilities. See the response to comment 5.2.13 on the unsuitability of using LLNL facility for production.

The utilization of fuel-grade plutonium directly in weapons is not within the scope of this EIS; furthermore, it should be noted that the utilization of such materials is directly contrary to approved weapon modernization programs.

4.8 RAPID INCREASE IN CAPABILITY

4.8.1 Comment:

It was stated there was no need to rapidly produce plutonium in peacetime, and that no delivery systems are or would be available for the weapons using the plutonium. It was also stated that the ability to rapidly increase plutonium production is of no value if a nuclear war is imminent or has actually begun.

Response:

The need to produce weapon-grade plutonium is determined by the President through the approval of the Nuclear Weapons Stockpile Memorandum (NWSM) and the subsequent approval of authorizations and appropriations by Congress. These processes take into account the need for weapon-grade plutonium with the appropriate weapon or delivery systems that would be deployed. Section 1.1.1 of the Final Environmental Impact Statement (EIS) has been clarified to show that the flexibility available because of the modularity of Special Isotope Separation (SIS) technology is not directly considered in the mission covered by this Final EIS. Rather, it is the flexibility in facility usage around the defense complex which requires enhancement. The SIS Project would provide the needed flexibility.

The need to produce plutonium rapidly in peacetime would be determined by the President and Congress. Consideration of such a need or the need for weapon-grade plutonium in the event of an imminent nuclear war is outside the scope of this EIS.

4.8.2 Comment:

It was stated that to provide "sprint/surge" capacity, the SIS Facility would have to access civilian spent fuel when the DOE-owned fuel-grade plutonium runs out in the early 2000s.

Response:

There is sufficient DOE-owned fuel-grade plutonium for the SIS Project to provide "sprint/surge" capacity. See the response to comment 4.8.1 regarding the SIS Project's capability to be more readily expanded. DOE does not intend to process civilian spent fuel precluded by law at the SIS Project. See the response to comment 5.26.2 regarding the illegality of using such commercial spent fuel. Discussion of need for specific quantities of plutonium is not relevant to the proposed action to construct and operate the SIS, and is therefore outside the scope of the EIS.

4.9 DETERMINATION OF NEED

4.9.1 Comment:

It was noted that the Special Isotope Separation (SIS) Project does not represent a national need but is a part of the DOE and Pentagon wish list.

Response:

The U.S. Department of Energy (DOE) and the Department of Defense both provide input to the President through the National Security Council in the development of the Nuclear Weapons Stockpile Memorandum (NWSM). The approval by the President and of the NWSM and the subsequent congressional approval of authorizations and appropriations constitute the legal direction for DOE to provide the approved nuclear defense materials. Because the recommendations of DOE and the Department of Defense, and more specifically the recommendations regarding the SIS Project, have been approved through the process identified above, it is inappropriate to characterize the SIS Project as being part of a "wish list" without need.

4.9.2 Comment:

It was stated that need and location of the SIS Project have not been justified and should be addressed by Congress before proceeding with the project.

Response:

A decision on whether to proceed with the SIS Project, and its location if a determination is made to construct and operate the project, will be contained in a publicly available Record of Decision of this Final Environmental Impact Statement (EIS).

With respect to the need for the SIS Project, its need and justification have been extensively considered by the current administration and Congress. In addition to briefings of members of Congress and their staffs, there have been several formal congressional hearings this year before the Senate and House Armed Services Committees. Within this year, DOE personnel (e.g., John S. Herrington, Secretary, Department of Energy, and Troy E. Wade II, Acting Assistant Secretary for Defense Programs, Department of Energy) have presented testimony regarding the need for the SIS Project. In addition, the document, Report to Congress on the Special Isotope Separation (SIS) Program, March 21, 1988, was provided to the House Committees on both Armed Services and Appropriations. An additional report will be provided in March 1989. Congress, therefore, is deeply involved in the process. The decision of location of the SIS Project has been left to DOE. Congressional support for the project is evidenced by continued funding appropriations. See the responses to comments 2.12.5 (location of SIS) and 3.4 (need) for additional information.

4.9.3 Comment:

It was noted that a self-declared need by the Federal government is not justification, and providing more plutonium for weapons leads to more destruction of people and the environment.

Response:

As identified in the response to comment 4.9.1, the identification of the need for the SIS Project is not a self-declared need by DOE or an agency of the Federal government. The response to

comment 4.9.2 also briefly discusses the efforts of DOE to inform Congress of the need for the project. Any discussion of the national policy on nuclear weapons, their deployment, and the need for weapons is beyond the scope of this EIS.

4.9.4 Comment:

Support was expressed for the SIS Project. It was stated that the President, Congress, the Department of Energy, the Department of Defense, the National Security Council, and several Senate and House Committees support the SIS Project, and that the elected officials should be trusted to determine if the SIS Project is needed. It was conversely stated that Congress and the White House do not support or advocate the need for the SIS Project or plutonium, and that the majority of Congress is unaware of the SIS Project and opposition thereto.

Response:

Support by the Administration and the Congress is evidenced by the language in the fiscal year 1988 Energy and Water Development Appropriations bill. The bill included an additional 40 million dollars above the President's request to support the deployment of the Special Isotope Separation technology, which is needed to meet national security requirements. Continued funding was granted for fiscal year 1989 for both development and construction activities, with the provision that a report be provided to Congress by March 1, 1989. The report will address such topics as readiness of the technology and feedstock information. See the response to comment 4.9.2 for additional information on congressional evaluations of the SIS Project.

4.9.5 Comment:

Concern was expressed that Senator Mark Hatfield has stated that we have a plutonium reserve and that the plutonium requirements of a modernized nuclear weapons arsenal can be met largely through retirement and dismantlement of weapons.

Response:

The main thrust of Senator Hatfield's paper, "The Plutonium Cushion," was to show that the N-Reactor at Hanford could be placed in cold standby because there were other sources of plutonium in addition to weapon retirements. These are: (1) blending using the Savannah River Plant (SRP) reactors, (2) production enhancements to increase SRP reactor output, (3) processing of scrap, (4) SIS, and (5) New Production Reactor (NPR). Tritium production is the priority mode for the aging SRP reactors, and plutonium production is highly uncertain. The importance of the SIS Project for contingency plutonium processing capability appears to be greater now than when Senator Hatfield issued his paper. The recovery and recycling of existing weapon-grade plutonium from retired weapons and from the enhanced backlog scrap recovery will also continue irrespective of whether the SIS Project is constructed and operated (see response to comment 4.4.7). Neither of these sources provide the necessary contingency, flexibility and technological diversity the SIS Project would for the production of weapon-grade plutonium. See Section 2.5.2 of the Final EIS for more details.

4.9.6 Comment:

It was stated that budgeting documents overstate plutonium requirements.

Response:

Although the reference to "budgeting documents" is vague, presumably the reference is to the administration's budget, which is submitted to Congress and which reflects the input of each of the

Federal agencies, including DOE. The administration's budget reflects the currently approved NWSM--which contains the requirements for plutonium--that has been approved by the President. As with all administration budgets, the Congress through its authorization and appropriation process may take exception to or modify the administration's budget recommendations.

4.10 NWSM/CLASSIFIED INFORMATION

4.10.1 Comment:

It was stated that the Nuclear Weapons Stockpile Memorandum (NWSM) is not useful for estimating plutonium requirements because Senator Mark Hatfield from Oregon states that the NWSM has always overestimated how much plutonium is needed.

Response:

The U.S. Department of Energy (DOE) and the Department of Defense both provide input to the President through the National Security Council in the development of the NWSM. The approval by the President and of the NWSM and the subsequent congressional approval of authorizations and appropriations constitute the legal direction for DOE to provide the approved nuclear defense materials. See the response to comment 4.9.5 regarding the statement of Senator Mark Hatfield. Disagreements between the administration and Congress with respect to national security issues are not reflective of the accuracy of the NWSM as approved by the President and are beyond the scope of this Environmental Impact Statement (EIS).

4.10.2 Comment:

It was stated that since the need for plutonium was not established except by referencing classified documents, the public cannot judge whether the Special Isotope Separation (SIS) Project is needed or not.

Response:

The Draft EIS did not reference classified documents in its discussion of the need for the SIS Project. The sole discussion of a classified document (i.e., the NWSM) contained in Chapter 1 of the Draft EIS and the Final EIS was intended to provide the reader with an understanding of the process whereby the requirements for weapon-grade plutonium are derived. The contingency, flexibility, and technological diversity in the production of weapon-grade plutonium are not based on any identified quantities of weapon-grade plutonium that are contained in the NWSM. In Section 1.1.1 of the Draft EIS and the Final EIS, the need to provide a prudent level of contingency and flexibility is specifically discussed with respect to the status and constraints on existing DOE production facilities.

4.10.3 Comment:

It was noted that the NWSM need for the SIS Project is acceptable and the production of "clean" rather than "dirty" weapons is preferred.

Response:

The processing of plutonium to reduce radiation exposures to weapon personnel is a potential mission for the SIS Project; however, DOE has neither formally proposed the use of the SIS Project for this mission nor directed the undertaking of detailed technical feasibility studies to assess the capability of the proposed SIS Project to undertake this mission. See the response to comment 4.10.2 regarding the NWSM. If the comments were meant to refer to the "clean" or "dirty" effects of a nuclear weapon detonation, this is beyond the scope of this EIS.

4.10.4 Comment:

It was stated that the actual need for plutonium in the future will be less than the forecast amount. It was also noted that neither our opponents nor we can accurately predict what will be needed.

Response:

That the need for plutonium in the future will be more or less than the forecast amount is uncertain. Many factors are considered in the determination of the need for weapon-grade plutonium, the most important of which is the agreement of the administration and Congress on the size and composition of the nuclear deterrent force. Agreement on this does in fact allow an accurate estimation of the amount of nuclear defense materials that are required to support the nuclear deterrent force.

4.10.5 Comment:

It was stated that the DOE determinesthe need for SIS operations and has a vested interest in building the SIS Project. It was also stated that DOE cannot be trusted to determine the need based on information in classified documents, and that there is no market mechanism to determine the need and no impartial review.

Response:

As explained in the response to comment 4.9.1, DOE does not independently decide the need (i.e., plutonium), nor does it propose a project such as the SIS Project without fully discussing the need with the Department of Defense and with Congress. Also, see the response to comment 4.9.2 and the response to comment 4.10.2 regarding the need for the SIS Project.

Market mechanisms are not valid in determining the need for nuclear defense materials, production capabilities for these materials, and the national policy on nuclear weapons and are beyond the scope of this EIS.

4.11 CLASSIFIED APPENDIX

4.11.1 Comment:

It was stated that the need for the plutonium supply capability of the proposed Special Isotope Separation (SIS) Facility should be documented in a detailed classified appendix. It was further indicated that such detail was necessary to provide for adequate congressional scrutiny.

Response:

A discussion of the need and underlying purpose for which the U.S. Department of Energy (DOE) is proposing the SIS Project is presented in Section 1.1.1 of the Draft and the Final Environmental Impact Statement (EIS), in accordance with Council on Environmental Quality (CEQ) regulations (40 CFR 1502.13). Discussion of needs of specific quantities of plutonium is outside the scope of this EIS. The SIS Project is not being proposed to meet an identified requirement for weapon-grade plutonium, but rather is being proposed to provide a prudent level of contingency, flexibility, and technological diversity. A classified appendix on supply capability is, therefore, not considered to be relevant. Decision makers in both the executive and legislative branches are periodically briefed on nuclear material supplies and needs outside of the National Environmental Policy Act (NEPA) process. See also the response to comment 4.9.2.

4.11.2 Comment:

It was noted that previous DOE Environmental Impact Statements have included a classified appendix containing information on specific defense material needs and that such an appendix was appropriate for the SIS Facility.

Response:

DOE has prepared only one EIS that contained a classified appendix on need--the EIS on the restart of the L-Reactor. The restart of the L-Reactor was proposed by DOE to provide specific quantities of weapon-grade material within a given time period, whereas the SIS Project is being proposed as only a contingency source of material. A classified appendix similar to that for the L-Reactor is, therefore, not considered necessary or appropriate for inclusion in the Final EIS for the SIS Project. Discussion of the need for specific quantities of plutonium is outside the scope of this EIS.

4.11.3 Comment:

It was noted that the Implementation Plan for the SIS Environmental Impact Statement indicated that a classified appendix would be prepared.

Response:

The EIS Implementation Plan was prepared prior to the issuance of the Draft EIS and the evaluation of the need for the SIS Project under NEPA. Based on the need for the SIS Project as a contingency source of material, DOE now considers that a classified quantitative discussion of the SIS Project is not appropriate.

4.12 COST/BENEFIT ANALYSIS

Comment:

It was stated that the Special Isotope Separation (SIS) Project is not justified economically or environmentally, and that a cost/benefit analysis should be included in the Environmental Impact Statement (EIS).

Response:

The U.S. Department of Energy (DOE) has evaluated the alternatives and has identified the SIS Project as a cost-effective option to assure that DOE responsibilities in meeting approved nuclear defense material requirements can be fulfilled. Both the Draft EIS and the Final EIS contain a full evaluation of the environmental impacts from normal SIS plant operation and from postulated accidents (Chapter 4). Socioeconomic and other impacts were also assessed. See the responses to comments 5.2.1, 5.2.5, 5.2.9, 5.2.10, and 6.2 for additional information.

Council on Environmental Quality (CEQ) regulations do not require, and in fact discourage, a monetary cost/benefit analysis when there are important qualitative considerations (40 CFR 1502.23). DOE has indicated those considerations likely to be relevant and important to a decision on the SIS Project and has evaluated the relative valves and drawbacks of the various alternatives. See the response to comment 2.13.10 for additional information.

4.13 NUCLEAR WEAPONS

Comment:

It was stated that there exist more than enough weapons for the defense of the U.S., and thus the Special Isotope Separation (SIS) Project capability to produce more plutonium is not needed. The morality of defense programs was also questioned.

Response:

The national policy on nuclear weapons, their deployment, and their number is a policy decision which is made by the President of the United States and approved through the authorization and appropriation process of the Congress. Although DOE and the Department of Defense provide input to the President through the National Security Council on this national policy, approval and implementation of the policy are the responsibility of the President and the Congress. The national policy on nuclear weapons, their deployment, and the need for nuclear weapons is beyond the scope of this Environmental Impact Statement (EIS). See the response to comment 3.4 for additional information. Morality issues are beyond the scope of an EIS.

4.14 ARMS REDUCTION

Comment:

It was stated that the Special Isotope Separation (SIS) Project is inconsistent with arms reduction negotiations and goals for peace and that successful negotiations resulting in arms reduction would most likely end the need for the SIS Project.

Response:

The United States will continue to pursue verifiable agreements to reduce nuclear weapons while maintaining the capability of producing special nuclear materials for national defense. Arms reductions negotiations, goals for peace, and implications regarding the SIS Project are beyond the scope of this Environmental Impact Statement (EIS).

4.15 NEED

4.15.1 Comment:

It was stated that the Special Isotope Separation (SIS) Project was needed and has a high national priority. Conversely, others stated that the U.S. has ample supplies of weapon-grade plutonium to meet all reasonable contingencies and therefore the SIS Project is not needed.

Response:

Although the quantities of weapon-grade plutonium are classified, it can be stated that the requirements for weapon-grade plutonium are directly based on weapon modernization program material requirements that have been approved by the President and Congress with respect to replacing enriched uranium with plutonium for nuclear weapons. The assertion that the U.S. has ample supplies of weapon-grade plutonium to meet all contingencies prejudges the national policy on nuclear deterrent forces which the President and Congress believe are appropriate to national security. The SIS Project is needed to provide contingency, flexibility, and technological diversity to the production complex. It is not based on specific Nuclear Weapons Stockpile Memorandum (NWSM) production quantities. Discussion of the need for specific quantities of plutonium is beyond the scope of this Environmental Impact Statement (EIS).

4.15.2 Comment:

It was stated that there is no need for more plutonium. Therefore, expenditures for the project are wasteful and will add to the Federal deficit.

Response:

See the response to comment 4.15.1 with respect to the need for more weapon-grade plutonium. Expenditures on projects such as the SIS Project which would ensure the fulfillment of national security policy issues agreed to by the President and Congress are not considered wasteful. Since all funds for the SIS Project must be appropriated and authorized by the Congress, funding for the project with respect to the Federal deficit is considered by Congress and is beyond the scope of this EIS.

4.15.3 Comment:

It was stated that there is a need for tritium but not for plutonium because there is enough plutonium; since the SIS Project will not produce tritium, it is not required.

Response:

While it is true that, unlike tritium, weapon-grade plutonium decays slowly, the production of both tritium and weapon-grade plutonium is currently dependent on the same production reactors. Construction and operation of the SIS Project as discussed in Section 1.1.1 of the Draft EIS and the Final EIS would provide the U.S. Department of Energy (DOE) contingency, flexibility, and technological diversity in meeting the approved requirements for both of these materials when the approved requirements are or may be dependent on the same facilities. Also see the response to 4.15.1 regarding the need for weapon-grade plutonium to support the modernization and upgrade policy.

4.15.4 Comment:

It was noted that the SIS Project is needed to assure national security, to ensure backup strength in arms negotiations and capability to counter a possible Soviet breakout, and to provide a safe economical contingency backup to existing aging facilities. Conversely, it was noted that there is no rational national security or economic justification for constructing the SIS Facility in Idaho or any place and that it endangers citizens and the environment.

Response:

The national policy on nuclear weapons, their deployment, and the need for weapons is beyond the scope of this EIS. As stated in Section 1.1.1 of both the Draft EIS and the Final EIS, the SIS Project is required as a contingency to meet potential demands for weapon-grade plutonium. Also see the response to comment 4.15.1 (nuclear deterrence) regarding the need for plutonium.

In keeping with the policy of the Department of Energy, the SIS Project will be designed, constructed, and operated in a safe, secure manner, with emphasis on minimizing environmental impacts as far below permissible limits as reasonably achievable. The EIS defines and evaluates the alternatives and the impacts of the proposed action of constructing and operating the SIS Project.

4.15.5 Comment:

It was stated that there is no need for more plutonium because of the large stockpile, as reported by knowledgeable people. It was also stated that the short mission of SIS (about 7 years maximum), without considering the impacts of INF and START, may have a detrimental impact on jobs and economics. Others supported the need for plutonium production capability.

Response:

See the response to comment 4.15.1 with respect to the need for more weapon-grade plutonium. DOE has identified a quantity of feed material consistent with the need for the SIS Project that would provide for several years (currently estimated as 8-10 years in contrast to the 6-8 years previously reported) of operation at full throughput capacity. Additional quantities of feed materials, which do not include materials from commercial spent fuel precluded by law, may be available in the future, depending on limitations on existing production facilities and new initiatives that might be undertaken. The impacts of ratified arms limitation agreements are accounted for in DOE's determination of requirements for weapon-grade plutonium, and would therefore not affect the need for the SIS Project as identified in the EIS. Potential impacts of nonratified treaties are uncertain and are beyond the scope of this EIS. See response to comment 4.3 for a discussion of treaties.

4.15.6 Comment:

It was stated that the use of the product from the SIS Project for weapons purposes (for war) violates agreements, e.g., the Nuremberg Charter.

Response:

The use of SIS product, presumably the use of nuclear weapons, is beyond the scope of this EIS, as is the national policy on nuclear weapons, their deployment, and number.

4.15.7 Comment:

It was stated that there is a system to make warhead triggers and thus there is no need for the SIS Project.

Response:

The SIS Project would not be involved in the manufacture of warhead triggers. The need for the SIS Project is discussed in Section 1.1.1 of the Draft EIS and the Final EIS.

4.15.8 Comment:

It was stated that the justification given in the Draft EIS for producing more plutonium is vague and nonsupportable, and no credible conditions under which plutonium from the SIS Project is needed for national security are presented. It was also stated that the need for the SIS Project has not been justified publicly or in classified documents.

Response:

The Draft EIS was prepared in accordance with the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of National Environmental Protection Act (NEPA). Specifically, these regulations at 40 CFR 1502.13 do not require DOE to justify the need for the SIS Project, but rather require a brief statement of the need and underlying purpose for which DOE is proposing the Project. As discussed in the Draft EIS and the Final EIS in Section 1.1.1, the need and underlying purpose for proposing the SIS Project are to have a contingent, flexible, and technologically diverse source of material. Also, see the response to comment 4.15.1 regarding speculation of credible conditions.

5.0 TECHNICAL ISSUES COMMENTS AND RESPONSES

5.1 ACCIDENTS

5.1.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) had serious flaws because the underlying assumptions used in the analysis of accident scenarios are unjustified and highly nonconservative, and the overall risk is too great.

Response:

The Draft EIS referenced all of the underlying assumptions used in the analysis of potential accident scenarios in Section 4.1.3 and Appendix A of the Draft EIS. With the exception of using a plateout factor (a factor to account for fallout of particles in ductwork) of 2 and the quantities of plutonium at risk for the design-basis fire accident in a single area with the uncontrolled chemical reaction, all assumptions used in the presentation of accident consequences in Section 4.1.3 were conservative. For the Final EIS, the redundant plateout reduction factor of 2 was not used and quantities of plutonium at risk during the postulated design-basis fire and uncontrolled chemical reaction have been revised to reflect the maximum quantities at risk based on design data available as of September 1988. The accident consequence analyses presented in Section 4.1.3 of the Final EIS do address the risks, which are well within those considered acceptable. Contrary to the assertion that the analysis is highly nonconservative, the U.S. Department of Energy (DOE) believes that the accident assessment methodology used and the assumptions made are conservative. The scenarios are considered conservative because the amount of plutonium at risk was maximized, all noncritical designed safety features were assumed to fail, and degraded filter efficiencies were considered. For a discussion of the assumptions used in the analysis of severe facility accidents, see response to comment 5.1.11.

5.1.2 Comment:

It was stated that the analyses of the SIS Facility accidents were inadequate, incomplete, and/or questionable.

Response:

As stated in the response to comment 5.1.1, the accidents presented in the Final EIS and the assessment of their potential environmental consequences are considered to be conservative. More specific comments on what reviewers considered to be inadequate, incomplete and/or questionable analyses are addressed in responses that follow.

5.1.3 Comment:

Reviewers expressed concern that the Draft EIS played down the probability of a serious accident. They felt that, because the design of the Special Isotope Separation (SIS) Facility is in such an early stage, and development is concurrent with design, there can be no firm basis for selecting design-basis accidents.

Response:

The Draft EIS did not downplay either the probability or the consequences of the postulated accidents presented in Sections 4.1.3, 4.2.3, and 4.3.3. Although not required by Council on Environmental Quality (CEQ) regulations, preliminary probabilities of the potential occurrence of the facility accidents presented in the Draft EIS have been incorporated into the Final EIS, Section 4.1.3, to assist the reader in understanding the probability of the occurrence of these events.

Several of the comments received on the Draft EIS have apparently confused design criteria and design-basis accidents with the level of design of the SIS Project, and have concluded that in the absence of the final design, the Draft EIS could not adequately assess design-basis accidents. Design criteria and criteria for determining a design-basis accident do in fact exist and are identified in DOE Orders (e.g., 6430.1A). These criteria are equally applicable to the demonstration facilities at the Lawrence Livermore National Laboratory (LLNL) and the SIS Project at the Idaho National Engineering Laboratory (INEL). While a final design of the SIS Project does not exist, a final design is neither a prerequisite to completion of an EIS nor is it essential to the postulation of events and consequences if conservative assumptions are used. Also see the response to comment 5.1.1. Detailed evaluation of SIS accidents will be contained in the Preliminary and Final Safety Analysis Reports, to be completed before the facility is constructed and operations begin, respectively.

5.1.4 Comment:

Reviewers stated that the SIS Draft EIS did not sufficiently incorporate atmospheric complexities, such as lofting and other atmospheric dispersal mechanisms, into accident analyses.

Response:

Atmospheric complexities were taken into consideration through the use of the CRAC2 computer model, which uses one year of consecutive hourly meteorological data as described in Appendix A of Volume 2. Exemplification of the meteorological complexities taken into account by the CRAC2 model is demonstrated by its capability of considering deposition of airborne radionuclide emissions by a rainfall event. Although it is true that the CRAC2 model did not incorporate the effects of lofting, the lofting condition may be considered as the most favorable diffusion sititution--other than when inversion is very shallow--and would lead to lower consequences than those described in the EIS.

5.1.5 Comment:

It was stated that the Draft EIS needed to address shipping problems identified in report BNWL-2288.

Response:

Shipments of SIS-generated plutonium feed and product would be made in Type B containers that are certified by the U.S. Nuclear Regulatory Commission (NRC). Currently, DOE plans to use the 55-gallon version of the 6M package, which has a failure threshold of 70,000 pounds. Analyses presented in the Draft EIS and the Final EIS are based on the 6M container. The BNWL-2288, Plutonium Transport Package Closure Survey, revised from BNWL-1846, The Risk of Transporting Plutonium Oxide and Liquid Nitrate by Truck, refers to the smaller 15-gallon-size version of the 6M container.

As also identified in the BNWL-2288 survey, handling and maintenance for most shipping containers surveyed were found to be proper. However, concern was expressed that a great deal of human involvement, and thus human error, was possible. Design consideration and maintenance procedures identified in the survey for minimizing error would be incorporated into SIS operations.

5.1.6 Comment:

It was stated that consequences of accidents were understated because of the use of outdated computer codes, specifically the use of CRAC2 instead of the more conservative MACCS, which is now the official basis for regulating the U.S. commerical nuclear industry..

Response:

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Response:

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Response:

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Response:

5.1.10 Comment:

Reviewers expressed concerns that the source terms and/or release fractions were too low or not consistent with values used throughout the nuclear industry. Specific flawed assumptions cited included underestimating dispersible plutonium inventory, overstated operability of highly efficient filtering systems, misinterpretation of the release fraction, and an unjustifiably optimistic assumption regarding containment and plateout.

Response:

Release fractions are dependent on the physical and chemical form of the plutonium and upon the physical or chemical properties of the environment to which the plutonium is released. The processes in which plutonium will be used at the SIS Facility are much different from those of a nuclear reactor or other nuclear industry facilities and therefore cannot be compared either directly or indirectly with respect to release fractions.

The source terms and release fractions cited for a nuclear reactor are not appropriate for the SIS Final EIS. Source terms (mass of material at risk) and the fraction available for release must be determined on the basis of what is initially airborne and other factors which ultimately determine what actually reaches the filtering system (or final release point). See the response to comment 5.1.8 for information on filtering efficiency. The fraction available for release is influenced by many factors, the most important of which is particle size; other influencing factors are humidity and flow of the air. Solid plutonium also has a very slow burning rate (~ 30 grams/hour). An assumption that all, or even a large fraction, of the material initially airborne is released to the atmosphere is not credible. See the response to comment 5.1.11 for more information on the plutonium release fractions.

Also see the response to comment 5.1.1 regarding plateout and quantities of plutonium at risk.

5.1.11 Comment:

It was stated that the Final EIS should include the basis for selecting the reference document used to determine the plutonium fraction released to the environment from the processing area in the postulated fire. It was also questioned how the release fraction was derived, using that document.

Response:

In the severe facility accident, 25 kg of plutonium are estimated to be at risk. This plutonium is in the form of metal, oxide and hydride. Release fractions for the accident were based on the relative amounts of each form. For conservatism, the hydride (which is readily converted to oxide) was added to the oxide total, even though the hydride is known to have a lower release fraction. The following table presents the values used:

Weight of Material Form at Risk	% of Total Mass at Risk	Fraction Available For Release[a]	Reference No.	Weighted Average Release Fraction	
Oxide - 10 kg	40%	1×10^{-3}	4	4×10^{-4}	
Metal - 15 kg	60%	1×10^{-5}	2	0.06×10^{-4}	
Total - 25 kg	100%			4.06×10^{-4}	$\simeq 5 \times 10^{-4}$

(a) This fraction represents the amount of material hypothetically available for release to the atmosphere. It includes a factor (10^{-1}) to account for deposition and fallout of the material.

For additional conservatism the release fraction of 5×10^{-4} from the Draft EIS was retained in the Final EIS. Based on these assumptions, a total of 12.5 grams of plutonium would reach the filters prior to release to the environment in the postulated severe facility accident. For additional information on other than the severe accident and other release fractions see Section 4.1.3 of the Final EIS.

Reference:

1. Elder, J.C., et al., A Guide to Radiological Accident Considerations for Siting and Design of DOE Nonreactor Nuclear Facilities, LA-10294-MS, Los Alamos National Laboratory, Los Alamos, New Mexico, January 1986.

2. Mishima, J., Plutonium Release Studies II., Release from Ignited, Bulk Metallic Pieces, BNWL-357, Battelle Memorial Institute, Pacific Northwest Laboratory, Richland, Washington, November 10, 1966.

3. Selby, J.M., et al, Considerations in the Assessment of the Consequences of Effluents from Mixed Oxide Fuel Fabriaction Plants, BNWL-1697 Rev. 1, Battelle Memorial Institute, Pacific Northwest Laboratories, Richland, Washington, June 1975.

4. Stewart, K., Vixen A Trials: Experiments to Study the Release of Particulate Material During The Combustion of Plutonium, Uranium, and Beryllium in a Petrol Fire, AWRE Report No. T15/60, United Kingdom Atomic Energy Authority, January 1961.

5. Walker, E., A Summary of Parameters Affecting the Release and Transport of Radioactive Material from an Unplanned Incident, BNFO-81-2, Bechtel National, Inc., San Francisco, California, September 1978 (reissued August 1981.)

5.1.12 Comment:

Reviewers were concerned that the Draft EIS did not take into account the consequences of past severe nuclear accidents in the Soviet Union that occurred in the 1960s. It was also stated that risk assessment models could not be relied upon because of the lack of data available to verify them.

Response:

The proposed action evaluated in this EIS is the construction and operation of the SIS facilities. A discussion of the consequences of past Soviet accident(s) is outside the scope of this EIS.

The consequences of the accidents presented in the Draft EIS and Final EIS are based on internationally recognized recommendations of the National Academy of Sciences Committee on the Biological Effects of Ionizing Radiation (BEIR III). For a discussion of health effects, see the response to comment 5.13.6. Only limited data are available to verify the risk assessment models. The data that do exist show that the models are highly conservative, especially for radiological dose assessment models.

5.1.13 Comment:

Reviewers noted that an independent analysis indicated substantially greater impact than stated in the Draft EIS. Specifically, (1) "significant" effects will occur out to 160 miles from the INEL and even at agricultural centers in the midwest, and (2) the NRC ground deposition limit for unrestricted public use areas is exceeded by 100 to 1 million times.

Response:

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Response:

are also included in the Final EIS. Regarding hydraulic venting, volumes of liquid containing plutonium are small and spills would be drained to containment tanks through the emergency and decontamination floor drain system. The handling and disposal of plutonium-contaminated waste are described in the Draft EIS and the Final EIS in Section 2.1.5.1. Because of the extensive safeguard and security measures described in Section 4.1.5, an act of terrorism would not be expected to greatly increase the likelihood of either type of accident.

5.1.17 Comment:

Reviewers stated that the design criteria will assure that design-related accidents have a low probability of occurrence and will have minimal effects should they occur.

Response:

The Draft EIS was based on preliminary design information and the use of both representative and conservative assumptions in the assessment of potential accident consequences. The continuation of detailed design complemented by continuing safety analyses will be used to assure that reasonably foreseeable accidents would be of low probability.

5.1.18 Comment:

It was stated that a technical basis should be provided to justify the assumption of 1×10^{19} fissions from a criticality event (selected from NRC Regulatory Guide 3.35).

Response:

The calculational basis assumption of 10^{19} fissions, which is considered conservatively high for a non-reactor facility, is given in Section 4.1.3.1 of the Draft EIS and the Final EIS, and, as noted, is based on NRC Regulatory Guide 3.35.

5.1.19 Comment:

It was noted that environmental investigations of externally initiated accident sequences are inadequate (e.g., ground shear in large seismic events would destroy the facility and result in a facility-wide fire). It was also noted that the magnitude of a Design-Basis Earthquake (DBE) was not given, and hence the adequacy of the DBE scenario cannot be ascertained.

Response:

An accident resulting from a seismic event, which is of external origin, is fully analyzed in the Draft EIS and the Final EIS. The SIS Project is being designed in accordance with DOE Category I standards, which consider possibilities for seismic and other accidents initiated by events of external origin. These events were evaluated and were determined not to have consequences greater than those of the DBE. Among these were tornado, tornado-driven missiles, snow load, and flood. The consequences of a DBE followed by a fire at the SIS Facility are addressed in Section 4.1.3.1 of the Final EIS.

The Draft EIS and the Final EIS list, in Table 3-1, the largest earthquakes which have occurred on or near the Eastern Snake River Plain in historical times, and Section 3.1.4.3 of the Draft EIS and the Final EIS identifies the accelerations associated with the DBE. The Final EIS also contains an amplified discussion of the seismic and volcanic characteristics of the INEL area,

including the 1983 Mt. Borah earthquake. As discussed, this earthquake caused no significant structural or safety-related damage to any facility at the INEL. For additional information on facility design and accidents, see the response to comment 5.1.34.

5.1.20 Comment:

Reviewers expressed concern about the "unacceptable" hazards associated with plutonium in large quantities and questioned the consequences of an accident that releases plutonium.

Response:

Plutonium is recognized as a toxic and dangerous material if ingested, inhaled, or otherwise taken into the body, which accounts for the elaborate and extensive controls required by DOE. However, plutonium, like many other hazardous materials, can be handled safely when adequate attention is devoted to safety analysis, design, and operating requirements. The DOE has over four decades of experience in safely handling plutonium. Plutonium is not a hazard to humans or the environment if it is isolated and/or its release to the environment is prevented or limited to nonhazardous quantities. Analysis of highly unlikely accident scenarios presented in the Draft EIS and the Final EIS shows that the quantity of plutonium projected to be released and transported to the accessible environment would be extremely low and would present no appreciable hazard to human populations or the environment.

5.1.21 Comment:

Reviewers expressed doubt that all significant accidents were considered in the Draft EIS and/or whether worst-case accident scenarios presented really were worst-case.

Response:

The postulated accidents that are presented in the Draft EIS and the Final EIS are those having the highest reasonably forseeable releases of radioactive material, and thus the greatest potential for consequences as stated in Section 4.1.3.1. The postulated accidents are presented in Section 4.1.3.1 and a severe facility accident is considered in Section 4.1.3.2. In addition to considering a severe accident associated exclusively with the SIS Facility, and in response to concerns that all significant accidents be considered in the EIS, a discussion of a low probability accident occurring simultaneously at Idaho Chemical Processing Plant has also been included in Section 4.1.4 of the Final EIS.

The severe facility accident presented in this Final EIS is considered to be a bounding accident meeting the criteria set forth in CEQ regulations (40 CFR 1502.22). As stated in the Draft EIS, for the postulated severe accident to occur, five conditions are assumed: (1) facility-wide fire must in some fashion occur; (2) the building fire suppression system, which will be Design-Basis Accident (DBA) qualified, is assumed to be not effective; (3) the final filtration systems, including fire protection systems, both of which will be DBA-qualified, are not effective; (4) no mitigative action (such as immediately placing plutonium into protected storage upon detection of a fire) is taken; and (5) no response is made by the ICPP fire brigade and INEL fire department. The severe accident would have an estimated probability of less than 1×10^{-6} per year (note: estimated probabilities of the occurrence of accidents are presented in the Final EIS to assist the lay reader in understanding the remote chances of occurrence even though CEQ does not require the inclusion of these probabilities). Based on the conditions that would have to occur to obtain the postulated releases and based on the extremely low estimated probability of occurrence, the severe accident scenario more than adequately satisfies the criterion of an extremely low-probability accident as contained in 40 CFR 1502.22. While other potential accident scenarios can be postulated, it is not believed that an accident can be postulated that would result in higher consequences and which is based on "credible scientific evidence" as also required by 40 CFR 1502.22.

5.1.22 Comment:

Reviewers expressed concern about the consequences of laser misalignment potentially resulting from earthquakes.

Response:

Lasers to be used in the SIS facilities, if misaligned or disrupted by any event, including an earthquake, are designed to immediately shut down. No accident involving laser misalignment was identifiable that would affect operating personnel or the environment.

5.1.23 Comment:

Reviewers requested that a section be included in the Final EIS that addresses equipment malfunctions associated with worst-case accidents and resulting emissions.

Response:

The equipment and systems that would have to fail during the severe facility accident before plutonium release to the atmosphere could possibly occur are listed in Section 4.1.3.2 of the Draft EIS and the Final EIS. Also, see the response to comment 5.1.21.

5.1.24 Comment:

Reviewers stated that hazards associated with accidents of external origin such as loss of power, tornadoes, and seismic activity were not sufficiently assessed or were omitted in the Draft EIS.

Response:

An accident resulting from a design-basis seismic event (which is clearly of external origin) is presented in the Draft EIS and the Final EIS. Other externally initiated events, such as tornadoes and tornado-driven missiles, probable maximum flood, etc., are also analyzed; however, because the SIS Project is designed specifically to withstand the effects of such natural phenomena, the consequences from these events were found to be less than those of the DBE followed by fire accident and were not presented in the EIS, as stated in Section 4.1.3. The Final EIS states that the SIS Facility will be designed to shut down and maintain a safe-shutdown condition in the event of the loss of electricity. This means that upon loss of power, all systems will default to a safe condition and maintain that status indefinitely.

5.1.25 Comment:

Reviewers stated that the SIS Draft EIS should tabulate the consequences, including death, injury, or birth defects, resulting from all types of accidents, including those assuming failure of all safety features.

Response:

Postulated accidents selected for presentation in the Draft EIS and the Final EIS were selected because they bound the reasonably forseeable consequences associated with SIS. Consequences (i.e., doses and latent cancer fatalities and premature genetic effects) are presented for each accident in Sections 4.1.3.1 and 4.1.3.2.

5.1.26 Comment:

Concern was expressed that the SIS Draft EIS did not discuss propagating accidents and dismissed the need to do so with unmentioned studies.

Response:

Propagating accidents are normally considered to be those accidents which are initiated by a sequence of events that lead to an accidental release of radioactive material. The EIS addressed quantities of plutonium at risk that would maximize the potential release and consequences independent of whether the accident is initiated by a single event or a series of events. Whether the accident is of a propagating nature or not, it would not affect the maximum quantities of plutonium at risk.

5.1.27 Comment:

Concern was expressed that plutonium vaporized in the separation process may accumulate in certain areas, remain undetected, and cause a criticality, fire, or explosion resulting in plutonium release. It was also stated that an explosion followed by a fire has an "incredibly high probability" of occurrence of one in one thousand per year, and should be evaluated.

Response:

In the Atomic Vapor Laser Isotope Separation (AVLIS) system, the only place where plutonium vaporization occurs is in a vacuum system, which precludes fire or explosion by excluding oxygen. Criticality and the possible locations of plutonium accumulation within the separators are key elements that are factored into the separator design. In addition, a continuous monitoring of the inventory would account for the quantities and locations of the plutonium. The quantity of plutonium not accounted for (due to analysis or statistical uncertainties) would be insufficient to result in criticality, even under unfavorable conditions of geometry, moderation, reflection, and other parameters having a bearing on criticality. The Plutonium Processing Building would be designed to minimize the consequences of all fires whether resulting from an explosion or other initiating events.

5.1.28 Comment:

Reviewers stated that the SIS Final EIS needs to thoroughly address the short-term and long-term impacts of plutonium spills.

Response:

During the preliminary hazards evaluation, accidental plutonium spills were evaluated and found to not have as severe consequences to the environment as other accident categories evaluated and therefore were not included in the Draft EIS. The Final EIS in Section 4.1.3.1 describes a high-probability (i.e., might occur twice a year) spill.

5.1.29 Comment:

Reviewers expressed concern regarding the ability of the SIS facilities to resist range fires.

Response:

Response:

Response:

Response:

5.1.33 Comment:

Concern was expressed that possible catastrophic environmental damage would occur during transportation of the plutonium and storage of the waste.

Response:

The transportation risk as described in the Draft EIS (Section 4.1.3.3 and Appendix A) is very small. The information has been modified in the Final EIS to include the transport of the SIS by-product and transuranic (TRU) waste. The annual radiological risk of accidents for all projected SIS shipments is calculated to be 1.3×10^{-4} cancer deaths and 5.9×10^{-5} genetic effects. The annual radiological risk of transport accidents includes potentially catastrophic accidents (in Section 4.1.3.3 of the Final EIS) involving the transport of plutonium. The only SIS-generated wastes that would be stored (i.e., for more than 90 days) at the INEL would consist of TRU waste awaiting shipment to the Waste Isolation Pilot Plant (WIPP), mixed waste, and SIS by-product. Catastrophic damage could not occur with respect to TRU waste and mixed waste because of the lack of an initiating event or sequence of events that would cause dispersal of significant quantities of material. In the event of an accident involving storage of by-product material in a specially designed vault, the consequences would not exceed those discussed for the postulated criticality accident described in Section 4.1.3.1.

5.1.34 Comment:

It was requested that the Final EIS include an analysis of an explosion of external origin with failure of all, rather than selected, safety features.

Response:

The SIS plutonium facilities would be Category I structure [as defined in the DOE-ID Architectural Engineering (A-E) Standards] and would be designed in accordance with DOE Order 6430.1A. As described in the Draft EIS and the Final EIS in Section 2.1.3, exteriors of Category I structures are designed to withstand design-basis winds and tornadoes and preclude the penetration of tornado-generated missiles. An explosion external to SIS facilities would not likely generate pressures greater than the design-basis wind or wind-driven missiles which are more penetrating than those generated by the design-basis tornado. Therefore, even if an external explosion with failure of the HEPA filters were to occur, the consequences would not exceed those of the severe facility accident described in Section 4.1.3.2. Simultaneous failure of all design safety features due to an external explosion is not reasonably foreseeable based on credible scientific evidence and is therefore not assessed in the Final EIS.

5.1.35 Comment:

Reviewers noted that the Draft EIS did not include enough information for accident analysis to determine if accidents presented are the worst that can be reasonably postulated. For example, was the potential plutonium inventory of the Stand-Alone Storage Vault considered in the analysis of earthquake impacts?

Response:

Additional information covering a range of accidents from high probability, low consequence to very low probability, high consequence accidents has been added to Section 4.1.3 of the Final EIS. The added information covers qualitatively the types of accidents evaluated, their relative

probabilities and postulated consequences. Both the SIS and the Stand-Alone Vault were considered in the evaluation. The information presented indicated how the worst (or most severe) accident was selected. In addition to considering a severe accident associated exclusively with the SIS Facility, and in response to concerns that all significant accidents be considered in the EIS, a discussion of a low probability accident occurring simultaneously at Idaho Chemical Processing Plant has also been included in Section 4.1.4 of the Final EIS. Although other accidents could be postulated for the SIS, it is believed that none, based on scientifically credible evidence, would be identified with higher consequences than those presented for the severe accident in Section 4.1.3.2 of the Final EIS. See the response to comment 5.1.21 for additional discussion of severe accident analysis.

The plutonium in the Stand-Alone Storage Vault was not included in the analysis of the postulated DBE followed by fire accident because all design safety features associated with the storage of plutonium in the vault (e.g., the vault and storage racks) are designed to preclude any release caused by the accelerations up to and including those associated with the DBE. The occurrence of an earthquake greater than the DBE is not reasonably foreseeable based on current credible scientific evidence. With the exception of insulation on instrument wiring, there are no combustibles in the vault, no chemical reactions conducted, nor any plutonium in an oxidizable form, and the plutonium is triple contained. There is no credible mechanism for propagation of an accident from the PPB to the Stand-Alone Vault (or vice versa); nor any reasonably foreseeable mechanism for dispersing plutonium from the vault. Therefore, as previously stated, the consequences of any reasonably foreseeable accidents involving the Stand-Alone Vault are bounded by the consequences of the severe accident discussed in the EIS.

5.1.36 Comment:

Reviewers expressed their conviction that the mere presence of the SIS Project creates an unacceptable risk, because accidents are going to happen. It was also stated that the SIS Project increases the probability for terrorism and accident.

Response:

The mere presence of a facility is not a contributory risk and therefore cannot be judged as either acceptable or unacceptable. The purpose of an EIS is to assess the potential environmental consequences of the proposed action and its reasonable alternatives. In the assessment of environmental consequences, as demonstrated by Section 4.1.3 of the Draft EIS and the Final EIS, accidents are postulated to occur to provide input to the decision-maker on the potential environmental consequences of accidents if they were to occur.

Any release of plutonium resulting from an act of terrorism would be bounded by the calculated releases from the design-basis fire and the severe facility accident evaluated in Section 4.1.3 of the EIS. In addition, the INEL, and particularly the Idaho Chemical Processing Plant (ICPP), incorporate state-of-the-art security systems and response teams whose personnel are trained to maintain a high level of readiness and competence to resist terrorist attack and/or infiltration. These physical and administrative systems and forces applied to the SIS facilities would minimize the environmental impact of any terrorist activity. Refer to response to comment 5.1.1.

5.1.37 Comment:

Reviewers believed that accidents, primarily because of the human error factor and the fallibility of humans, would be inevitable.

Response:

The SIS Project would be designed specifically to mitigate or reduce the consequences of accidents, whether initiated by human fallibility or other mechanisms. The objective of

safety-related design, safety analyses, and other safety-related reviews is not only to reduce the likelihood of accidents but also to ensure that all consequences to the public and the environment are small. The purpose of an EIS is to assess the environmental consequences of postulated accidents involving the proposed action. The results of postulated accidents presented in Section 4.1.3 of the Draft EIS and Final EIS show that even for extremely low-probability accidents having scientific credibility, the consequences would be small.

5.1.38 Comment:

Concerns were expressed over possible contamination of groundwater, rivers, or streams in the event of a transportation or facility accident and the resulting potential impacts on tourism, recreation, and agriculture.

Response:

The design of the SIS facilities precludes liquid radioactive effluents, including those from accidents, from being discharged to the environment. For each of the accidents presented in Sections 4.1.3.1 and 4.1.3.2 of the Draft EIS and the Final EIS, the accidental release would be to the atmosphere. Consequence modeling (i.e., calculations of radiological doses to individuals) takes into consideration the inhalation of released material as well as the ingestion of the released material through contaminated food and water. Results of the consequence analyses performed do not indicate that groundwater, rivers, or streams would be contaminated as a result of the SIS Project accidents.

Facility accidents having the potential for the highest consequences are presented in Sections 4.1.3.1 and 4.1.3.2 of the Draft EIS and the Final EIS. The consequences of these accidents as stated in Section 4.1.3.1 of the Final EIS would not be of sufficient magnitude to require costs for mitigation and thus would not require decontamination, nor cause crop and milk disposal, evacuation, and land-use prohibition. The facility accidents would have small impact and therefore would not impact tourism, recreation, or agriculture.

With respect to potential contamination of ground or surface waters from potential accidents involving the transport of plutonium, potential contamination of surface water would be extremely unlikely, as a combination of severe impact and fire is required to cause release of plutonium from a safe secure transport (SST)--severe fires exceeding the NRC test fire do not occur in water. Potential contamination of groundwater would also be extremely unlikely as shipments of plutonium involve almost exclusively insoluble materials and some mechanism must exist for a material, regardless of its chemical form, to penetrate soil over a long period of time and eventually reach the groundwater.

5.1.39 Comment:

It was stated that the SIS Draft EIS needs to include the cost associated with different-magnitude accidents, including those for transportation, processing, and storage.

Response:

For the postulated facility accidents having the highest consequences, presented in Sections 4.1.3.1 and 4.1.3.2, the accidents would not release radioactivity sufficient to require costs for offsite mitigation (also see the response to comment 5.1.38). Similarly, accidents of lower magnitude would also not require costs for offsite mitigation. The potential costs of a severe transport accident involving plutonium would be bounded by the costs identified in the NRC's Final EIS on the transportation of radioactive material by air and other modes (NUREG-0170). Lesser magnitude

transport accidents would result in significantly lower costs. Accidents involving the potential storage of SIS by-product, which are considered to be bounding for the storage of mixed waste, would not be exceeded by the consequences of the criticality accident presented in Section 4.1.3.1 of the Draft EIS and the Final EIS. The releases associated with the postulated criticality accident would not be great enough to require costs for offsite mitigation.

5.1.40 Comment:

Statements were made concerning the negative impact of the SIS Project on the environment and that the consequences of an earthquake would be devastating (a specific comment addressed a potential plutonium leak to the aquifer and another questioned the potential impact on waste handling, processing, and storage). It was stated that the SIS Project would negatively affect tourism and agriculture in the area. Others stated that there is a potential for an accident on the highways when transporting plutonium to and from the INEL.

Response:

Section 2.1.3 of the Draft EIS and the Final EIS states that Category I structures would be designed to preclude undue risk to operating personnel, the environment, and offsite populations during normal and abnormal operating conditions. The SIS Category I facilities would be designed to withstand a DBE having a resultant vertical bedrock acceleration of 0.16g and a horizontal bedrock acceleration of 0.24g. Peak accelerations for 100- and 1000-year return periods have been estimated to be 0.073g and 0.14g for the southeast sections of the INEL. These accelerations are well below those used as the design basis. Even so, the impacts of a release following a DBE were calculated. The results, presented in Section 4.1.3.1, indicate minimal impacts, even using highly conservative assumptions. Impacts of specific operational activities, such as waste loading/unloading, processing, and storage are bounded by the accident analyzed and therefore are not otherwise specifically addressed. The proposed SIS Facility will be constructed to contain liquid waste from postulated accidents, including earthquakes. Also see the response to comment 5.1.38 regarding impacts to tourism and agriculture and contamination of surface and groundwater.

5.1.41 Comment:

Reviewers were concerned about the cleanup after transportation accidents involving powdered plutonium.

Response:

The likelihood of a transportation accident that would result in the release of powdered plutonium aboard an SST is discussed in Section 4.1.3.3 of the Draft EIS and the Final EIS, which concludes that such likelihood is very low (e.g., less than 1.58×10^{-10}). The actual manner of cleanup of an accident involving powdered plutonium, after immediate appropriate response is taken to protect public health and safety and the environment, would be governed by applicable NRC cleanup criteria. Methods of cleanup would include removal of top soil or pavement as well as efforts to further limit dispersion. See the response to comment 5.29.93 for additional information.

5.1.42 Comment:

Reviewers addressed the general topic of potential impacts of SIS Project accidents on the region surrounding the INEL. Some indicated that the impacts of the Design-Basis Accidents (DBAs) were shown in the Draft EIS to be minimal and would not require large relocations of offsite populations or other acute measures. Others registered concerns about the potential long-lived, widespread, and severe negative impact of accidents on the environment, including human life.

Response:

Response:

Response:

5.1.45 Comment:

Reviewers compared the potential consequences of SIS accidents to those of accidents in reactors such as Three Mile Island and Chernobyl.

Response:

The source terms and release fractions used in the accident consequence analyses for the EIS were chosen to be conservatively high. Release fractions are highly dependent on the physical and chemical form of the plutonium and upon the physical or chemical properties of the environment to which the plutonium is being subjected at the time release occurs (see the response to comment 5.1.11). The processes in which plutonium would be used at the SIS facilities are much different from those of a nuclear reactor such as Three Mile Island or Chernobyl or other commercial nuclear industry facilities and therefore cannot be compared either directly or indirectly with respect to release fractions or consequences.

Within this EIS, a postulated severe accident is assessed in Section 4.1.3.2 of the Final EIS which has an estimated probability of occurrence of less than 1×10^{-6} per year. While other potential accident scenarios can be postulated, it is not believed that an accident can be postulated that would result in higher reasonably foreseeable consequences and which is based on "credible scientific evidence" as required by 40 CFR 1502.22. Additional information on postulated accidents and probabilities is presented in Section 4.1.3 of the Final EIS.

5.1.46 Comment:

It was stated that accidents have happened at the INEL, citing the SL-1 accident, three ICPP criticality incidents, and contamination of three INEL workers in March 1988, as examples. Others questioned whether some reactors have been allowed to explode or melt at the INEL.

Response:

Accidents and incidents involving nuclear materials have happened at the INEL during its some 39 years of operation. By far the most serious was the SL-1 reactor accident of 1961, which killed three individuals. That accident involved a uranium-fueled demonstration reactor, which in no way resembles any operation or process employed at the SIS facilities. The environmental effects of that accident were negligible, and there was no significant radiation exposure to any offsite population from the small radioactive release associated with the accident itself, or during the several-month-long accident analysis and recovery phases that followed.

The DOE recognizes its responsibilities to design and operate its facilities in a safe manner. Since its beginning, the INEL has been a national test site for advanced reactor design and concepts. Earlier testing involved operations at the leading edge of known technology with respect to core disruptive accidents involving rapid reactivity excursions. Later extensive testing of prototype reactor fuel under accident conditions was routine at test reactors; tests included those at the Loss of Fluid Test (LOFT) Facility, Power Burst Facility (PBF), and Transient Reactor Test Facility (TREAT). The PBF and TREAT tests were done in a controlled environment inside a test vehicle which precluded damage to the test reactor.

There have been only nine occurrences at the INEL since 1949 that involved test reactor core damage, including partial meltdowns. Only five of those occurrences were unplanned, and those occurred prior to 1963. None of the occurrences resulted in radiological release or injury to the

public. In normal reactor operation, cladding failure can be detected early enough to allow timely replacement of the defective fuel element before a significant release of fission products into the primary system occurs.

Three accidental criticalities have occurred in the 37 years of operation of the ICPP. Because they occurred in radiation shielded process areas, there were no injuries, no property damage, or long-term effects on the environment. The investigation into these accidents has led to a number of improvements in plant criticality safety. However, the operation of the ICPP process and the operation of the SIS Project are entirely different; therefore, past operations at the ICPP are not directly applicable to the proposed action of operation of the SIS Project.

Minor incidents involving radioactive contamination of operating personnel have occurred at the ICPP and other INEL facilities. These incidents have only rarely resulted in external or internal radiation exposures in excess of minimum DOE and EPA guidelines, and no detectable effects have resulted from any such incident.

5.1.47 Comment:

Concern was expressed that the worst-case scenarios do not adequately describe the potential risks for laypersons, particularly with regard to "unfiltered" offsite radiation releases.

Response:

For the postulated severe facility accident with an unfiltered release, presented in Section 4.1.3.2 of the Final EIS, the radiological dose to a hypothetical person who would receive the highest radiation dose and to the population residing within a 50-mile radius of the INEL are 270 millirem and 75 person-rem, respectively. The 270 millirem is well within the standards used by the NRC for the siting of a commercial nuclear reactor (25,000 millirem, or 25 rem) and may be compared to the 30 to 40 millirem that an individual might receive from a full-body x-ray or scan. The calculated health effects to the population as a result of the occurrence of the accident are 2.1×10^{-2} cancer fatalities.

5.1.48 Comment:

It was stated that a risk methodology needs to be identified and calculational methods and computer output for additive risks need to be made available to interested parties.

Response:

For the Final EIS, the probabilities of occurrence associated with facility accidents having the highest consequences, including the severe accident, have been included in Section 4.1.3.1. Risks associated with these accidents may be obtained by multiplying the preliminary probability by the consequences. Risk methodologies to account for additive risks (multiple risks which are added together) cannot be determined without defining the risks to be included; for example, it is not known whether the risk of an employee at the SIS Project driving to and from work should be included. Generally, the additive risks associated with nuclear facilities are considered to be extremely low when compared to other risks encountered in daily life.

5.1.49 Comment:

Reviewers noted that there is a risk of accidental contamination of plutonium hydride in the Plutonium Processing Building (PPB) and asked about the impact of a nuclear criticality excursion.

Response:

5.2 ALTERNATIVES

5.2.1 Comment:

It was stated that the Special Isotope Separation (SIS) alternative would be the safest, would be the least expensive, would produce less waste, and would best conserve our natural resources. Others stated that the SIS Project has the highest cost, does not justify the billion-dollar price tag, and is the most hazardous of the alternatives.

Response:

The Atomic Vapor Laser Isotope Separation (AVLIS) technology was chosen by the U.S. Department of Energy (DOE) as the preferred technology as described in Sections 1.1.4 and 2.5.1 of the Draft Environmental Impact Statement (EIS) and the Final EIS. As stated, cost was not the sole factor considered however, DOE considers the SIS Project to be a safe, cost-effective means to provide weapon-grade plutonium while meeting the objectives of contingency, flexibility, and technological diversity. As described in Sections 4.1, 4.2, and 4.3 of the Draft EIS and the Final EIS, there are no significant environmental impacts from construction and operation of the SIS Project. The no-action alternative and reactor-dependent methods do not meet the technological diversity and flexibility objectives. The unit cost of material from SIS is comparable to the unit cost of scrap recovery and less than the unit cost of blending if the cost of reprocessing is included.

5.2.2 Comment:

It was stated that the Draft EIS provided inadequate justification for rejecting all production alternatives to the SIS facility. The opinion was expressed that the alternatives were not deemed reasonable "because they do not accomplish the desired objective in exactly the same way as SIS." A more general identification of the need for the SIS Project should have been presented to allow adequate evaluation of alternatives.

Response:

As required by the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA) [40 CFR 1502.14 (a)], DOE, within Section 2.5.2 of the Draft EIS, briefly discussed the reasons why other production alternatives to the SIS were not considered to be reasonable. This section has been expanded in the Final EIS. Achieving the objectives of a contingent and technologically diverse source of weapon-grade plutonium and flexibility to respond to approved needs for weapon-grade plutonium are part of the underlying rationale for the proposed action and have not been posited to simply dismiss alternatives. Positing the need for the SIS Project in a more general way, such as providing only a contingency source of weapon-grade plutonium beyond the 1990s, is incomplete. Technological diversity is also needed to minimize the technological dependency which has constrained the DOE nuclear defense production process. See the response to comment 5.2.1 for additional information.

5.2.3 Comment:

It was stated that some alternatives that do not depend on existing production reactors, including plutonium recycled from retired weapons and from Intermediate Nuclear Force (INF) Treaty weapons reductions, were not evaluated in detail, and that alternatives were rejected for insufficient reasons.

Response:

Section 2.5.2 of the Draft EIS and the Final EIS discusses other weapon-grade plutonium production alternatives to the construction and operation of the SIS Project and provides a brief discussion of why the alternatives identified are not considered by DOE to be reasonable alternatives to the SIS Project. As stated in Section 2.5.2 of the Final EIS, recycling of weapon-grade plutonium from retired weapons, which includes those dismantled as a result of treaties and agreements, provides no new weapon-grade plutonium to the stockpile.

The availability of weapon-grade plutonium as a result of future agreements limiting nuclear weapons is speculative. Future agreements do not represent an assured source of weapon-grade plutonium, nor do they resolve the need to provide a contingency capability to produce new material if agreements are abrogated.

5.2.4 Comment:

It was stated that the alternatives in Section 2.5.2 of the Draft EIS are not alternatives.

Response:

In accordance with CEQ regulations [40 CFR 1502.14(a)] for implementing the procedural provisions of the National Environmental Policy Act (NEPA), Section 2.5.2 of the Draft EIS and the Final EIS discusses alternatives considered but eliminated from detailed study and briefly states the reasons for their having been eliminated.

5.2.5 Comment:

It was stated that the EIS should show the benefits to the public health and economy for the "no action" and other alternatives.

Response:

The Draft EIS and the Final EIS address the environmental impacts, including socioeconomic impacts associated with the construction and operation of the SIS Project (Section 4.1.1.1), at the Idaho National Engineering Laboratory (INEL) (Section 4.1.2.1), the Hanford Site, and the Savannah River Plant (SRP) (Section 4.5.1.1). The no-action alternative does not reflect a change from existing DOE operations. For additional information, refer to the response to comment 5.2.6.

5.2.6 Comment:

It was stated that the no-action alternative analysis should be expanded and that the consequences of no action are more severe than stated in the Draft EIS. Reviewers stated that the no-action alternative was not adequately considered by DOE and that less mental stress, reduced nuclear weapons, and no new nuclear waste would result from no action.

Response:

The comparison of alternatives, including no action, in Section 2.6 and in the Summary Section of the EIS indicates that the no-action alternative would not provide the needed level of contingency, flexibility, and technological diversity as would the SIS Project.

The no-action alternative as defined in the EIS would be neither an elimination of nuclear weapons nor the cessation of the production of weapon-grade plutonium. It would not necessarily reduce nuclear waste generation. The no-action alternative would be a continuation of current DOE practices for the production of weapon-grade plutonium as described in more detail in several environmental impact statements referenced in Sections 2.4 and 4.4 of the EIS. The potential impact of mental stress or the number of nuclear weapons irrespective of the definition of no action is beyond the scope of this EIS.

5.2.7 Comment:

It was stated that the Draft EIS and the choice of hearing locations were biased toward locating the SIS Facility at the INEL and that the other sites were not seriously considered, in the style of pork-barrel politics.

Response:

The Draft EIS and the Final EIS examined in a comparable manner the environmental impacts associated with potential location of the SIS Project at either the INEL, the Hanford Site or the SRP. As stated on page 4-1 of the Draft EIS, the discussion of the potential environmental consequences at these alternative locations focused on the major differences from those that would be expected if the project were to be located at the INEL. See the response to comment 2.8.7 regarding the choice of hearing locations for the SIS Project. In early 1986, DOE initiated a decision-making process to identify a preferred site for the SIS plant deployment consideration. A site evaluation team composed of experts in related disciplines presented its findings to the Energy System Acquisition Board. Based on these findings, the Under Secretary of Energy designated the INEL as the DOE-proposed site for the SIS Project based on the assessment that it would provide diversification of plutonium production and a favorable labor climate. In support of this designation, the evaluation team examined available support facilities and other criteria, including project cost and schedule; environmental safety and health effects; human resources and workload and socioeconomic considerations. This led to the INEL being identified as the preferred site; however, all alternatives are being fully considered in the decision-making process, leading to a Record of Decision on this proposed action.

5.2.8 Comment:

It was stated that it is not possible to adequately evaluate the environmental impact of the SIS Project if the EIS overlooks the reprocessing of spent fuel at Hanford which would be the initial step to provide the raw material for the SIS Project.

Response:

Transportation of materials from Hanford is assessed in the Draft EIS and the Final EIS. Prior to shipping, the spent fuel would be processed at Hanford. Processing of N-Reactor fuel was extensively considered in a previous EIS on the operation of the Plutonium Uranium Extracton (PUREX) and Uranium Oxide Plant at the Hanford Site (DOE/EIS-0089). Processing Fast Flux Test Facility (FFTF) fuel is being assessed in an Environmental Assessment (EA), as the decision to proceed with construction and operation of the SIS Project is independent of decisions regarding processing of FFTF fuel. Also see the responses to comments 2.13.11, 5.26.1, and 7.31 regarding FFTF fuel.

5.2.9 Comment:

It was stated that locating the SIS Facility at Hanford might reduce costs because of N-Reactor shutdown, available idle facilities, and safety improvements already made at the N-Reactor.

Response:

The N-Reactor and other idle facilities at Hanford are unsuitable for the SIS Project. Previous evaluations by the site evaluation team of siting the SIS Project at Hanford indicated no advantages from a cost or schedule standpoint. The alternative of locating the SIS Project at Hanford is evaluated in this EIS.

5.2.10 Comment:

It was noted that an existing alternative called blending is not practical because of production capacity limitations at the SRP reactors. Conversely, it was stated that blending (the no-action alternative) should be continued by DOE, and used to produce the necessary plutonium and that blending is a less expensive way to obtain the plutonium.

Response:

As stated in the Draft EIS and the Final EIS Summary and Section 1.1.1, the SIS Project is needed to provide a flexible, contingent supply of plutonium that is not dependent upon operation of the DOE production reactors. Blending depends on operation of the SRP reactors, and no longer provides the necessary assurance that approved plutonium needs can be met. DOE considers the SIS Project to be cost-effective in comparison to the practice of blending. Further, as noted in Section 2 of the Final EIS, decisions to blend would be made independent of the selection of any alternatives discussed in the EIS; i.e., blending is not specific to the no-action alternative. Blending is comparable in cost to the SIS Project when reactor costs are discounted. Full costs of blended material are higher than costs for SIS-produced material.

5.2.11 Comment:

It was stated that relying on existing old facilities leaves us vulnerable; that the SIS Project would protect the plutonium supply during the vulnerable periods; that new plutonium will not be created, but existing plutonium will be utilized; and that the country needs a way to upgrade existing stockpiles. Others stated that existing facilities provide redundancy and are sufficient, and that we should never build nuclear weapons in a hurry.

Response:

The DOE has determined that a reactor-independent source of plutonium is needed to provide contingency to the plutonium supply complex. SIS facilities would not create new plutonium, but would isotopically separate existing fuel-grade plutonium to provide weapon-grade plutonium. The SIS Project could be completed in less time than it would take to build a new production reactor. Although other existing facilities might be upgraded to provide a source of plutonium, they would have limited operational life and would not fulfill the need for diversity and flexibility. See Section 2.5.2 of the Final EIS. For additional information on existing facilities and redundancy, refer to the responses to comments at 4.1, 4.4.5, 4.4.7, and 4.7.3.

5.2.12 Comment:

It was stated that two of the most serious flaws of the Draft EIS are that it fails to address reasonable alternatives to the development of the SIS Project and that it rejects as unreasonable a whole category of production alternatives including increased blending, use of a new fuel lattice in the reactors at the SRP, construction and operation of a new production reactor, conversion of the WNP-1 reactor at the Hanford Site to plutonium production, recycling of existing weapon-grade plutonium from retired weapons, and accelerated weapon-grade plutonium scrap recovery.

Response:

The Draft EIS was not flawed, since these alternatives were discussed. Sections 2.1 through 2.4 of the Final EIS have been expanded, in response to these concerns, to more fully describe and discuss the proposed action and reasonable alternatives to the proposed action, including taking no action. Section 2.5.2 of the Draft EIS and the Final EIS discusses production alternatives to the proposed action of constructing and operating a SIS facility and why these alternatives were not considered reasonable alternatives by DOE in accordance with CEQ regulations [40 CFR 1502.14(a)]. All the alternatives listed in the comment summary above were specifically considered in Section 2.5.2 of the EIS; thus, the EIS is not flawed.

5.2.13 Comment:

It was stated that the SIS development facilities at Lawrence Livermore National Laboratory (LLNL) could be used as a production facility and should be an alternative to the SIS Project. It was also stated that use of the LLNL facilities, which have the same laser power as the SIS Facility, for a production mission would raise many environmental issues.

Response:

The SIS Demonstration Facility at LLNL has been designed for research and development purposes to demonstrate the technological and systems capabilities of the Atomic Vapor Laser Isotope Separation (AVLIS) process and supporting processes for the safe and efficient tailoring of the isotopic content of plutonium material. The LLNL facility will be capable of delivering approximately one-quarter of the total laser output required for the SIS Project. This is commensurate with the one separator line being installed at LLNL as compared to four lines in the SIS Project. Also, the facilities at LLNL do not include the full complement of balance-of-plant process equipment required for full-scale production. They have also been configured to allow design iteration of the hardware components in pursuit of detailed designs of the special equipment that can provide good operability and correspondingly high plant availability. However, they are not suitable for a production mission.

5.2.14 Comment:

It was stated that there is a substantial plutonium reserve. It was also stated that increased processing of plutonium scrap; accelerated retirement of obsolete weapons; use of a New Production Reactor (NPR) and N-Reactor at Hanford (which is on cold standby and could be restarted), or the L-Reactor at Savannah River for blending; direct usage of fuel-grade plutonium; or use of LLNL facilities are alternatives to the SIS Project that could provide backup or contingency production capability. Others noted that the DOE production reactors are old and cannot be relied upon, and that the SIS Project is needed to provide backup, or replacement of these old facilities.

Response:

As described in Section 1.1.1 in the Draft EIS and Final EIS, DOE has identified the need for a contingency source of plutonium that does not depend on the operation of the DOE production reactors. The present DOE production reactors are all more than 25 years old, and their continued operation is not assured. Thus, blending provides no real contingency source of plutonium. The N-Reactor is on cold standby and has only limited remaining useful life. Even if it were upgraded and operated for a limited time, it would not provide the diversity and flexibility needed by the production complex. The L-Reactor at the SRP is expected to operate at reduced power levels and is 35-years old. Furthermore, it is part of the planning baseload for tritium production and may not be

available as a production contingency for plutonium. Also see the responses to comments 4.4.7 (scrap), 4.4.5 (blending), 5.2.13 (LLNL), 5.2.3 (recycling weapons), 4.7.4 (fuel-grade plutonium) and 5.2.12 (other alternatives).

5.2.15 Comment:

It was stated that the needed plutonium could be provided by recycling weapons as an alternative to SIS. In addition, it was stated that over the last decade, most material for new warheads has come from retired warheads. It was suggested that plutonium recycled from weapons dismantled under the INF Treaty was not taken into account.

Response:

Retired weapons have been, and will continue to be, one of the major sources of plutonium supplied for the manufacture of new weapons. Weapon retirements are an integral part of the planning in the Nuclear Weapons Stockpile Memorandum (NWSM).

DOE has considered the potential impacts of arms reduction treaties through the NWSM. The recently ratified INF Treaty on the Non-Proliferation of Nuclear Weapons has been fully considered in weapon-grade material demand projections in the NWSM. Neither retirements nor materials made available because of the treaty obviate the need for a prudent, contingent, flexible, and technologically diverse source of material as would be afforded by the SIS Project. Consistent with normal practice, the requirements for defense nuclear materials (reflected by the NWSM) would be delineated on an annual basis, taking into account materials that become available from retirements. See Sections 1 and 2.5.2 of the Final EIS for further discussion. Potential impacts of the Strategic Arms Reduction Treaty (START) are speculative and beyond the scope of this EIS.

5.2.16 Comment:

It was stated that plutonium in its present form (fuel-grade plutonium) and/or highly enriched uranium could be used directly in weapons rather than weapon-grade plutonium (6% Pu-240).

Response:

The proposed action would be to provide weapon-grade plutonium (6% Pu-240 assay or less) by a reactor-independent source that is needed for contingency, flexibility, and technological diversity in defense material supply programs. The existence of fuel-grade feedstocks does not satisfy the need for a contingent source of weapon-grade plutonium as identified in this proposed NEPA action. The feasibility of direct utilization of fuel-grade plutonium or highly enriched uranium in weapons is beyond the scope of this NEPA action. It is noted, however, that weapon designs using enriched uranium are not consistent with policies of weapon modernization. Also see the response to comment 4.7.4.

5.2.17 Comment:

It was asked if the SIS operations would result in a reduction of environmental impacts from other, currently operating, production facilities.

Response:

The SIS Project would be a new facility at the ICPP; it would not replace operations at other sites, and therefore would not itself cause a change in current environmental impacts from existing facilities.

5.2.18 Comment:

It was stated that the SIS Project would produce no new plutonium because it would use DOE-owned stock and that the alternative of a new production reactor versus SIS should be evaluated.

Response:

Section 2.5.2 of the Draft EIS and the Final EIS, commensurate with the requirements of 40 CFR 1502.14(a), discusses the construction and operation of a new production reactor(s) as a potential alternative to the SIS Project. This alternative was not considered reasonable because it would not provide the flexibility and technological diversity desired from a reactor-independent source. The SIS Project would not produce new plutonium; it produces weapon-grade plutonium.

5.3 ATMOSPHERIC EMISSIONS

5.3.1 Comment:

It was stated that potential air toxics should be specifically identified as such and that the best available control technology (BACT) should be addressed where appropriate. It was also noted that any differences between as low as reasonably achievable (ALARA) and BACT should be explained.

Response:

The only air toxics would be radioactive particulates identified in Table 2-4 in the Draft and the Final Environmental Impact Statement (EIS). The BACT for particulates has historically used various filtration systems. The BACT for the Special Isotope Separation (SIS) Project would be to use multiple stages of high-efficiency particulate air (HEPA) filtration to ensure that radioactive releases are negligible. Experiences at other Department of Energy (DOE) plutonium processing facilities have demonstrated the efficiency and reliability of this particulate control method. Maintenance of all safety-related exposures to ALARA, a required DOE objective, would be accomplished by radiation shielding, criticality safety, radiation monitoring and alarm systems, and fire protection. Best available control technology protects the public (health) from exposure to atmospheric emissions.

5.3.2 Comment:

It was requested that all calculations and assumptions needed for the estimated annual atmospheric emissions (Table 2-4) be shown in an appendix, and that individual source emissions should be expressed as both hourly values and annual values.

Response:

The annual atmospheric emissions listed in Table 2-4 are based conservatively on the maximum throughput capacity of the SIS Project, given current design, and represent the maximum quantities of potential emissions. No attempt has been made to estimate or provide hourly values for this EIS because of the batch processing operational nature of the project (i.e., continuous processing does not occur). Detailed calculations and assumptions have also not been included, as the information would necessarily contain data which could be used to derive the throughput capacity of the facilities, which is classified.

5.3.3 Comment:

It was requested that the EIS reference the emission factors used to calculate the annual emissions from the Coal-Fired Steam-Generation Facility (CFSGF) in Table 4-6.

Response:

The emission factors used to calculate the annual emissions from the CFSGF have been referenced in Table 4-6 of the Final EIS.

5.3.4 Comment:

It was noted that if the coal-fired boilers are permitted at design levels, then the statement in Section 4.1.2.2 could read: "... can be accommodated within permit limits." If not, then the permit standard, not the boiler design, limits the operation of the boiler.

Response:

The statement has been modified in Section 4.1.2.2 of the Final EIS to state that "...incremental use of the CFSGF and oil-fired boilers can be accommodated within existing permit limits."

5.3.5 Comment:

It was requested that the PM-10 particulate emission estimates be included in the appropriate emissions sections.

Response:

The PM-10 particulate emission standard has been included in Table 4-5 of the Final EIS.

5.3.6 Comment:

It was noted that the National Ambient Air Quality Standards (NAAQSs) for particulate matter were revised on July 1, 1987. Others noted that Table 4-3 should be revised to reflect the new PM-10 standards rather than using the old total suspended particulates (TSP) standards.

Response:

Table 4-5 has been revised to reflect the new NAAQSs for PM-10 in the Final EIS.

5.3.7 Comment:

It was requested that facility-wide net emission increases within the 10 years prior to the date the SIS would become operational [or since the last Prevention of Significant Deterioration (PSD) baseline] be considered when determining PSD applicability. It was also requested that an emissions inventory of criteria pollutants, with startup dates, be included to support the conclusions.

Response:

An evaluation of the facility-wide net emission increases in criteria pollutants within the 10-year period prior to startup of the SIS Project is currently in process.

5.3.8 Comment:

It was noted that routine waste emissions are exceedingly low and easily manageable with present procedures. Also noted was that the SIS Project will produce a ton of highly toxic plutonium vapor annually.

Response:

Less than 1.4×10^{-2} microcurie of plutonium will be released to the air/atmosphere annually from normal operations. This is equivalent to less than 2×10^{-11} pound (0.00000000002 lb) of plutonium that would be released annually in the airborne emissions. At this rate, it would take over 100,000,000,000 years to release a ton of plutonium.

5.3.9 Comment:

It was noted that potential radioactive emissions are limited to plutonium and contaminating transuranics in the SIS Project, thus making air quality emission control much simpler than at a facility like the Plutonium Uranium Extraction (PUREX) Plant.

Response:

Air quality emission control in the SIS Project would use the best available control technology to limit the release of radionuclides.

5.3.10 Comment:

It was stated that limits of plutonium emission to the atmosphere are exceeded frequently and consistently at other DOE facilities, such as Rocky Flats.

Response:

There are no DOE facilities currently operating that have emissions frequently or consistently exceeding limits prescribed in DOE Orders or U.S. Environmental Protection Agency (EPA) regulations (40 CFR 61, subpart H).

5.3.11 Comment:

Concern was expressed about the increases in radioactive emissions from the INEL and from SIS in the form of dust or vapor having a half life of 24,000 years.

Response:

According to the 1987 Environmental Monitoring Program for the Idaho National Engineering Laboratory Site [DOE-ID-12082(87)] published in May 1988, the effective dose equivalent that would have been received by the "hypothetical maximum individual" living in Atomic City (the closest populated area with respect to the INEL) would have been about 0.54 millirem during 1987. The effective dose equivalent from SIS operations that would be received by an individual at the site boundary receiving the greatest possible radiation would be only 2.2×10^{-6} millirem in one year. Thus, the consequences of the radiological emission from the SIS Project, when added to those from current INEL operations, would be well below the EPA National Emission Standard for Hazardous Air Pollutants of 25 millirem to the whole body. The SIS facility releases would be exceedingly small, and any long-term consequences due to residual radioactivity remaining after decontamination and decommissioning (D&D) of the facility would be even smaller.

5.3.12 Comment:

It was requested that Section 2.1.5.1 of the Draft EIS be revised to mention the radioactive emissions outlined in Table 2-4 and discussed on page 2-41. The inconsistency in identifying radioactive emissions in Table 2-4 with the conclusion that there would be no radioactive atmospheric emissions from the exhaust system (introductory text to Section 2.1.5.1) needs to be resolved.

Response:

The radioactive atmospheric emissions are discussed in Sections 4.1.23 and 4.1.3.2 of the Draft EIS and the Final EIS. The numbers discussed in the text are consistent with the values in Table

2-4. The reference to "no radioactive atmospheric emissions expected" refers to the Stand-Alone Storage Vault (Page 2-39 of the Draft EIS Section 2.1.5.1, Paragraph 2), not to the Plutonium Processing Building (PPB).

5.3.13 Comment:

It was noted that radioactive air emissions can contribute to contamination of liquid waste such as building runoff, steam condensate, etc., that are discharged to the percolation pond.

Response:

The only liquid effluents that would be discharged to the service waste system and hence to the percolation ponds on a routine basis would be process steam condensate and cooling water blowdown. All liquid effluents would be monitored and sampled prior to discharge to ensure that the liquid discharge would be neither hazardous nor radioactive. Building runoff and water vapor would not be discharged to the percolation pond and would not be contaminated by the SIS radioactive atmospheric emissions as these are extremely small (i.e., at the level of detection). For additional information, see the response to comment 5.3.8.

5.3.14 Comment:

It was suggested that the Final document should more fully document the back-up engineering safety features which ensure that the integrity of the high-efficiency particulate air (HEPA) filter system would not be compromised below an efficiency of 90 percent. It is suggested that visual and graphic depiction of all radiological safety systems (and backups to the primary safety systems) be included.

Response:

Each of the three stages of HEPA filtration would provide for a filter efficiency of greater than 99.8 percent. To obtain a condition where the total efficiency would be degraded to less than 90 percent, all three stages of HEPA filtration must be significantly degraded. As stated in Section 2.1.2.1 of the Draft EIS,"... multiple high-efficiency filter housings would be installed in parallel at the final filter stage, such that any one housing could be isolated..." Each of these filter housings would be monitored with respect to pressure to ascertain normal operation. In the event that monitoring of the pressure indicates a potential degradation in filter performance for a given filter housing, an alarm would sound, the airflow would be rerouted to a parallel filter housing, and the filters within the housing which sound the alarm would be tested and replaced if necessary. The inability to reroute airflow to a parallel filter housing would require the shutdown of operations. In summary, because the design of the HEPA filtration itself incorporates those features necessary to ensure that filter efficiency is not degraded below 90 percent, a figure of other systems is not considered appropriate.

5.3.15 Comment:

It was requested that Figure 2-6 (Figure 2-8) of the Draft EIS indicate the number of HEPA filters used for each exhaust stream along with the PPB stack parameters.

Response:

Figure 2.8 in the Final EIS has been modified to provide the requested information.

5.3.16 Comment:

It was noted that the accident scenario described on Page 4-28 (Paragraph 1) of the Draft EIS states, "The ventilation system would route the contaminated exhaust air through the Final HEPA filtration system and discharge to the environment. The system blowers would not have to be operating for this to occur." The assumption that the 36.6-m stack will discharge contaminated exhaust air without an operating blower should be explained.

Response:

The sentence (Page 4-28, Paragraph 1 in the Draft EIS), "The system blowers would not have to be operating for this to occur" is no longer considered valid and has been deleted from the Final EIS. As a result of design reviews, the design has been modified to provide standby power (redundant to the dual independent loop power supply) to the blowers.

5.3.17 Comment:

It was requested that DOE state the rationale behind its PSD level of 36.2 metric tons of Freon. Also, DOE should address alternatives if PSD levels are lowered or if chlorofluorocarbons (CFCs) are banned.

Response:

The 36.2 metric tons per year corresponds to the 40 tons per year specified by the EPA as significant for volatile organic compounds [e.g., 40 CFR 51.24(b)(23)(i)]. Addressing potential future lower PSD levels that may be required or bans on CFCs is speculative and therefore beyond the scope of this EIS. Also see the responses to comments 5.9.3, 5.9.4 and 5.9.5.

5.3.18 Comment:

It was noted that a PSD permit is required due to the increase in radionuclide emissions.

Response:

Table 5-1 and Section 5.6.3 of the Final EIS acknowledge that a PSD permit is in preparation for the SIS Project.

5.3.19 Comment:

It was requested that "source term" be explained and that the calculations/assumptions used to estimate the source term as 1.4×10^{-2} microcurie per year be shown; it was also requested that "routine atmospheric emission" be explained.

Response:

"Source term" is defined in the glossary of the Final EIS. "Routine atmospheric emissions" are the airborne releases anticipated from normal operations of the SIS Facility. As stated in Section 2.1.5.1 of the Final EIS, the 1.4×10^{-2} μCi/yr source term was derived based on annual throughput rates of material, available operating data from other facilities and a conservative estimate of HEPA filtration efficiency. Detailed calculations and assumptions involve classified data and are not provided.

5.3.20 Comment:

A request was made for a description, design specifications, and control efficiency of the potassium hydroxide (KOH) scrubbers, and the types and loading of acid-exhausted gases to be collected by the KOH scrubbers.

Response:

The design specifications, detailed description, and estimated control efficiency of the KOH scrubbers are not available at this time. This information will be developed as part of a detailed design, which will be completed to support the proposed startup of the SIS Project. The gaseous acids to be removed by the scrubbers are hydrochloric acid (HCl) and nitric acid (HNO_3). The planned scrubbing solution will be KOH.

5.4 BY-PRODUCT STORAGE

5.4.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) did not adequately address several topics concerning the temporary storage of plutonium by-products onsite. Specifically mentioned were the following: (1) the intent to use a stand-alone by-product storage vault should be clearly stated throughout the document; (2) the EIS should explain why it was not necessary to include emissions from the stand-alone vault in the postulated accident scenario; (3) concern was expressed regarding safety and duration of long-term by-product storage; and (4) storage of the by-product, for which there may be no foreseeable need, shows a lack of concern by the U.S. Department of Energy (DOE).

Response:

The intent to use a storage vault for the storage of SIS-generated by-product if the Special Isotope Separation (SIS) Project were located at the Idaho National Engineering Laboratory (INEL), Hanford or SRP was clearly identified in the Draft EIS as exemplified by the following selected sections: 2.1.1, 2.1.2.3, 2.1.5.1, and 4.1.3. In addition, the use of a storage vault was also specifically identified in the Foreword (page vi) and Summary (page S-2). The Final EIS contains the same information in comparable parts of the document.

All of the postulated accidents described in the Draft EIS and the Final EIS, except those initiated by the Design-Basis Earthquake (DBE), are initiated by events internal to the Plutonium Processing Building (PPB). As stated in Section 4.1.3 of the Draft EIS and the Final EIS, the Stand-Alone Storage Vault would be physically separated from the PPB. Design studies indicate that accidents in one facility would not propagate to adjacent facilities in the event of a design-basis accident and therefore an emission from the storage vault is not included. A release from the storage vault is not included in the analysis of a postulated DBE because all safety features associated with storage are designed to preclude a release from a DBE (see the response to comment 5.1.35). Additionally, there are no projected radioactive releases during normal operation of the Stand-Alone Vault.

DOE's concern for safety associated with the storage of SIS-generated by-product material is directly reflected by the decision to construct a specially designed storage vault (at the INEL) or use an existing specially designed vault (at SRP or Hanford). The storage vault would maintain confinement of stored materials following a design-basis accident resulting from potential natural phenomena, and would also be designed to provide appropriate levels of security and safeguards. The placement of SIS-generated by-product materials into the specially designed storage vault cannot be equated with the storage of other waste products such as the storage of mixed or transuranic (TRU) waste.

The by-product contains constituents which could be of use in future DOE defense programs missions. Recovery would only be accomplished after completing the appropriate technical feasibility and National Environmental Policy Act (NEPA) evaluations.

5.4.2 Comment:

It was noted that the SIS by-product might be used as a source of power in space.

Response:

The potential exists for processing of the by-product to recover material useful as power sources for space applications using SIS-related technologies. The use of SIS by-product material for this application, however, has never been formally considered, proposed, or approved by DOE.

5.5 DECONTAMINATION AND DECOMMISSIONING

5.5.1 Comment:

Reviewers asked for more details on decommissioning of the Special Isotope Separation (SIS) Project; specifically, the costs, scheduling, methodologies, amounts of wastes generated, how those wastes are going to be handled, where they will be disposed of, and the routes used to transport them out of Idaho.

Response:

Section 4.7 of the Draft Environmental Impact Statement (EIS) and the Final EIS describes the methodology of three basic decommissioning options based on the Nuclear Regulatory Commission (NRC) Program Status Paper (Calkins, 1980). The SIS facilities are being based on a design that facilitates decontamination and decommissioning (D&D) in accordance with DOE Order 6430.1A. The National Environmental Policy Act (NEPA) action addresses the environmental impacts of the proposed siting, construction, and operation of a SIS Facility. As such, specifics as to D&D at the end of the service life of the SIS Project are beyond the scope of this EIS and will be addressed in detail in future NEPA actions as required. The estimated cost for D&D as contained in the Final EIS is roughly $96M.

5.5.2 Comment:

Concern was expressed that the estimated costs for decommissioning the SIS Project are unrealistically low and that costs for a more thorough cleanup should be included.

Response:

A description of possible D&D options and a cost approximation ($96M) are included in the Final EIS (Section 4.7). Prior to undertaking D&D activities, a D&D plan would be prepared and appropriate NEPA review initiated. Detailed cost estimates would be made at that time. It is also acknowledged in the Final EIS that D&D costs are the least accurately known of the life-cycle costs.

5.6 ECOLOGY

5.6.1 Comment:

Reviewers stated that the Draft Environmental Impact Statement (EIS) does not adequately address effects on wildlife, and expressed concern for endangered species. Others indicated that impacts to flora and fauna would be inconsequential.

Response:

The Draft EIS and the Final EIS in Section 4.1.1 assess the ecological impacts of the construction of the Special Isotope Separation (SIS) Project, and conclude that there would be no significant impacts to flora and fauna, including rare and endangered species. No hazardous or radioactive discharges would be released in SIS liquid effluents. Additionally, the atmospheric releases from the SIS Project would be well below all applicable state and Federal standards that ensure protection of man and the biota. For more specific information, refer to the remaining comments and responses in this section.

5.6.2 Comment:

Concern was expressed for the impact of the SIS Project on the fragile desert ecosystem.

Response:

Although the SIS Project would have an impact on the desert ecosystem, the amount of land potentially involved is very small compared to the total area of the desert ecosystem involved. For example, the construction of the SIS Project would require 26.9 acres inside the security fence at the Idaho Chemical Processing Plant (ICPP), all of which has been previously disturbed. Approximately 22.9 acres outside the security fence also would be required, but only during construction; all but 2.9 acres would be revegetated. The remaining impacts on this ecosystem as outlined in Section 4.1 of the EIS would be minor. The fragile nature of the desert ecosystem is well recognized, and significant funding has been expended to conduct routine environmental monitoring and special research projects to quantify the effects of Idaho National Engineering Laboratory (INEL) operations on this ecosystem and to assure that the remaining environment is well protected. Additional information on the environmental monitoring program is included in the responses to comments 5.19.3 and 5.19.6.

5.6.3 Comment:

Concern was expressed that the SIS Project presents an unacceptable risk to the Greater Yellowstone Ecosystem.

Response:

The postulated accidents analyzed in the Draft EIS and the Final EIS (Section 4.1.3) would result in only a small risk to the maximum individual or exposed population within 80 km (50 mi) of the project site. Routine operation of the SIS Project would result in an inconsequential risk. The Greater Yellowstone Ecosystem is approximately 160 km (100 mi) from the SIS Project site, and therefore, normal or accidental releases from the project would not pose an unacceptable risk.

5.6.4 Comment:

Concern was expressed for radiological impacts on wildlife and crops from the SIS Project. It was noted that the Draft EIS did not address those impacts.

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Response:

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Response:

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leucocephalus)

_____ swainsonii)

_____ regal

jackrabbit population cycle (Craig et al., 1984). A maximum of five bald eagles have been recorded on the INEL during any of the midwinter eagle counts held annually since 1983 (Markham, 1987). Bald eagles have never been recorded within 8 km (5 mi) of the proposed SIS Project site. Swainson's hawks are classified on the INEL as uncommon migrants, uncommon summer breeders, and rare winter visitors (Reynolds et al., 1985). The closest suitable nesting habitat (riparian trees) to the proposed SIS Project site is 0.8 km (0.5 mi). There are no historical Swainson's nests within 1.2 km (0.75 mi) of the proposed site. Ferruginous hawks are also classified as uncommon migrants, uncommon summer breeders, and rare winter visitors on the INEL (Reynolds et al., 1985). There are no historic nests of this species within 1.6 km (1 mi) of the proposed SIS Project site. The habitat near the proposed site lacks the proper combination of water, snags, and carrion preferred by wintering bald eagles (Steenhof and Brown, 1978; Steenhof et al., 1980; Reynolds et al., 1984; Isaacs and Anthony, 1987). Because no bald eagles utilize the area adjacent to the proposed site, it is unlikely that construction or operation activities of the SIS Project would impact wintering or migrant bald eagle populations on or near the INEL. Historical and successful ferruginous and Swainson's hawk nests are no closer to the proposed project site than 1.2 km (0.75 mi). This is far greater than the 0.25-km (0.16-mi) buffer zone recommended to prevent nest desertion (White and Thurow, 1985). The proposed SIS Project area is within the hunting range of the nearest nests of both species. However, the proposed area is covered with gravel, devoid of vegetation, and lacking in prey species. Hence, it is unlikely that construction or operation activities will impact the nesting success or hunting activities of either candidate species. Additional information is included in the Final EIS in Sections 3.1.5.3 and 4.1.1.2.

5.6.7 Comment:

Reviewers stated that the cumulative impacts on domestic animals and wildlife both onsite and offsite, and on humans that consume them, could not be determined at this time. Suggestions were made to expand the monitoring program (samples and frequency) to determine long-term or subtle trends.

Response:

The environmental monitoring program, conducted by the Radiological and Environmental Sciences Laboratory (RESL), routinely collects tissue samples from road-killed game animals onsite. Fish are sampled annually from the Big Lost River when it is running. RESL also conducts sampling of offsite foodstuffs, including a collection of milk, wheat, lettuce, and sheep, on an annual basis. Beef cattle that have grazed onsite are sampled biannually. The RESL annual Environmental Monitoring Program Report contains a section on Maximum Individual Dose--Game Ingestion Pathway, which summarizes the results of various radioecology research studies on ducks, sage grouse, doves, and pronghorn. Although RESL's monitoring program maintains a regular sampling schedule, more frequent samplings are made for special situations. For example, following the Chernobyl accident, precipitation samples, normally collected monthly, were picked up daily to provide timely information on fallout. Additional chemical analyses were performed on air samples, extra milk samples were collected, and soil and vegetation sampling was initiated. Additional information on environmental monitoring is included in the responses to comments 5.19.2, 5.19.3, and 5.19.6. Additional information on radionuclide concentrations in wildlife in the vicinity of the ICPP is included in the response to comment 5.6.5. Section 3.1.6.2 of the Final EIS includes additional information on the INEL monitoring program.

5.6.8 Comment:

A reviewer commended the Draft EIS for its coverage of rare plants (in context, DOE interpreted that the reviewer intended to reflect Draft EIS inadequacy in addressing rare plants).

Response:

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Response:

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Response:

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Response:

5.7 EMERGENCY PREPAREDNESS

5.7.1 Comment:

Concern was expressed about the need for coordination among the State of Idaho, counties, and the U.S. Department of Energy (DOE) to develop an emergency plan to address potential offsite and onsite accidents having offsite impacts. In addition, it was suggested that an explicit agreement be developed and that roles and responsibilities of the participants be defined.

Response:

Section 4.6 of the Draft Environmental Impact Statement (EIS) and the Final EIS defines the responsibilities and discusses coordination of the Idaho National Engineering Laboratory (INEL), the State of Idaho, and local counties for emergency preparedness response to potential offsite incidents. It is the responsibility (State of Idaho Executive Order 81-8) of the state and local emergency planning agencies to develop adequate emergency response plans that cover all offsite natural and man-made disasters.

The coordination of emergency response actions occurs at all levels (Federal, state, local). During an INEL site emergency, appropriate facility, contractor, and DOE-Idaho Operations Office personnel conduct the emergency response. However, close liaison is maintained with appropriate state and local officials, including dispatch of a DOE-Idaho representative to the Emergency Operations Center (EOC) of the offsite area, as needed. The DOE Albuquerque Operations Office (DOE-AL) is responsible for the transportation system used for transporting strategic quantities of Government-owned special nuclear material (SNM). DOE Albuquerque is responsible for coordination of emergency planning, preparedness, and response for accidents involving safe secure transports (SSTs).

The Idaho Operations Office of DOE has provided the DOE-Idaho Emergency Planning, Preparedness, and Response Plan to the state and local agencies to assist them in developing plans as they relate to the INEL. DOE is willing to help by reviewing existing state plans as they interact with the INEL. DOE is also willing to enter into negotiations to establish a stronger Memorandum of Understanding (MOU) to delineate areas where assistance can be provided to state and local response agencies by DOE and the DOE emergency response teams.

5.7.2 Comment:

It was stated that DOE should annually provide emergency response training to state and local emergency response personnel, including state police, which covers on- and off-INEL incidents.

Response:

The responsibility for training state and local emergency response personnel rests with the state and local agencies, per State of Idaho Executive Order 81-8. To assist state and local personnel, DOE has provided training to these groups on several occasions, particularly in the area of radiological emergency response. Training also is made available through other Federal agencies, such as the U.S. Department of Transportation (DOT), U.S. Environmental Protection Agency (EPA), and the Federal Emergency Management Agency (FEMA) upon request. One example of DOE's assistance is the recent training conducted by DOE for Waste Isolation Pilot Plant (WIPP) transportation activities and on emergency response. Among the attendees were personnel from the State of Idaho Law Enforcement Department, Civil Defense, Radiation Control, and Environmental Quality Offices. DOE-Idaho will continue to provide training when requested. The information presented in Section 4.6 of the Draft EIS has been amplified in the Final EIS.

5.7.3 Comment:

It was stated that the state, local counties and cities, and DOE should form a review team to review and evaluate existing emergency plans and correct deficiencies.

Response:

DOE stands ready to assist state and local agencies in reviewing and evaluating existing state plans as they relate to the INEL. A request for review would be made through the established channel of communications between the State of Idaho and DOE-Idaho.

5.7.4 Comment:

It was requested that DOE acknowledge existing commitments for notification to the State of Idaho, and that DOE be willing to negotiate revisions as necessary.

Response:

DOE continues to comply with existing notification commitments as outlined in the Nonroutine Release Section of the "Working Agreement," which provides guidance for notification of state and local agencies in the event of a release of hazardous (including radiation) materials from the INEL in excess of agreed-upon limits between the State of Idaho and the U.S. Energy Research and Development Administration (ERDA) (now DOE). This working agreement covers environmental monitoring at the INEL, and provides guidance for notification of state and local agencies in the event of a release of hazardous (including radiation) materials from INEL in excess of agreed-upon limits. DOE is also willing to negotiate necessary changes to notification commitments requested by the State of Idaho using existing channels of communication with DOE-Idaho. DOT provides training upon request for transportation-related emergencies. DOE-AL has responsibility for DOE's emergency response. DOE-AL recently conducted training for transportation incidents related to transuranic (TRU) waste to which State of Idaho personnel were invited and which they attended.

5.7.5 Comment:

It was requested that DOE-Idaho, in coordination with local emergency planning committees, conduct annual emergency exercises which deal with onsite and transportation emergencies.

Response:

The Idaho Operations Office of DOE conducts an annual INEL site-wide emergency exercise. The State of Idaho has participated in the exercise each year since 1983. The State of Idaho is invited to participate in these exercises to assist the emergency response organizations. During each of the previous years, DOE-Idaho has concentrated on interfacing with one of the local counties. Each year a different county is chosen, to minimize the impact on the budgets of the planning agencies. The state and local agencies are tasked with providing training to their emergency response organizations. DOE-Idaho will continue to assist in the training and provide emergency exercises upon request.

State of Idaho Executive Order 81-8 tasks the state and local agencies with the responsibility for the emergency response to transportation emergencies. However, the State of Idaho and DOE-Idaho do have a demonstrated history of coordinating and responding jointly to off-INEL transportation accidents. The INEL has not conducted exercises involving transportation emergencies, but the State of Idaho and INEL could develop off-INEL emergency transportation exercises if there was a perceived need.

5.7.6 Comment:

It was noted that the Draft EIS indicated reliance on existing county emergency plans to handle any site-related emergencies and also that state/local resources are inadequate for such emergencies.

Response:

DOE-Idaho Operations Office Order 5500.2, Emergency Planning, Preparedness, and Response for Operations, states: "Off-site emergency conditions caused by DOE or DOE contractor activities or operations shall be under the jurisdiction of civil authorities. During Site and General Emergencies, close liaison will be maintained with appropriate State and Local officials, including dispatch of an ID representative to the Emergency Operations Center of the affected off-site area, as needed."

The DOE emergency plans supplement state and local emergency response plans. Also, DOE provides resources upon request for an emergency that supplement the state and local equipment and personnel. Refer to response to comment 5.7.1 for additional information.

5.7.7 Comment:

Concern was expressed over the fact that Superfund Amendments Reauthorization Act (SARA) Title III was not addressed in the Draft EIS.

Response:

DOE-Idaho has provided to the state, as part of an on-going process, the appropriate SARA Title III data that identify hazardous materials used at the INEL. Acknowledgment of the SARA requirements has been added to the Final EIS in Table 5-1, Section 5.6.6.

5.7.8 Comment:

Concern was expressed that local emergency planning agencies were not being given guidance on what to plan for with regard to types of incidents or materials involved in potential emergencies.

Response:

The state and local agencies are tasked with developing emergency response plans to handle all natural and man-made disasters (State of Idaho Executive Order 81-8). To assist in these efforts, DOE-Idaho has provided the state and local agencies with a copy of the DOE-Idaho Emergency Planning, Preparedness, and Response Plan. State and local authorities also participate in annual exercises with DOE-Idaho. Additionally, DOE-Idaho has provided SARA Title III reporting data that identify hazardous materials used at the INEL. DOE-Idaho will also assist in the review of existing plans as they relate to the INEL, upon request by the state or local agency.

5.7.9 Comment:

It was noted that emergency preparedness plans are being developed involving local and state officials and DOE-Idaho.

Response:

In accordance with DOE-Idaho Order 5500.2, a plan is being developed to address potential emergencies at the SIS Facility. Any changes to the existing DOE-Idaho Emergency Planning,

Preparedness, and Response Plan will be provided to state and local agencies for information and for inclusion into their plans, as has been done in the past.

5.7.10 Comment:

It was stated that the Draft EIS omitted any mention of or specific provisions for emergency response plans to deal with potential SIS-related emergencies.

Response:

Section 4.6 of the Draft EIS addressed the emergency planning, preparedness, and response hierarchy. The state, local, DOE, and SIS Facility Emergency Response plans provide details of the role each organization plays in emergency response actions. Section 4.6 has been expanded in the Final EIS to provide additional information.

5.7.11 Comment:

It was recommended that release limits and action plans (if those limits are exceeded) be provided.

Response:

DOE-Idaho Order 5500.2, DOE-Idaho Emergency Planning, Preparedness, and Response Plan, requires that thresholds be established for response-level actions. Facility emergency response plans contain these thresholds. A working agreement between the State of Idaho and ERDA (now DOE) covering environmental monitoring at the INEL identifies these levels; if they are exceeded, the state and certain state agencies are notified. This agreement has been in place since 1977.

5.7.12 Comment:

Concern was expressed that the state and local emergency response organizations were incapable of handling a routine or potentially catastrophic emergency caused by the SIS Project. Additionally, concern was expressed that the response organizations were inadequately trained.

Response:

In accordance with the State of Idaho Executive Order 81-8, it is the responsibility of the state and local governments to provide adequate emergency response capability for all natural and man-made disasters. To assist in development of emergency response plans that deal with INEL-related emergencies, DOE-Idaho has provided the DOE-Idaho Emergency Planning, Preparedness, and Response Plan to the state and local governments for evaluation and inclusion in their plans. DOE-Idaho also has provided SARA Title III information to the state to assist in determining the types of hazardous chemicals that could be encountered in an emergency response at the INEL. To assist the state and local authorities, DOE has provided training to emergency response personnel at the state and local level. DOE ensures that state and local agencies are provided assistance from special response teams (e.g., the DOE Radiological Assistance Program) that are trained to handle radiological emergencies. Assistance is also available from other Federal agencies, such as the EPA, FEMA, and U.S. Coast Guard National Response Teams, for hazardous materials emergencies.

5.7.13 Comment:

Concern was expressed relative to the ability of area medical facilities to handle potential SIS-related emergencies. It was stated that the Draft EIS failed to address this issue. It was noted that the qualifications of the Eastern Idaho Regional Medical Center (EIRMC) should be included in the EIS.

Response:

An MOU between DOE-Idaho and the EIRMC is in place to provide mutual assistance in the event that the capabilities of either organization are exceeded. Training has been provided by DOE-Idaho to EIRMC personnel in handling radiological emergency injuries. The State of Idaho Department of Health and Welfare is responsible for and coordinates medical resources during any declared emergencies (State of Idaho Executive Order 81-8). The details of emergency response procedures are contained in INEL, state, and local emergency plans, which are discussed in Section 4.6 of the Draft EIS. This section has been expanded in the Final EIS.

Information on the qualifications of the EIRMC is contained in the EIRMC Emergency Response plans. Copies of these can be obtained from local planning agencies or EIRMC.

5.7.14 Comment:

Concern was expressed that the Shoshone-Bannock tribal infrastructure was not analyzed for emergency response capability.

Response:

DOE-Idaho has provided assistance to the Shoshone-Bannock tribes during emergencies, including those outside the realm of radiological emergencies. For example, during a pesticide fire on reservation land, DOE-Idaho provided assistance by providing a consultant experienced in hazardous material emergencies. DOE-Idaho will continue to provide assistance and is willing to enter into negotiations to formalize mutual aid agreements.

In January 1988, DOE-Idaho met with Shoshone-Bannock personnel at Fort Hall to discuss the DOE-Idaho Radiological Assistance Program and the availability of resources from the INEL in the event of emergencies. DOE-Idaho will provide assistance when formally requested to do so.

5.7.15 Comment:

Concern was expressed that the Draft EIS did not contain detailed emergency response plans for accidents or terrorist attack.

Response:

The DOE-Idaho, state, and local agency emergency response plans define the resources, actions for mitigation, and personnel protection procedures. The details of response plans for dealing with terrorist attacks are classified and were not included in the Draft EIS or the Final EIS. Section 4.6 of the Final EIS has been expanded to include additional information on responsibilities, procedures, coordination, and training with respect to transportation accidents. For information on terrorist attacks, see the response to comment 5.25.5.

5.7.16 Comment:

It was requested that DOE address in the EIS the initial response of isolation and containment of contaminated areas and protection of wildlife, should an accident occur.

Response:

The response actions to prevent spread of contamination and exposure of wildlife are contained in the DOE-Idaho, state, and local emergency plans. Facility spill prevention and control plans contain instructions for dealing with hazardous material emergencies based in part on EPA requirements. Section 4.6 of the Final EIS has been expanded to include additional information on responsibilities, procedures, coordination, and training. Also refer to responses to comments 5.1.20 and 5.1.41.

5.7.17 Comment:

Concern was expressed that the Draft EIS did not provide evacuation plans.

Response:

THE DOE-Idaho, state, and local emergency plans contain the specifics of evacuation responses, roles, and methodologies. Section 4.6 of the Final EIS has been modified to include a more detailed discussion of responsibilities, coordination, procedures, and training.

5.7.18 Comment:

It was requested that information on the state of readiness for off-facility care of public victims of major contaminating events and rescue methodology for those victims be included in the Final EIS.

Response:

The Draft EIS and the Final EIS discuss INEL, state, and local emergency response plans. Each plan addresses the actions, rescue methodology, and interfaces necessary for medical care. State of Idaho Executive Order 81-8 tasks the Department of Health and Welfare with the coordination of medical care during an emergency. The ability to respond to emergency conditions requiring medical care is tested at the discretion of local and state emergency response agencies. The handling of simulated contaminated patients is an integral part of Bonneville County Civil Defense exercises for maintaining state of readiness.

5.7.19 Comment:

It was stated that the Draft EIS made no mention of medical treatments, cleanup equipment, security, evacuation, and routes for evacuation in the event of an accident.

Response:

Section 4.6 of the Final EIS and the Draft EIS discuss the emergency response plans for DOE, the State of Idaho, and local counties. These plans contain the details for security and medical care arrangements, resources for emergency recovery, and evacuation procedures and routes. Security arrangements are discussed in these plans and in the MOU that is in place.

5.7.20 Comment:

Concern was expressed over the response times of emergency teams.

Response:

Onsite response time by the emergency response team is tested annually in site-wide exercises. The demonstrated response time is classified but appropriately short. The response times of offsite emergency response teams are the responsibility of and are tested at the discretion of the state and local agencies.

5.7.21 Comment:

It was noted that the Draft EIS should identify agencies to turn to in the event of an accident.

Response:

Section 4.6 of the Draft EIS discusses INEL, state, and local emergency plans. Details of occurrence types, response actions, responsible agencies, and who to turn to are contained in these plans. Copies of the local emergency plans are available through the local emergency planning office.

5.7.22 Comment:

It was noted that the INEL was a good neighbor and has provided help on spills and training programs.

Response:

Training of state and local emergency response personnel on a variety of simulated accidents has been provided by DOE in the past as part of a "Good Neighbor" policy. This practice will continue in the future when requested. Additionally, state and local agencies are invited to participate in the annual INEL site-wide emergency response exercises. DOE-Idaho has also provided the State of Idaho with resources under the Radiological Assistance Program for transportation incidents and has provided assistance to the Shoshone-Bannock tribes for hazardous materials emergencies.

5.7.23 Comment:

It was stated that the SIS EIS should address the education and training of the health community on plutonium hazards from accidents.

Response:

The State of Idaho Department of Health and Welfare is responsible for and coordinates medical resources during any declared emergencies (State of Idaho Executive Order 81-8). However, in cooperation with the state, education and training have also been provided by DOE-Idaho to EIRMC personnel in handling radiological emergency injuries. An MOU between DOE-Idaho and EIRMC is in place to provide mutual assistance in the event that the capabilities of either organization are exceeded. The details of emergency response procedures are contained in INEL, state, and local emergency plans, which are discussed in the Final EIS.

5.7.24 Comment:

It was stated that the State of Idaho should receive Federal monetary assistance in emergency planning, training, and disaster response.

Response:

The State of Idaho presently receives Federal monetary assistance from FEMA in the areas of emergency planning and training. The Final EIS (Section 4.6) further explains the involvement that state and Federal agencies have in emergency planning, training, and disaster response. Refer to response to comment 5.7.2.

5.8 FACILITY DESIGN

5.8.1 Comment:

It was stated that the Special Isotope Separation (SIS) Plutonium Processing Building (PPB) would be a Category I structure maintaining a safe condition during an accident. It was also stated that all plutonium processing in the facilities would be conducted in glove boxes with exhausts passed through three testable high-efficiency particulate air (HEPA) filters. Others commented on severe natural phenomena, indicating that the Plutonium Processing Building PPB would withstand regional earthquakes of the same or larger size than the Hebgen Lake and Mt. Borah earthquakes; that the SIS PPB would withstand severe tornadoes; and that the SIS Project would be constructed above the Probable Maximum Flood (PMF).

Response:

Section 2.1.3 of the Draft Environmental Impact Statement (EIS) and the Final EIS states that the PPB and Stand-Alone Storage Vault would indeed be Category I as designed in the U.S. Department of Energy Idaho Operation Office (DOE-Idaho) Architectural Engineering (A-E) Standards facilities constructed in accordance with DOE Order 6430.1A. These standards specify the design-basis natural phenomena which a Category I facility design shall withstand. Section 2.1.2 also describes how the ventilation, exhaust, and filtration systems, including those for the glove boxes, are designed and specifies the design-basis natural phenomena against which these systems are designed. It also indicates the site would be graded to raise the facility floor-level elevations above the PMF, and describes the PMF.

5.8.2 Comment:

It was asked if DOE can design a facility to withstand a volcanic event.

Response:

Section 3.1.4.3 of the Final EIS addresses volcanic processes that might affect facilities at the Idaho National Engineering Laboratory (INEL) such as lava flows, earthquakes associated with volcanism, ground deformation, and explosive eruptions. Renewed volcanic activity would be preceded by moderate seismic activity that would provide warning of any threat to the SIS Project or other INEL facilities so that an orderly shutdown and other appropriate mitigating action could be initiated. Design of the SIS facilities to withstand a volcanic event would not be required, because the likelihood of a volcanic event's threatening the SIS Project is slight due to the distance between potentially active volcanic areas and the long interval between periods of volcanic activity in the area.

5.8.3 Comment:

It was stated that there are always design compromises over efficiency, safety, cost, and reliability, that some things will be overlooked, and that the result could be disastrous. Concern was also expressed over tradeoffs of safety and budget for the SIS Project.

Response:

Design of nuclear facilities such as the SIS Project does not compromise safety for the sake of efficiency, cost, or reliability. Potential releases and exposures are governed by the principle of as-low-as-reasonably-achievable (ALARA) to ensure that workers and the public are not exposed to any

significant level of radiation. In addition, the SIS Facility would meet all applicable safety regulations. All phases of the project would be subject to internal U.S. Department of Energy (DOE) independent review for technology and design safety. Quality assurance requirements for the SIS Project identified through system design and safety analysis would be applied to equipment, components, systems, and plant operation to assure worker and public safety.

5.8.4 Comment:

It was asked if physical protection at the SIS Project is being designed for the threat to the environment by the year 2000.

Response:

The threat environment in the year 2000 is unknown. The SIS Facility safeguards and security systems will be designed to meet all current DOE Orders and guidance documents, and DOE continually upgrades security to new threat criteria.

5.8.5 Comment:

It was stated that the seismic discussion needs to be amplified. It was indicated that the commentor understood a new study would be made of probable ground acceleration at the site, and that a better explanation is appropriate for selection of the Design-Basis Earthquake (DBE).

Response:

The Final EIS discussion of seismicity has been expanded to include updated information in Section 3.1.4.3. The selection of the DBE is in accordance with DOE Order 6430.1A and the DOE-Idaho A-E Standards referenced in Section 2.1.3 of the Draft EIS and the Final EIS. Based on the information presented in Section 3.1.4.3 of the Final EIS, the accelerations used for the SIS Project design are appropriate.

5.8.6 Comment:

It was stated that the DBE for the INEL should be increased to include bedrock acceleration at least 50 percent greater than listed in the Draft EIS because epicenters of high-magnitude earthquakes along major faults at the Howe and Arco scarps may be close to the SIS Project.

Response:

Section 3.1.4.3 of the Draft EIS characterizes the site seismicity. The discussion on seismicity has been expanded in the Final EIS. The selection of the DBE for the SIS Project is in accordance with DOE Order 6430.1A and the DOE-Idaho A-E Standards referenced in Section 2.1.3. Based on the information contained in the Final EIS, the bedrock acceleration used is appropriate and should not be increased by 50 percent. Although past estimates of fault displacement on the Howe and Arco scarps have ranged up to 6 meters, current estimates are centered at about 3 meters. See Section 3.1.4.3 of the Final EIS for additional information.

5.8.7 Comment:

It was stated that the EIS doesn't discuss Design-Basis Flood (DBF) elevation and how high the plant must be raised to avoid the flood.

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facility would contain the liquid waste stream when the fire sprinkler system discharges, washing plutonium from the air. The Final EIS should clearly state that the SIS Facility would be constructed to contain liquid waste from all postulated accidents.

Response:

In accordance with DOE Order 6430.1A, the SIS Project would be designed to contain all liquid radioactive spills in the event of a DBA, including that from a DBE. As required in DOE Order 6430.1A, all pipes or other conduits--which would include equipment such as the evaporator--for the transfer of plutonium in a product or waste liquid would be at least double-walled or run within an enclosure that would provide for a second leak-tight barrier in the event of a DBA. In the event of a fire, fire suppression by water in plutonium areas is not the preferred method of extinguishing, due to potential for criticality. As clarified in the Final EIS in Section 2.1.2.1, Fire Protection, wet pipe sprinklers would serve as backup to the Halon primary fire suppression systems in the separator control and local control rooms, and zoned prereaction supervised sprinkler systems would be used to strictly control accidental water discharge based on criticality analysis in plutonium processing, handling, and storage areas. The objectives of the fire suppression systems are to extinguish fires and not to wash plutonium from the air. The Final EIS has referenced in numerous locations throughout Chapter 2 that the SIS Project would be designed in accordance with DOE Order 6430.1A, which provides for the containment of radioactive liquids containing plutonium in the event of a DBA.

5.8.15 Comment:

It was stated that the PPB cooling tower blowdown and process steam condensate would be routed to the same quarantine tanks as the overheads from the waste evaporation. However, decontamination of tanks is not addressed in the case where the analyses indicate hazardous waste has been stored in the tanks.

Response:

The Final EIS (Figure 2-9) reflects that the current design separates the quarantine tanks from the cooling tower blowdown and process steam condensate. Hazardous waste would be segregated in a separate system, and decontamination of the tank would not be necessary until maintenance is required; therefore, decontamination of tanks is not addressed.

5.8.16 Comment:

It was stated that there is a discrepancy between the Draft EIS and the budget submission to Congress in the number of separator lines. It was also noted that if the number of lines increases, the Draft EIS may substantially underestimate the environmental impacts because more plutonium can or will be processed.

Response:

The change from two separator lines to four resulted from a plant layout configuration change after the Draft EIS was issued. The number of separator lines does not quantify plant throughput but only the number of separator units, which has not changed. The SIS Project capacity (throughput) and the subsequent environmental impacts remain unchanged. The Final EIS (Section 2.1.1) states that four separator lines each containing four separator units would be used.

5.8.17 Comment:

It was asked what the alarm set point for the PPB stack monitor, which indicates high radionuclide levels, would be.

Response:

At the current stage of design the alarm set point has not been established. The alarm set point for the PPB stack monitor would be established based on the final stack design and the actual instrumentation selected to ensure that all regulatory requirements and design objectives, such as ANSI N13.1 and DOE Order 6430.1A, are fulfilled to meet all regulatory requirements.

5.8.18 Comment:

It was stated that the Draft EIS should describe PPB stack monitors for radioactive and nonradioactive emissions, list the gases to be monitored, the types of monitors, and where monitor probes will be located in the stacks.

Response:

Section 2.1.2.1 indicated that the stack monitoring for radionuclides would be in accordance with ANSI N13.1 and DOE Order 6430.1A. As the advanced design proceeds, additional details such as the constituents to be monitored, specific monitor design, precise isokinetic probe location, etc., of these systems will be developed.

5.8.19 Comment:

It was stated that the Draft EIS should describe how a negative pressure is produced in Zone III, and that a flow diagram of exhaust systems associated with Zones I, II, and III is needed.

Response:

The negative pressure differential between Zone III and Zone II would be provided by the exhaust fans described in Section 2.1.2.1 of the Draft EIS and the Final EIS. Section 2.1.2.1 described ventilation Zones I, II and III and their interrelationship. In addition, Figure 2-8 showed the preliminary atmospheric emissions functional flow diagrams.

5.8.20 Comment:

It was noted that the actual expenditure rate for plutonium Atomic Vapor Laser Isotope Separation (AVLIS) is so different from the expected rate based on other laser-based development projects of the duration specified by DOE, that the completion schedule is likely in error. It was also noted that the Draft EIS underestimated the research and development time to develop the technology, which will delay the schedule and increase costs.

Response:

"Other laser-based development projects" should not be compared with the AVLIS development program. The "other laser-based development projects" may or may not be similar to the AVLIS program in complexity and development maturity. Physical construction of the SIS Project could not start until after the AVLIS technology is demonstrated in a major program milestone called Plant Performance

Verification Series that uses full-scale plant-prototypical equipment. As of September 1988, the development that is planned and scheduled to support a construction go-ahead in Fiscal Year 1990 is on schedule. Technical performance of the lasers and separators is acceptable to meet plant operating requirements. "Cold" tests using surrogate material (nonradioactive but a good simulation) have been successful. The copper lasers have been operating 24 hours per day, 7 days per week for over 2 1/2 years. The dye lasers are well understood and the wavelengths necessary for the SIS Project have been successfully demonstrated at Lawrence Livermore National Laboratory (LLNL). The mainline pyrochemistry and new aqueous process would be demonstrated before plant construction. The remaining SIS supporting development activities would include integrating the demonstrated lasers and separators and conducting the integrated separation demonstrations. These demonstrations are planned to start in early 1989 and to be completed in early 1990.

Increase in total project cost may not provide a good basis for projecting the occurrence of further delays or cost increases. As with many Government projects, including the SIS Project, reductions in funding from the funding originally requested require a stretching out of activities, resulting in higher labor and equipment costs.

5.9 FREON

5.9.1 Comment:

Concern was expressed over the potential Freon release to the atmosphere (less than 20 tons per year) because of the implication that certain Freons deplete the stratospheric ozone layer. Other reviewers referred to "radioactive" Freons, and another stated that toxic fluorocarbons are released during normal operations.

Response:

The 20-ton per year figure in the Draft and the Final Environmental Impact Statement (EIS) refers to the upper projected maximum amount of total volatile organic compounds (VOCs) potentially anticipated -- which would be released comprised primarily of, but not limited to, Freon. This emission would meet U.S. Environmental Protection Agency (EPA) and State of Idaho criteria for pollutant de minimis limits for VOCs under the Prevention of Significant Deterioration (PSD) requirements. Freon is not produced in the Special Isotope Separation (SIS) process but is used as a cooling fluid in the copper laser power system. Freon is not a radioactive material. Because the copper lasers would be located in the Laser Support Building, the Freons are not exposed to any radioactive material. Therefore, there would be no release of radioactive Freon from the SIS Facility.

There is considerable evidence that Freons may deplete the stratospheric ozone layer, as discussed in Section 4.1.2.2 of the Draft EIS and the Final EIS. Work is on-going both to find ways to further reduce the emissions and to find a substitute material for use in the SIS Project that would have no adverse impact on the environment. Section 5.4 of the Final EIS discusses the recent EPA regulation that requires a 50-percent reduction of production and consumption of chlorofluorocarbons such as Freon by 1998, and Section 4.1.2.2 of the Final EIS discusses measures that would be taken to reduce Freon emissions as well as to use a substitute when available.

5.9.2 Comment:

It was requested that estimates of the quantity of uncontrolled Freon emissions and the effectiveness of control measures be provided.

Response:

Operation of the plant as currently designed would result in a maximum annual release of less than 20 tons of VOCs. The VOCs are primarily, but not limited to, Freons. The value of VOC emissions anticipated annually would be less than one-half the de minimis level for VOCs as contained in 40 CFR 52.

The SIS Laser System, Support Building, refurbishment system, and operational procedures are designed to minimize Freon emissions. Efforts are on-going to further reduce emissions by including measures such as chiller and condensation systems to reduce evaporation of Freon during refurbishment, and vapor recovery systems for recycling the Freon. Designs are being examined that would minimize the required inventory. Inventory monitors, local spill detectors, and emission monitors would be used to detect residual Freon losses, and these data would be used to improve operating procedures to further reduce emissions. In addition, commercial Freon manufacturers are working with the SIS Project to identify and/or develop substitute dielectric coolants that have no adverse impact on the environment; these potential substitutes are being evaluated for potential use in the SIS Project and would be implemented when practical.

5.9.3 Comment:

Concern was expressed about releasing Freon to the atmosphere because of potential impacts upon stratospheric ozone. It was requested that the impact of Freon released from SIS facilities upon the ozone layers be addressed, and that an assessment of the risk of skin cancer from Freon emissions be included in the Final EIS. Concern was also expressed about "radioactive" Freon.

Response:

Operation of the plant, as currently designed, would release less than 20 tons per year of VOCs, consisting mostly of Freon. This release would be less than one-half of the de minimis level set by the EPA for the PSD for VOCs. For comparison, 20 tons constitutes approximately 0.006% of the estimated 1/3 million tons consumed in the United States in 1985.

The theoretical impacts from the release of 20 tons of Freon on the ozone layer and the occurrence of skin cancer have been estimated using the detailed information presented in Regulatory Impact Analysis: Protection of Stratosphere Ozone, December 1987. The calculations indicate that:

A. Stratospheric ozone would decrease by about 1×10^{-6} percent per year.

B. The annual risk to an individual member of United States population to fatal skin cancer would increase by 2.7×10^{-12}.

Based on these results the impacts would be negligible. The above information has been presented in the Final EIS in Section 4.1.2.2.

The SIS Laser System, Support Building, refurbishment system, and operational procedures are designed to minimize Freon emissions. Efforts are on-going to further reduce emissions by including measures such as chiller and condensation systems to reduce evaporation of Freon during refurbishment, and vapor recovery systems for recycling the Freon. Designs are being examined that would minimize the required inventory. Inventory monitors, local spill detectors, and emission monitors would be used to detect residual Freon losses, and these data would be used to improve operating procedures to further reduce emissions. In addition, commercial Freon manufacturers are working with the SIS Project to identify and/or develop substitute dielectric coolants that have no adverse impact on the environment; these potential substitutes are being evaluated for potential use in the SIS Project and would be implemented when practical.

As indicated in the response to comment 5.9.1, the Freons released would not be radioactive.

5.9.4 Comment:

It was requested that the Draft EIS include a discussion of mitigation measures to be used to control Freon emissions, and a discussion of the possible use of non-ozone-depleting chemicals.

Response:

Section 4.1.2.2 of the Final EIS has been expanded to discuss the mitigation measures (e.g., the use of chiller systems to reduce evaporation and vapor recovery systems for recycling the Freon) that would be used to control Freon emissions and the possible use of chemicals with a lower ozone-depleting potential.

5.9.5 Comment:

It was stated that Section 157(B) of the Clean Air Act proposes to restrict the production and consumption of specified ozone-depleting chemicals. It was also stated that the Draft EIS should address Freon releases relative to emission limits internationally.

Response:

A discussion has been added to Section 5.4 of the Final EIS on the Montreal Protocol, which, when enacted, will limit Freon production to 50 percent of the 1986 production values by 1998.

5.10 GEOLOGY

5.10.1 Comment:

Concern was noted about the adequacy of the Draft Enviromental Impact Statement (EIS) presentation on volcanic and seismic or earthquake hazards, including the scientific documentation given. Others stated that it did not address the potential for a plutonium leak to the aquifer.

Response:

Sections 3.1.4.2 and 3.1.4.3 of the Final EIS have been modified to include more specific information on seismic and volcanic hazards based on recent and on-going scientific studies at the Idaho National Engineering Laboratory (INEL). Also, see the responses to comments 5.12.1 and 5.12.2 for information on the potential for a plutonium leak to the aquifer.

5.10.2 Comment:

Concern was expressed that the Draft EIS underestimates earthquake potential at the INEL, because a 7.3-magnitude earthquake is a major earthquake and its zone of impact would therefore be considered major, not minor, as the Draft EIS contends.

Response:

Information on seismic activity in the area surrounding the INEL has been expanded in Section 3.1.4.3 of the Final EIS. While seismic activity is significant, with major events occurring in areas surrounding the INEL, the Snake River Plain on which the INEL is located is generally described as aseismic. The Final EIS states that although the 1983 shock from the 7.3-magnitude Mt. Borah earthquake (a Modified Mercali Intensity rating of VI) was felt at the INEL, no structural or safety-related damage occurred.

The consequences of a Design-Basis Earthquake (DBE) are discussed in Section 4.1.3.1 of the Final EIS, which indicates that there would be no significant adverse impacts to environmental quality or human health and safety.

5.10.3 Comment:

It was stated that the Draft EIS is inconsistent in saying the INEL has a history of volcanic activity, and also that there is no anticipated problem from volcanic hazards.

Response:

Although the Eastern Snake River Plain has had a geologic history of volcanic activity, available data indicates the potential threat from volcanic eruptions is low. During a period of eruptive activity at a particular fissure eruption zone, the interval (once eruptions have begun) between eruptions may be 2000 to 3000 years, with the last major eruptive cycle near the proposed Special Istope Separation (SIS) Project site having occurred approximately 255,000 years ago. The interval between the major eruptive cycles measured on the INEL is about 80,000 to 225,000 years. Section 3.1.4.3 of the Final EIS has been expanded to include additional information.

5.10.4 Comment:

It was stated that the INEL is located in a geologically active area.

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Response:

5.10.12 Comment:

It was stated that the Final EIS assessment of earthquake hazards should take into account the geologic data published after 1984.

Response:

Section 3.1.4.3 of the Final EIS has been updated to include data published since 1984. See the responses to comments 5.10.13, 5.10.15, and 5.10.16 for geologic data added to the Final EIS.

5.10.13 Comment:

It was stated that a discussion of the past and future earthquake activity north of the Snake River Plain should be included in the EIS.

Response:

Section 3.1.4.3 of the Final EIS has been expanded to include a discussion of past movements on the major faults north of the Snake River Plain. Predictions for future earthquake activity along those faults are also addressed. Based on the data available, seismic events with a magnitude of up to 7.3-7.5 are anticipated along the major fault zones (Arco and Howe), with a recurrence interval of approximately 30,000 years.

5.10.14 Comment:

It was stated that the Draft EIS provides no empirical data for earthquake and volcanic activity.

Response:

Section 3.1.4.3 of the Final EIS has been expanded to include the latest empirical data available on those topics; the conclusions remain the same as stated in the Draft EIS.

5.10.15 Comment:

It was stated that the vertical and horizontal bedrock and ground accelerations at the INEL associated with the Borah Peak earthquake as well as the design acceleration values should be given in the Final EIS.

Response:

The Final EIS (Section 3.1.4.3) has been expanded to include peak ground accelerations (0.02-0.078g) and the Modified Mercalli Intensity (VI) experienced in the vicinity of the proposed SIS site. The design bases values (0.16g and 0.24g for vertical and horizontal bedrock acceleration, respectively), are given in Section 2.1.3 of the Final EIS.

5.10.16 Comment:

It was asked what the magnitude of the DBE is, compared to geologists' estimates of possible earthquake magnitudes in Idaho.

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Response:

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Response:

Geophysical

Response:

Response:

5.11 GRAZING

Comment:

It was stated that additional information on livestock grazing at the Idaho National Engineering Laboratory (INEL), including site-specific maps and a discussion of the impacts from the Special Isotope Separation (SIS) operations, should be included in the Final EIS.

Response:

Approximately 340,000 acres of the INEL are open to controlled grazing of cattle or sheep. The areas allocated for grazing at the INEL site are mutually agreed on by the U.S. Department of Energy (DOE) and the Department of the Interior (DOI), and the grazing permits are administered through the Bureau of Land Management (BLM). Grazing is generally restricted within 3.2 km (2 mi) of any nuclear facility, no milkcows are allowed, and livestock populations are controlled. Permit grazing areas at the INEL are shown in Figure 3-2 of the Final Environmental Impact Statement (EIS). The nearest grazing area boundary is approximately 7.0 km (or 4.4 mi) from the SIS Project. Grazing area boundaries and permits would not be impacted by the SIS Project.

5.12 WATER

5.12.1 Comment:

It was noted that development of weapons-related facilities on or over the Snake River Plain aquifer located near the Borah Peak earthquake zone would put the aquifer at risk. Others noted that the aquifer was already polluted from previous Idaho National Engineering Laboratory (INEL) activities. Concern was also expressed that pollution of the aquifer would be irreversible and would negatively affect the market for Idaho agricultural products. Others noted that the Special Isotope Separation (SIS) Project will not discharge contaminated liquids into the Snake River Plain aquifer.

Response:

The INEL was located in eastern Idaho in 1949 for a variety of reasons, including water supply, remote location, geology, seismic inactivity, and nearby labor supply. In general, the site location is very good, and the INEL has been able to perform its various missions safely. The INEL has operated more than 52 nuclear facilities over the Snake River Plain aquifer periodically for almost 40 years. Contaminants from a variety of processes were discharged, within limits existing at the time, to the environment through ponds and injection wells. The movement of these contaminants has been monitored, documented, studied, and reported in great detail. Only a small portion of the contamination present in the subsurface is a result of leakage or mishandling of wastes. A majority of the current contamination is a result of past practices to treat and store intermediate-level and high-level radioactive waste. Those early waste management practices were considered acceptable at the time and met appropriate environmental regulations. Low-level wastes were discharged to the environment in the most suitable manner then available. Those waste management practices have since been discontinued. Careful measurements of soil and water samples taken over the years have detected waste products in the subsurface and in the Snake River Plain aquifer. These waste products have been detected only at extremely low levels that are slightly above or below Environmental Protection Agency (EPA) standards for drinking water, and therefore do not constitute a health hazard. The ground-water monitoring program is continuing.

The INEL has made these data available in a number of published reports, presentations, and news media articles. The data are objective and have been verified by State of Idaho personnel making independent determinations on the split samples. The data show the extent and concentrations of various waste products that are dispersed (called plumes) in the Snake River Plain aquifer. These data indicate that concentrations of waste products in the aquifer are very low, especially south of the Central Facilities Area (CFA).

After 35 years of waste disposal at the INEL, only three radionuclides are dispersed in the aquifer over a distance of one-half mile or more. The radionuclides are tritium, which constitutes more than 95 percent of the radionuclides discharged, strontium-90, and iodine-129.

Tritium has migrated about 9 miles south of the points of disposal in about 35 years, or at an average velocity of about 4.5 feet per day. The leading edge of the tritium plume reached wells near the southern INEL boundary in barely detectable concentrations in 1983. However, it has not been detected in water from wells offsite. The tritium concentrations are continually reduced by radioactive decay (half-life 12.5 years), by dilution, and by dispersion.

One way to measure the degree of contamination is to compare the waste products in the water to drinking water standards. The tritium plume is above the EPA standards for drinking water (i.e., 4 millirem per year as contained in 40 CFR 141) in a small area of the INEL and, because of dilution and radioactive decay, will not reach the INEL boundary at those levels. Other measured contaminants are

below drinking water standards throughout their entire plumes, or within a short distance of the Idaho Chemical Processing Plant (ICPP). These contaminated plumes would not be a factor limiting the use of water from the Snake River Plain aquifer.

The improved waste management practices currently used do not cause contamination of the aquifer. An environmental restoration program is currently evaluating necessary remedial actions to reduce or eliminate continued migration of hazardous wastes from previously used disposal sites. Current waste management practices employ waste minimization, separation of Resource Conservation and Recovery Act (RCRA) hazardous wastes for offsite disposal, and improved onsite treatment and disposal practices that comply with current requirements for protecting human health and the environment.

The SIS Project would be designed to be a modern, state-of-the-art facility and would comply with all applicable environmental standards and regulations.

5.12.2 Comment:

Concern was expressed about increasing tritium and plutonium in groundwater at the INEL from the SIS Project.

Response:

Existing ground-water contamination at the INEL is discussed in Section 3.1.4.4 of the Final Environmental Impact Statement (EIS). The vast majority of contamination at the INEL is a result of early waste management practices that were considered acceptable at the time and met appropriate environmental regulations. Those waste management practices have since been discontinued. The SIS Project would comply with all applicable environmental regulations. The SIS Project will not discharge tritium or plutonium to the groundwater and therefore would not increase contamination of the groundwater. There would be no release of contaminants resulting from postulated SIS accidents which would enter the Snake River Plain aquifer. See the response to comment 5.12.1 for additional information on the aquifer.

5.12.3 Comment:

It was suggested that the Final EIS should utilize the most current data available, including U.S. Geological Survey (USGS) Monitoring Reports, to assess the current status and vulnerability of the Snake River Plain aquifer.

Response:

The USGS has monitored the INEL continually since 1949. They have provided reports on the hydrology, geology, water quality, and water availability at the INEL. These reports covered the background quality of water in the Snake River Plain aquifer prior to INEL operations. As data are collected by the USGS, they are made available to and are used by INEL personnel. The USGS has a strict policy of peer review of reports and final approval by its Director. This process provides technical accuracy and improves the overall quality of the reports. However, the review and printing phases take considerable time. It is inappropriate to publish interpretive material in the EIS prior to official publication by the USGS. However, data in USGS monitoring reports that have not been subjected to the review and publication phases within USGS have been reviewed to note any changes affecting the technical accuracy of the information contained in the Final EIS, and the appropriate changes have been made.

5.12.4 Comment:

It was requested that a discussion of the effects of the designation of the Snake River Plain aquifer as a sole-source aquifer by the EPA be included.

Response:

The sole-source designation for the Snake River Plain aquifer would mean that any construction project that receives Federal financial assistance and has the potential for polluting the aquifer would be subject to special EPA review to ensure that contamination would not occur.

The EPA made a detailed review of the Snake River Plain aquifer and commissioned the USGS to prepare a report concerning the aquifer. After hearings, the EPA made the following decision on January 16, 1985, in a general news release:

> Commitment by the state of Idaho to a comprehensive groundwater protection strategy for the Snake Plain Aquifer has prompted the U.S. Environmental Protection Agency to postpone any Final action on the pending "sole source" designation for the aquifer.
>
> Announcement of the postponement was made today (January 16, 1985) in Seattle by Ernesta B. Barnes, EPA's Northwest regional administrator.
>
> "The Idaho Department of Health and Welfare, as the lead agency, will be developing a coordinated state-wide groundwater protection program. Its special emphasis on protecting the Snake River Plain Aquifer goes beyond the scope of EPA's review authority under a sole source designation," Barnes said. "For that reason, EPA has decided to postpone final action on the sole source proposal."

The EPA has contacted staff at a number of Federal agencies which oversee Federally funded projects, according to Barnes. They have indicated their willingness to submit their projects to EPA for review without EPA first formally designating the aquifer as a sole source.

"Equivalent EPA protection for the aquifer, without the administrative costs associated with designation, will be provided," Barnes said.

Barnes also said EPA is reviewing Idaho's request for more than $100,000 in a no-match Federal grant to the Department of Health and Welfare to help the state attain its objectives for groundwater protection. The work program places special emphasis on groundwater protection for the Snake River Plain aquifer.

Because of the strong feelings to let Idaho manage Idaho's water and the number of groups and individuals against designating the Snake River Plain aquifer as a sole-source aquifer, it is doubtful that this will occur. The EPA has reviewed and commented on this EIS; therefore, a discussion of the effects of such a designation is not included in the Final EIS.

5.12.5 Comment:

Concern was expressed that SIS wastes could not be safely disposed of at the INEL because research on the effects of generating large amounts of nuclear waste appears inadequate. Storage of wastes at the INEL is also unacceptable because the INEL is above the Snake River Plain aquifer, the Snake River Plain is geologically active, and contamination of the aquifer would be devastating.

Response:

Response:

Response:

were considered good practices and which met drinking water standards and other applicable environmental regulations. Improved waste management practices have reduced the chances of waste migration to a minimum. Current monitoring results indicate that the detected levels of these contaminants do not pose a health threat and that the plutonium would not reach the Snake River Plain aquifer in detectable quantities. For additional information on the aquifer, see the response to comment 5.12.1.

5.13 HEALTH EFFECTS

5.13.1 Comment:

It was noted that the Draft Environmental Impact Statement (EIS) underestimates the potential radiation health impacts by failing to consider the accumulated exposure over the life of the Special Isotope Separation (SIS) Project, and the fact that radiation risks are additive.

Response:

As stated in Section 4.1.2.3 and Appendix A, Section A.1 of the Draft EIS and the Final EIS, doses from routine releases were calculated on an annual basis (i.e., the normal operational doses are based on the potential annual releases of radioactive material from the SIS Plutonium Processing Building). The doses, which are calculated for both routine and accidental releases, are committed dose equivalents (i.e., they are the sum of the internal 50-year doses received by an organ or the whole body from ingestion and inhalation during 1 year from exposure to radionuclides in the air and deposited on the ground). Section 4.5.1.4 of the Draft EIS and the Final EIS compares the annual doses against the appropriate regulatory standard for atmospheric emissions [i.e., the U.S. Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP)]. If the annual radiological doses were to be multiplied by any assumed lifetime of the SIS Project, the potential radiological doses and risks would still be extremely small. An analysis of 30 years of SIS operation that includes accumulated radiological doses has been provided in the Summary and Section 4.5 of the Final EIS. The cumulative population effective dose equivalents from continuous operation at maximum throughput over the design life of the facility (30 years) are 2.1×10^{-6} person-rem, 3.3×10^{-5} person-rem, and 6.9×10^{-5} person-rem for the Idaho National Engineering Laboratory (INEL), Hanford, and Savannah River Plant (SRP), respectively. Exposure to radioactive releases from continuous operation of the SIS Project would result in a maximum of 6.9×10^{-10}, 1.1×10^{-8}, and 2.3×10^{-8} latent cancer fatalities for the INEL, Hanford, and SRP, respectively. Similarly the resulting genetic effects for INEL, Hanford, and SRP are 5.1×10^{-11}, 7.5×10^{-10}, and 1.7×10^{-9}, respectively. These values are included in Section 4.5 of the Final EIS.

5.13.2 Comment:

It was noted that the model doesn't take into account the effects of radiation on children.

Response:

The models used to calculate the radiological doses presented in the Draft EIS and the Final EIS are based on International Commission on Radiological Protection (ICRP) Publications 26 and 30. Age-specific parameters for radiological assessments based on ICRP 26 and 30 have not yet been validated. The Nuclear Regulatory Commission (NRC) presently uses dose conversion factors based on ICRP 2 (NUREG-0172), which predates ICRP Publications 26 and 30. Application of the dose conversion factors in NUREG-0172, while resulting in a potentially higher dose to children from plutonium releases (i.e., a factor of about 2), would also result in lower doses to adults. For this EIS, the NUREG-0172 dose conversion factors have not been applied because they predate ICRP Publications 26 and 30.

5.13.3 Comment:

It was noted that the Draft EIS and the Final EIS underestimate (by a factor of 10 compared to estimates by Goffman, 1981) the radiation health impact by averaging absolute and relative risk estimates. It was stated that an arithmetic average of absolute and relative risks has no meaning, and that a range of risks would be more appropriate.

Response:

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Response:

5.13.5 Comment:

It was noted that a comparative analysis should be made of the national incidence rates of congenital abnormalities and those potentially resulting from radioactive releases from the SIS Project, and that the results of this analysis should be presented in the EIS.

Response:

BEIR-III states that at radiation levels at or below background levels, there is no method to distinguish whether developmental effects result from radiation or from other causes. Operation of the SIS Facility would not change the range of background radiation levels sufficiently to alter the present incidence rate of developmental changes in unborn children.

5.13.6 Comment:

It was noted that the Draft EIS should state what method of extrapolation was used for latent cancer risk; specifically, for low Linear Energy Transfer (LET) radiation, whether the linear, linear-quadratic, or quadratic method was used.

Response:

Appendix A of the Draft EIS and the Final EIS presents a detailed discussion of radiation-induced health effects and includes all the assumptions made to calculate cancer risks. There are three methods to extrapolate the cancer risks observed at the relatively high dose rates down to the low dose rates caused by most nuclear facilities (i.e., the linear model, which represents an upper limit or maximum risk; the linear-quadratic model, which represents an intermediate risk; and the quadratic model, which represents a low-limit or a minimum risk). For high-LET radiation (see Appendix A, Section A.1, of the Draft EIS and the Final EIS for an explanation of the radiological terminology used), the linear model represents the best estimate for probable risk. It was used for health-effects calculations performed for the Draft EIS, as stated in Appendix A, because high-LET radiation is associated with the majority of the SIS Project radioactive releases. In addition, because only about 40 years of cancer incidence data have been collected on the survivors of atomic bomb blasts, the data do not account for all the cancers that might develop because of the bombs' radiation. Two projection models have been developed to account for these future cancer deaths: (1) the absolute-risk model, which assumes that the cancer rate (risk per year) observed since the atomic bomb blasts (Hiroshima and Nagasaki) will continue throughout the life spans of those exposed; and (2) the relative-risk model, which assumes that the excess radiation-induced risk is proportional to the natural incidence of cancer with age. The relative-risk model results in cancer-risk estimates greater than those predicted by the absolute-risk model. However, the BEIR-III report states that the absolute-risk model is generally more applicable to most forms of cancer. The cancer-risk estimates used in the EIS represent an average of those calculated using the absolute-risk and relative-risk models.

5.13.7 Comment:

Reviewers stated that the health physics data presented on pages 4-12 through 4-14 of the Draft EIS are the kind of information essential to evaluate the health impact of the SIS Project, and should be included in the Final EIS.

Response:

The health physics information presented on pages 4-12 through 4-14 in the Draft EIS is retained in the Final EIS.

5.13.8 Comment:

Reviewers stated that the Draft EIS ignores the supralinear technique of dose/response, which is more valid and conservative.

Response:

The supralinear technique (i.e., a method of extrapolating health effects based on a curve) presented in Goffman was not used in this EIS because it has not been verified as an accepted methodology for the evaluation of potential health effects by any known Federal or state agency. As stated in the Final EIS, the BEIR-III linear model, the most conservative model accepted, was used to estimate health risks resulting from SIS operations.

5.13.9 Comment:

Reviewers stated that the estimate of cancer risk based on studies around nuclear facilities (such as Rocky Flats) has not been considered in the Draft EIS.

Response:

Routine atmospheric radioactive releases from commercial nuclear power plants are controlled such that they result in environmental doses well below the strict limits set by the EPA (25 mrem/yr to the whole body and 75 mrem/yr to the critical organ). It is widely accepted by the scientific community that routine environmental radioactive releases from commercial nuclear power plants will not result in leukemia clusters. Because the SIS Facility's environmental doses would result in doses much lower than those resulting from commercial nuclear power plants, it can conservatively be concluded that leukemia clusters would not be caused by the projected very low radioactive releases.

It should be noted that the laws of probability predict that clusters of rare diseases, such as leukemia, will occur at random. These clusters may be near nuclear sites or far from them.

Existing cancer data concerning Rocky Flats or any other nuclear site would not be statistically significant because of their relatively low levels of radioactive emissions, and therefore cannot be used as factual controls. However, the risk estimators used to predict health effects following exposures to low-level radiation were obtained following extensive studies conducted by world-renowned scientific organizations. Cancer data from survivors of the Hiroshima and Nagasaki bombs were used by BEIR-III to obtain the risk estimators used in the SIS analyses.

5.13.10 Comment:

Reviewers disagreed that health effects resulting from the SIS Project would amount to only an insignificant fraction of the cancers due to normal background radiation.

Response:

The committed dose and the corresponding health effects imparted to the maximally exposed individual from annual and cumulative routine releases from the SIS Facility would be very small. They

are less than one-hundred-thousandth of the dose and corresponding health effects that could be imparted to an individual from a full-body x-ray or scan. Such minute increases in risk are considered insignificant in other industries and can be similarly considered insignificant in the SIS Project.

5.13.11 Comment:

Reviewers stated that the Draft EIS should more thoroughly address the public health effects resulting from postulated accidents. Concern was expressed that health effects were derived assuming full filter efficiency.

Response:

Section 4.1.3.1 of the Final EIS was modified to present the offsite consequences and health effects for degraded filter efficiencies considered for each of the accidents discussed.

5.13.12 Comment:

Reviewers stated that the health effects assessment contained in the Draft EIS is flawed on scientific and epidemiological grounds and should be redone.

Response:

The health effects presented in the EIS were calculated using a conservative health risk estimator of 280 cancer fatalities per million person-rem and 257 genetic effects per million person-rem. For high-LET radiation a quality factor of 20 is applied. To determine risk estimates from high-LET radiation, epidemiological data were available only for radon, radium, and thorium. For radon, BEIR-IV reports lower organ health-risk estimators than those used in the EIS for plutonium. Estimates of risk for transuranic elements cannot be derived from human epidemiological studies (BEIR-IV, p. 337).

5.13.13 Comment:

Reviewers expressed concern about potential health effects associated with the SIS Project because of reported higher incidence rates of cancer and/or birth defects around and downwind of INEL, Hanford, and other nuclear facilities. It was requested that further research be done and that this issue be discussed in the EIS.

Response:

The Draft EIS and the Final EIS demonstrate maximum credible exposures at millirem levels (levels that epidemiologists have recognized would require the exposure of millions of people before any effects would be demonstrated). Extensive effluent and environmental monitoring at each of the candidate sites, as documented in publicly available annual monitoring reports, indicates that maximum calculated public exposures from all past operations are in the range at which observable effects would not be expected. Studies have been made and are continuing which verify these expectations.

Counties surrounding the INEL have experienced lower total cancer rates than those in more remote locations. The small population and small number of specific cancer cases result in large statistical variations in yearly rates without any associated significance (i.e., large fluctuations are expected because of the small sample). Some investigators have selectively separated apparent

increases in specific cancers without noting the overall low averages and the statistical variability to be expected. No scientifically sound impact on health effects has been demonstrated; rather, the available data indicate the expected "no-effect" results.

5.13.14 Comment:

It was stated that the health risks associated with the SIS Project would be too high, that the impact of the SIS Project would be a detriment to health, and that the impact would be measured in human lives.

Response:

Environmental doses and health risks resulting from normal operational releases from the SIS Facility would be extremely small (see the response to comment 5.13.1). The potential radiological risks from accidents presented in the EIS, while presenting greater risks to the population and environment than those from normal operations, would be about one one-hundreth (i.e., 1/100) of the criteria used by the NRC for siting a commercial nuclear reactor (10 CFR 100).

5.13.15 Comment:

Reviewers expressed concerns about potential long-term effects on workers and residents around the U.S. Department of Energy (DOE) facilities.

Response:

The National Academy of Science's BEIR Committee has stated that it cannot determine whether or not low levels of radiation such as those resulting from the SIS Project are detrimental to humans. Thus, the committee conservatively assumed that radiation-induced health effects would occur at all levels of exposure. The risks of health effects at low levels are extrapolated from observations at high levels of exposure to ensure that uncertainties associated with low levels of exposure are reduced in estimating potential health effects. See also the responses to comments 5.13.13 and 5.13.16.

The EIS assesses the potential environmental consequences of the construction and operation of the SIS Project, including its potential cumulative long-term impacts on human health and the environment. In assessing the potential impacts of the SIS Project, conservative assumptions (i.e., those which estimate higher consequences) were used to bound the upper limit of potential adverse impacts. The impact of SIS annual and cumulative affects (i.e., 30 years) are presented in Chapter 4 of the Final EIS.

All radiation exposures to workers and residents from the SIS operations will be maintained within regulatory limits and as low as reasonably achievable below these limits. These limits are established for the expressed purpose of guarding against long-term radiation induced health effects. In order to monitor compliance, workers who are potentially exposed to radiation at DOE facilities are provided with monitoring devices and the results of this monitoring are made available to these individuals. Also, environmental monitoring programs are maintained and the results reported to the public. For the 10-year period between 1975 to 1985, only 0.0001 percent of all DOE and DOE contractor personnel exposures to radiation resulted in excesses to DOE's 5-rem standard.

5.13.16 Comment:

Reviewers stated that the effects of low-level radiation are greater than reported and may pose serious health effects.

Response:

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Response:

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Response:

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Response:

The Idaho Tumor Registry program is an on-going effort to collect data for a variety of purposes, one of which is the detection of major health effects to Idaho residents (in general) or those in specific reporting areas. Data from this registry show a lower than average cancer incidence rate in Idaho (compared with national averages) and a lower total cancer rate in the counties surrounding INEL than in the more remote counties. This indicates a lack of any major health effect from the INEL. Since the registry data can neither confirm nor refute the probable health effects from the SIS Project, these data were not included in the Final EIS.

5.13.20 Comment:

Specific references to appropriate studies regarding the nonmutagenicity of laser dyes (Technical Information Report) were requested.

Response:

This response provides references and clarifies the statement in the Technical Information Report with respect to laser dyes. The four dyes presently planned for use for the SIS Project are R4, R6, Rhodamine 6G (R6G), and P6F. The first three of these are basic dyes of the xanthene series and are prepared and purified as tetrafluoroborate compounds. P6F is produced as a perchlorate salt. In these forms all dyes have been evaluated for mutagenicity using Ames/Salmonella microsome test procedure. In all the tests there was no indication of mutagenic behavior.[1,2,3]

The first two dyes, R4 and R6, have been synthesized for the SIS mission. P6F is a commercially available laser dye also known as LD700. R6G is a well-established commercial dye developed over 50 years ago and now prepared in various forms and with various purities in quantities exceeding 100 tons per year. This dye is used extensively for coloring drugs for internal use, mouthwashes, lipsticks, toothpastes, soaps, and lacquers, and in pigments for printing ink, cosmetics, crayons, pastels, and leather and paper dyes.

Over the years, several investigators have tested R6G, which had a variety of generally unknown chemical purities and compositions, for mutagenicity. Two in vitro studies in the 1970s produced negative results for mutagenicity,[4,5] Earlier work in Japan produced tumors in rats from repeated injections (average of 100 injections) but the test dosages (an average of nearly 100 mg for a 200-gram rat) and control on the tests and materials were not consistent with presently accepted testing procedures.[6] A study on the biological effects of dyes on living tissue indicates that repeated injections of toxic substances may generate tumors by the trauma rather than by chemical carcinogenesis.[7] Nestmann et al. published results that indicated positive mutagenic activity, but in response to discussions with the authors of Reference 3, Nestmann indicated that impurities could be responsible for his results.[8] The workers (Reference 3) attempted to reproduce Nestmann's results with R4, R6, P6F and R6G, but were unable to do so with the SIS dyes.

Although the evidence for mutagenicity of properly purified R6G is weak, R6G has been identified, on the basis of the earlier tests, as a possible animal carcinogen. This identification is to be contrasted with two more serious categories of (a) human carcinogen, or (b) positive mutagenic activity in two or more mammals.

The National Toxicology Program is conducting a comprehensive cancer bioassay program that will include R6G in the survey. Results from this work will not be available for a year or more. In any case, all dyes used in SIS operations would be handled and designed for as possible carcinogens.

References:

1. In Vitro Microbiological Mutagenicity Assays of Compound A(R4), Final Report: SRI International Study No. 386M-87-008 (Oct. 1987).

2. In Vitro Microbiological Mutagenicity Assays of Compound B(R6), Final Report: SRI International Study No. 386M-87-009 (Oct. 1987).

3. Webbles, B.J.W., and J.S. Felton, "Evaluation of Laser Dye Mutagenicity Using the Ames/Salmonella Microsome Test," Environmental Mutagenesis 7:511-522 (1985).

4. Kada, T., K. Tutikawa, and Y. Sadais, "In Vitro and Host-Mediated 'rec-assay' Procedures for Screening Chemical Mutagens: and Phloxine, a Mutagenic Red Dye Detected," Mutation Research 16:165-175 (1972).

5. Au, W., and T.C. Hsu, "Studies on the Clastogenic Effects of Biologic Stains and Dyes," Environmental Mutagenesis 1:27-35 (1979).

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5.13.21 Comment:

It was requested that Chapters 2, 4, and Appendix A of the Draft EIS be revised to reflect that the effects of low doses of ionizing radiation are hypothetical and are based on an assumption with respect to the shape of the dose-effect curve.

Response:

Chapter 4 (Section 4.1.2.3) and Appendix A (Section A.1.2) of the Final EIS have been modified to indicate that the health effects/risks could be less than presented in the Draft EIS, since the linear model has been used to extrapolate the cancer risks observed at relatively high dose rates down to the low doses associated with SIS operations.

5.14 HIGH-LEVEL WASTE

5.14.1 Comment:

It was noted that high-level waste is not addressed in the Draft Environmental Impact Statement (EIS) for the Special Isotope Separation (SIS) Project.

Response:

No high-level waste would be produced in the proposed SIS process. Estimated waste quantities generated from the SIS facilities are listed in the EIS (Section 2.1.5.1) and include transuranic (TRU) waste, low-level radioactive waste, hazardous waste, and mixed waste.

5.14.2 Comment:

It was noted that calcine storage bins (at the Idaho Chemical Processing Plant) may not have been designed and constructed properly.

Response:

Calcine storage facilities (bin sets) are designed and constructed to appropriate commercial and nuclear codes and requirements. The reinforced concrete vault for Bin Set 6 (referred to by commentor) was designed and constructed to ACI-318, Building Code Requirements for Reinforced Concrete. Conservatism in the design of Bin Set 6 has been confirmed during design of Bin Set 7, which was designed to requirements ACI-318 and ACI-349, Code Requirements for Nuclear Safety Related Concrete Structures. Bin Set 6 meets all applicable requirements. Since bin set vaults are not pressure vessels, ACI-359 is not applicable.

5.15 HISTORIC RESOURCES

Comment:

It was stated that the archeological survey conducted by Idaho State University (ISU) and referenced in the Draft Environmental Impact Statement (EIS) was incomplete and did not include historic farm sites and former irrigation projects located near the Idaho Chemical Processing Plant (ICPP) area. The comment concludes, however, that the U.S. Department of Energy (DOE) would take the necessary measures to assure protection and preservation of historical artifacts.

Other reviewers stated that the historic resources section of the Draft EIS was incomplete. Specifically, it was stated that paleontological resources, proposed construction monitoring, prehistoric sites, and details on the survey conducted were not addressed.

Response:

Section 3.1.3.6 of the Final EIS contains an expanded discussion of historic, archeologic and paleontologic resources. As stated in the Final EIS, according to the archeological survey of the ICPP, no archeologic or historic sites were identified within the area bounded by the ICPP site and new Special Isotope Separation (SIS) facilities, including those outside the ICPP perimeter fence. Details on how the survey was conducted and findings may be found in Reed et al. (1986). The survey, conducted by the ISU Swansoen/Crabtree Anthropologic Research Center, included prehistoric and paleontologic resources. If, during construction, archeologic or paleontologic resources are encountered, work will be stopped and a qualified archeologist will be retained to evaluate the significance of the resource and to make recommendations regarding its protection.

5.16 HYDROLOGY

5.16.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) failed to adequately address hydrologic effects or the use of an injection well.

Response:

Sections 3.1.4.4, 4.1.1.3, and 4.1.2.2 of the Draft EIS and the Final EIS characterize and discuss the potential hydrologic impacts for locating the Special Isotope Separation (SIS) Project at the Idaho National Engineering Laboratory (INEL). The SIS Project at the INEL would neither directly discharge to surface waters nor discharge hazardous or radioactive liquid effluents. Sections 4.1.1.3 and 4.1.2.2 discuss impacts relative to water withdrawals.

As stated in Section 3.1.4.4 of the Draft EIS and the Final EIS for the practice of using an injection well for disposal of Idaho Chemical Processing Plant (ICPP) liquid wastes was replaced in February 1984 with the practice of using percolation ponds. The SIS Project would discharge only nonhazardous and nonradioactive liquid effluents to a new percolation pond which would be located at the ICPP.

5.16.2 Comment:

Reviewers were concerned, should the SIS Facility be sited at the Hanford reservation, with water withdrawals from the Columbia River, including the timing and the effects of water withdrawals on fish.

Response:

The use of water, if the SIS Project were located at Hanford, is very minimal compared to the flows of the Columbia River. The average flow rate of the Columbia River is 120,000 cubic feet per second (cfs) and the use of water by the SIS Project would be 0.64 cfs at steady-state (average flow) during operation. A withdrawal of less than 1 cfs would not have any effect on the flow or the fish of the Columbia River, even during periods of low flow (i.e., 36,000 cfs below the Priest Rapids Dam). The facilities for withdrawal of water from the Columbia River are already in place, and there is ample capacity for the water needs of the SIS Project if it is located on the Hanford Reservation.

5.16.3 Comment:

Concern was expressed for the existence of, or the potential need to acquire, an additional State of Idaho water right for the SIS Facility, taking principles of state's rights into account.

Response:

INEL state water permits provide water uses for industrial, potable, soil conservation, irrigation and domestic purposes. No change in diversion points under state law is currently planned as a result of the SIS Project. The U.S. Department of Energy (DOE) is cognizant of the principles of state water rights, and these have not been overlooked in the exercise of DOE's water rights. DOE is currently participating in the State of Idaho General Adjudication of Rights to the Use of Water from the Snake River Basin Water System. As the state noted in its comments, in the event that a new state water right is needed under state water law, the Swan Falls Agreement allows appropriation of water for industrial purposes.

5.16.4 Comment:

It was stated that the SIS Project's use of water from the Snake River Plain aquifer would be only three hundreths of one percent of irrigation withdrawal.

Response:

The Final EIS in Section 4.1.2.2 identifies that, based on current design, the annual SIS water withdrawals would approximate 0.04 percent of the amount withdrawn for irrigation.

5.17 INJECTION WELLS

5.17.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) implied illegal use of injection wells. It was asked what emergency situation would require discharge into the injection well and if the Special Isotope Separation (SIS) Project would increase the likelihood of injections.

Response:

The former use of the injection well for discharge of effluents was in compliance with applicable regulations at the time of its use. After the percolation ponds were constructed, the U.S. Department of Energy (DOE) voluntarily discontinued the use of the well except under emergency conditions. Current plans are being developed to cap and plug with cement, in accordance with Idaho Department of Water Resources Rules for Construction and Operation of Injection Wells (August 1984), the Idaho Chemical Processing Plant (ICPP) injection well in 1989. Thus there will be no emergency situation that would require effluents from the SIS Project to be discharged to the injection well, and the likelihood of such a discharge is zero.

5.17.2 Comment:

It was stated that low-level waste/radioactive materials and/or toxic wastes have been released to the ICPP injection well and then to the aquifer, and that such injection of wastes was halted because of public protest. It was also stated that there may be more than one ICPP injection well.

Response:

The former use of the injection well for discharge of effluents was in compliance with applicable regulations at the time of its use. There is only one injection well at the ICPP, and most of the waste discharged was nonhazardous and nontoxic and was below the prescribed DOE limits for radionuclides. DOE voluntarily discontinued use of the injection well and now is using percolation ponds for disposal. See the response to comment 5.12.1 for information on the aquifer.

5.17.3 Comment:

It was stated that the use of injection wells for the SIS operations should be precluded. It was also stated that page 5-12 of the Draft EIS should be amended to reflect that Idaho permits emergency use of injection wells, if that is a true statement. It was requested that alternative contingency plans be included in the Final EIS if injection of radioactive effluents is contrary to Idaho regulations.

Response:

A permit application was filed with the State of Idaho covering emergency use of the well when the State of Idaho obtained jurisdiction with respect to injection wells. Subsequently, use of the injection well at the ICPP was voluntarily discontinued by DOE. Therefore, permits and contingency plans are not required. See the response to comment 5.17.1 for additional information.

5.18 LIQUID EFFLUENTS

5.18.1 Comment:

It was noted that the Environmental Impact Statement (EIS) states that discharges will meet all appropriate state/Federal standards. It was also stated that a discussion of the probable composition of the waste stream going to the service waste system would be very helpful. A thorough familiarity of this waste stream would enable a more representative sample to be collected from what would perhaps be a very heterogeneous matrix.

Response:

Table 2-5 of the Final EIS indicates that the only routine liquid waste streams to be discharged to the service waste system would be process steam condensate and cooling tower blowdown. Chemicals used in cooling water treatment are listed in Table 2-8. The potential composition of the discharge may be obtained by dividing the chemicals for cooling water treatment listed in Table 2-8 by the annual amount of water discharged to the service waste system listed in Table 2-5.

5.18.2 Comment:

It was requested that the Draft EIS should contain a more detailed description of the Special Isotope Separation (SIS) waste-water constituents (radionuclides, chemicals, and other contaminants) in order to evaluate possible cumulative impacts from combining SIS effluents with those from the Idaho Chemical Processing Plant (ICPP).

Response:

See the response to comment 5.18.1 regarding characterizing liquid discharges that would be routinely sent to the service waste system. In addition to liquid discharges that would be routinely discharged, discharges to the service waste system might include those from floor drains. Liquid waste streams from floor drains would be collected in a tank and sampled to ensure that no hazardous or radioactive effluent would be discharged to the service waste system. A characterization of the potential constituents in the liquid waste stream from floor drains is not possible due to the varied collection points; however, the volume of effluent is expected to be negligible.

5.18.3 Comment:

It was requested that the Final EIS contain estimates of the volume of water to be used/sent to the percolation ponds, etc. The Final EIS should clearly state that the proposed quarantine tanks should be of sufficient size and numbers to ensure total isolation and sampling prior to discharge to the ICPP.

Response:

The volume of water that would be sent to the service waste system, which discharges to the percolation pond, is listed in Table 2-5 of the Final EIS. As part of DOE's goal of improving waste management practices, a new percolation pond or ponds will be constructed at ICPP. The SIS liquid effluents will be discharged to the new ponds, not the existing ponds. As depicted in Figure 2-9 of the Final EIS, the preliminary liquid effluent flow diagram incorporates revisions that were made in the design of the liquid effluent system following the issuance of the Draft EIS. As shown in Figure 2-9, a building quarantine tank is no longer proposed, and catch tanks of appropriate size to contain all liquid waste streams would be used to ensure isolation and sampling prior to discharge.

5.18.4 Comment:

Reviewers stated that all liquid discharges would meet Environmental Protection Agency (EPA) drinking water standards, current DOE Orders, and all current Draft regulations, which would ensure protection of the aquifer. Other reviewers indicated that they wanted no discharge of liquid radioactive wastes.

Response:

Liquid discharges from the SIS Project to the ICPP service waste system would contain no radioactive or hazardous constituents, and the concentrations of all constituents would be below all applicable EPA standards, EPA drinking water standards, DOE Orders, and State of Idaho standards.

5.18.5 Comment:

Reviewers asked whether, if the proposed SIS waste-water treatment is less effective than expected, SIS Project waste water would simply be diluted and discharged like ICPP waste water. They also inquired as to the probability that the SIS waste-water treatment system would fail or that the waste water would be diluted.

Response:

As depicted on Figure 2-9 of the Final EIS, which reflects the current design of the SIS liquid waste system, no liquid waste streams released to the service waste system are treated. Failure or degraded treatment capability is therefore not a relevant issue.

The ICPP does not dilute wastes in order to meet standards. Each waste stream to service waste is analyzed for hazardous constituents and radioactivity. Only if the waste stream is found to be nonhazardous and nonradioactive is it released to the service waste system. Upgrades of the service waste system will be operational by summer 1991, further decreasing the radioactive constituents going to the service waste system.

5.19 MONITORING

5.19.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) discussion of offsite monitoring should be clarified and the location of Idaho National Engineering Laboratory (INEL) environmental monitoring sites should be identified.

Response:

Figures 3-10 through 3-14, showing the environmental monitoring locations, were added to the Final EIS.

The Final EIS contains an expanded discussion of the environmental radiological monitoring program. The discussion clarifies that the distant (offsite) monitoring locations serve as background controls, which are much less affected by any radioactive releases associated with INEL operations.

5.19.2 Comment:

It was requested that the annual range, along with median and mean measurements, be provided for each environmental monitoring location at the INEL. It was also suggested that the projected increase at each location as a result of Special Isotope Separation (SIS) emissions be included.

Response:

Environmental monitoring data for the INEL are published annually in the Environmental Monitoring Program Report for INEL. These data include the mean (arithmetic or geometric), standard deviation (arithmetic or geometric), and ranges for applicable sample media and locations. Medians are not typically reported for environmental monitoring data. SIS operational emissions are projected to cause no detectable increases in the levels of plutonium measured in the environment at any of the monitoring locations.

5.19.3 Comment:

Concern was expressed that the animal monitoring program should be increased in scope to include (1) all species in the impact area, and (2) increased sampling frequency to quarterly and then to monthly in the event of "above normal" releases of contaminants.

Response:

The existing animal monitoring program is extensive and includes onsite sampling of game birds, game fish, game animals, beef, cattle, and sheep. See the 1987 Environmental Monitoring Program Report for the Idaho National Engineering Laboratory Site. The results of onsite animal sampling and onsite air monitoring over the past 15 years and the results of air sampling offsite demonstrate that there is no need to sample animals offsite. In addition, it is believed that some sampling for extremely low concentrations of radionuclides is better conducted as an intensive research project rather than as a regular, but more limited, monitoring effort. Therefore, it is not necessary that all species be sampled; only representative species should be sampled.

It is unclear whether the comment on increased frequency applies to the frequency of the total environmental monitoring program or only sampling in the food chain. Since some air samples are analyzed on a daily basis, and milk is sampled both weekly and monthly, it was assumed that the comment

applies to items in the food chain. Samples are timed for collection to maximize radionuclide accumulation. For example, sheep and beef cattle are sampled at the end of their onsite grazing, wheat and lettuce at the end of the growing season, and fish shortly before the Big Lost River stops flowing onsite, if it flows for more than a few days. In the event of a significant accidental release, the need for additional sampling of representative food chain materials would be evaluated and sampling would be implemented if a reasonable chance of finding elevated concentrations existed. It should also be noted that the dose calculations presented in the Draft and the Final EIS presume maximum ingestion of contaminated food and milk.

5.19.4 Comment:

Concern was expressed about the adequacy of monitoring at the INEL. Some stated concerns over the lack of comprehensiveness of the monitoring program both onsite and offsite and remarked that the monitoring program cannot detect problems until they are irreversible. Conversely, others stated that the routine monitoring at the INEL is comprehensive, thorough, and assures compliance with applicable regulations.

Response:

The INEL monitoring program is comprehensive and complies with all applicable regulations. However, the monitoring program is constantly reevaluated as new processes or projects start up, and this would be done for the SIS Project. For example, comprehensive monitoring on and around the INEL site would be instituted during each phase of the SIS Project. The monitoring program is designed to detect (if detectable) trends in concentrations of pollutants in environmental media so that potential problems are identified before they become real and so that mitigative measures can be taken. See the responses to comments 5.19.3 and 5.19.6 for additional information on plans for the monitoring program.

5.19.5 Comment:

It was asked if the Idaho Department of Health and Welfare would be "kept up to speed" on results of expanded monitoring studies.

Response:

The Department of Health and Welfare is being kept informed of all monitoring studies and results through meetings held at two-month intervals.

5.19.6 Comment:

It was requested that funding be allocated to an independent or state monitoring agency with the technical background to work with the U.S. Department of Energy (DOE) in monitoring environmental impacts, including those on the Snake River Plain aquifer, and developing independent reports on the results.

Response:

The State of Idaho has a working agreement with DOE whereby the state may obtain portions of any samples collected by DOE or the U.S. Geological Survey (USGS), onsite or offsite. That agreement would be expected to continue, and suggestions for improvements have been requested from the State of Idaho. However, DOE policy prohibits direct funding of regulatory agencies except for uniformly assessed fees. In consultation with the State of Idaho, DOE is establishing a contract with Idaho

State University (ISU) to provide independent verification of the environmental monitoring program at the INEL. DOE would fund the contract, and ISU would furnish its findings to both DOE and the State of Idaho. Thus, the data on which the state may base regulatory decisions would be gathered by state employees and their students, and would be fully available to the regulatory bodies of the State of Idaho.

5.20 OCCUPATIONAL SAFETY

5.20.1 Comment:

Reviewers made general statements on the Draft Environmental Impact Statement (EIS) discussion of occupational safety. It was stated that the EIS underestimated and covered up work exposure in the vicinity of the Idaho Chemical Processing Plant (ICPP); that impacts to employees have not been fully addressed; that the occupational dose to a construction worker at the Savannah River Plant (SRP) was not included in the summary; that Chapter 4 of the Draft EIS should be expanded to include routine occupational doses to Special Isotope Separation (SIS) workers; that an in-depth study of onsite worker doses had been deferred to a later date; and that many of the concerns regarding worker safety were not thoroughly explored.

Response:

Surveys of ground-level sources of external radiation in and around the ICPP area are routinely conducted as part of the ongoing Idaho National Engineering Laboratory (INEL) environmental monitoring program. The most recent of these surveys provided the basis for the analysis of construction worker exposure discussed in the Draft and the Final EIS. Results of these routine surveys are published as they are performed, in annual monitoring reports that are publicly available and thus not "covered up."

The Draft EIS discussion of occupational safety (Section 4.1.4) presented the potential radiological impacts to construction workers as well as potential injuries and deaths from construction accidents, the radiological and other exposures to workers in the ICPP area from normal and accidental releases of SIS operation, and discussed the requirements to be met to comply with the U.S. Department of Energy's (DOE's) safety goal to maintain occupational exposures as low as reasonably achievable (ALARA). As identified in the Draft EIS, an in-depth analysis of potential SIS occupational exposures to workers within the SIS Plutonium Processing Building is being conducted as part of the on-going safety analysis on routine occupational exposures to workers in the SIS Facility. Current data available from this analysis have been included in the Final EIS in Section 4.1.4.

The occupational dose of 15 millirem to a construction worker at the SRP has been included in the summary and Section 4.3.1 of the Final EIS.

5.20.2 Comment:

It was stated that exposure to radiation from working in the nuclear industry was not significant due to current protection standards and entailed a lesser risk than occupations in other industries or recreational activities like skiing. Others stated that the risk of plutonium radiation exposure to workers is too great.

Response:

The SIS Facility would be designed and operating procedures developed to continue the practice of reducing the risks to workers in accordance with the ALARA process. As discussed in Section 4.1.4.2 of the Draft EIS and the Final EIS, for the 10-year period between 1975 and 1985, only 0.0001 percent of all DOE and DOE contractor personnel exposures to radiation, which included DOE plutonium facilities, exceeded the current DOE occupational radiation safety standards. DOE's safety record is better than that of comparable commercial industries and the higher-risk skiing.

5.20.3 Comment:

Concern was expressed that the Draft EIS did not employ the work of Mancuso (1977), Wilkenson et al. (1987) and Chekoway et al. (1988), etc., to assess SIS impacts on workers.

Response:

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Response:

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Response:

surrounding most of the perimeter of the ICPP, compared to readings of less than 15 microrem per hour of background external radiation. As discussed in Section 4.1.4.1 of the Draft EIS and the Final EIS, measured external radiation measurements at the perimeter of the 200 Area at the Hanford Site were less than 2 microrem per hour as reported in the Environmental Monitoring at Hanford for 1987 (PNL-6464).

5.20.6 Comment:

It was stated that the Draft EIS was flawed, based on an analysis in which synthetic sources of radiation were derived from several sections of the Draft EIS (i.e., Chapters 3 and 4) and that the Draft EIS should be revised to (1) clearly state the annual dose increment to a construction worker from the SIS Project at the three alternative sites based on the reviewer's analysis, (2) clearly distinguish between synthetic and natural radiation sources, and (3) address the dose to workers located within 1 mile of the SIS site.

Response:

The doses to construction workers presented in the Draft and the Final EIS are based on measured sources of external radiation above background radiation multiplied by the fraction of the year that a construction worker would spend in the construction area (i.e., 2000 work hours divided by 8760 hours within a year). The information presented in Chapter 3 on background radiation, while applicable to the entire offsite INEL region, is not appropriate for assessing the potential onsite radiation doses to a construction worker at the INEL. The annual construction work dose at each of the three sites has been rereviewed and is considered to be appropriate as identified in Sections 4.1.4.1 and 4.3.4 of the Draft EIS and the Final EIS.

In the reconstruction of background radiation into synthetic and natural sources, there appears to be general confusion with respect to the use and comparability of external and internal sources of radiation (e.g., the value of 110-115 millirem identified by the reviewer as the value for offsite background radiation is based on annual measurements which only provide an external dose, and the dose of 93 millirem for SRP should be 64 millirem, as about 28 millirem per year of the SRP are from internal sources).

With respect to workers within 1 mile of the ICPP, the Draft EIS and the Final EIS (Section 4.1.4.2) list the dose to an INEL worker in the ICPP area as less than 3.0×10^{-8} rem. The collective dose to individuals would be this dose times the number of individuals of interest (e.g., assuming 800 individuals, the collective dose would be 2.4×10^{-5} person-rem.)

5.20.7 Comment:

Concern was expressed that maintenance activities, expected to yield the highest occupational doses, were not addressed.

Response:

Section 4.1.4.2 of the Draft EIS and the Final EIS addresses the operational safety impact and requirements for the SIS Project. Until the final facility design and proposed operations are fully analyzed, which would occur prior to the operational readiness review effort and startup, it is difficult to ascertain which normal operational or maintenance activity would yield the highest occupational dose; however, all worker exposures, including maintenance activities, would be within

radiation protection standards as specified by DOE Orders and will be ALARA. A special task force is currently evaluating potential worker exposures based on the present design, and is recommending methods to further reduce projected exposures in the SIS Facility design.

5.20.8 Comment:

Reviewers requested that the Final EIS include an assessment of the health impacts to workers as a result of enhanced operations of the ICPP.

Response:

The SIS Project would not cause additional radioactive emissions or discharges from existing ICPP facilities as the SIS Project is not connected to or dependent on the operation of existing ICPP facilities. As identified in Section 4.1.4.2 of the Draft EIS, the calculated whole-body committed dose to an ICPP worker due to the SIS Project would be 3.0×10^{-8} rem. A maximum of approximately 800 persons would work within 1 mile of the proposed SIS location. As identified in response to comment 5.20.6, the collective dose to these 800 individuals would be 2.4×10^{-5} person-rem.

5.20.9 Comment:

Reviewers stated that the SIS Draft EIS should report existing data on job-related health effects resulting from past INEL operations.

Response:

Detailed records of exposures to radiation are maintained of employees at the INEL and are reported to DOE (e.g., see the response to comment 5.20.2 and Section 4.1.4.2 of the Draft and the Final EIS). Results of medical tests, including bioassays, are also kept; however, medical records are not released or reported because of privacy restrictions. DOE is actively participating in a number of studies conducting health effects and epidemiological studies, including an industry-wide Health and Mortality Study of Workers. Results of research are periodically published in peer-reviewed scientific journals. Specific job-related health effects and injuries at the INEL are not included in the EIS, as these would not be representative of those that would be associated with the SIS Project.

5.20.10 Comment:

It was asked why the Occupational Safety and Health Act (OSHA) Right-to-Know regulations are not applicable to DOE facilities.

Response:

DOE imposes standards that are equivalent to the OSHA Right-to-Know regulations on its contractors operating DOE facilities at the INEL.

Section 4(b)(1) of the OSHA of 1970 grants the Atomic Energy Commission (and successor agencies, such as DOE) an exemption from administrative oversight by the OSHA Administration. However, the exemption requires that DOE maintain a safety program as effective as that required by OSHA. As a matter of policy, DOE Orders 5480.4 and 5483.1 adopt all current and future OSHA standards and require its contractors to comply with these standards, whether or not the contractor falls under the Standard Industrial Classification (SIC) codes referenced in the

OSHA standards. DOE thus requires its operating contractors to comply with these requirements, and routinely audits its contractors to ensure they are in compliance with the OSHA safety and health standards.

5.20.11 Comment:

Concern was noted that in reference to evacuation measures, Appendix A.2.5 of the Draft EIS had the statement, "In this assessment no evacuation or special sheltering measures were assumed."

Response:

Appendix A.2 of the Draft EIS and the Final EIS is a discussion of consequences from accidental releases of radioactivity. Sheltering and evacuation measures lead to reduced exposure and therefore lower radiation doses from airborne radioactivity. Thus, the assumption that there are no sheltering or evacuation measures provides overestimates of the radiation dose that may result from a release.

5.21 PERCOLATION PONDS

5.21.1 Comment:

Reviewers questioned: (1) how wet years and seasons with freezing weather will affect percolation; (2) if the ponds will be allowed to freeze over; and (3) what the anticipated seasonal depth of the ponds is.

Response:

Wet years and freezing weather have less effect upon the ponds than the volume of flow to the ponds. The bulk of the water in the ponds does not freeze over in the winter because the water coming into them is warm (70-80^{o}F) and there is a constant in-flow to the ponds. However, areas near the edges of the pond will freeze.

A change in rate of in-flow to the pond overwhelms the effect of any seasonal variation in natural percipitation on the depth of the water in the pond. There are two percolation ponds at ICPP and normally, the depth of water in pond 1 is about 8-9 foot in the 16-foot-deep pond. The water in pond 2 has reached only about a 1-ft depth to date.

5.21.2 Comment:

It was stated that the Special Isotope Separation (SIS) Draft Environmental Impact Statement (EIS) should have addressed the impact of the proposed Idaho Chemical Processing Plant (ICPP) evaporator working/not working on percolation pond seepage.

Response:

The volume of flow anticipated through the ICPP evaporator is small compared to the total flow to the percolation ponds. Therefore, the operation of the evaporator would not have a significant impact on the total volume of flow to the percolation pond and consequently no significant effect on seepage.

5.21.3 Comment:

It was stated that the U.S. Department of Energy (DOE) is now using percolation ponds; that the SIS Project's use of ICPP percolation ponds for waste water was not addressed adequately in the Draft EIS; and that the possible inadequacies of percolation ponds and infiltration beds are not discussed.

Response:

The use of percolation ponds and infiltration beds is an acceptable practice provided that the discharges to the percolation ponds and infiltration beds are controlled to levels that are below State of Idaho Environmental Protection Act (EPA) drinking water standards. The discharges from the proposed SIS Project would be nonhazardous and nonradioactive (i.e., they would include only cooling tower blowdown and process steam condensate that would be monitored prior to discharge) as discussed in Section 4.1.2.2 of both the Draft EIS and the Final EIS. As part of DOE's continuing goal to upgrade waste management practices, a new percolation pond or ponds will be provided at the ICPP. The pond(s) would be located in such a manner that it (they) would not interact with the existing percolation ponds. Only nonradioactive and nonhazardous effluents which meet all applicable Federal and state standards would be discharged to the new ICPP pond. The effluents from the SIS Project would be discharged to a new percolation pond being constructed for the ICPP.

5.21.4 Comment:

Concern was expressed over the quantity of waste water (> 200,000 gpd) to be sent to the percolation ponds, and the controversial nature of the ponds. It was requested that the Final EIS clearly state that the waste stream from the SIS Project would be discharged to a percolation pond that has never received hazardous waste, and that these ponds have sufficient capacity to dispose of the waste streams without using the injection well. It was recommended that the bottom sludge of the ponds be sampled on a quarterly basis to monitor contaminant buildup.

Response:

Between the issuance of the Draft EIS and the Final EIS, the design of the SIS liquid waste system was changed to separate liquid waste discharged to the service waste system from potentially contaminated waste generated in the Plutonium Processing Building (PPB). Additionally, as part of DOE's continuing goal to upgrade waste management practices, a new percolation pond or ponds will be provided at the ICPP. The pond(s) would be located in such a manner that it (they) would not interact with the existing percolation ponds. Only nonradioactive and nonhazardous effluents which meet all applicable Federal and state standards would be discharged to the new ICPP pond(s). This effluent represents water originally withdrawn from the aquifer being recharged to the aquifer.

Sampling of the bottom sludge in the existing ICPP percolation ponds has been and would continue to be performed twice a year in accordance with operating procedures.

5.21.5 Comment:

It was noted that the SIS Final EIS must address the "long-term use of percolation ponds contrary to DOE intent." It was stated that the use of these percolation ponds should be avoided because of the potential for buildup of waste constituents in the soil.

Response:

DOE's intent is to eliminate those practices that have resulted previously in the contamination of groundwater resources. For percolation and seepage ponds that have been used for hazardous and radioactive discharges, DOE is undertaking the necessary corrective actions to comply with the Resource Conservation and Recovery Act (RCRA). The use of percolation ponds for nonradioactive and nonhazardous liquid discharges is not contrary to DOE intent or Orders. To ensure that the proposed SIS Project would only discharge nonhazardous and nonradioactive liquid effluents, the liquid waste system design of the SIS Project has been changed since the issuance of the Draft EIS to specifically provide for the separation of potentially contaminated liquid waste streams (see Section 2.1.5.1 of the Final EIS). As part of DOE's continuing goal to upgrade waste management practices, a new percolation pond or ponds will be provided at the ICPP. The pond(s) would be located in such a manner that it (they) would not interact with the existing percolation ponds. Only nonradioactive and nonhazardous effluents which meet all applicable Federal and State standards would be discharged to the new ICPP pond(s). As stated in the Draft EIS and the Final EIS (Section 4.1.2.2), DOE considers the percolation ponds at ICPP to be interim measures. Studies and evaluations would continue to identify improvements or changes in operation that would more effectively dispose of liquid effluents.

The potential for buildup of contaminants in the soil beneath the existing percolation ponds is recognized by DOE. Sampling of bottom sludge has been and would continue to be performed in accordance with operating procedures.

5.21.6 Comment:

It was stated that the SIS Project would increase reliance on the use of percolation ponds. It was also stated that the SIS Draft EIS "needs to address planned ICPP percolation pond use that violates Idaho proposed groundwater standards."

Response:

As part of DOE's continuing goal to upgrade waste management practices, a new percolation pond or ponds will be provided at the ICPP. The pond(s) would be located in such a manner that it (they) would not interact with the existing percolation ponds. Only nonradioactive and nonhazardous effluents which meet all applicable Federal and state standards would be discharged to the new ICPP pond(s). The proposed SIS Project would increase the flow to the new percolation pond by approximately 12 percent. Discharges from the SIS Project to the new percolation pond would not be hazardous or radioactive and would therefore not violate Federal or state groundwater standards.

5.21.7 Comment:

It was noted that (1) a regular monitoring system characterizing the effluent entering the percolation pond should be established, (2) the bottom sludge of the pond should be sampled and analyzed regularly, and (3) assessment/remediation procedures should be proposed in the event that the pond(s) become contaminated.

Response:

All effluents from the ICPP discharged through the service waste system to the percolation pond are monitored and characterized on a regular basis. In addition, all waste streams to be sent to the service waste system are sampled and analyzed prior to discharge to ensure that they are nonhazardous and nonradioactive, below DOE concentration guidelines for radioactivity and meet all appropriate Federal and state regulations. The bottom sludge of the ponds is now sampled and analyzed twice a year. If sampling were to indicate a significant buildup of contaminants in sludge such that standards were likely to be exceeded, plans and procedures for remediation would be prepared and implemented in coordination with EPA and the State of Idaho, Department of Health and Welfare.

5.22 PERIOD OF CONSTRUCTION/OPERATION

5.22.1 Comments:

It was stated that the time to complete the project was vastly underestimated in the Draft Environmental Impact Statement (EIS).

Response:

The project schedule was based on the Special Isotope Separation (SIS) Project at a 30-percent design completion stage. The estimates made were developed by experienced designers and constructors and have been reviewed in detail by the operating contractor project office, the U.S. Department of Energy (DOE) project office, and DOE Headquarters. The DOE is confident that the schedule could be achieved with appropriate funding support.

5.22.2 Comment:

It was stated that the SIS Project's operating lifetime was not identified or was too short to justify the project. It was also implied that the feedstock would be depleted during the SIS Project's lifetime.

Response:

The actual period of operation of the SIS Project for production of weapon-grade plutonium would be dependent on (1) the availability of DOE-owned feed, and (2) the rate of operation (i.e., fraction of full SIS production) which is commensurate with the approved requirements for nuclear defense materials. A quantity of feed material for SIS processing has been identified by DOE consistent with the objectives of contingency and flexibility that--based on maximum throughput rate--would result in several years (currently estimated as 8-10 years in contrast to the 6-8 years previously reported) of SIS operation. This period would obviously be longer, if the SIS Project were not operated at full productions capacities and annual projected information would be reduced proportionately. Additional sources of feed material would possibly be available in the future, depending on additional production initiatives and the limitations on existing production facilities.

The Final EIS provides an analysis of impacts based on 30 years of SIS operation at maximum throughput to attempt to bound reasonably foreseeable impacts. If and when additional feed were to be identified, an analysis of the impacts of processing these materials would be conducted and the appropriate National Environmental Policy Act (NEPA) documentation would be prepared.

5.22.3 Comment:

It was stated that the currently defined mission for the SIS Project would last only 5-8 years, and that the Draft EIS did not discuss potential extended operation of the SIS Project beyond that mission. It was stated that the EIS did not address the environmental or safety impacts associated with an extended mission (i.e., it fails to address the cumulative impacts from transport as well as processing of feed materials such as Fast Flux Test Facility (FFTF) fuel or material from existing weapons). It was also noted that the SIS Project will be useful in the future.

Response:

See the response to comment 5.22.2 regarding the period of SIS operation and the incorporation of an analysis of potential impacts from 30 years of SIS operation.

This Final EIS assesses the potential consequences of the construction and operation of the SIS Project for the mission of isotopically separating fuel-grade plutonium to produce weapon-grade plutonium. While the SIS Project may have the capability to perform other missions as identified in Section 1.1.2 of the Final EIS, DOE has not formally considered or proposed these additional missions. Any mission for the SIS Project other than the production of weapon-grade plutonium from fuel-grade plutonium would require the necessary technical, safety, and environmental evaluations to determine their feasibility and if proposed, would require appropriate NEPA review.

As stated in Section 1.1.2 of the Draft EIS, the recovered plutonium in the FFTF fuel could provide a significant source of feed material for SIS processing. DOE is preparing an Environmental Assessment (EA) on the potential feasibility and environmental impacts of decladding the FFTF fuel with a preferred location for the processing at the Hanford Site in Washington. The potential impacts of transporting this feed material to the SIS facility are bounded by the transportation analyses presented in Section 4.1.3.3 of the Draft EIS and the Final EIS. However, as stated in Section 1.1.2 of the Draft EIS and the Final EIS, there are other potential uses for the FFTF fuel, e.g., blending, and the use of FFTF fuel at the SIS Facility, would not be a prerequisite in DOE's decision to proceed with the SIS Project. See the response to comment 2.13.11 for additional discussion on FFTF fuel.

5.22.4 Comment:

It was noted that the EIS should address the resulting long-term socioeconomic effects when the relatively short mission of the SIS Project is complete and many people become unemployed.

Response:

As discussed in response to comment 5.22.2, the SIS Project would have a design life of 30 years and the actual period of SIS operation for the production of weapon-grade plutonium would be dependent on two important factors--availability of feed material, and the approved requirements for nuclear defense materials. Given the uncertainty associated with these two factors, it cannot be precisely ascertained how long the SIS Project would operate. However, an analysis of potential impacts based on maximum throughput capacity of the SIS Project has been provided in the Final EIS in an attempt to bound the potential environmental consequences of SIS operation over the 30-year design life of the facility.

In the event that the length of operation of the SIS Project for processing fuel-grade plutonium to produce weapon-grade plutonium would be relatively short (i.e., less than 10 years), it is not likely that long-term socioeconomic effects would result. The number of operating personnel associated with the SIS Project is relatively small compared to the current workforce at the Idaho National Engineering Laboratory (INEL). In addition, operating personnel would come primarily from the existing labor pool in the INEL area rather than from persons who would in-migrate into the area. Sections 4.1.1.1 and 4.1.2.1 of the Final EIS provide a more detailed discussion of in-migrating workers and their potential socioeconomic consequences than is contained in the Draft EIS, to assist in understanding potential socioeconomic impacts.

5.22.5 Comment:

It was stated that after the currently defined mission, DOE would transport plutonium from the Savannah River Plant (SRP) to the INEL for purification and that the risk from this transportation would be higher than for transporting plutonium from Hanford to the INEL.

Response:

A small amount of scrap from SRP would be processed by the SIS Project as stated in the Foreword to the Draft EIS. The transportation impact of the shipment of SRP scrap is included in the analysis of potential consequences and risk as identified in Sections 4.1.2.4, 4.1.3.3, and A.3 of the Final EIS. Also see the response to comment 4.22.2 regarding other missions.

5.22.6 Comment:

It was noted that the jobs provided by the SIS Project would last less than a decade unless the Non-Proliferation Treaty is violated. Concern was expressed that plutonium from commercial power reactor fuel would be processed in the SIS Project.

Response:

See the response to comment 5.22.2 regarding the period of SIS operation and the response to comment 5.22.4 regarding socioeconomic impacts. The SIS Project would not violate the Non-Proliferation Treaty, as discussed in response to comment 3.5.2. As identified in the Foreword of the Draft EIS, the SIS Project would not utilize feed material derived from the nations commercial nuclear reactors for the production of weapon-grade plutonium, as such use is precluded by law.

5.23 RADIOLOGICAL

5.23.1 Comment:

It was asked what assurance the U.S. Department of Energy (DOE) would provide so that future generations would not be exposed to deadly radiation as a result of operations and waste disposal. It was stated that "radiation is a mutagen" and that radioactive releases are only alluded to and not discussed in detail in the Draft Environmental Impact Statement (EIS).

Response:

Operation of the Special Isotope Separation (SIS) Project would be conducted in accordance with all applicable environmental regulatory standards for emissions, effluents, and wastes. The SIS Project is designed to contain and mitigate potential exposure as a result of an accident.

Radiation is a mutagen. However, at the extremely low levels resulting from SIS releases, no mutagenic effect is expected. Chapter 4 of the Draft EIS and the Final EIS presents the estimated number of genetic effects to the population surrounding each of the alternative SIS locations from routine radioactive releases.

A discussion of the radioactive release from the SIS Project is presented in Section 2.1.5.1 of the Draft EIS and the Final EIS. The emphasis is on atmospheric emissions and solid wastes because all liquid discharges to the environment would be nonradioactive. As stated in the Final EIS, atmospheric emissions are based on (1) the maximum annual SIS throughput of material, (2) actual operating data from other DOE plutonium facilities, and (3) a conservative filter efficiency of 99.97 percent for the first stage of high-efficiency particulate air (HEPA) filtration and 99.5 percent for the two remaining stages of HEPA filtration. Sources, amounts, treatments, and transport of radioactive and hazardous wastes are also discussed in the Final EIS, Sections 4.1.2.2 and 4.1.2.3.

5.23.2 Comment:

Reviewers requested an explanation of why Idaho people are best suited to withstand high radiation levels, and maintained that the Draft EIS disregards the higher maximum individual dose imparted to Idahoans.

Response:

The maximally exposed hypothetical individual residing at the Idaho National Engineering Laboratory (INEL) site boundary would receive a slightly higher dose as a result of normal SIS operations than the hypothetical maximum individual at the other two alternative sites. However, the dose would still be so small that the routine dose differences from normal operation among the three sites would be insignificant. The total population doses for locating the SIS Project at the INEL would be the lowest compared to the other alternative sites because of the smaller population residing within 80 kilometers (50 miles) of the SIS Project site. This does not imply that the population around the INEL is more suited to withstand radiation effects, but rather acknowledges that fewer persons would be at risk from the extremely low levels of radioactive emissions associated with the SIS Project. As with the maximum individual exposure levels, the impacts to the surrounding populations at all three locations would be extremely small.

5.23.3 Comment:

Reviewers noted that there is no safe radiation level and that any increase in background radiation results in a corresponding increased mutation rate.

Response:

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Response:

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Response:

As indicated by the above, conservative assumptions were used and no attempt was made to mask or hide potential effects.

5.23.6 Comment:

A reviewer asked that the EIS be clarified by comparing population doses from natural background radiation to the dose from SIS operations, and to use population figures for the year 2010 based on an analysis performed by the reviewer in which the population dose was divided by the maximum individual dose.

Response:

The population dose is not derived by multiplying the maximum individual dose by the projected population, nor, as reflected by the comment, can one derive the projected population by dividing the population dose by the maximum individual dose. The average individual population dose may be obtained by dividing the population dose by the population. In the case of the INEL, 7.0×10^{-8} person-rem is divided by 230,129 persons. This yields an average effective dose equivalent to the year-2010 population of less than 3.5×10^{-13} rem, or 3.5×10^{-10} millirem.

5.23.7 Comment:

Concern was expressed with the methods used in Appendix A of the Draft EIS for calculating radiation doses, health effects, and impacts of transportation. It was also stated that the radiological assessments were done very well.

Response:

Radiological assessments were performed using computer codes that have been accepted and approved by various Federal agencies. Health effects (fatal cancer and genetic effects) were calculated using the widely accepted methodology recommended in the Biological Effects of Ionizing Radiation (BEIR III) reports. Transportation impacts were calculated using the widely accepted risk analysis model implemented by the RADTRAN III computer code. As exemplified by the response to comment 5.23.6 concerning the AIRDOS-EPA model, every attempt was made to estimate the upper bound of potential radiological consequences, given scientifically acceptable and approved methods.

5.23.8 Comment:

It was noted that medical scientists are just beginning to realize possible long-term effects of exposure to increments of radiation.

Response:

The analysis of radiological effects of SIS releases takes into consideration the long-term effect of releases by calculating a 50-year radiological dose based on 1 year of SIS releases. The incremental 50-year exposure resulting from annual releases from the SIS Facility imparted to the individual receiving the maximum dose was estimated to be 1.6×10^{-7} millirem effective dose equivalent (EDE) at the INEL. For 30 years of releases the estimate would be 4.8×10^{-5} millirem. Potential health effects surrounding the INEL from 30-years of SIS releases, taking into consideration effects 50 years after the 30-year release, would be 6.9×10^{-10} cancer deaths and less than 5.1×10^{-11} genetic effects.

5.23.9 Comment:

Reviewers felt that the risks associated with low-level radiation, which are stated as fact in the Draft EIS, are so low that they could actually be zero, and even in a transportation accident the doses are too low to produce risk with any degree of accuracy.

Response:

The Final EIS in Appendix A (A.1.2) and Chapter 4 (4.1.2.3) has been modified to indicate that the linear extrapolation (straight-line projection) of health effects data from relatively high dose rates down to the low doses associated with SIS operation was used; thus the Final EIS bounds the upper range of potential health effects.

5.23.10 Comment:

It was noted that the unit of particle size shown on page A-17 of the Draft EIS is incorrect.

Response:

The typographical omission of the "μ" (micro) has been corrected in the Final EIS.

5.23.11 Comment:

It was stated that the Final EIS needs to address risk beyond the local population, i.e., the rest of humanity.

Response:

Conventionally, doses and health effects have been calculated to the population residing out to a distance of 50 miles from nuclear facilities. This has been done for the SIS Project. Atmospheric dispersion ensures that concentrations of radioactivity carried beyond 50 miles are much smaller than those at close distances. Therefore, beyond 50 miles, incremental doses from atmospheric releases have been found to be smaller. In some cases, doses and health effects resulting from liquid effluents have been calculated to distances greater than 50 miles and have been included in environmental impact statements. However, the SIS Project will not discharge radioactivity in a liquid form. Potential risks of health effects to the population surrounding the INEL from 30 years of SIS releases would be less than 6.9×10^{-10} cancer deaths and less than 5.1×10^{-11} genetic effects. Risks to the population beyond 50 miles of INEL would be less.

5.23.12 Comment:

It was stated that an overview of risk modeling/methodology should be included to lend credibility to estimates of population risk during shipments to the Waste Isolation Pilot Plant (WIPP).

Response:

A discussion of the methodology used to derive the radiological risks to populations with respect to transuranic (TRU) waste shipments to the WIPP is contained in Appendix A, Section A.3, of the Final EIS.

5.23.13 Comment:

It was stated that the Draft EIS accepts fallout from nuclear weapons testing as part of background radiation in Table 3-2 but carefully itemizes much smaller doses such as exposure from travel in airplanes and occupational exposure to medical and dental personnel.

Response:

The Draft EIS did include fallout from nuclear weapons tests as part of background because everyone is constantly exposed to it. However, radiation doses from air travel were separated because not everyone travels in an airplane. The cited table has been revised in the Final EIS to provide additional clarity.

5.23.14 Comment:

Reviewers stated that the values for background radiation given in the Draft EIS will not correct or the latest available, and if the correct values [i.e., National Council on Radiological Protection (NCRP) Publication 93 which includes radon] were used, the impacts of the SIS Project could be reduced by as much as a factor of 2.

Response:

The Final EIS in Chapter 3 (Table 3-3) acknowledges that natural background radiation levels may be higher than presented in the Final EIS tables and text because of radon inhalation. Because calculations of doses associated with radon inhalation are still open to questions of accuracy, they have not been included in the calculated background radiation in the Final EIS.

5.23.15 Comment:

Reviewers stated that less reliance should be placed on natural background radiation for a standard of comparison, and the EIS should not imply that a trivial increase in background radiation is of no consequence. It was stated that the Final EIS should emphasize that increments will be controlled to be ALARA.

Response:

The comparisons presented in the Draft EIS were not intended either to trivialize the significance of background radiation or to use background radiation as a "standard" of comparison. The Final EIS has been modified to include comparisons of radiological impacts to bases other than natural background radiation, e.g., limits established in EPA's 40 CFR 61, Subpart H, and DOE Order 5480 series. However, it should be noted that while for perspective the projected doses for the SIS Facility were compared to those limits, these limits actually apply to cumulative releases from an entire DOE site. See also Section 4.5 in the Final EIS.

The Final EIS has also been modified to express DOE's intent to limit all exposures in accordance with the ALARA process as reflected by the draft revisions to DOE Order 5480 series.

5.23.16 Comment:

Concern was expressed over comparing doses or risks from transportation accidents, which are avoidable, to those of natural background radiation, which are not. More specifically, concern was expressed over comparing doses from transport, which are sporadic, to background radiation doses, which are continuous.

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Response:

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Response:

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Response:

5.23.20 Comment:

Reviewers stated that comparisons of population doses to background, medical x-rays, etc., make good data, and that a bar graph be used to convey this information.

Response:

The incremental health effects (fatal cancers and genetic effects) and doses from SIS operation would be less than one-half of 1 percent of those from existing INEL operations. Because the offsite exposures from the SIS Project would constitute much less than 1 percent of exposures from an x-ray, watch dials, or even airplane travel and television viewing, the SIS exposures cannot be effectively displayed on a bar graph.

5.23.21 Comment:

Reviewers stated that the Draft EIS adequately covered the scenarios of exposure during normal operations, accidents, and transportation conditions. It was also stated that radiation impacts were covered up and are deliberately underestimated; specifically, fallout, fossil fuel burning, and INEL-generated radionuclides are classified as natural background radiation on p. 3-21 of the Draft EIS.

Response:

Scenarios that could conceivably result in measurable exposures were considered in the dose assessment. The Draft EIS and the Final EIS do not cover up future radiological impacts of the SIS Project; where assumptions had to be made, conservative assumptions were applied to overestimate the potential radiological impacts. Also see the responses to comments 5.23.13 and 5.20.6 regarding clarification of Table 3-2 of the Draft EIS and the Final EIS, and the misinterpretation of data contained in Table 3-2 with that calculated on the basis of external radiation surveys.

5.23.22 Comment:

It was stated that a particularly damaging aspect of the Draft EIS was that it frequently cited doses for whole body and thyroid, and plutonium does not produce a whole-body exposure. It was suggested that using doses to the lungs would be better.

Response:

The highest organ dose as a result of SIS design-basis analysis of accidents considered in the Draft EIS and the Final EIS was to the thyroid as a result of iodines associated with the postulated criticality accident. Doses to the bone surface were the highest organ dose from routine releases and the severe accident and were appropriately identified throughout Chapter 4 of the Draft EIS and the Final EIS. The whole-body doses and effective dose equivalents are frequently cited in the EIS because they provide a direct comparison with appropriate radiation protection and environmental standards and guides.

5.23.23 Comment:

Reviewers observed that the radiological impacts and offsite health risks during normal operation are small, and that the offsite doses are less than those from natural sources.

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Response:

year of release. Also see the response to comment 5.23.3 regarding risks to man from cumulative releases and the response to comment 5.23.17 regarding impacts to wildlife.

5.23.27 Comment:

It was noted that the specific Draft EIS source for isotopic distribution in Table 2-4 (p. 2-41) was not described. However, reasonable variation in composition would not have a major effect on dose projections under normal operating conditions or emergencies.

Response:

The specific source data for the isotopic distribution are classified; however, the values chosen overestimate the radiological consequences. Small variations in composition would not have a major effect on dose projections. Since the releases are so low, even a moderate variation in composition could not increase the resulting doses by more than a small fraction.

5.23.28 Comment:

It was noted that the Draft EIS underestimated the quantity of inhalable (less than 10 microns) plutonium powder (cited by a DDE study) that may be involved in connection with a transportation accident.

Response:

Aerosol and respirable aerosol fraction values of plutonium for dispersibility category 5 (loose, small powder) are used for feed and by-product, and values for dispersibility category 3 (sintered, loose chunks) are used for product (NRC, 1977b). These categories determine the amounts of material that may be dispersed and eventually inhaled in each severity category in which a postulated release may occur. The fraction of airborne material that is less than 10 microns in size (mean aerodynamic diameter) and could enter the human respiratory system was conservatively set at 5 percent for product and by-product and 50 percent for feed. There are no recognized studies that have suggested larger values for respirable fraction. There are a number of references that have placed an upper limit value of no more than 0.1 percent of the total source that would be respirable when a severe accident is involved. Therefore, the analyses reported in the Draft EIS and the Final EIS are believed conservative.

5.23.29 Comment:

It was stated that in Table 3-2 on p. 3-21 of the Draft EIS, the column headed "Dose to Average Individual (MREM/YR)" should have indicated a total background radiation of approximately 300 mrem/yr. (See Table 2.4 on p. 15 of NCRP Report 93.) Also, effective dose equivalent should have been used throughout, per current EPA, International Commission on Radiological Protection (ICRP), and National Council on Radiological Protection (NCRP) requirements and recommendations.

Response:

The higher background radiation dose value is attributed to the inclusion of a dose from the inhalation of radon. However, since calculations of doses associated with radon inhalation are still open to questions of accuracy, the background radiation levels presented in the Final EIS are the same as those in the Draft EIS.

Concerning dose terminology, whole-body and organ dose equivalents are used in the Final EIS along with the effective dose equivalent, since these different terms are all in use today, per EPA, ICRP, and NCRP.

5.23.30 Comment:

It was stated that the Draft EIS was deficient for not giving radiation maximum allowance tables.

Response:

The standards for atmospheric emissions of radioactivity are found at 40 CFR 61, Subpart H, which is identified in Section 4.5.1 of the Draft EIS and the Final EIS as a whole-body and critical organ dose of 25 and 75 millirem per year, respectively, to a member of the public.

5.24 SAFETY

5.24.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) glossed over extreme hazards.

Response:

The Draft EIS and the Final EIS analyzed discrete hypothetical accident scenarios including an extremely low-probability severe accident analysis, i.e., beyond design basis. Sections 4.1.3 and 4.1.4 of the Draft EIS and Final EIS addressed the potential hazards to the public and workers, respectively, in light of these accident scenarios. See Section 4.1.3 for additional information on accident analysis.

5.24.2 Comment:

It was stated that the Special Isotope Separation (SIS) process has obvious safety implications because of the large heat source (copper vapor lasers) in close proximity to large quantities of vaporized flammable plutonium and ethanol.

Response:

The addition of the small quantity of heat from the process laser to the heat already present in the vaporized plutonium (which occurs in a vacuum) does not constitute a hazard. The lasers and the plutonium processing facilities are separated by fire barriers. The consequences of an accident for a fire in a single area are discussed in Section 4.1.3.1 of the Final EIS.

5.24.3 Comment:

It was stated that the SIS process is hazardous because vaporized plutonium is in close proximity to highly flammable hydrogen gas used in the hydriding/dehydriding process, with the resultant possibility of an explosion.

Response:

The SIS Project is designed with engineered safety features (e.g., operations are conducted in an inert atmosphere, are monitored to detect accumulation of hydrogen, and the equipment used does not generate ignition sources) to prevent a hydrogen explosion. The facility is designed to withstand such an event with no adverse effects to the environment and to minimize impact on the operating staff. The hydriding/dehydriding process safety aspects are being demonstrated in the Engineering Demonstration System (EDS) at Lawrence Livermore National Laboratory (LLNL).

The Draft EIS and the Final EIS address an uncontrolled chemical reaction as a postulated accident. This hypothetical accident bounds, or covers, the postulated consequences of an uncontrolled hydrogen explosion. The evaluation of this accident shows that the projected consequences for both Idaho National Engineering Laboratory (INEL) workers and anyone at the site boundary would be well below acceptable levels.

5.24.4 Comment:

It was stated that the SIS Project is more dangerous than more mature nuclear power technology because the material is handled in loose form (powder, exposed metal, and high flux vapor) with minimal containment.

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Response:

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Response:

5.24.8 Comment:

Concern was expressed that there was no nuclear criticality safety evaluation presented in the Draft EIS.

Response:

Criticality safety requirements are set forth in DOE Orders, which must be met by all DOE-contractor operations. Each activity within the SIS facilities, where a potential for criticality exists, will be evaluated for criticality safety and presented in a Safety Analysis Report. Each criticality calculation is independently verified. It was assumed in the Draft EIS in Section 4.1.3.1 that a criticality accident occurred and its consequences to the general public were presented. Additional information on criticality controls is given in Section 4.1.3.1 of the Final EIS.

5.24.9 Comment:

It was noted that there are three separate exhaust systems which would have to go down (fail) prior to releasing untreated air to the atmosphere.

Response:

Three exhaust system failures would have to occur for significant quantities of material to be released from the SIS. In addition to the failure of the exhaust systems, there are a number of physical containment barriers that would require penetration if the failures did occur. The systems are further enhanced by the final exhaust filtration systems being designed to withstand DBA criteria.

5.24.10 Comment:

It was noted that chloride and fluoride processes in SIS will not perform in textbook fashion.

Response:

Both chloride and fluoride processes are well established in the chemical and nuclear industries. The SIS Project will be using proven techniques gained from industry experience and each application will undergo a thorough safety evaluation prior to operation. Additionally, the processes will be demonstrated in the SIS testing facility at LLNL.

5.24.11 Comment:

Noting that overriding and bypassing the safety systems results in unsafe operations in industry, reviewers questioned why this would not happen at the SIS Facility.

Response:

A philosophy of safety-in-depth will be used for design and operation of the SIS Project. This philosophy requires engineered safety features supplemented with administrative controls. The operation will be frequently audited by personnel independent of the operations. Audits will cover all aspects, including procedural compliance. The Draft EIS and the Final EIS in Sections 4.1.3.1 and 4.1.3.2 analyzed several accidents having the highest potential for consequences, each of which assumed the bypassing or failure of safety systems.

5.24.12 Comment:

It was suggested that if the SIS Project is built, an active public awareness program on safety measures should be instituted.

Response:

The INEL has an active tour program that encourages civic organizations to visit DOE facilities in order to increase public awareness. Additionally, an active public outreach effort includes speaker bureaus capable of addressing the basic concepts of radiation and safety. The Idaho Operations Office of DOE engaged in a substantial outreach effort to provide information on the SIS Project to the public (with over 100 overview presentations). DOE made every effort to respond promptly to all informational inquiries on the SIS Project pursuant to the spirit and intent of the National Environmental Policy Act (NEPA) process. These public awareness efforts concerning proposed projects and ongoing operations at INEL will continue in the future.

5.24.13 Comment:

Concern was expressed that the Draft EIS did not include prudent safety procedures, but relied on past methods which were clearly ineffective. It was stated that DOE must develop storage and safety procedures that will work without exception.

Response:

The design and procedures that would be used are the result of many years of experience; ineffective procedures or past methods which do not fulfill current requirements will not be used. Storage and safety features have evolved based on experience. While no guarantee could be provided that everything will work "without exception," every effort is being extended to ensure that the exception would result only in acceptable levels of consequence.

5.24.14 Comment:

Concern was expressed about the accuracy of risk assessments, and it was specifically stated that probabilistic risk assessments and other predictions by experts have been "blown out of the water by the man-made, man-machine interface."

Response:

Risk assessment is a statistical evaluation that considers the man-machine interface in assigning a risk factor. The SIS Project and all DOE activities mitigate the accident probability by extensive use of human factors engineering during design, personnel training, and mandatory compliance with operating procedures. Risk is further reduced by the DOE requirement for redundant safety systems with minimal dependence on administrative controls when engineered features are practicable.

5.24.15 Comment:

It was noted that the INEL has an excellent safety record, and that the safety of the SIS Project will be enhanced with monitoring by the EPA and an independent safety oversight board.

Response:

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Response:

The nuclear industry is subject to controls that equal or exceed the safety requirements of other industries. DOE requires compliance with all applicable state and Federal standards as well as additional requirements in the form of DOE Orders which cover the health and safety of workers, the public, and the environment.

Incidences of contamination at DOE sites are generally a result of early waste management practices at those sites. Those practices were considered adequate at that time for protection of the environment and met existing environmental regulations. Since then, waste management practices have changed. For more information on improved waste management practices, see the responses to comments in the 5.30.4.X series.

5.24.23 Comment:

The excellent INEL safety record was noted, and support was expressed for the site and the SIS Project in particular. It was also stated, however, that the SIS Project could place the INEL safety record in jeopardy.

Response:

DOE believes that the facility as described in the Final EIS presents a minimal hazard to the public and the environment. DOE has always stipulated that safety is the overriding consideration for the project and that it will not be compromised for schedules, economics, or expediency.

5.24.24 Comment:

The good safety record at INEL was acknowledged, but concerns were expressed that accidents at INEL are still possible because of human error.

Response:

The Draft EIS and Final EIS in Section 4.1.3 assess postulated accidents having the highest reasonably foreseeable potential consequences, including severe facility (i.e., beyond design-basis) and transportation accidents. Human error is accounted for in the postulation of these events (i.e., some element of human error is required either to initiate the event, as in the case of a fire, criticality, or uncontrolled chemical reaction, or to obtain the postulated releases, such as the failure of all HEPA filters for the severe accident). The human error factor is mitigated by safety design, utilizing human factor engineering, and developing and demanding compliance with detailed operating procedures during operation of the facility.

5.24.25 Comment:

It was requested that DOE guarantee the safety of the SIS Project. It was also stated that DOE could not guarantee safety of the SIS Project.

Response:

It is not possible to provide an absolute guarantee of safety. However, it is the objective of DOE and its operating contractors to operate its facilities in a manner which provides safety to the general public and the environment through the appropriate design and operations. Also see the response to comment 5.24.16.

5.24.26 Comment:

It was asked what guarantee there is that, if a localized system malfunction were to occur, the remaining systems would not also fail (e.g., the exhaust filtration systems).

Response:

The filtration systems are designed, constructed, and tested according to the requirements of DOE Order 6430.1A and the appropriate American Nuclear Standards Institute (ANSI) standards. These documents specify applications, installation, quality assurance, and testing requirements. Additionally, the filtration system blowers will be powered by a standby electrical system, redundant to the dual-loop commercial power supply. A number of similar systems are currently operating throughout the country.

5.24.27 Comment:

Concerns were expressed about the extreme toxicity and hazards of plutonium relative to the SIS Project and the risks associated with the handling of plutonium.

Response:

Plutonium is recognized as an extremely hazardous material, which accounts for the elaborate and extensive controls required by DOE. Stringent control is exercised by a control-in-depth philosophy which requires numerous back-up systems employing both redundant engineered systems and strict procedural compliance.

The handling of plutonium, like many hazardous materials, requires that adequate attention be devoted to safety analysis, facility design, and operating requirements. The DOE community has a great deal of experience handling plutonium and other hazardous materials, and the knowledge derived from the sum of this experience is being utilized by SIS design experts. See the response to comment 5.24.28.

5.24.28 Comment:

It was noted that plutonium is pyrophoric and therefore must be handled in a vacuum, and that a piece the size of a pinhead can cause cancer in whole populations.

Response:

Plutonium is technically pyrophoric. The pyrophoric character of plutonium has been fully considered in the SIS design. Plutonium is toxic; however, the purpose of the elaborate and redundant containment and control mechanisms is to prevent distribution of potentially hazardous materials to the population.

5.24.29 Comment:

Reviewers noted that the Final EIS should contain a discussion of the technical problems associated with handling metallic plutonium in the SIS processes.

Response:

The handling of metallic plutonium is described in the American Nuclear Society (ANS) Plutonium Handbook: A Guide to the Technology, O. J. Wick, Editor, and will be controlled in detail

by operating requirements. The operating experience gained in the DOE plants over the last three decades will be factored into the SIS design. The Final EIS describes the facilities and equipment that will provide the means of protecting the environment when handling plutonium.

5.24.30 Comment:

General comments were made regarding the safety of the SIS Project and its effect on the environment (e.g., storage of nuclear waste).

Response:

DOE shares the public's concern for safety and will comply with all applicable occupational and environmental requirements. DOE has discussed SIS operational emissions in Section 2.1.5 of the EIS. Section 4.1.2 of the Draft EIS and the Final EIS assessed the impacts associated with these releases.

DOE has also discussed potential accident emissions and the impacts associated with these emissions in Section 4.1.3 of the EIS. An in-depth analysis of operations and potential accidents will be performed during the preparation of both the preliminary and final safety analyses, which will be reviewed by groups of independent experts. This process will document potential hazards and consequences and the methods, measures, or controls to be employed to eliminate or mitigate the hazards and consequences. The SIS design will minimize safety problems.

5.24.31 Comment:

Comments were made comparing nuclear technology with other hazards. Some reviewers stated the SIS Project would be safe; others disagreed.

Response:

The nuclear industry is subject to special controls that equal or exceed the safety requirements of other industries in recognition or the special hazards associated with radioactivity. DOE requires compliance with all Federal and state codes and standards as well as additional requirements in the form of DOE Orders specific to safety such as 6430.1A and the 5480 series. Within this EIS, postulated accidents have been discussed to provide the public and understanding of potential risks and consequences. As indicated in the EIS, the consequences and risks of the SIS Project are small (e.g., the dose to an individual at the INEL site boundary of 0.28 rem from the postulated severe accident).

5.24.32 Comment:

It was noted that the SIS Project will be safe because it employs the best dose-reduction techniques.

Response:

DOE requires the use of state-of-the-art techniques in design and further requires all operations be conducted in accordance with the as low as reasonably achievable (ALARA) philosophy.

5.24.33 Comment:

It was stated that production has been overemphasized at the Idaho Chemical Processing Plant (ICPP), thus resulting in a weakening of safety. Therefore, statements that the SIS Project would be safe are doubted.

Response:

DOE has always stipulated that safety is the overriding consideration and will not be compromised for schedules, economics, or expediency. The nuclear industry, including the SIS Project, is subject to controls that equal or exceed the safety requirements of other industries. DOE requires compliance with all applicable state and Federal standards as well as additional requirements in the form of DOE Orders which cover health and safety of the environment, including workers and the public. For example, the DOE orders governing industrial safety are comparable in protection to Occupational Safety and Health Administration (OSHA) requirements. A stringent quality assurance program will be used to ensure compliance with these safety requirements.

5.24.34 Comment:

Concern was expressed that there would be large quantities of plutonium in proximity to large quantities of ethanol in the SIS Facility.

Response:

The plutonium and ethanol that would be used in the SIS Project are not in close proximity, but are located in different buildings. The Laser Support Building (which contains some ethanol in the dye lasers) is separated from the Plutonium Processing Building (which contains the plutonium) by a 4-hour rated fire wall, and the dye pump building is separated from both by distance. A fire in the Plutonium Processing Building is analyzed in the EIS (Section 4.1.3.1) and consequences are presented. For additional information on the impact of an explosion external to the Plutonium Processing Building, see the response to comment 5.1.34.

5.25 SECURITY

5.25.1 Comment:

It was stated that the Draft Environmental Impact Statement (EIS) did not address the problem of security or give assurance that safeguards and security measures at the Special Isotope Separation (SIS) Project are based on up-to-date assessments of insider/outsider threats.

Response:

The basis for evaluation of the safeguards and security of all DOE facilities is the Threat Guidance issued by DOE Headquarters. This guidance, for the most part, is a classified document. It does consider a wide range of postulated threats to all facilities from overt (outsider) and covert (insider) sources. A revised guidance can be issued to reflect changes in the threat environment. SIS Facility safeguards and security systems will be designed to meet all current orders and guidance documents.

DOE has for many years required operational procedures that protect government property from theft or subversion by insiders. Methods such as personnel clearances, and administrative and physical material controls are among those that will be used for the SIS Facility. In addition, techniques such as a strong human relations program, biometric personnel identification, and computer enhanced material control are used to further mitigate covert (insider) threats.

5.25.2 Comment:

It was asked if the placement of the SIS Project at the Idaho National Engineering Laboratory (INEL) and the resulting higher levels of security would jeopardize future INEL projects due to the higher security required for the SIS Project, (which would thus reduce the chances for obtaining nondefense contracts).

Response:

DOE policy requires that facility sites at the INEL have security protection levels consistent with individual missions. Because each mission site is evaluated separately, the levels of protection often differ, even for adjacent projects at the INEL. A high-security project, such as the SIS Project placed at the Idaho Chemical Processing Plant (ICPP), would not preclude the future placement of a research-related or nondefense project at the INEL.

5.25.3 Comment:

It was noted that the INEL has a very high level of security.

Response:

The INEL and the ICPP have undergone several major security-related upgrades since 1978. The ICPP security systems have been carefully evaluated to ensure compliance with DOE Orders and Guidelines. The SIS Facility will include security systems that are compatible with, and enhance as necessary, the existing INEL/ICPP protection systems.

5.25.4 Comment:

It was stated that DOE has been lax in implementing safeguards and security measures, as demonstrated by problems at the Savannah River, Pantex, and Los Alamos facilities.

Response:

DOE Orders require that all facilities that process, store, and utilize special nuclear material (SNM) must provide adequate safeguards and security measures. The safeguards and security measures at DOE facilities are tested, including mock drill and adversaries intrusion to ensure their adequacy. Results of these tests are used as a basis for upgrading measures when tests and evaluations indicate specific deficiencies.

5.25.5 Comment:

Concern was expressed that the Draft EIS did not adequately address the threats of sabotage and terrorism.

Response:

DOE Orders require that all facilities that process and store nuclear material must include features that will provide a high level of protection against overt (outsider) and covert (insider) attack. DOE protective systems are tested against trained mock adversaries to ensure that the facilities meet all DOE requirements. The SIS Facility will be provided with equivalent levels of protection based on the Threat Guidance issued by DOE Headquarters. The Threat Guidance is a classified document that addresses all threats to DOE facilities, including terrorism.

The DOE Albuquerque Transportation Office has the responsibility for all Safe Secure Transport (SST) transfers of nuclear material between DOE field sites. They use developed systems and methods to protect the material from theft.

5.25.6 Comment:

It was stated that comments have been received by DOE-Idaho regarding allegations of theft of proprietary data by INEL employees having security clearances.

Response:

These allegations were referred to the DOE Inspector General and to the Federal Bureau of Investigation (FBI). The Idaho Operations Office and the INEL are not aware of any thefts of proprietary data by INEL employees.

5.26 FEED

5.26.1 Comment:

It was stated that the amount of fuel-grade feed material available for Special Isotope Separation (SIS) Project would last only 7-8 years, which makes the economics of the project questionable. It was also stated that the Fast Flux Text Facility (FFTF) fuel at Hanford could be used as a feed material to extend the SIS mission, but the resulting impacts were not addressed in the Draft Environmental Impact Statement (EIS). Others asked if the British plutonium stored at Hanford was being considered as feed material for the SIS Project.

Response:

The length of operation of the SIS Project for production of weapon-grade plutonium would be dependent on (1) the availability of DOE-owned feed material, and (2) the level of operation (i.e., fraction of full SIS production capacity). The latter would be determined annually commensurate with the approved requirements for nuclear defense materials. Currently, the U.S. Department of Energy (DOE) has identified a quantity of feed material that would result in several years (currently estimated as 8-10 years in contrast to the 6-8 years previously reported) of SIS operation at full throughput capacity. Additional sources of DOE-owned feed material, which do not include spent fuel from commerical reactors precluded by law, may be available in the future, depending on other DOE production initiatives and the limitations on existing production facilities. DOE does not consider the economics of the project to be questionable, based on the objectives which the SIS Project would fulfill.

As stated in Section 1.1.2 of the Draft EIS, the recovered plutonium in the FFTF fuel could provide a significant source of feed material for SIS processing. DOE is preparing an Environmental Assessment (EA) on the potential feasibility and environmental impacts of decladding the FFTF fuel with a preferred location for the processing at the Hanford Site in Washington. The potential impacts of transporting this feed material to the SIS facility are bounded by the transportation analyses presented in Section 4.1.3.3 of the Draft EIS and the Final EIS. However, as stated in Section 1.1.2 of the Draft EIS and the Final EIS, there are other potential uses for the FFTF fuel, e.g., blending, and the use of FFTF fuel at the SIS Facility, would not be a prerequisite in DOE's decision to proceed with the SIS Project. See the response to comment 2.13.11 for additional discussion on FFTF fuel.

DOE's current policy is not to use the British plutonium as a source of feed material for the SIS Project.

5.26.2 Comment:

Reviewers expressed concern or asked if DOE originally planned or currently intends to process spent commercial fuel in the SIS Project and pointed out that it was illegal, would violate the Nonproliferation Treaty, and was not covered in the Draft EIS. Another reviewer also expressed concern that DOE might take title to commercial spent reactor fuel about 1998 which could be classified as "existing DOE fuel-grade plutonium" and used for a secondary mission of the SIS Project. It was also suggested that accessing spent commercial fuel for direct use in weapons was a viable alternative to the SIS Project.

Response:

Current law (Hart-Simpson-Mitchell Amendment) prohibits DOE from recovering plutonium originating from spent commercial fuel to use in weapons. DOE will comply with the law and as is stated in the Foreword of the Draft EIS and the Final EIS, DOE has no intention of recovering plutonium from spent commercial fuel.

5.26.3 Comment:

It was noted that the United States is circumventing the Non-Proliferation Treaty by using plutonium from N-Reactor fuel.

Response:

N-Reactor was authorized and funded by Congress to produce plutonium for weapons and to generate steam for sale to a utility for power generation. N-Reactor has never been a commercial reactor and therefore is not covered by the Non-Proliferation Treaty. Its primary mission was plutonium production, although the by-product steam was sold for power generation to offset costs of operating the reactor. Also see the responses to comments 3.5.1 and 3.5.2 regarding the Non-Proliferation Treaty.

5.26.4 Comment:

It was noted that the FFTF fuel processing schemes including the Nuclear Regulatory Commission (NRC) licensed facility should be identified and discussed in the Final EIS.

Response:

DOE is currently preparing an Environmental Assessment (EA) to evaluate various options to process FFTF fuel. The NRC-licensed facility that is being considered for decladding of FFTF fuel was Rockwell's Hot Cell Complex at Santa Susanna, CA, but this is not currently the DOE preferred alternative. The proposed action and alternatives are being addressed in a separate NEPA action because decisions on processing FFTF fuel are independent of decisions being made for the SIS Project. See the response to comments 5.26.1 regarding further information on FFTF fuel and 7.31 regarding alternatives for decladding FFTF fuel.

Comment:

It was claimed that the plutonium processed in the SIS Project depends on materials from Hanford nuclear facilities which are shut down largely due to failure to control radiation.

Response:

The material planned to be processed in the SIS Project is existing reactor-grade plutonium, and does not depend on a reactor operating or not operating at Hanford.

5.26.6 Comment:

Reviewers stated that the Draft EIS does not address the storage needs for SIS feedstock.

Response:

The SIS Project, as presently designed, has sufficient feedstock storage to accommodate anticipated shipments to the INEL. Incoming shipments will be stored in the SIS process storage vault until processed.

5.26.7 Comment:

It was noted that the Process Facility Modification (PFM) at Hanford was canceled, and it was asked what percentage of feedstock for the SIS Project is expected from PFM, and what the impact of this decision will be.

Response:

5.27 SOCIOECONOMICS

5.27.1 DEIS Presentation

5.27.1.1 Comment:

Reviewers believed that sections of the Draft Environmental Impact Statement (EIS) dealing with socioeconomic impacts were inadequate, incomplete, or "absolutely deplorable" and needed to be redone; it was suggested that local economists be used to assist in preparation of the Final EIS. It was stated that prosperity was implied but probably would not occur.

Response:

The discussion of socioeconomic impact has been expanded in Final EIS and an Appendix B has been added which describes demographic economics and tourism characteristics in the areas surrounding each of the alternative sites. The employment analysis has also been revised using the latest projections of workforce requirements for the Special Isotope Separation (SIS) Project. The assessment of socioeconomic impacts addressed in Chapter 4 of the Final EIS indicates that the SIS Project would not result in adverse socioeconomic impacts, but would probably benefit the site's regional economy. Studies performed by Idaho State University (ISU) were used in preparation of the Draft EIS and the Final EIS.

5.27.1.2 Comment:

Reviewers stated that the Draft EIS treated the entire cost of constructing the SIS Project as being those costs that were going to be spent in this region, when actually only a small portion of the construction funds would be spent in Idaho.

Response:

Neither the Draft EIS nor the Final EIS includes estimated expenditures on employees or materials and equipment in order to conservatively estimate the lower, or minimum, level of economic benefits.

5.27.1.3 Comment:

It was stated that simple macroeconomic accounting was not done in the Draft EIS.

Response:

The sources of funding for a project and the impacts on the Federal budget and other programs (and therefore any macroeconomics) are beyond the scope of this EIS. Also see the response to comment 2.7.4.

5.27.1.4 Comment:

Some reviewers felt that the Draft EIS overestimated short-term economic and job benefits and underestimated long-term costs to community, farming, and tourism.

Response:

Both the Draft EIS and the Final EIS indicate that an abundant construction workforce is available within the region. However, to determine the maximum potential impact, an assumption of a percentage of workers in-migrating is used. The analysis for the EIS indicated that the maximum projected population growth can be absorbed within the region because sufficient housing and municipal service systems already exist to accommodate it. For this reason, long-term costs to the community are estimated to be minimal. Additional information on the economic impacts of a SIS Facility can be found in the Final EIS in Sections 3.1.3, 4.1.1.1, and 4.1.2.1. As also discussed in the Final EIS, there are no anticipated significant long-term adverse impacts on tourism and agriculture. See the response to comment 5.27.3.6 for more information.

5.27.1.5 Comment:

Concern was noted over the Draft EIS's misuse and misinterpretation of the employment/ economic multiplier. It was stated that regional employment figures were optimistic because other factors may depress employment (e.g., schedule delays, out-of-state businesses supplying technology/ services).

Response:

The estimates of the number of direct jobs were based on engineering design studies and not on how much money is spent on technology development out of state or factors that may depress employment. The multiplier used in the Final EIS to estimate indirect jobs comes from a recent ISU study and is considered to be conservative in its application, in that it does not account for induced effects or the direct benefits associated with significant materials and equipment purchased for the project.

5.27.1.6 Comment:

It was stated that the Draft EIS failed to identify how communities would meet project-induced demands.

Response:

Based on the analysis of potential in-migrating workers, it was found the areas surrounding each of the alternative SIS locations have the capability to absorb the estimated growth, and the infrastructure is in place to provide the needed services and support as discussed in Sections 4.1, 4.2, and 4.3 of the Final EIS.

5.27.1.7 Comment:

Reviewers recommended that the projected economic/demographic impacts from the SIS Project be evaluated using a model such as NEDAM or BREAM/PAS.

Response:

The projected population increase due to the SIS Project would be small and such small increases have historically not had significant impacts on the surrounding communities. Models such as those suggested are not generally used to assess socioeconomic impacts on the size of the workforce associated with the SIS Project.

5.27.1.8 Comment:

It was stated that the socioeconomic analysis did not consider the costs of externalities such as radioactive pollution, crowding, groundwater contamination, etc.

Response:

The potential impacts of radioactive releases and the potential for overcrowding (of schools) and ground water impacts were addressed in the Draft EIS and the Final EIS in Chapter 4. As indicated in the Final EIS, routine radioactive releases would not exceed the regulatory standards of the Environmental Protection Agency (EPA) (Section 4.5), in-migrating population would not overcrowd schools (e.g., Sections 3.1.3.3 and 4.1.1.1), and the potential for ground water contamination is limited as the SIS Project would not discharge either radioactive or hazardous liquid effluents (Section 2.1.5.1).

5.27.1.9 Comment:

It was stated that the Draft EIS failed to describe peak temporary project demands versus long-term stabilized demands.

Response:

The Draft EIS and the Final EIS in Sections 2.1.4.3, 2.1.5.3, 4.1.1.1, and 4.1.2.1 identify the average and peak employment associated with the SIS Project. The Draft EIS and the Final EIS also delineate in the referenced sections the small differences in expected socioeconomic impacts during the construction phase and the operations phase, and the cumulative aspects in Section 4.5.1.1. Because the small increased demands on services and facilities can be met by existing services and facilities, detailed analyses of the demands are not included in the Draft EIS and the Final EIS. Additional information on housing availability, schools and higher education, and health care is included in the Final EIS in Section 3.1.3 based on the documents referenced in the Draft EIS.

5.27.1.10 Comment:

It was stated that the Draft EIS was inadequate per Council on Environmental Quality (CEQ) guidelines on the discussion of socioeconomic issues. Specifically cited were such items as population growth and impacts, peak and long term employment, in-migration, personal income, social/cultural structure, land use and values, tax base, government revenues and expenditures, and transportation problems.

Response:

The Final EIS includes an expanded characterization of the demography and existing infrastructure and potential impacts on socioeconomic issues. A detailed discussion of such issues as land values, personal income growth, changing social structure, government revenues, and transportation problems is not included, as the size of the projected construction and operation workforce associated with the SIS Project is small in comparison to total Idaho National Emergency Laboratory (INEL) employment and is insignificant in relation to total employment in the INEL region.

5.27.1.11 Comment:

Reviewers stated there was a lack of information in the Draft EIS on impacts that the SIS Project would have on tourism, agriculture, wilderness, and other businesses and that any benefits were short-lived.

Response:

Response:

Accidents/Contamination

Response:

5.27.3 Tourism/Agriculture

5.27.3.1 Comment:

Concern was expressed about the impacts that the SIS Project would have on Idaho's agriculture. It was stated that the SIS Project would damage Idaho's agricultural industry or at least do little to help it. It was also stated that Idaho is an agricultural state and not a nuclear plant region. Others stated that the INEL and the SIS Project would not endanger Idaho's agriculture or the reputation of Idaho's crops.

Response:

The U.S. Department of Energy (DOE) agrees that it is highly unlikely that the SIS Project would cause any damage to Idaho's agricultural industry. The analyses in the Final EIS support the position that the proposed facility would endanger neither Idaho's agriculture nor the reputation of its crops.

Construction and operation of the SIS Project would not directly benefit the agricultural industry, although increased regional employment would generally increase the total amount of dollars spent on agricultural products.

While it is true that Idaho is well known for its potatoes and has a long tradition of agricultural success, it is also true that Idaho has a significant history in nuclear power. The INEL has been in operation since 1949 and has a history in nuclear activities and the operation of many nuclear reactors. In fact, the INEL was originally named the National Reactor Testing Station. Additionally, the INEL has been operating one of the major naval nuclear reactor training facilities since the 1950s. Because of the long history of defense-related projects at the INEL, it is unlikely that the addition of an SIS Project would significantly damage Idaho's agricultural industry.

5.27.3.2 Comment:

It was stated that the Draft EIS failed to utilize available information on tourism in the INEL region.

Response:

The Final EIS acknowledges the importance of tourism to the INEL region and indicates that the SIS Project is unlikely to have significant adverse impacts on that industry. A cooperative market research project entitled The 1987 Idaho Leisure Travel and Recreation Study was released in April 1988. Appropriate findings from that report and other information on the importance of tourism to the INEL region are presented in Section 3.3.3.4 and Appendix B of the Final EIS.

5.27.3.3 Comment:

Concern was expressed about the impacts of the SIS Project on regional and state tourism and the efforts to promote it. Specific issues raised by the reviewers included loss of tourism revenues, danger and controversy associated with the SIS Project , and impacts (both positive and negative) on neighboring businesses such as those in the Sun Valley-Ketchum areas. It was further stated that the SIS Project would be a nuclear weapons factory and would be a waste of taxpayers' is money.

Response:

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Response:

Demographics

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Response:

5.27.4.2 Comment:

Reviewers stated the Draft EIS failed to meet the intent of CEQ requirements because it simply characterized the expected population growth as a percentage of the regional population, and dismissed it as having little or no impact.

Response:

In both the Draft EIS and the Final EIS, population growth is expressed as estimated number of people (workers and their families) and a percentage of average annual growth. These estimates are presented in the Final EIS for the region and for each county surrounding the alternative sites, assuming that the distribution of in-migrating people would be similar to the residential location of existing employees.

5.27.4.3 Comment:

Concerns were expressed about the potential impacts on hunting, fishing, schools, etc. from the in-migration of workers and their families resulting from the construction and operation of the SIS Project in Idaho. Others stated that the impacts would be positive, since the SIS Project would increase tax revenues. It was also stated that the in-migration of people would be greater than reported in the Draft EIS, specifically because the use of 1970-1980 population growth figures was inappropriate.

Response:

The SIS Project is not expected to have significant adverse socioeconomic impacts. The small number of potentially in-migrating people would not significantly impact fish and wildlife resources or the existing community infrastructure, including schools. The Final EIS in Sections 4.1.1.1 and 4.1.2.1 presents an expanded discussion of potential socioeconomic impacts resulting from the construction and operation of the SIS Project. The analyses in both the Draft EIS and the Final EIS present an upper estimate of workers moving into the area. The comparison of population growth attributable to in-migrating workers to population growth between 1970 and 1980 was included to provide a perspective on the significance of the potential impact. Using a different population base would not alter the number of people expected to in-migrate.

5.27.4.4 Comment:

It was stated that the Draft EIS did not consider out-migration of people from Idaho when construction of the SIS Project would be complete. Others stated that people would leave Idaho if the SIS Project were constructed there.

Response:

It is not expected that a significant number of construction workers hired for the SIS Project will out-migrate, as most of the construction workers employed would be from the INEL region. DOE's experience at the INEL which has a long history of siting, constructing, and operating defense-related facilities, indicates that it is also unlikely that a significant number of people would leave Idaho if the SIS Facility is constructed.

5.27.4.5 Comment:

It was stated that the jobs provided by the SIS Project would decrease the regional out-migration of people.

Response:

Development/Location

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Response:

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Response:

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Response:

_____ Aspects

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Response:

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Response:

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Response:

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Response:

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Response:

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Response:

5.27.6.7 Comment:

It was stated that the military industry creates dead-end products in terms of economics, because those products are put on the shelf, so to speak, and the money is never injected back into the economy.

Response:

A discussion of the military industry or of the economic products of that industry is beyond the scope of this EIS. The SIS Project ensure that the approved needs for defense nuclear materials could be met. Expenditures on employment, material, and equipment are directly injected back into the economy.

5.27.6.8 Comment:

Reviewers stated that the economic benefits equivalent to those created by the SIS Project could be achieved without the aid of the Federal Government, and that an economy created by Federal funding is a false economy.

Response:

The DOE concurs that economic benefits equivalent to those of the SIS Project could be achieved by other means; however, an analysis of such other means and of the legitimacy of an economy created by Federal funding is beyond the scope of this EIS.

5.27.6.9 Comment:

Reviewers noted that the SIS Project was a pork barrel, was very costly, would not help Idaho economically, would not solve Idaho's financial problems, and would damage Idaho's economy. It was stated that Idaho's economy should not be enhanced at the expense of public safety or environmental quality.

Response:

The socioeconomic impacts of the SIS Project are analyzed in the EIS, and indicate that the SIS Project would probably benefit Idaho's economy. As also identified in both the Draft EIS and Final EIS, there would not be major adverse impacts on public health or environmental quality. For information on site selection see the response to comment 5.2.7.

5.27.6.10 Comment:

It was noted that the short-term economic benefits of the SIS Project would be minor compared to the long-term deficit with which Idaho could be impacted.

Response:

The EIS assessment of environmental and socioeconomic impacts from construction and operation of the SIS Facility in Idaho does not indicate that any long-term deficits to the state would occur.

5.27.6.11 Comment:

Concern was expressed about deficit financing of the SIS Project specifically, that it would contribute to the national debt and incur negative effects on the economy.

Response:

The President and the United States Congress are responsible for balancing the needs and priorities of the nation within the constraints of the budgetary process. The complexities and impacts of this process are beyond the scope of this EIS.

5.27.6.12 Comment:

It was stated that the SIS Project would not benefit the state's revenue and that the Draft EIS overstated the sales taxes generated by the SIS Project.

Response:

The Draft EIS and Final EIS estimate only the amount of additional sales tax revenue that would be generated from SIS employees and not by direct purchases of materials and equipment. The stated tax revenue is therefore conservative and not overestimated.

5.27.6.13 Comment:

It was stated that the SIS Project would provide an opportunity for training of the local workforce.

Response:

One of the likely beneficial impacts of SIS operations would results from an expected increase in INEL employment due to broadened application of craft apprentice programs which would be necessary to support operations of the SIS Project.

5.27.6.14 Comment:

It was stated that, based on an economics model, the Draft EIS significantly overestimates the economic benefits to be derived from the SIS Project. It was noted that there is commingling of the funds supporting both the uranium and plutonium Atomic Vapor Laser Isotope Separation (ALVIS) development, which makes it difficult to make cost projections. It also was noted that an additional five years of development effort (through 1995) beyond that currently shown in SIS plans would be required to demonstrate plutonium isotope separation, resulting in significantly higher project costs and reduced benefits. It was also stated that the construction of the project could undergo halts in construction, changes in design, and reversals as problems occur in the development effort.

Response:

Significant differences exist between the uranium and plutonium AVLIS technologies. However, because some of the systems (i.e., the laser systems) are very similar, development of the plutonium technology is expected to take significantly less time and effort than if there were no similar technology available. The commingling of the funding for the two activities benefits both activities synergistically. Plutonium separation has been achieved already in smaller scale experiments. See also the responses to comments 5.8.20, 5.28.8, and 2.27.6.3 for additional information.

5.27.7 Employment

5.27.7.1 Comment:

Support and concern were expressed concerning the type, quality, and associated salaries of the jobs that would be provided by the SIS Project. Others stated that the cost of providing these jobs was too high.

Response:

The construction jobs created by the SIS Project would utilize all types of construction crafts. The pay scale for these jobs is the Davis-Bacon Wage Rates (union scale) for this area. The operations personnel would be paid on the same scale that exists for other INEL operations. The support services that would expand because of the SIS Project would be extensions of, or services similar to, those currently in the area with similar salary schedules.

The SIS Project would require various types of jobs to support it through construction and operations phases. Skilled construction craftspeople will be required to construct the facility. The operations crew will be staffed with technically trained specialists and operators. The support services required will be an extension of the current support service jobs performed at the INEL. Overall, there is a diversity of skills, training levels, and experience needed for the SIS Project which offers opportunities for quality positions. With respect to the costs for the jobs being too high, see the response to comment 6.2 (Cost/Risks versus Benefits).

5.27.7.2 Comment:

Concern was expressed that the duration of the SIS Project would not provide long-term employment.

Response:

The SIS Project has a design life of 30 years and the actual period of SIS operation for the production of weapon-grade plutonium would be dependent on two important factors (availability of feed material and the approved requirements for nuclear defense materials). Given the uncertainty associated with these two factors, it cannot be precisely ascertained how long the SIS Project would operate. However, an analysis of potential impacts based on maximum throughput capacity of the SIS Project has been provided in the Final EIS in an attempt to bound the potential environmental consequences of SIS operation over the 30-year design life of the facility.

In the event that the length of operation of the SIS Project for processing fuel-grade plutonium to produce weapon-grade plutonium is relatively short, it is not likely that long-term socioeconomic effects would result. The number of operating personnel associated with the SIS Project is relatively small compared to the current workforce at the INEL. In addition, operating personnel would come primarily from the existing labor pool in the INEL area rather than from persons who would in-migrate into the area. Sections 4.1.1.1 and 4.1.2.1 of the Final EIS provide a more detailed discussion of in-migrating workers and their potential socioeconomic consequences than is contained in the Draft EIS to assist in understanding potential socioeconomic impacts. See also responses to comments 5.22.2 and 5.22.3.

5.27.7.3 Comment:

Support and concern were expressed on the number and type's of jobs that would result from the SIS Project at the INEL.

Response:

See the responses to comments 5.27.1.5 and 5.27.7.1 regarding the number and types of jobs.

5.27.7.4 Comment:

Reviewers questioned the number and duration of jobs that would be filled by Idahoans and the number that will be filled by out-of-state workers.

Response:

The Final EIS discusses in more detail the number of jobs required and the expected number that would be filled by Idahoans (Section 4.1.1.1). Also see the responses to comments 2.2.9, 5.22.2, and 5.27.7.2 regarding the period of SIS operation.

5.27.7.5 Comment:

It was noted that net employment at the INEL would not change significantly because of the SIS Project.

Response:

The SIS Project would not significantly change net employment at the INEL although there would be a slight increase based on the estimated number of construction and operating personnel. See Section 4.1.1.1 of the Final EIS.

5.27.7.6 Comment:

It was noted that the benefit of increased employment for the people of Idaho due to construction and operation of the SIS Project is uncertain.

Response:

Section 4.1.1.1 of the Final EIS provides an expanded discussion of SIS employment requirements and the expected number of Idahoans that would be employed. For purposes of calculating potential socioeconomic impacts on the six-county area, the number of personnel that would be hired from the local workforce was minimized. However, as this is an upper bound, it is likely that fewer personnel will in-migrate and more personnel will be hired from the local workforce. See also the response to comment 5.27.7.2.

5.27.7.7 Comment:

It was noted that unemployment rates of surrounding communities would drop because of new jobs created by the SIS Project.

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Response:

5.27.7.12 Comment:

It was noted that a mix of types or worker categories (e.g., engineers, scientists, technicians, crafts, unskilled labor) would be needed to fill SIS jobs.

Response:

The SIS Project would require various worker categories during both the construction and operations phases. Skilled construction craftspeople would be required to construct the facility. The operations crew would be staffed with technically trained specialists (such as scientists and engineers) and skilled operators and technicians. The support services required would be an extension of the current support service jobs performed at the INEL. Overall, there is a diversity of skills, training levels, and experience needed for the SIS Project which offers opportunities for quality positions.

5.27.7.13 Comment:

It was noted that the nuclear industry is not the only source of jobs in the Northwest; other sources are recreation and tourism.

Response:

The Final EIS in Appendix B presents employment statistics, and DOE acknowledges that tourism and recreation are important industries in the State of Idaho.

5.27.7.14 Comment:

It was stated that nuclear plant jobs, and jobs offered by the INEL, are undesirable and exploit workers.

Response:

The DOE and its contractors will comply with applicable occupational, safety, and health protection requirements (DOE Order 5483.1A), equal employment opportunity guidelines (Title VII of the 1964 Civil Rights Act), and wage guidelines (Service Contract Act and Public Contracts Act). DOE does not consider jobs at the INEL to be either undesirable or exploitative.

5.27.7.15 Comment:

It was stated that Idaho laws do not require worker's compensation to cover long-term radiation injuries.

Response:

Idaho law does recognize the viability of claims for injuries due to radiation. One example is a claim for an occupational disease which can be presented under Idaho Workmen's Compensation Laws. In accordance with the provisions of Idaho Code section 72-448 (2), assuming a 10- to 20-year incubation period for a radiation injury, the claimant would still have 1 year within which to file his claim after he knew, or in the exercise of reasonable diligence should have known, that radiation which the employee received in his present or prior employment caused the occupational disease. In addition, outside the provisions of Workmen's Compensation Law, Idaho Code section 5-243 indicates that a person suffering a radiation injury has 3 years after he knows, or reasonably should have known, the cause

of the injury to bring an action for his damages. This same section indicates that such an action may be maintained up to 30 years from the date of the last occurrence to which the injury is attributed.

5.27.7.16 Comment:

It was stated that the SIS Project was needed by Idaho. Specific reasons cited included statements that the SIS Project would result in an increase in permanent jobs, stable employment, needed tax revenue, and that the SIS Project would decrease the number of people leaving Idaho. Conversely, it was stated that the jobs that would be provided by the SIS Project are not needed.

Response:

In the Draft EIS and Final EIS it is stated that unemployment in the INEL region exceeds the national average, therefore jobs provided by the SIS Project would be beneficial, and would potentially provide opportunities for prospective employees to remain in Idaho. See responses to comments 5.27.6.1 and 5.27.6.12 for more information on employment and tax revenue impacts of the SIS Project.

5.27.7.17 Comment:

It was suggested that other alternatives (e.g., tourism) should be sought for creating employment opportunities in Idaho. The reasons cited included statements that the SIS Project is risky, expensive, evil, immoral, obsolete, unethical, etc.

Response:

A discussion of other means of providing employment to the Idaho area is beyond the scope of this EIS. The risks (potential environmental impacts) of the SIS Project are addressed in the Draft EIS and the Final EIS. Discussions of whether the SIS Project is moral, evil, expensive, or ethical are also beyond the scope of this EIS.

5.27.8 Social Impacts

Comment:

Reviewers noted that psychological and social impacts of nuclear weapons production in a community were not addressed in the Draft EIS.

Response:

Because the INEL has historically been engaged in defense projects and currently is engaged in naval reactor activities, nuclear fuel reprocessing, and other defense work, the SIS Project would be only a small portion of the defense-related work at the INEL. The SIS Project would not produce nuclear weapons. It is unlikely that the addition of the SIS Project would significantly alter any social impacts that may or may not exist. Psychological impacts are beyond the scope of this EIS.

5.27.9 Potential Spinoffs

5.27.9.1 Comment:

There were many general comments regarding potential spinoffs from the SIS Project. Many comments discussed potential positive impacts including education, business, technology, economy,

employment, and benefits to mankind and the environment. Reviewers stated that the spinoff from the SIS Project would be greater than spinoff from the space program. Conversely, reviewers suggested the spinoff potential is limited, overrated, and not worth the risk.

Response:

Technological spinoffs are conjectural and are beyond the scope of this EIS. As stated in Section 4.1.1.1 and 4.1.2.1 of the Final EIS, there is a potential to benefit the local economy because of increased employment, tax revenues, and indirect jobs. See the response to comment 6.2 for more information on the risk benefits of the SIS Project.

5.27.9.2 Comment:

Reviewers commented concerning potential spinoffs of the laser optics and electronic technology from the SIS Project.

Response:

The possibility of positive spinoffs from the SIS technologies with respect to laser optics and electronic technology is acknowledged. DOE has an active technology transfer program to promote the commercial applications of research conducted at the INEL. Potential spinoffs are only conjectural, however, and are beyond the scope of this EIS.

5.27.9.3 Comment:

It was noted that the SIS technology could have medical, materials refining, and other industrial applications or spinoffs.

Response:

DOE acknowledges that the SIS technology could have medical, materials refining, and other industrial applications or spinoffs. It should be noted that no specific applications have been identified at this time, but the DOE has an active technology transfer program to promote the commercial applications of research and development programs at the INEL. Potential spinoffs are only conjectural, however, and beyond the scope of this EIS.

5.27.9.4 Comment:

Reviewers noted that the Draft EIS did not discuss technological transfer economic spinoffs, or what would happen if the project were canceled during construction. It was stated that SIS would help technology transfer to rural communities.

Response:

The DOE does not discuss economic spinoffs or technology transfer, in the Draft EIS or the Final EIS, as they are acknowledged to be conjectural. A discussion of the impacts resulting from cancellation of the SIS Project during construction is considered arbitrary and therefore is not included in the EIS.

5.27.9.5 Comment:

Reviewers noted that the SIS Project would be a production facility and, therefore, INEL would not benefit from the laser technology because the research was performed elsewhere and would stay at the Lawrence Livermore National Laboratory (LLNL). Others stated that the SIS Project would broaden the bases of INEL's laser research.

Response:

Benefits can arise from both basic research and research into development and applications. For example, the INEL did not invent nuclear reactors, but over the years the INEL has realized benefits from research into applications of reactor technology. Therefore, DOE believes that the INEL may realize benefits from laser technology.

5.27.9.6 Comment:

Reviewers cited possible positive regional business opportunities and socioeconomic benefits that could result from the SIS Project. Others stated that spinoffs should not be discussed because the INEL does not use local vendors; others countered that DOE does use local vendors.

Response:

The INEL does use local vendors. For example, in 1987 Idaho businesses and industries received $35 million in the form of contracts and subcontracts from INEL site employers. Spinoffs are covered in the response to comment 5.29.9.2. Socioeconomic impacts are discussed in Section 4.1.1.1 and 4.1.2.1 of the Draft EIS and the Final EIS

5.27.10 Boom/Bust Cycle

Comment:

Reviewers expressed concern (due to the limited supply of feedstock and/or the uncertain need for weapon-grade plutonium) over the possibility that a boom-and-bust cycle would be caused by the eventual shutdown of SIS facilities, and the cleanup costs associated with shut-down; that the jobs would be temporary or short-term; that a boom-and-bust economy is not stabilizing; and that the jobs probably will not go to Idahoans. Others were concerned that radiation hazards and high risks could cause social problems.

Response:

The analyses performed indicate that an economic "boom" will not occur and that the majority of jobs will probably go to Idahoans, largely because of gradual hiring of construction and operating workforces and local (regional) workforce availability. In addition, the INEL anticipates a slight near-term decline in employment because of the completion of some major projects. The SIS Project would absorb many of the workers employed by those completed projects, thus stabilizing the INEL workforce. The INEL has historically maintained a relatively stable workforce by obtaining a variety of projects in succession. Because the population increases are small and the workforce may be absorbed by other INEL projects when the SIS Project would terminate, a "bust" in the economy because of SIS Project is not likely to occur. Upper-bound estimates on the number of in-migrating workers, population growth, and associated impacts resulting from the SIS Project are contained in the EIS. Costs associated with any necessary cleanup are the responsibility of the DOE and are not borne by local communities or the state. For information on risks, see the response to comment 6.2 regarding costs and risks versus benefits.

5.27.11 Infrastructure

5.27.11.1 Comment:

Reviewers commented on the general state of the existing infrastructure of the INEL region. It was stated that the infrastructure of the counties affected by the SIS Project have adequate surplus capacity to assimilate the SIS workers. Conversely, it was stated that the existing infrastructure is inadequate.

Response:

The INEL region has adequate community services and facilities to accommodate the expected influx of SIS workers and their families. Additional information has been included in the Final EIS on characterizing the infrastructure (e.g., Section 3.1.3.3) and impacts (e.g., Section 4.1.1.1).

5.27.11.2 Comment:

Reviewers stated that the availability of health care in the INEL region is adequate to support SIS construction and operation.

Response:

The Final EIS in Section 3.1.3.3 indicates that there would be sufficient health services in the INEL area to meet the anticipated demand.

5.27.11.3 Comment:

Reviewers stated that there may or may not be an adequate construction/craft workforce available in the INEL area to support SIS construction.

Response:

Both the Draft EIS and Final EIS indicate that there are over 3,000 craft personnel within a 50-mile radius (and over 16,000 within 200 miles) of the INEL. Because of the large number of construction/craft personnel available in the area, it is not anticipated that a significant number of personnel would be needed to migrate into the area to fill jobs. A small number of workers may in-migrate to fill specialized construction jobs.

5.27.11.4 Comment:

Reviewers stated that the assessment of housing availability in the Draft EIS needs more sound data and analyses.

Response:

As identified in Section 3.1.3.3 of the Draft EIS and the Final EIS, a recent regional survey indicated that there are about 1,300 single-family units for sale in addition to many rental units. Because the maximum projected need is less than 10 percent of currently available housing, it is not considered essential that an in-depth analysis of housing availability be conducted.

5.27.11.5 Comment:

Reviewers stated that the SIS Project might have a negative impact on local services, (i.e., schools, hospitals, municipal services, etc.). It was also stated that the Draft EIS conclusion that the project would not be expected to have major impacts on local governmental services and community infrastructure is not supported by any firm data or by the use of a model. Concern was expressed that the Draft EIS did not discuss how the community would be able to respond to the increased demands on these services or finance any required improvements.

Response:

Section 4.1.2.1 of the Draft EIS and the Final EIS indicates that there would be sufficient local services to accommodate SIS personnel and their families and that there would be no significant adverse impacts on local businesses or community support services. In addition, the average income for a worker at SIS is anticipated to be greater than the current average income in the six surrounding counties. Generally, people with higher household incomes contribute more toward local services, voluntary social activities, and community amenities (e.g., charities, scouts, community concerts). Generally, if jobs provided by a project increase a community's average income, the project has a positive economic impact on the community. The requirements of SIS are minor, have been identified and can be met by the existing infrastructure. Therefore, it was determined to be unnecessary to develop a detailed assessment by using of a model.

5.27.11.6 Comment:

Reviewers stated that the SIS Project would have a negative impact on local schools. Other comments were positive, stating that any economic recovery in the area would benefit the schools. It was noted that there is an excess school capacity in Pocatello. Other reviewers expressed concern because of the statement in Section 4.5.1.1 that indicated that overcrowding of selected schools might occur based upon current school capacities. It was noted that the source of funding for any new schools that are needed has not been identified.

Response:

The Draft EIS indicated that the potential population growth due to in-migrating personnel might result in impacts in some schools, depending on the choice of residence of the new personnel. Section 3.1.3 also identified that the reasons many schools have enrollments at capacity were consolidation and closures due to declining enrollment. The Final EIS, based on a more detailed analysis of in-migrating workers, does not anticipate overcrowding of schools. Because of the higher-than-average wage the SIS employees would receive, they would be able to contribute more to public school support, which is anticipated to mitigate any adverse impacts.

5.27.12 INEL

5.27.12.1 Comment:

It was noted that the INEL has created a large influx of people, which has resulted in cultural opportunities unusual for an agricultural community.

Response:

DOE acknowledges that the INEL has contributed to the cultural diversity of the region.

5.27.12.2 Comment:

Reviewers stated that local contractors and workers are competent, experienced, and hard working, and that the INEL tries to first use Idaho contractors for construction jobs, rather than out-of-state contractors.

Response:

DOE acknowledges that local contractors and workers are competent, experienced, and hard working and that the INEL uses local contractors whenever possible. For example, in 1987 Idaho businesses and industries received $35 million in the form of contracts and subcontracts from INEL site contractors.

5.27.12.3 Comment:

It was noted that the INEL doesn't pay property tax, sales tax, fuel tax, etc., yet creates demands on area schools, sewers, and highways.

Response:

Sales/use taxes are paid on all construction materials for buildings and associated equipment (such as those associated with the SIS Project) by fixed price subcontractors. County tax assessors have been assisted when visiting construction job sites in identifying property within the county subject to the county's property taxes. INEL contractors pay a franchise tax and/or corporate income taxes. They also pay millions of dollars in sales taxes on procurements of supplies, equipment, rentals, etc. The State of Idaho receives about 8 percent of its personal income taxes from site employees. The INEL bus system pays a fuel excise tax for its use of the state highways. In addition, the 10,000 INEL employees pay real property taxes, sales taxes, income taxes, and all other taxes that other Idaho residents pay.

5.27.12.4 Comment:

Reviewers stated that the dollars/cents, jobs, and training opportunities resulting from INEL operations and constructing and operating the SIS Project are very important to Idaho's economy.

Response:

The activities of the INEL over the past 35-plus years have provided significant opportunities for construction contractors, construction craftsmen, and technical personnel in the State of Idaho. The SIS Project is expected to continue to provide opportunities for those personnel as well as opportunities for the development of new businesses.

5.27.12.5 Comment:

Reviewers stated that since the INEL has greatly contributed to local and state economies, and since several INEL projects are nearing completion, the SIS Project is necessary to maintain a stable employment level and sound economy in the INEL region.

Response:

The INEL has contributed to local and state economies and the SIS Project would provide continued economic benefits and stability. The success of local and state economies, while not exclusively dependent on a project of the magnitude of the SIS Project, is strongly affected by INEL activities.

5.27.12.6 Comment:

It was noted that cooperative efforts between management and union workers have resulted in a safe and healthy workplace and a safe and healthy environment.

Response:

No response required.

5.27.12.7 Comment:

Reviewers stated that it was essential for the INEL to maintain a healthy, viable relationship with Federal agencies and noted that the economic impact of the INEL is dependent on the Federal Government.

Response:

Because the INEL is a Government-owned, contractor-operated laboratory, any economic impacts of the INEL would be dependent on the Federal Government.

5.27.12.8 Comment:

Reviewers stated that the economic benefits from constructing and operating the SIS Project were overestimated because the INEL does not use local businesses. It was further stated that the economic benefits to the local community would probably be less at the INEL than if the SIS Project were constructed elsewhere because other DOE sites use local businesses, specifically engineering firms. Other reviewers stated that the SIS Project would provide positive opportunities for local businesses (large and small), due to a "Buy in Idaho" policy.

Response:

Similar to other DOE sites, the INEL contractors have policies encouraging the use of local businesses whenever possible. For example, in 1987 Idaho businesses and industries received $35 million in the form of contracts and subcontracts from INEL site contractors. The SIS Project would provide positive opportunities for local businesses.

5.27.13 Land Use

5.27.13.1 Comment:

Objections were raised to putting more land into wilderness classification.

Response:

No wilderness classification of land will result from locating the SIS Facility at the INEL. The land proposed for the SIS Project is within or adjacent to the fenced area of the Idaho Chemical Processing Plant (ICPP) and has previously been withdrawn from public use by Bureau of Land Management (BLM) public land orders.

5.27.13.2 Comment:

Reviewers stated that the SIS Project will not remove any additional land from public or productive use. It was also stated that the SIS Project is a good multiple use of public lands.

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Response:

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Response:

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Response:

5.27.14.3 Comment:

Concern was expressed about the safety and protection of the tribe's homeland. Some reviewers stated that the Draft EIS should be revised to include a discussion of the impacts of constructing and operating the SIS Project on Shoshone-Bannock Indian treaty rights. Others observed that the tribes are not willing to risk irreparable damage to their off-reservation treaty rights, hunting, fishing, gathering, trapping, or permanent homeland.

Response:

The INEL was originally established by Congress as the National Reactor Testing Station (NRTS) for the purpose of national defense and safety research. As such, it does not fall into the category of open and unclaimed lands. INEL land was withdrawn by Public Land Orders of the BLM and turned over to DOE [formerly the Atomic Energy Commission (AEC)]. In addition, several parcels of land were privately deeded to DOE (formerly AEC). As such, those lands are not affected, nor do they affect treaty rights. As identified in the Draft EIS and the Final EIS, the potential environmental consequences associated with the construction and operation of the SIS Project would not result in releases or impacts beyond the INEL boundary that would measurably impact the environment. Consequences to the Fort Hall Reservation would therefore be inconsequential and would not result in any irreparable damage.

5.27.15 Higher Education

5.27.15.1 Comment:

Reviewers stated that the SIS Project would provide benefits to higher education systems and institutional and vocational training in Idaho. It was also stated that higher educational institutions would be a resource for the SIS Project.

Response:

The DOE acknowledges that the SIS Project may have a positive impact on education and vocational training primarily through increased tax revenue and apprentice employment opportunities. DOE also acknowledges that Idaho's educational institutions are a valuable resource for the INEL and SIS Project.

5.27.15.2 Comment:

It was stated that the SIS Project would have a negative effect on education, and that universities should not be used for warfare-related research.

Response:

The DOE believes that the SIS Project may have a positive, rather than a negative, impact on education primarily through increased tax revenues. The universities would not be involved in warfare-related research for the SIS Project.

5.27.16 General

Comment:

It was stated that the SIS Project would force local businesses to raise current standards of workmanship.

Response:

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Response:

5.28 SIS TECHNOLOGY

5.28.1 Comment:

Reviewers expressed concern that advanced technology creates environmental problems and leads to more complicated lives. It was also stated that new technologies need to be used to solve problems and allow other technologies to develop.

Response:

While the Special Isotope Separation (SIS) Project would utilize the advanced technology of Atomic Vapor Laser Isotope Separation (AVLIS), the purpose of this Environmental Impact Statement (EIS) is to assess the potential environmental consequences of the construction and operation of the SIS Project using the AVLIS technique rather than the merits of advanced technology. This EIS appropriately describes the AVLIS technique, discusses the design safety features that would be used to limit or mitigate consequences, and considers the potential environmental consequences in the event of an accident. An Environmental Assessment (EA) was prepared to assist the U.S. Department of Energy (DOE) with the decision on the selection of technology used for the SIS processes.

5.28.2 Comment:

Reviewers noted that, compared to other plutonium processing technologies such as reactors, the SIS technology would be safer, cheaper, less complex, generate less waste, and offer significant advantages. Conversely, it was stated that the SIS technology has not been demonstrated to be an economical process for processing fuel-grade plutonium, that the Office of Management and Budget (OMB) has said that SIS would require the highest cost of the various methods of increasing plutonium production, and that using existing technologies such as blending could save millions of tax dollars.

Response:

The SIS technology cannot be readily compared to either a production reactor or the chemical separation processes which currently are used to extract and recover material in irradiated fuel and targets. To the extent that fuel-grade plutonium previously produced in a reactor is available, the SIS Project is relatively attractive with respect to waste generation and unit costs for material when compared to the production of new, highly purified plutonium that is required for in blending. Unlike blending, however the SIS Project would not require production of additional quantities of plutonium.

The SIS Project represents a cost-effective means of meeting future requirements for weapon-grade plutonium compared to reactor-based production. See the response to comment 7.14 regarding discussion of blending versus SIS unit costs.

5.28.3 Comment:

Reviewers noted that the SIS Project is a separation facility, not a facility that produces new plutonium as a reactor would.

Response:

DOE concurs that the facility would not produce new plutonium. The SIS Facility takes existing plutonium not meeting weapon-grade isotopic specifications and isotopically purifies the material to meet weapon-grade specifications.

5.28.4 Comment:

It was stated that criticality experiments have not been performed on plutonium chloride.

Response:

No criticality experiments have been performed using plutonium chloride because of the difficulty of handling that compound in a critical array. Plutonium chloride is very hygroscopic (i.e., absorbs moisture from the air) and is soluble in water. The quantities to be used in the SIS Facility are small and would not approach the quantities necessary for criticality. Criticality calculations are based on conservative estimates that have been utilized by other DOE sites handling plutonium chloride.

5.28.5 Comment:

It was stated that the laser isotope separation technology is the least expensive method for processing fuel for commercial nuclear power plants.

Response:

The purpose of this EIS is to assess the environmental consequences of the SIS Project, which would use the AVLIS technique for the isotopic separation of DOE-owned fuel-grade plutonium to produce weapon-grade plutonium. The AVLIS technology is being developed under a separate program of DOE to provide low-enriched (in the isotope U-235) uranium to fuel commercial nuclear power plants. For the future, AVLIS offers lower enrichment costs than can be expected from existing gaseous diffusion uranium enrichment plants. Also see the response to comment 5.28.6.

5.28.6 Comment:

It was noted that the AVLIS/SIS technology and/or the SIS Facility could be used or evaluated for other possible applications, including isotopic separation of other elements or other forms of plutonium, isotopic separation for purposes not related to weapons, refinement of warhead materials for peaceful purposes, generation of high-purity unique materials, waste recycling and reduction, production of material for conventional weapons, cleanup of DOE-owned plutonium, development of a thermal source for satellites, or enrichment of uranium for reactor fuel.

Response:

This EIS assesses the potential environmental impacts for constructing and operating the SIS Project to process DOE-owned fuel-grade plutonium into weapon-grade plutonium. Although the SIS Facility may have the capability to perform additional missions such as those indicated in Section 1.1.2 of the Final EIS, none has been formally evaluated or proposed by DOE. Any such proposal would be fully subject to the necessary technical, environmental, and safety evaluations and the requirements of National Environmental Policy Act (NEPA).

5.28.7 Comment:

Reviewers noted that SIS technology could help solve nuclear waste problems, would reduce the amount of nuclear waste by converting it into a useful product, and would provide the technology to clean up DOE-owned plutonium more safely, securely, and economically.

Response:

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Response:

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Response:

5.29 TRANSPORTATION CONSIDERATIONS

5.29.1 Comment:

Reviewers noted that the discussion on transportation and handling of radioactive materials in the Environmental Impact Statement (EIS) was inadequate and the analysis deficient or unacceptable, and that many of the concerns about transport of materials are unresolved. Specific additional information was requested on individual training, cleanup costs, product and feed transport containers, emergency response, and hazards.

Response:

The Draft EIS and the Final EIS include a description of planned transportation of Special Isotope Separation (SIS) feed, product, by-product, and wastes. The analysis of potential transportation impacts presented in the Draft EIS includes radiological impacts of normal transportation and transportation accidents, and physical injuries resulting from accidents. The methods used in this analysis are discussed and references provided for more details (Sections 4.1.3.3, 4.2.3.2, 4.3.3.2, and Appendix A). The Final EIS was expanded to include transportation of by-product and wastes (Section 2.1.5.2) and a more detailed description of the analytical methods used. An analysis of the impacts of offsite shipments of transuranic wastes was also included. For more information on risks associated with transportation, see the response to comment 5.29.2.

The estimated cleanup costs of the most severe accident involving the transport of plutonium in an urban area with high population density would be relatively high; however, the overall risk of incurring such costs is relatively small given the extremely low probability of such an accident occurring. The consequences of a severe accident involving the transport of plutonium are presented in the U.S. Nuclear Regulatory Commission (NRC) final environmental impact statement on radioactive material transport (NRC, 1977b) in terms of both the number of potential latent cancer fatalities and the economic consequences (e.g., cleanup and agricultural products). The consequences of the severe plutonium accident presented in the 1977 NRC NUREG-0170 (Reference NRC 1977b, in the Draft EIS and the Final EIS) are probably higher than those associated with SIS shipment of plutonium because of improved containment afforded by the current safe secure transport (SST). In evaluating both the consequences and risks of radioactive material transport, including severe accidents, the NRC concluded that "the risks attendant to accidents involving radioactive material shipments are sufficiently small to allow continued shipments by all modes." For more information on training and emergency response, see the responses to comments 5.29.57, 5.29.66, and 5.29.67. Based on the information presented and discussed in the Final EIS, no unresolved issues were identified.

5.29.2 Comment:

Reviewers stated that the Draft EIS had inadequate coverage of the risks associated with a transportation accident. Conversely, it was also stated by others that the transportation risks have been carefully analyzed.

Response:

Risks associated with transportation are covered in Section 4.1.3.3 of the Final EIS. The analysis of transportation accidents and their associated risks was conducted in cooperation with Sandia National Laboratories (SNL), experts in the risk analysis of the transportation of nuclear materials. Standard analytical computer codes, developed and maintained by SNL, were used. Input to these codes included the characteristics of SIS feed, product, and by-product, the accidents that might occur, and SIS-specific route characteristics. Additional information has been provided in Appendix A.3, Radiological Impacts of Transportation, of the Final EIS on waste and by-product transportation.

5.29.3 Comment:

Reviewers stated that the model, analysis, and input parameters used to assess the risks associated with transportation were woefully inadequate and underestimated the risks, and that this Draft EIS is worse than most with respect to transportation.

Response:

The model assumptions and risks for transportation are covered in Appendix A.3 of the Final EIS. The analysis of transportation accidents and their associated risks was conducted in cooperation with SNL, experts in transportation risk assessment. Standard analytical computer codes, developed and maintained by SNL, were used. Input to these codes included the characteristics of SIS feed, product, and by-product, and SIS-specific route characteristics. Model assumptions and data were conservative in that they tended to maximize calculated risks. Based on the information presented in the Draft EIS and the Final EIS, the risks do not appear to be underestimated.

5.29.4 Comment:

Reviewers stated that there was inadequate discussion of emergency responses required in the event of a transportation accident.

Response:

Section 4.6 of the Final EIS provides additional information and briefly discusses state, local, county, and DOE emergency response plans. These plans contain specific emergency response procedures and define responsibilities for the various responding agencies. A vast network of Federal, state, and local response capability is available for emergency situations.

5.29.5 Comment:

Reviewers stated that environmental concerns were not addressed adequately, specifically, adequacy of transport casks, leaks at the Waste Isolation Pilot Plant (WIPP), and duration of temporary Idaho National Engineering Laboratory (INEL) waste storage.

Response:

Containers used to ship materials would be either NRC-certified or approved for use by the Department of Transportation (DOT). For more information on cask construction and safety, see the response to comment 5.29.41. See the response to comment 5.30.3.1 regarding leaks at the WIPP and temporary INEL waste storage.

5.29.6 Comment:

Reviewers stated that the transportation accident assumptions were incorrect and that total number of shipments, risks, and quantity of material to be shipped were underestimated or speculative. Specific assumptions mentioned were the safety of the cask and emergency response capabilities. Conversely, it was noted that the assumptions are extremely conservative.

Response:

The exact number of shipments of SIS-related sensitive nuclear materials is classified; however, conservative assumptions and data were used in the analysis (see the response to comment 5.29.21). Therefore, the transportation risks for these materials have not been underestimated.

Additional transportation scenarios (e.g., by-product shipped to the WIPP rather than to the onsite storage vault) have been analyzed in the Final EIS. Accident assumptions are included in the Final EIS for eight accident severity categories (Final EIS, Section 4.1.3.3). The Final EIS also includes a comparison of transportation impacts for the 30-year operational life of the SIS Project. All shipment configurations for SIS-related materials will meet or exceed NRC standards and there is an on-going emergency response training program for all shipments. (See the response to comment 5.7.5 for additional information on emergency responses.)

5.29.7 Comment:

Reviewers stated there was an underestimation of the release fractions, no basis for the assumptions made to determine the release fractions, and insufficient information to independently verify the conclusions. It was asked if tests had been performed to determine if the size of the container breach affected the release fraction.

Response:

The basis for the release fractions used in the transportation risk analysis is discussed on pages A-48 to A-50 of the Draft EIS and the Final EIS. The release fractions were based on release fraction values in the publicly available NRC document NUREG-0170 (Reference NRC 1977b, in the Draft EIS and the Final EIS, Appendix A) for eight separate accident severity categories. The additional protection provided by the SST was based on the classified Safety Analysis Report for the SST (Reference SNL, 1976, in Draft EIS and the Final EIS, Appendix A).

The performance standards for Type 8 packaging exceed the severity of more than 99 percent of all highway accidents. This is discussed in NUREG-0170 and NUREG/CR-4829 (see References).

Under certain conditions, the size of the container breach could affect the release fraction. The most recent available test data were used in the analyses presented in the EIS.

References:

McWhirter, M., R. G. Brooks, J. M. Stomp, and L. A. Dillingham, "Final Report on Special Tests of Plutonium Oxide Shipping Containers to FAA Flight Recorder Survivability Standards," SAND75-0446, Sandia National Laboratories, Albuquerque, NM, September 1975.

Bonzon, L. L., "Final Report on Special Impact Tests of Plutonium Shipping Containers, Description of Test Results," SAND76-0437, Sandia National Laboratories, Albuquerque, NM, February 1977.

Fischer, L. E. et al., "Shipping Container Response to Severe Highway and Railway Accident Conditions," NUREG/CR-4829, UCID-20733, Nuclear Regulatory Commission, Washington, DC, February 1987.

5.29.8 Comment:

Reviewers stated that release fractions as calculated for plutonium oxide may underestimate the potential release from an accident if plutonium in another form were involved.

Response:

The method of calculating the release fractions is described in Appendix A, pages A-48 to A-50, of the Draft EIS and the Final EIS. The approach is conservative, consistent with available data, and is based on nationally and internationally accepted methodology. SIS shipments would consist of metal

in bulk form and plutonium oxide in powder form. The physical difference between bulk and powder forms was accounted for in the analysis by using appropriate dispersivity category values as described in the Draft EIS and the Final EIS, Appendix A.

5.29.9 Comment:

Reviewers noted that release fractions were not presented for each category of material shipped.

Response:

The categories of material were identified and evaluated separately by use of appropriate release fractions, etc., as described in Appendix A of the Draft EIS and the Final EIS, Section A.3, page A-50.

5.29.10 Comment:

Reviewers stated that, in the Draft EIS, plutonium source terms and release fractions relating to transportation accidents were underestimated.

Response:

The source term is the amount of material available for dispersal as the result of an accident. The release fraction calculations are described in Appendix A, Section A.3, of the Draft EIS and the Final EIS. Since the release fractions are conservative, consistent with available data, and are based on nationally and internationally accepted methodology, the source terms have not been underestimated. See the response to comment 5.29.7 for additional comments on the basis for the release fractions used.

5.29.11 Comment:

Reviewers requested that the specific NUREG-0170 model (either Model I or Model II) used to calculate release fractions be identified and any modifications used for calculations be explained.

Response:

Model II in Table 5-8 from NUREG-0170 (Reference NRC, 1977b in Draft EIS and the Final EIS, Appendix A) was used as the source of release fraction data for Type B containers. The calculation for the Draft EIS and the Final EIS, which is explained in detail in Appendix A, Section A.3, used the Type B release fractions as part of the calculation and took into account the additional protection provided by the SST. Thus, the overall shipment configuration quite reasonably has release fractions different from those for a Type B alone.

5.29.12 Comment:

Reviewers stated that the calculation of inhalable particles was underestimated because the wrong cutoff size was selected and that small airborne particles composed only 50 percent of the waste being transported when the actual value is as high as 80 percent.

Response:

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Response:

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Response:

from other human activities. Section 4.5 of the Final EIS provides a parametric analysis of cumulative risks for 10, 20, and 30 years of SIS operation.

5.29.15 Comment:

It was stated that the assumptions and quantities used in the Draft EIS for transport stop time, which can have a major impact on the overall risk assessment, were not accurate and not supported by independent studies. Concern was expressed over whether a stop time reduction could be adequately supported by conversation with an individual at Sandia.

Response:

The stop time is based on actual operational requirements for SST shipments. The reference provided for this information is a personal communication with an individual knowledgeable about these requirements. The specific requirements are classified. The decreased stop time does result in a decrease in incident-free risk, but has no effect on accident risk calculation. Total stop time may be apportioned into any number of stops. The number of stops has no essential influence on the risk calculation. The total time spent at stops, along with certain characteristics of the stop locations, is what determines the stop-related component of incident-free risk.

5.29.16 Comment:

Reviewers noted that route-specific data and analysis uncertainties were not disclosed, and also that only national, rather than specific, data for the actual routes for SIS shipments were used. Data concerning weather-releated road closures and truck access to roads were of particular interest.

Response:

The transportation impact assessment in the Draft EIS and the Final EIS uses both route-specific and national average transportation data. The route-specific data include total distance, adjacent population, and fraction of the route on various types of roads (e.g., rural, urban, or suburban). The road-type fractions are then combined with national average truck accident data for each road type. The national average data used in the analysis described in the Draft EIS yield accurate risk estimates for the cross-country routes to which they were applied. The SNL has conducted a number of tests to demonstrate the validity of this conclusion. Data included in the Final EIS show that the national average combination truck accident rate on interstate highways is about 3.1×10^{-7} accident/km. The average for only those states through which representative SIS shipments would pass is 3.2×10^{-7} accident/km. State average accident rates along the nine separate representative routes for SIS shipments range from 2.1×10^{-7} to 4.0×10^{-7} accident/km. These rates are for all property-damage accidents involving combination trucks and are much higher than the rates for severe accidents. This limited variability in accident rates supports the use of national average data for SIS shipments. For onsite shipments, the analysis does account for relevant site-specific factors such as low population density.

Weather-related road closures in the region are not expected to affect the risk estimates. Effects due to weather will be kept to a minimum by considering actual and forecast road conditions and by not dispatching trucks in either bad weather or under poor forecast conditions. Restricting truck transport to good weather conditions would reduce the overall truck accident rate by about 10 percent (NUREG-0170, Section 6.3.3). Since accidents associated with travel in poor weather conditions are included in the DOT accident-rate data that were used in the risk analysis, the risk estimate is slightly conservative with respect to this parameter. Second, in the unlikely event of an unforeseen road closure, radiological impacts would be associated mainly with an increase in stop time and

perhaps an increase/decrease in distance traveled (e.g., if a vehicle were able to use an alternative route). Since only one or a few shipments would be affected on an annual basis, the overall annual incident-free risk estimate would not change significantly.

See the response to comment 5.29.21 for information on analysis uncertainties.

5.29.17 Comment:

Reviewers noted that accident/risk data for past plutonium shipments were not included.

Response:

From 1971 to 1982 only one shipment containing plutonium was involved in an accident with no resultant release of plutonium. See the response to comment 5.29.28 for details.

5.29.18 Comment:

Reviewers noted that area-specific highway accident statistics are available and suggested that the risk in Idaho be calculated without the diluted U.S. accident factor. Reviewers noted concern over the variation in truck accident rates and pointed out that specific accident data for Idaho, Colorado, and Washington highways were not used. It was stated that the national averages are based on a study done in California, which appears inconsistent with national highway conditions and the Bureau of Motor Vehicles' statistics.

Response:

The national average data for interstate highways published by the DOT are for accidents that occur on the entire interstate highway system including Idaho, Colorado, and Washington. They are actual accident rates (i.e., accidents per vehicle-kilometer) and, because they represent many millions of total vehicle-kilometers of travel, they are highly reliable statistically. The total accident rates for Idaho, Colorado, and Washington are all lower than the nationwide average (see the response to comment 5.29.33 for specific data). If the state data were used, then the risk estimate would be based on fewer truck accidents per kilometer and would be a less conservative estimate. Therefore, use of national average accident rate data is appropriate for calculation of total risk. See also the response to comment 5.29.16 for more information on accident rate variability.

5.29.19 Comment:

It was noted that worst-case doses for an accident were missing, including rates for the individual exposed to the maximum extent or for the most sensitive populations (i.e., pregnant women and children).

Response:

The transportation risks presented in the Draft EIS and the Final EIS are the annual risk from transporting all SIS radioactive material and include accidents of varying severity. The risks from any individual accident are highly dependent on the circumstances of the accident and the characteristics of the area in which it occurs. Risk is used as a basis for comparison because it is an integrated measure of the consequences of the accident and its probability of occurrence. The risk from a less severe accident with lower doses and high probability is no less important than the most severe accident with very high doses and extremely low probability. Refer to the total risk discussion in Appendix A of the Final EIS.

Available information about variation in dose-effect relationships is discussed in ICRP Publication 27 and NUREG/CR-4214 (see References). With regard to in utero exposure, "no excess cancer deaths have been observed among those exposed in utero ....in Hiroshima and Nagasaki" (see References). The risk factors developed by the ICRP have been used due to the lack of authoritative factors for specific groups within the population.

References:

International Commission on Radiological Protection (ICRP), 1977, "Problems Involved in Developing an Index of Harm," ICRP Publication 27, Annals of the ICRP 1 (4), Pergamon Press, Oxford.

Evans, J. S. et al., "Health Effects Model for Nuclear Power Plant Accident Consequence Analysis," NUREG/CR-4214, Nuclear Regulatory Commission, Washington, DC, July 1985.

Till, J. E. and H. R. Meyer, Eds., "Radiological Assessment," NUREG/CR-3332, ORNL-5968, Nuclear Regulatory Commission, Washington, DC, September 1983.

5.29.20 Comment:

Reviewers noted that transportation risks outside the region for waste transport and refined plutonium were not addressed.

Response:

The full lengths of the representative routes for each shipment type, which include the routes both inside and outside the region around the SIS site, were used to calculate the transportation risks given in the Draft EIS and the Final EIS, Appendix A. Therefore, the national transportation risks, not merely the regional risks, were calculated. The transport of refined plutonium was included; it is the material labeled "product" in the analysis in the Draft EIS and the Final EIS.

5.29.21 Comment:

Reviewers noted that there was no acknowledgment of the uncertainties and limitations associated with using the RADTRAN model.

Response:

There are several ways to develop a risk estimate. One is to express risk as a mean or average accompanied by a standard deviation or some other statistical measure of uncertainty. Another is to assign conservative values (i.e., values that tend to maximize the risk estimate) to parameters with large uncertainties to generate credible upper-bound risk estimates. Neither of these is inherently "better" than the other, but calculation of upper-bound risk values typically has been used for environmental impact assessments. The relevant parameters have been identified and explained in the text in Appendix A of the Draft EIS and the Final EIS.

Regarding the "limitations" of the computer code RADTRAN III, a brief overview of the code may provide some perspective. RADTRAN was originally developed to support the analyses in NUREG-0170. The code has been modified and refined considerably since that time, and was the source code for the International Atomic Energy Agency's INTERTRAN code (see Reference). Since RADTRAN III (Madsen et al., 1986 in Draft EIS and the Final EIS) was first issued, additional refinements have been made. This was the code used for the Draft EIS and the Final EIS analysis, and it is now available free of charge to all public users on the TRANSNET system (see Reference). The code has been used to perform

numerous risk analyses for the U.S. Department of Energy's (DOE's) Office of Civilian Radioactive Waste Management and private users. The single greatest "limitation" facing users of RADTRAN or any code of this type is a scarcity of statistical data for certain input parameters. This difficulty can be overcome by using conservative estimates of these parameters (i.e., values that tend to maximize the risk). The resulting risks tend to be overestimates (see References), but are appropriate for use as bounding estimates in environmental documents. In this context, use of confidence limits as a measure of uncertainty would be inappropriate. See the References for a discussion of the limitations of parameter uncertainty analysis.

With respect to the comment regarding a sensitivity analysis, an extensive analysis of the sensitivity of RADTRAN risk calculations to variations in parameters was performed in 1986 (see References) for a sample truck transport case. The parameters that had the greatest effect on the incident-free risk calculation for truck transport were found to be, in decreasing order of importance, exposure distance while stopped; Transportation Index (TI) value; packages per shipment; shipments per year; K_0 (a factor that accounts for the shape of the package); distance traveled; number of persons exposed while stopped; stop time; shipments per year; distance from source to crew; and number of crew members. All of these are either deterministic (i.e., have known, fixed values for the problem being analyzed) or can be appropriately bounded by a conservative assumption. The accident risk calculation was sensitive to values for release fraction and for probability of occurrence of accident-severity categories; it was relatively insensitive to changes in accident rate or fractions of travel in urban and suburban population-density zones. Consequently, where data are not available, conservative assumptions regarding package release fractions and accident-severity-category probabilities are used as described in Appendix A of the Draft EIS and the Final EIS.

References:

Neuhauser, K. S. and P. C. Reardon, "A Demonstration Sensitivity Analysis for RADTRAN III," SAND85-1001, Sandia National Laboratories, Albuquerque, NM, October 1986.

Ericson, A. M. and M. Elert, "INTERTRAN: A System for Assessing the Impact from Transporting Radioactive Material," IAEA-TECDOC-287, International Atomic Energy Agency, Vienna, Austria, 1983.

Till, J. E. and H. R. Meyer, Eds., "Radiological Assessment," NUREG/CR-3332, ORNL-5968, Nuclear Regulatory Commission, Washington, DC, September 1983.

Cashwell, J. W., "TRANSNET--Online Transportation Risk Analysis for Public Use," SAND88-0568C, Sandia National Laboratories, Albuquerque, NM, March 1988.

5.29.22 Comment:

Reviewers noted that there was no confidence level indicated or sensitivity analysis for the RADTRAN model in the Draft EIS, and the lack of available testing data made the model results highly speculative. It was noted, for example, that a State of Utah study indicated that if you increase truck stop time by 10 percent, you increase the total risk by approximately 7 percent.

Response:

Increased stop time does increase risk from normal transport. The sensitivity analysis and confidence levels are discussed in the response to comment 5.29.21. The effects of stop times on overall risk calculations is discussed in the response to comment 5.29.15.

5.29.23 Comment:

Reviewers stated that the model used to determine the probability of an accident was flawed and in particular did not account for human error.

Response:

National average data for interstate highways and other roadway types are published by the DOT. The former includes the entire interstate highway system in Idaho. They are actual accident rates (i.e., accidents per vehicle-kilometers of travel), and are highly reliable statistically. For shipments of hundreds or thousands of kilometers of interstate travel, these accident rate data will yield an accurate total risk estimate. Note that the shortest offsite shipment distance is almost 1,000 kilometers. That portion of the total risk incurred within Idaho may be estimated separately using state-level data from the DOT's Bureau of Motor Carrier Safety (1984), which gives accident rates for Idaho of 3.652×10^{-7} accident per kilometer overall, and 3.375×10^{-7} accident per kilometer for the interstates. They are more than a factor of 2 lower than the national average rate of approximately 1×10^{-6} truck accident per kilometer, which is used in the risk analysis. If rates for the State of Idaho were used, then the "share" of total risk attributable to Idaho would be less than that calculated by use of the national average accident rate.

Human error as a cause of accidents is already accounted for in the accident rate data used in the analysis. The potential for human error during emergency response is being addressed in on-going training programs for potential emergency responders.

5.29.24 Comment:

Reviewers stated that proper response to a release and subsequent cleanup was assumed without a discussion of specific cleanup methods or errors involved in emergency response.

Response:

Cleanup would be carried out in full compliance with procedures outlined in the emergency response procedures and with all applicable standards. The recommended cleanup level for surface contamination of plutonium recommended by the U.S. Environmental Protection Agency (EPA) is 0.2 microcurie per square meter (see Reference). The SIS Project will meet these limits, if cleanup becomes necessary. Human error as a cause of accidents is already accounted for in the accident rate data used in the analysis. The potential for human error during emergency response is being addressed in on-going training programs for potential emergency responders.

Reference:

"Proposed Guidance on Dose Limits for Persons Exposed to Transuranium Elements in the General Environment," EPA 520/4-77-016, U.S. Environmental Protection Agency, Office of Radiation Programs, Washington, DC, September 1977.

5.29.25 Comment:

Reviewers suggested that calculations to determine background radiation risk be included in the Draft EIS.

Response:

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Response:

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Response:

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Response:

Reference:

Wolff, T. A., "The Transportation of Nuclear Materials," SAND84-0060, Sandia National Laboratories, Albuquerque, NM, December 1984.

5.29.29 Comment:

Reviewers stated that transportation risks were underestimated because the assumption that by-product material would not be shipped offsite was made and not substantiated. It was stated that either the reasons for this assumption should be given in the EIS or the shipment of these wastes to a high-level waste repository or other appropriate terminus should be addressed.

Response:

DOE has not made a final determination on the possible uses of SIS by-product. If no use is identified, the by-product will be shipped to the WIPP. The risks associated with such shipments have, however, been included in the Final EIS, Appendix A.3.

5.29.30 Comment:

It was noted that assumptions made regarding volatility and gaseous releases for a transportation accident were not listed.

Response:

None of the major radionuclides (plutonium or americium) in the SIS materials are either gaseous or volatile in the forms in which they would be shipped, nor would they be expected to be released in gaseous or volatile forms as the result of a severe accident. They would be released as solid particulates (aerosols). The release fractions are identified in Appendix A of the Draft EIS and the Final EIS. See the response to comment 5.29.12 for additional information on aerosols.

5.29.31 Comment:

Reviewers expressed concern over transportation of plutonium across highways and did not understand why the SIS Project would be built so far away from feed material. Others noted that locating the SIS Project at the INEL made sense from a transportation logistics standpoint. Clarification on this, along with a comparison of transportation risks between the INEL and other sites, was requested.

Response:

A comparison table on transport risks is given in the Draft EIS and the Final EIS, Appendix A, Table A-24. As explained in the Final EIS, the impacts of by-product and transuranic (TRU) waste shipments from the SIS site to the WIPP dominate overall transportation risk such that the location of the feed material has little impact on the total transportation risk.

Production and plutonium processing sites have typically been dispersed throughout the United States for a variety of reasons, including national security interests. All of the proposed alternatives would involve transportation of nuclear materials. The DOT has designated that transportation routes be over interstate highways to the maximum extent possible because they are considered to be the safest routes. If the SIS Project were not to be constructed, cross-country shipments of radioactive material would not be eliminated. Shipments of feed from Savannah River, shipments of

product to Rocky Flats, and shipments of TRU waste to the WIPP would still occur. Further, probable routes for many of these shipments would traverse the State of Idaho and the other states through which SIS material would be shipped.

Transportation safety was only one of the many factors considered by DOE in selecting the INEL as the preferred site for the SIS Project.

5.29.32 Comment:

Reviewers noted that plutonium presently is transported through Idaho and that, if the SIS Project is not located at the INEL, plutonium transportation to Colorado or the WIPP will follow a route through Idaho.

Response:

Shipment of plutonium and plutonium-containing wastes through Idaho occurs and will continue at some level regardless of which alternative is selected for the SIS Facility. See the response to comment 5.29.31 for information on transportation of plutonium.

5.29.33 Comment:

Reviewers noted concern over cumulative safety impacts resulting from an increase (for example, by 50 percent) in the number of plutonium and/or TRU waste shipments in Idaho and other Northwestern states. Reviewers stated that the transportation assessment appeared to underestimate the needed shipments of hazardous material, including wastes, and did not compare these to present shipment rates.

Response:

There are about 100 million shipments of hazardous materials (including radioactive material) per year in the United States (see References). The SIS-related shipments would not result in a dramatic increase in such shipments overall even in the "corridors" of the Northwestern states, nor would it result in a statistically detectable change in the average number of annual shipments. Therefore, these would not add significantly to "cumulative safety impacts."

A recent survey indicated that about 2.8 million unclassified shipments of radioactive material occur annually in the United States (see References). These data are from public sources that can be easily confirmed. Thus, "shipping rates required for nuclear materials" have not been underestimated, and SIS-related shipments would not constitute a large volume of nuclear shipments or be expected to have any detectable effect on traffic safety. See the response to comment 5.29.35.

References:

Wolff, T. A., "The Transportation of Nuclear Materials," SAND84-0062, Sandia National Laboratories, Albuquerque, NM, December 1984.

Javitz, H. S., et al., "Transport of Radioactive Material in the United States: Results of a Survey to Determine the Magnitude and Characteristics of Domestic, Unclassified Shipments of Radioactive Materials," SAND84-7174, TTC-0534, SRI International, Menlo Park, CA, 1984.

5.29.34 Comment:

Reviewers suggested that the transport assessment should address risks and shipment quantities associated with transportation of "the other fuel stockpiles," facility decontamination and decommissioning (D&D), plant accident cleanup and weapons cleanup program. It was also stated that a different type of container would likely be necessary to handle these possible future feed materials. Reviewers stated that waste would be transported from all over the country for SIS processing.

Response:

Waste would not be transported from all over the country for processing at the SIS Facilities. The Draft EIS and the Final EIS in the "Foreword" identify the feed material that would be processed by the SIS Project (processed N-Reactor fuel and scrap at the Hanford Site and SRP). In addition, the Draft EIS and the Final EIS acknowledge in Section 1.1.2 that recovered plutonium from the Fast Flux Test Facility (FFTF) represents a potential source of feed material. Currently, DOE is preparing an Environmental Assessment (EA) analyzing the feasibility and environmental impacts of various fuel-decladding techniques that could be used to recover DOE-owned plutonium in the spent fuel from the FFTF located at the Hanford Site. Section 4.5.1 and the Summary of the Final EIS have been modified to include cumulative impacts of 30 years of SIS operation at maximum capacity, including the cumulative risk of transporting FFTF fuel to the SIS Facility from the Hanford Site, the preferred location for the decladding activity. (However, it should be noted in addition to its potential use as feed for SIS, the FFTF spent fuel could be blended to produce weapon-grade plutonium, and a decision to build the SIS Project does not foreclose options concerning use of FFTF fuel.) Specific information on shipment quantities is classified. No other feed sources have been identified or formally proposed for the SIS Project; consequently, the potential transportation risks associated with other feed material are beyond the scope of the EIS. The weapons cleanup program is not a mission that has been formally approved or considered by DOE, and is beyond the scope of this EIS. See the response to comment 7.20.

Major SIS Facility accidents and decontamination and decommissioning of the SIS Project would most likely result in additional quantities of TRU waste. The transportation risks identified in the Draft EIS and the Final EIS for TRU waste transport would bound the annual transport risks (i.e., if a major accident were to occur or the facility would be decommissioned and decontaminated, the SIS-generated TRU waste and those generated from these other events would not be additive). Also see the response to comment 5.5.1 regarding decontamination and decommissioning. Containers which are certified by the NRC or approved for use by the DOT will be used to transport SIS radioactive materials.

5.29.35 Comment:

Reviewers noted that the radiological inventory and quantity of plutonium (as requested in the scoping hearings) and waste shipped in and out of Idaho were not addressed in the Draft EIS.

Response:

The amount of plutonium in SIS-related shipments is classified. The major isotopes (i.e., all isotopes of plutonium and americium) in each shipment type (feed, product, by-product) were considered, and representative values for each were used in the analysis. The exact amounts of each radioisotope are classified, but general discussions of the overall isotopic composition (selected to overstate the radiological impact and to mask classified numbers) of these materials are found in the Draft EIS and the Final EIS in the Summary and in Section 4.1.2.3.

More detailed information describing shipment of by-product and TRU waste to the WIPP and their potential impacts has been added in the Final EIS (Appendix A.3).

5.29.36 Comment:

Reviewers noted that the incremental increase in infrastructure needs to ensure a smooth operation of the SIS Project and the approximate costs for increased plutonium shipments in the region were not covered in the Draft EIS. Additionally, the costs of normal transportation associated with the SIS Project are not included in the Draft EIS analysis.

Response:

Transportation-related impacts on local infrastructure and costs are expected to be minimal. Interstate highways will be used and the access routes are established. No new demands would be placed on the local economy other than those arising from the employment of personnel. The transportation projections were based on full-capacity operation of the SIS Project at full throughput, which maximizes the estimated transportation risks and impacts. The environmental impacts are very small and the increase in transportation costs, which are borne by DOE, would be minimal. The costs of transporting material by SST are classified.

5.29.37 Comment and response combined with others.

5.29.38 Comment:

Reviewers stated that the mandatory use of SSTs for plutonium shipments must be addressed; also that the SSTs had been used for over 30 years for safe and secure transportation. Reviewers noted that the transport assessment did not account for shipments of plutonium by aircraft or for the increased risk if SSTs were not used for shipments, and that armed escorts would give Idaho a bad image. It was also questioned whether there are enough SSTs to handle all SIS shipments and whether the SST would compensate for an inadequate package.

Response:

Use of SSTs is required for all special nuclear material (SNM) and provides additional safety as well as security. The use of armed escorts for SST shipments is also required everywhere in the United States; therefore, it is unlikely to give Idaho a bad image. Non-SNM (e.g., by-product and TRU wastes) would be transported to the WIPP in TRUPACT IIs. Air shipments would not be considered. Sufficient SSTs are or would be available to meet DOE's current and future projected needs.

5.29.39 Comment:

Reviewers asked that shipment schedules by season be indicated, including meteorological conditions along the route.

Response:

The number, timing, and exact route of shipments have not yet been determined and, in any case, will be classified. Therefore, this information cannot be provided. However, the SSTs are not dispatched in inclement weather. See the response to comment 5.29.16 for additional information.

5.29.40 Comment:

Reviewers requested that the shipment route from Hanford to the INEL and from the INEL to Rocky Flats be identified. In addition, particular concern was expressed over rail and road routes which bisect the Shoshone-Bannock Reservation.

Response:

DOT rule HM-164 specifies that, in the absence of state-designated alternate routes, interstate highways are the preferred routes for highway-route-controlled quantities of radioactive materials. The route through the Shoshone-Bannock Reservation is about 80 kilometers along routes I-84 and I-15. The exact routing of shipments of sensitive nuclear materials and other sensitive information regarding scheduling may not be specified for security reasons. Rail transport will not be used for SIS material.

5.29.41 Comment:

Reviewers asked if the containers used to package and transport plutonium and wastes were safe and would be tested and available. Specific concern was also expressed about heat buildup and potential resulting pressurization of containers. Others stated that the containers were adequate to protect against accidents.

Response:

Only the Type B shipping container would be used for the transport of feed, product, and by-product to and from the SIS Project; the TRUPACT II will be used for shipment of waste (in drums) and eventually by-product (Type B containers) to the WIPP. These Type B containers would be certified by the NRC and will meet DOT specifications. The Type B container presently used by DOE for plutonium shipments is the 6M. Extensive testing of the Model 1518 6M container is described in the References. The inner and outer containers of each 6M are individually leak-tested during fabrication per ANSI N542-1977 (i.e., bubble test), or equivalent. The inner and outer containers also must be inspected prior to each shipment, and maintenance inspections must be performed at least annually. The containers are designed to withstand the heat and pressure generated by their contents.

The TRUPACT II for transport of TRU waste to the WIPP is currently undergoing NRC certification tests. The waste would be transported to the WIPP in certified containers that have passed the NRC certification tests.

References:

McWhirter, M., R. G. Brooks, J. M. Stomp, and L. A. Dillingham, "Final Report on Special Tests of Plutonium Oxide Shipping Containers to FAA Flight Recorder Survivability Standards," SAND75-0446, Sandia National Laboratories, Albuquerque, NM, September 1975.

Bonzon, L. L., "Final Report on Special Impact Tests of Plutonium Shipping Containers, Description of Test Results," SAND76-0437, Sandia National Laboratories, Albuquerque, NM, February 1977.

5.29.42 Comment:

Reviewers expressed concern that the proposed shipping (for example, the LLD-1) cask was not approved by DOE or the DOT, and requested that an alternative be identified. In addition, reviewers

questioned why DOE did not use containers that DOE itself certified. It was stated that the NRC-approved version of the 6M container is not the one used by DOE. Reviewers noted that there are no containers which have been certified by the NRC or the DOT to transport plutonium and that casks have a past history of design deficiencies, incorrectly installed valves, bowed gaskets, improper welds, leakage, and suspended shipments due to "near misses."

Response:

The shipping containers to be used by the SIS Project would be certified by NRC or approved for use by DOT. It is DOE policy that an evaluation be conducted prior to resumption of normal operation following transportation incidents. The LLD-1 shipping container is obsolete, has been retired from service, and will not be used. See the response to comment 5.29.41 for additional information.

5.29.43 Comment:

A reviewer suggested the transportation assessment take into account discrepancies and crush and criticality questions for the 6M container.

Response:

Type B containers cerified by the NRC or approved for use by the DOT would be used for SIS shipments of feed, product, and by-product. The Type B container presently used by DOE for plutonium shipments is the 6M. There are no known discrepancies concerning crush and criticality analyses. For additional information, see the responses to comments 5.29.54 and 5.29.59.

5.29.44 Comment:

Reviewers noted that the LLD-1 shipping container was not approved by the NRC and continued to be used by DOE after problems had been identified.

Response:

The LLD-1 is obsolete, has been retired from service, and will not be considered as a container for any SIS materials shipments. See the response to comment 5.29.49 for additional comments on the use of shipping containers for SIS materials.

5.29.45 Comment:

Reviewers noted that there is no container certified by the DOT or NRC to ship TRU materials and there is presently no acceptable container design. It was noted that the TRUPACT container is still in the design stage and will probably not be available for several years. It was also stated that shielded casks may be needed to eventually ship Pu-238, 240, 241, and 242 waste separated by the AVLIS process to WIPP.

Response:

Type B containers certified by the NRC or approved for use by the DOT would be used for SIS shipments of feed, product, and by-product. The Type B container presently used by DOE for plutonium shipments is the 6M. The TRUPACT II will be certified prior to its use for shipping SIS TRU waste. All shipment configurations would meet DOT regulations for external exposure and will be shielded if required. See the response to comment 5.29.41 for more detailed information.

5.29.46 Comment:

Reviewers stated that DOE and the Final EIS must ensure that waste casks are tested and safe, and noted that proposed containers have not yet been physically tested full-scale but only computer-modeled. Reviewers also noted that crush-test criteria had not been incorporated into the certification requirements for shipping containers and, in particular, the 6M container was not crush-tested.

Response:

All the containers proposed for use in transport of SIS radioactive materials (feed, product, by-product) will be NRC-certified or approved for use by the DOT. The SST also has undergone rigorous full-scale testing, which is described in the classified Safety Analysis Report (Reference SNL, 1976 in the Draft EIS and the Final EIS, Appendix A). Type B containers have undergone crush-testing, the results of which were used in the Draft EIS and the Final EIS analysis.

5.29.47 Comment:

Reviewers requested assurance that shipping containers would meet the strictest Government standards in the event of a truck accident on a river road.

Response:

Type B packages must pass a water-immersion test that involves submersion under a head of water of at least 3 feet for not less than 8 hours without damage or leakage. NUREG/CR-4829 (see Reference) shows that for the Type B package design evaluated (spent fuel cask), a 750-foot drop into water would be equivalent to the NRC 30-foot drop-test onto an unyielding surface. Thus, impact into water is not considered a serious threat. See the responses to comments 5.29.41 and 5.29.46 for additional information.

Reference:

Fischer, L. E., et al., "Shipping Container Response to Severe Highway and Railway Accident Conditions," NUREG/CR-4829, UCID-20733, Nuclear Regulatory Commission, Washington, DC, February 1987.

5.29.48 Comment:

Reviewers stated that nuclear waste shipping containers have a 30-year useful life.

Response:

The multiple inspections that must be performed on each package each time it is used result in rapid identification of problems regardless of the cause. Thus, the aging of containers is not expected to contribute to any reduction in safety.

5.29.49 Comment:

Reviewers felt that SIS material should be shipped only in NRC-certified casks and asked if DOE would commit to NRC certification of all shipping containers. Reviewers noted that DOE presently is not required by law to obtain DOT or NRC certification, and there were questions on the safety of these containers; it was noted that, in the past, noncertified casks or containers with operational

problems, such as FL-10, LLD-1, and TRUPAC-I, have been used. It was further noted that in numerous cases NRC has refused to certify DOE containers and DOE consequently has withdrawn the requests for certification rather than supply additional information.

Response:

DOE has stated that NRC-certified or DOT-approved containers would be used for transport of wastes from the SIS Project. The shipment configuration for transport of SNM (feed, product, and by-product) is identified in Appendix A of the Final EIS. The shipping containers FL-10, LLD-1, and TRUPAC-I would not be used. As stated, the Type B containers would be either NRC-certified or DOT-approved; the SST is not. However, the SST is required not only for security reasons but also because it enhances the safety of the overall package. There are no plans for NRC to certify the SST, but it should be realized that the feed, product, and by-product will be packaged in certified Type B containers in addition to the SST. DOE voluntarily requested NRC certification, which is equivalent to DOT approval, of TRUPACT II. Discussion of the safety of the shipping containers is contained in Appendix A.3.2. The annual risk associated with transportation involving these shipping containers is very low; little risk is contributed in comparison to that contributed by natural background radiation.

5.29.50 Comment:

Reviewers stated that because the package curie content is classified, there was no way to tell if DOE had been consistent with previous analyses for the LLD-1 cask or other Type B casks with respect to source term.

Response:

The consistency with previous analyses consists mainly of use of the same package-response data (release fractions) and approved calculational methods. The package response for Type B containers is described in NUREG-0170 and elsewhere (see the response to comment 5.29.7). The LLD-1 is obsolete, has been retired from service and would not be used for SIS shipments.

5.29.51 Comment:

Reviewers noted that information available to the State of Idaho Department of Health and Welfare indicated that Type B shipping containers were not designed to withstand a rail accident. If that is valid information, then the Draft EIS reference to rail transport is invalid and should be omitted from the report.

Response:

No rail shipments of SIS materials are planned, as stated in the Final EIS.

5.29.52 Comment:

Reviewers noted that human error has been a significant problem in nuclear energy operation, including transportation of material, and that there are two instances in which accidents were caused by human error. These factors have been completely ignored by the Draft EIS.

Response:

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Response:

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Response:

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Response:

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Response:

5.29.57 Comment:

Reviewers noted that observed deficiencies during management of hazardous waste transport spills in Idaho were not addressed.

Response:

On-going training of potential emergency responders in Idaho and other states will improve the ability of these groups to respond appropriately to all future hazardous materials accidents. Cleanup techniques are discussed in Madsen et al. (1986) cited in the Draft EIS, Appendix A. See the responses to comments 5.7.1, 5.7.2, and 5.7.5 for a discussion on emergency response.

5.29.58 Comment:

Reviewers stated that DOE should modify RADTRAN to include container malfunctions resulting from imperfect packaging designs, manufacture, and maintenance. As a minimum, a clear acknowledgement of RADTRAN's limitations should be included in the EIS.

Response:

The multiple inspections and leak tests required before each use of Type B containers reduce the probability of compromising package integrity as a result of packaging error to such low levels that the results of the risk analysis would not be affected. Breaching of the containers under accident conditions is included in the RADTRAN calculations presented in the Draft EIS and the Final EIS. The limitations of the RADTRAIN code are discussed in the response to comment 5.29.21.

5.29.59 Comment:

Reviewers stated that collisions involving plutonium containers were not addressed.

Response:

Collisions involving plutonium containers were included in the Draft EIS and the Final EIS analysis. In a typical inertial-crush scenario, tie-downs fail upon impact and movement of one or more containers into adjacent container(s) occurs at some velocity dependent on the magnitude of the impact force, the strength of the tie-downs, etc. For equal initial impact forces, this scenario is less severe than the direct impact case cited as an example of a severe accident in Appendix A of the Draft EIS and the Final EIS because at least some energy would be expended in breaking tie-downs and overcoming inertia. This would result in less total energy available to be applied directly to the container(s) as a crush force. Therefore, the analysis in the Draft EIS and the Final EIS remains bounding (i.e., overestimates this risk).

5.29.60 Comment:

A reviewer residing near rail lines expressed concern over the potential for a rail accident and the associated impacts.

Response:

Rail transport would not be used for SIS-related materials.

5.29.61 Comment:

Reviewers expressed concern over terrorist activity with respect to a trucking accident.

Response:

The purpose of the SST is to provide a high level of security (protection against deliberate acts) as well as a high level of safety (accident resistance) during the transport of material associated with the SIS Project materials.

5.29.62 Comment:

Reviewers suggested that the worst-case transportation accident scenario be changed.

Response:

In Appendix A of the Draft EIS and the Final EIS, Accident Severity Category VIII is described as open-ended (i.e., there are no arbitrary upper limits placed on the forces in this category). This alternative approach avoids the obvious pitfalls of attempting to identify a so-called "worst-case" scenario. This is a very low-probability event. The risk calculations were performed for a Category VII accident, which is very conservative and considered to be bounding for this EIS.

5.29.63 Comment:

Reviewers stated concern over the condition of Idaho roads and the potential increased risk of a transportation accident.

Response:

Except for the access route to the site, all transport of SIS-related radioactive and other hazardous materials would occur on interstate highways. They are constructed to a uniform engineering standard throughout the country. This would be in compliance with DOT's HM-164, which states that, where possible, highway-route-controlled quantities of radioactive material must be transported on the interstates or on state-designated alternate routes. Designation of alternate routes must be accompanied by a safety analysis demonstrating that the route is of equal or greater safety.

See the responses to comments 5.29.16 and 5.29.18 for a discussion of accident probability, road closures, and truck access. Hazardous material transportation is covered in the response to comment 5.29.33.

5.29.64 Comment:

Reviewers noted that contributing factors in both rail and highway accidents were human error, decaying roads, and faults in equipment, package design, manufacturing, maintenance, and handling. Reviewers noted that there was no indication that the Draft EIS examined human error, and they expressed concern about quantification of risk. It was stated that transportation of plutonium was too dangerous because of the human error factor. Reviewers noted that Idaho has had an increase in the number of hazardous material transport accidents and that tractor-trailer trucks jackknife every winter on I-84. It was noted that transporting plutonium for the SIS Project would increase the chance of an accident.

Response:

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Response:

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Response:

5.29.67 Comment:

Reviewers stated that emergency preparedness training of personnel along shipment routes must be addressed. It was asked if trucks and trains were marked as to contents. Conversely, it was noted that the DOE's record on HAZMAT training and transport is impeccable.

Response:

DOE has provided and will continue to provide training for handling radiological emergencies. DOE shipments are subject to DOT regulations for shipping hazardous/radioactive materials. These regulations include requirements for using properly trained drivers, proper labeling and placarding of nonclassified vehicles and containers, and prior notification to states of schedules and routes for highway-route-controlled shipments of radioactive materials (excluding classified shipments). Federal organizations such as DOT and EPA also provide assistance to state and local response teams (see response to comment 5.29.66). Additional information on training is included in the response to comment 5.7.2.

5.29.68 Comment:

Reviewers noted that Idaho does not have the financial resources or ability to deal with a transportation accident.

Response:

Costs involved in response to transportation incidents can be recovered from the responsible parties involved. Idaho is one of several states developing methods of supplementing their available funds for handling transportation-related hazardous material emergencies. DOE has responded to these radioactive transport accidents in Idaho; none of these involved the release of radioactivity. The ability to handle such emergencies is addressed in the response to comment 5.29.66.

5.29.69 Comment:

Reviewers stated that DOE must address the need and cost of training and equipping emergency response teams along the transportation corridors.

Response:

DOE recognizes the costs involved in training and equipping emergency response teams along transportation corridors. Refer to the responses to comments 5.7.2 and 5.29.68 for a discussion of emergency response, training, and costs.

5.29.70 Comment:

Reviewers noted that the type, cost, and risks of an emergency response to a transportation accident were not addressed. Some asked about psychological effects on Idaho's population, how trucks would handle winter white-out situations, and how Boise would be evacuated.

Response:

Risks involved in transportation of materials are addressed in Appendix A of the Draft EIS and the Final EIS. Emergency response cost recovery is addressed in the response to comment 5.29.68. Section 4.6 of the Draft EIS and Final EIS reference state and local emergency response plans. Boise

evacuation and response procedures for all natural and man-made emergencies are contained in the Ada County plans. Drivers of vehicles are trained professionals who are able to determine when road/weather conditions preclude safe vehicle operation. SSTs do not operate in bad weather. Potential psychological effects are beyond the scope of this EIS.

5.29.71 Comment:

Reviewers stated that the assumption that transportation accident victims would be taken to medical facilities was not realistic.

Response:

The method of handling transportation accident victims is the same as that in use for any hazardous material incident in Idaho today. Trained medical response personnel make decisions based on injuries to victims, availability of medical care close to the accident scene, and type of hazardous material involved.

5.29.72 Comment:

Reviewers suggested that mitigation/reduction of shipping risks include NRC authority over shipments, testing of full-scale simulated plutonium shipments, enforcement by police of shipping requirements, and adoption of controls such as traffic timing and weather conditions.

Response:

Congress has stated that DOT is responsible for the regulation of radioactive material shipments. The NRC has issued regulations concerning shipments of radioactive material from and to NRC licensees.

Containers for plutonium shipments including SSTs have been tested on a full-scale basis (see Reference). Information on exact timing and routes is classified, but the SSTs will not be dispatched in bad weather or under poor weather forecast conditions.

See the responses to comments 5.29.7, 5.29.40, and 5.29.48 for release fractions, container information, and a discussion on routes.

Reference:

Fischer, L. E. et al., "Shipping Containers Response to Severe Highway and Railway Accident Conditions," NUREG/CR-4829, UCID-20733, Nuclear Regulatory Commission, Washington, DC, February 1987.

5.29.73 Comment:

Reviewers were concerned about notification of and consultation/confrontation with Idaho law enforcement on plutonium shipments.

Response:

Agreements with the State of Idaho regarding notification will be observed. Training of emergency response personnel is in progress. Highly trained armed guards are a required security measure for shipments of sensitive nuclear material.

DOE has provided training in hazardous material response to the Idaho State Police (ISP) and intends to continue working with the ISP to continue the good relations between the two agencies.

See the response to comment 5.7.2 for a discussion on emergency training.

5.29.74 Comment:

Reviewers stated concern that DOE regulations did not cover rail shipments, that personnel did not fully understand regulations, and that regulations would not be strictly adhered to and enforced by the DOE/NRC. Other reviewers expressed confidence in existing DOE transportation procedures.

Response:

Rail transport is not being considered for shipment of SIS materials. DOE safety and security procedures for SST shipments are in place for transporting hazardous materials and SNM and will be strictly enforced. Personnel are trained in these procedures to give them an understanding of the regulations and requirements.

5.29.75 Comment:

Reviewers stated that DOE must explain transportation tracking, recordkeeping, and reporting for shipments of hazardous wastes.

Response:

Wastes that will be disposed of onsite at the Radioactive Waste Management Complex (i.e., low-level waste) will be transported in accordance with DOT and EPA requirements (40 CFR 100-199 and 40 CFR 263). In addition, all Resource Conservation and Recovery Act (RCRA) requirements for manifesting, labeling and packaging, and reporting hazardous waste generation would be followed (40 CFR 202). Wastes that may be disposed of offsite, either at a hazardous waste disposal site or at the WIPP, will also be transported in accordance with these regulations. Shipments to the WIPP must meet the WIPP Waste Acceptance Criteria. These regulations include detailed instructions on labeling, placarding, and shipping-paper requirements. These serve not only as recordkeeping aids but also as potential sources of information to emergency responders in the event of an accident.

5.29.76 Comment:

Reviewers stated that an independent oversight of plutonium shipments must be conducted by individual states and/or the NRC, including regular and unannounced vehicle inspections.

Response:

DOE shipments of radioactive materials are required by law to meet all applicable DOT regulations. DOT inspects nonclassified shipments of radioactive and hazardous materials, thereby providing an independent oversight. Route and timing of SNM shipments are classified information.

5.29.77 Comment:

Reviewers stated that documentation on the legal transport of material for cities and states in the United States be provided and that the Final EIS must address transportation safety issues for concerned sites and routes.

Response:

The Final EIS has been expanded to include a more detailed discussion of transportation safety issues. See the response to comment 5.29.81 for more information on routes and safety issues. DOT requirements for radioactive shipments will be followed.

5.29.78 Comment:

Reviewers stated that SIS transportation issues must be included in a national environmental impact statement.

Response:

The Final EIS fully addresses the environmental impacts of transportation associated with the proposed construction and operation of the SIS Facility. Transportation issues not specifically associated with the siting and operation of the SIS Facility are beyond the scope of this National Environmental Policy Act (NEPA) action.

5.29.79 Comment:

It was requested that "maximum hypothetical radiological risk ....or of the hypothetical risk of ....percent of the hypothetical risk..." be added to Table 2-10 on page 2-79.

Response:

The suggestion was considered and a discussion of the theoretical nature of the risk calculations has been added to Appendix A of the Final EIS. The terminology as stated in Table 2-10 in the Draft EIS was considered adequate.

5.29.80 Comment:

Reviewers noted that there was no mention of the consequences of a transportation accident where plutonium was released to the environment or a river (specifically the Salmon) because of a poor container seal, breach of container integrity, or an unspecified problem.

Response:

The inner container and the fully assembled package of each Type B container must be inspected prior to shipment, and a radiation survey must be performed. This reduces to a very low level the probability of improper seals. For an improper seal to be a contributor to the consequences of an accident, the following would have to occur in the same shipment: operator error in sealing a component of a Type B container, independent overcheck error for the same container, operator error in closure of the SST, and an accident involving at least some impact.

A combination of severe impact and fire is required to cause releases of plutonium from an SST loaded with Type B containers, as described in Appendix A of the Draft EIS and the Final EIS. Fires, including fires which could cause the release of radioactive material, cannot occur in water. As explained, the integrity of the packaging configuration is much greater than that of the trucks and tractor-trailers used to haul ordinary hazardous materials. A spill or release directly into a river or otherwise is not considered a credible event when Type B containers are involved. Deposition onto

surface-water bodies of released particulates dispersed from an accident site on land is the primary credible means of introducing plutonium into a river or lake as a result of a transportation accident. The likelihood of such an accident occurring close to a river or other water body is lower than the already small overall accident risk by a factor roughly proportional to the fractional occurrence of such locations along the route(s) in question.

Such an accident would represent an irretrievable commitment of plutonium to the environment. However, in response to the query concerning a comparison with other environmentally toxic hazardous materials, one should note that the mobility of plutonium in the biosphere is very low. It is also in insoluble form in the SIS shipments. The transfer fraction (curies ingested per curies deposited) for plutonium is only 2.8×10^{-6} (Reference Ostmeyer, 1986, cited in the Draft EIS and the Final EIS Appendix A). The containers have been designed and leak-tested to withstand the forces of water immersion.

5.29.81 Comment:

It was noted that the nonhuman, social, agricultural, and economic effects of a transportation accident were not addressed in the Draft EIS and should be in the Final EIS. Specific areas identified were agricultural and business losses, thousands of cancer fatalities, decontamination costs, effects on tourism, and any other social or economic impacts such as panic, fear, and stigma associated with an accident. Additionally, the NUREG-0170 study was referenced as an example of nonhuman impacts resulting from a transportation accident.

Response:

The impacts of a transportation accident would be negligible in the absence of a release of material. A release of material from SIS plutonium-shipment configurations would be expected to occur only in very severe accidents, which have an estimated probability of occurrence of between 10^{-15} and 10^{-10} per kilometer.

With regard to concerns about the impacts of potential releases on agriculture, crops, and the environment, the consequences of the severe transportation accident are bounded by the accident evaluations developed by the NRC in NUREG-0170. The consequences (in terms of cleanup and agricultural loses) presented in NUREG-0170 are probably higher than those associated with an SIS shipment of plutonium because of improved containment afforded by the current SST.

The exact extent of any irretrievable commitment of plutonium to the environment following an accident involving a release would depend on site-specific circumstances and cleanup methods. The primary hazard associated with plutonium is that of inhalation by humans, and the risk analysis in the Draft EIS and the Final EIS appropriately emphasized this. Analyses of emotional and psychological issues are considered to be outside the scope of this EIS.

5.29.82 Comment:

It was noted that those areas of the sovereign Shoshone-Bannock nations which might be affected by a transportation accident were not identified.

Response:

There are about 80 kilometers (50 miles) of travel within the Shoshone-Bannock Reservation which may be affected. The chance of an accident (without a release) on this section of road is 1.1×10^{-5} per shipment. The chance of an accident in which material is released is 9.0×10^{-10}. This travel is along routes I-84 and I-15 and is through rural population areas.

5.29.83 Comment:

It was stated that the additive effects of all the negligible transportation hazards were not addressed.

Response:

The Final EIS has been expanded to include a thorough discussion of transportation issues including cumulative (additive) transportation risks.

5.29.84 Comment:

It was stated that past experience with radioactive material shipments must be addressed.

Response:

The Type B containers and SST have been in use for over a decade. DOE's operational experience with shipments of this type is extensive, and there have been no accidents resulting in radioactive releases. Experience with nuclear materials shipping in general is even more extensive, amounting to about 2.8 million unclassified shipments per year.

References:

Wolff, T. A., "The Transportation of Nuclear Materials," SAND84-0062, Sandia National Laboratories, Albuquerque, NM, December 1984.

Javitz, H. S. et al., "Transport of Radioactive Material in the United States: Results of a Survey to Determine the Magnitude and Characteristics of Domestic, Unclassified Shipments of Radioactive Materials," SAND84-7174, TTC-0534, SRI International, Menlo Park, CA, 1984.

5.29.85 Comment:

Opposition was expressed to transportation of plutonium and other radioactive or hazardous wastes across Idaho's highways because of possible cancer and contamination effects.

Response:

Transport of plutonium and other radioactive and hazardous materials in the State of Idaho occurs and will continue to occur regardless of whether the SIS Facility is constructed or where it is located. A significant portion of radioactive materials shipped are radiopharmaceuticals and radiotherapy sources. Hospitals also produce quantities of radioactive wastes. Also see the response to comment 5.29.87 for information on potential impacts of transportation accidents. SIS material shipments are not expected to result in measurable increase in either cancer deaths or contamination.

5.29.86 Comment:

It was stated that the rationale for transporting hazardous wastes across the country was not understood.

Response:

Hazardous wastes from all over the country would not be transported to the INEL as a result of SIS operations. There would be two major sources of feed material resulting from SIS operations (Hanford and Savannah River), as discussed in the Draft EIS, and material would be shipped only from these sites to the INEL. See the responses to comments 5.29.49 and 5.29.98 for a discussion of safety records and containers for transportation.

5.29.87 Comment:

General concern was expressed over the potential impacts of a transportation accident (truck or rail) where plutonium was released and humans were exposed. Some of the concerns were decontamination costs, radiation exposures, releases to surface waters, cancer fatalities, postaccident fear and other health effects, and inevitability of a severe transportation accident.

Response:

General concerns regarding transportation accidents, containers, and consequences are addressed on a more specific basis throughout this section (i.e., 5.29) of comments and responses. With respect to rail shipment, no impacts are anticipated because rail shipment of SIS material is not being considered by DOE. Regarding concerns about "waste transport accidents on Idaho roads," it should be noted that the SIS Project is would not be a major contributor to the projected TRU waste shipment volume from the INEL, accounting for less than 9 percent of the total projected shipment volume from the INEL to the WIPP. Regarding concerns over contamination of the Little Salmon River, see the response to comment 5.29.80 for a discussion of potential contamination of surface waters. Also, see the responses to comments 5.29.12 and 5.29.80 for discussion of dispersal accidents. It is incorrect to assert that a severe accident would be "inevitable." NUREG/CR-4829 (see Reference) includes an in-depth discussion of some of the most severe transport accidents that have ever occurred. None was more severe than a Category III accident, which results in no release. The estimated probability of occurrence of a severe accident involving a release is between 10^{-15} and 10^{-10} per kilometer.

Reference:

Fischer, L. E., et al., "Shipping Container Response to Severe Highway and Railway Accident Conditions," NUREG/CR-4829, UCID-20733, Nuclear Regulatory Commission, Washington, DC, February 1987.

5.29.88 Comment:

Concern was expressed over contamination of the Snake River Plain aquifer in the event of a transportation accident.

Response:

See the response to comment 5.29.80 for a discussion of potential contamination of surface waters. Contamination of an aquifer is even less likely for two reasons. First, the SIS-related shipments involve almost exclusively insoluble materials, and groundwater cannot easily be contaminated

with insoluble particulates because of the filtering action of the geologic medium through which it flows. Second, some mechanism must exist for a material, regardless of its chemical form, to get into an aquifer, for example, long-term seepage of chemicals from a contaminated landfill. A highly localized, short-term, surface event such as a transportation accident does not provide such a mechanism.

5.29.89 Comment:

Concern was noted regarding the impact of a transportation accident in an urban area (such as Boise, Idaho), densely populated area, or prime hunting and fishing areas, including the associated cleanup costs.

Response:

The impact of an accident at any single location is not estimated in the risk analysis, which is modeled as a moving source (truck), except at stops. An analysis for an accident of a particular type at a particular location is best addressed by a consequence analysis. However, it should be noted that less than 3 percent of the representative route from Hanford to the INEL passes through areas of urban population density (27 kilometers), and the probability of occurrence of an accident involving a release (Severity Categories VII and VIII) in an urban area is about 5.4×10^{-9} per shipment for 27 kilometers of urban travel. This would include travel through urban Boise. Also, see the response to comment 5.29.80 for a discussion of container integrity and possibility of a spill into a river, and see the response to comment 5.29.34 on risks and costs of cleanup.

5.29.90 Comment:

Concern was expressed with the uncertainty of the environmental impacts for a transportation accident between Hanford and the INEL.

Response:

There are several ways to develop a risk estimate. Calculation of upper-bound risk values typically has been used for environmental impact assessments, and that approach is used in the risk analysis described in Appendix A of the Draft EIS and the Final EIS. The values of the input parameters used in the analysis are either firmly established (i.e., subject to little uncertainty) or are conservatively estimated. The relevant parameters have been identified and explained in the text in Appendix A of the Draft EIS and the Final EIS. See the response to comment 5.29.21 for discussion on the uncertainty of the analysis.

5.29.91 Comment:

It was stated that transportation of SIS materials would contaminate the incoming and outgoing transportation routes.

Response:

The information and risk analysis methodology described in Appendix A of the Final EIS shows that (1) the likelihood of one accident resulting in a release of radioactive material thereby contaminating transportation routes is very small, and that (2) the likelihood of occurrence of such an accident along a particular segment of a route (e.g., an in/out transportation route) is related to the length of the segment in question (see the responses to comments 5.29.82 and 5.29.89 for examples). The occurrence of one accident at a particular time or location has no influence on the

probability of occurrence of an accident at another time or location. The chance of two accidents of a certain type occurring on specified route segment(s) is smaller than the chance of one such accident. See also the response to comment 5.29.24 for a discussion of cleanup following an accident.

5.29.92 Comment:

Concern was expressed over transportation of plutonium and SIS radioactive, hazardous, and toxic wastes in/out of the Idaho Falls area.

Response:

Radioactive material shipments in and out of the INEL generally avoid the city of Idaho Falls. If a shipment passed through Idaho Falls (a 27-kilometer segment), the estimated probability of having an accident resulting in a release is very small (5.4×10^{-9} per shipment). See the response to comment 5.29.89 for additional information.

5.29.93 Comment:

Concern was expressed over transportation of plutonium oxide powder and recovery of that powder in the event of a transportation accident.

Response:

The inhalation toxicity of plutonium is accounted for in the risk analysis code RADTRAN III. See Appendix A of the Draft EIS and the Final EIS for dispersivity categories. The exact extent of any loss of plutonium to the environment following an accident involving a release would depend on site-specific circumstances and cleanup methods. The primary hazard associated with plutonium is that of inhalation by humans, and the risk analysis in the Draft EIS appropriately emphasized this. Many methods of cleanup (e.g., removal of top soil or pavement) would provide recovery of much of the deposited material. The EPA cleanup criteria require that residual contamination after cleanup not exceed 0.2 microcurie per square meter (see Reference). See also response to comment 5.1.41.

Reference:

"Proposed Guidance on Dose Limits for Persons Exposed to Transuranium Elements in the General Environment," EPA 520/4-77-016, US Environmental Protection Agency, Office of Radiation Programs, Washington, DC, September 1977.

5.29.94 Comment:

It was noted that safe transport of plutonium was not guaranteed and was an unknown.

Response:

The Draft EIS and the Final EIS acknowledge that a radiological risk as well as a nonradiological risk (which is common to all forms of transportation) is associated with radioactive materials transportation. It is impossible to provide an absolute guarantee of safety, but the risk can be bounded. The purpose of the risk analysis in the Draft EIS and the Final EIS, presented in Appendix A, is to provide a conservative estimate of the magnitudes of the risks (radiological and nonradiological) associated with SIS shipments. These risks are small.

5.29.95 Comment:

It was noted that there has never been an injury, death, or diversion of nuclear material in a transportation accident involving an SST. Reviewers stated that trained drivers and certified casks were used in transportation. However, other reviewers expressed concern over inherent hazards or dangers to the ecology from the transport of plutonium and wastes.

Response:

The risks for transportation of feed, product, and by-product given in the Draft EIS and the Final EIS, Appendix A.3, are from a risk analysis that used conservative input values as explained in the text. Additional risks incurred from the transport of TRU waste to the WIPP and from the onsite transport of low-level wastes are discussed in Section 4 of the Final EIS. They are also small.

There is a past history of safe transport of radioactive materials of all types, which amounts to about 2.8 million unclassified shipments per year (see References and response to comment 5.29.33). Should an accident involving a release ever occur, any resulting contamination must be cleaned up to EPA standards.

The comment that "no one ... has been injured or killed who was involved in a transportation accident of radioactive material" requires clarification. There have been several fatalities from mechanical (i.e., crash-related) injuries from transportation accidents involving radioactive materials. However, no radiological exposures resulting in death or injury have been associated with the transportation of radioactive materials.

5.29.96 Comment:

It was stated that any project which requires transportation of nuclear materials shows little regard for the environment and human safety.

Response:

DOE holds a great regard for the safety of the citizens and the environment. The proven safety record and thorough analysis of radioactive material shipments demonstrates that radioactive materials can be transported safely.

5.29.97 Comment:

It was stated that the risk involved in transportation of SIS materials was lower than general transportation risks, that it was about the same as current INEL risks, that it was lower than transportation of a large gasoline tanker or toxic-chemical truck, and that it had a radiation risk below that of background radiation. Conversely, reviewers also expressed concern that transportation of plutonium posed extreme risks to population and might contaminate homes and the environment, that there are no proven methods for safely transporting and storing plutonium, and concluded that any risk was too great.

Response:

The risks of transporting SIS-related materials are described in Appendix A of the Draft EIS and the Final EIS. While a comparison of the safety of transporting material from the SIS Project was

not made versus more commonly encountered transportation hazards, the risks presented in the Draft EIS and the Final EIS are indeed small. See the response to comment 5.29.93 for more information on cleanup of plutonium contamination from potential transport accidents.

5.29.98 Comment:

It was stated that the safety trend for hazardous material transportation was becoming progressively worse.

Response:

With regard to the safety record for transportation of hazardous materials, even in general commerce, transportation accidents involving radioactive materials account for only about 0.7 percent of the accidents/incidents in the DOT's Hazardous Material Incident (HMI) reporting system (see Reference), and no trend toward decreasing safety is indicated by these data. The additional level of safety and security provided by Type B containers shipped in an SST means that this shipment configuration has even lower risks than these indicated in the DOT reporting system.

Reference:

Wolff, T. A., "The Transportation of Nuclear Materials," SAND84-0062, Sandia National Laboratories, Albuquerque, NM, December 1984.

5.29.99 Comment:

It was stated there was no acceptable method to safely transport radioactive materials between sites.

Response:

The radioactive material will be shipped in NRC-certified or DOT-approved containers. Transport of the waste will be accomplished in a safe and acceptable manner. The Final EIS concludes that there would be no significant environmental impacts resulting from such transport.

5.29.100 Comment:

It was requested that the Final EIS more thoroughly address the long-term effects of an I-84 accident in Treasure Valley.

Response:

The impact of an accident at any single location is not estimated in the transportation accident consequence analysis. The computer code (RADTRAN III) used to assess the accident consequences models a moving source through population density zones along representative highway routes. The likelihood of a particular accident resulting in a release along a specific segment of a route is related to the length of that segment. It should be noted that the length of the route through Treasure Valley is about 80 kilometers through an essentially rural area. The probability of an accident involving a release (Severity Categories VII and VIII) in an 80-kilometer area is about 1.4×10^{-8} per shipment. Although the impact of an I-84 accident in Treasure Valley is not specifically addressed, if such an unlikely accident occurred, the long-term consequences would certainly be less

than the conservative estimates of risks for all SIS shipments along other entire routes. No significant adverse long-term impacts would result from transportation accidents involving SIS materials.

5.29.101 Comment:

Concern was expressed that no agency was monitoring the transportation of plutonium, and an emergency preparedness plan has not been developed.

Response:

The DOT monitors all shipments of hazardous materials, including plutonium. This department sets the regulations for transporting hazardous materials. All DOE shipments of hazardous materials are required to meet DOT regulations. The individual states and counties along the transportation routes have developed emergency response plans for responding to transportation incidents involving hazardous materials. These plans are tested for adequacy on a regular basis by the cognizant agencies. Federal assistance and response plans are in place for dealing with a transportation incident involving radioactive material. DOE's Radiological Assistance Program is available when requested by state or local authorities. An explanation of how the system works is contained in Section 4.6 of the Final EIS. See also the responses to comments 5.29.27 and 5.29.66 for more information on emergency preparedness.

5.29.102 Comment:

It was noted that the SIS Project would create more nuclear weapon waste and plutonium transportation for Hanford and Oregon byways.

Response:

Operation of the SIS Project, regardless of its location, would not significantly increase the amount of waste or plutonium transported on Washington and Oregon routes. The risks of transportation are presented and discussed in the Draft EIS and the Final EIS.

5.29.103 Comment:

It was requested that route-specific data, including route maps, be identified, made public, and enforced by state police. It was also noted that DOE has used non-interstate routes for material shipments when safer interstate routes could have been used. Additionally, reviewers requested that construction projects, seismic activity, population densities, seismic certification of bridges and tunnels, wind patterns and drainage directions under a maximum credible accident scenario and identification of other meteorological hazards be evaluated in risk assessment.

Response:

Information on the number, timing, and exact route of shipments is classified. The DOT is responsible for enforcing radioactive material transportation regulations.

The accelerations associated with even large earthquakes would not generate forces on a shipping container as great as those experienced during the NRC performance tests and would not cause failure of a Type B container. Historic accidents that have occurred as a result of an earthquake or road construction projects are included in the DOT accident data.

It should be noted that less than 3 percent of the representative route from Hanford to the INEL (about 27 km) passes through areas of urban population density. The probability of occurrence of an accident involving a release (Severity Categories VII and VIII) in an urban area is about 5.4 x 10^{-9} per shipment for 27 kilometers of urban travel. This would include travel through urban Boise.

Except for the access route to the site, all transport of SIS-related radioactive and other hazardous materials will occur on interstate highways, which are constructed to a uniform engineering standard throughout the country. This will be in compliance with the DOT's HM-164, which states that, where possible, highway-route-controlled quantities of radioactive materials must be transported on the interstates or on state-designated alternate routes. Designation of alternate routes must be accompanied by a safety analysis demonstrating that the routes are of equal or greater safety.

The access route for the INEL is U.S. Highway 26. Road conditions are assessed on this route prior to shipment. Shipments will not be dispatched if adverse weather conditions are present or imminent, which will further minimize risks.

Weather-related road closures in the region are not expected to affect the risk estimates. Effects due to weather will be kept to a minimum by considering actual and forecast road conditions, and by not dispatching trucks in bad weather or under poor forecast conditions. Restricting truck transport to good weather conditions would reduce the overall truck accident rate by about 10 percent (NUREG-0170, Section 6.3.3). Since accidents associated with travel in poor weather conditions are included in the DOT accident-rate data that were used in the risk analysis, the risk estimate is slightly conservative with respect to this parameter. In the unlikely event of an unforeseen road closure, radiological impacts would be associated mainly with an increase in stop time and perhaps an increase/decrease in distance traveled (e.g., if a vehicle were able to use an alternate route). Since only one or a few shipments would be affected on an annual basis, the overall annual incident-free risk estimate would not change significantly.

The uniform engineering standards for interstate highways do give specifications for bridges and tunnels. However, neither these standards nor any others make any attempt to guarantee that a tunnel, in particular, would withstand a severe earthquake. The response to comment 5.29.80 covers the issue of falls, as in falling off overpasses. However, there is historically demonstrable low frequency of severe damage to tunnels even in areas of high seismic activity (e.g., California). Also, in a truly catastrophic tunnel collapse that involves static loads great enough to cause the package(s) to release their contents (since it is not possible to have an engulfing fire when the shipment is covered by tons of rocks), the shipment will also be protected against dispersal since it is difficult to generate an aerosol plume from a shipment covered by tons of rocks.

With regard to wind directions and "other meteorological factors," the RADTRAN risk analysis considers Pasquill Stability Category frequencies of occurrence as part of the intermediate calculations. Pasquill Stability Categories are indicators of wind speed and atmospheric stability, which are important to plume dispersal. National average values were used. A consequence calculation is performed within RADTRAN in which the plume is assumed to pass over an area of each population density used in the analysis (rural, suburban, and urban). Doses are calculated for each density zone (assuming uniform distribution of persons), for each severity category, and each exposure pathway. These are then multiplied by the appropriate probabilities of occurrence and summed to give a risk estimate. Thus, meteorological factors (wind speed and atmospheric stability) are considered in the analysis, but wind direction data (wind roses) are not necessary for this type of analysis.

As appropriate, portions of the preceeding information have been added to the Final EIS.

5.29.104 Comment:

Reviewers expressed concern about the frequency of new routes for plutonium shipments and expressed concern over accidents on Idaho's highways.

Response:

Frequency and routing information concerning plutonium shipments is classified. The transportation associated risks are covered in the Final EIS. The assessments, which were developed to appropriately overestimate the consequences, indicate a low risk to the environment and populace along the transportation routes. Additional information is included in the response to comment 5.29.93.

5.29.105 Comment:

Concern was expressed over transportation routes through urban areas.

Response:

Minimizing shipments or transportation routes through urban areas is considered in transportation planning. The risks of transport accidents in urban areas are included in the Draft EIS and the Final EIS.

5.29.106 Comment:

It was asked what hazardous materials and hazardous waste products will be transported, stored or utilized for the proposed SIS Project. It was also noted that Highway I-84, LaGrande, and surrounding roads are too treacherous due to ice and snow to safely transport nuclear wastes.

Response:

The hazardous materials and hazardous wastes generated annually during operation of the SIS Project are listed in Section 2.1.5 of the Final EIS, and the disposition of these wastes is also described. No shipments of waste and no SSTs would be dispatched in inclement weather or during unacceptable road conditions. See the response to comment 5.29.103 for additional information.

5.29.107 Comment:

It was stated that DOE's record for transporting radioactive material is not good, and there have been many accidents.

Response:

DOE Orders require that adequate transfer records (DOE/NRC Form 741/741A) be maintained to ensure accountability of SNM during shipment. As indicated in the Final EIS, the DOE transportation record is excellent and has never resulted in a radioactive release or significant impact.

5.29.108 Comment:

Reviewers stated that Idaho transportation records were excellent and that the primary goal was public safety.

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responsibilities and obligations. The funding provided by DOE to the State of New Mexico is based on the specific responsibilities as defined by the agreement, rather than on the basis of the risks of TRU waste transport, storage, or disposal.

5.29.113 Comment:

It was asked how much more transport of plutonium will be through Oregon to support the SIS Project, and what commitment DOE will make to resolve Oregon's concern about safe transport of these materials.

Response:

Information on the number, timing, and exact route of shipments is classified. As identified in the response to comment 5.29.102, all feed shipments would be transported in SSTs that provide for the safest transport of plutonium feed. DOE would adhere to all agreements between DOE and the State of Oregon respecting those shipments.

DOE-owned nuclear materials are already being transported through Oregon from Washington. DOE believes that the agreements already in place between DOE and the State of Oregon are adequate to cover SIS shipments. See the response to comment 5.29.76 for more information about regulations concerning radioactive material transport.

5.29.114 Comment:

It was noted that the Draft EIS did not discuss transportation costs, such as emergency response training, infrastructure costs, container manufacturing costs, accident cleanup costs, and the additional cost of maintenance.

Response:

The costs of truck and container manufacturing are included in the annual operating costs for the SIS Project. Emergency training costs are borne by the individual states, but are supported by Federal agencies through permission of specially trained response teams (on call) and equipment. The siting of the SIS Project and the accompanying transportation risks resulting, therefore, would not differ significantly from the existing situation, and would not increase transportation costs. See the response to comment 5.29.1 for additional information about cleanup costs.

5.30 TECHNICAL WASTE

5.30.1 Draft EIS Presentation

5.30.1.1 Comment:

Maps of all waste burial areas and potential downgradient contaminated plumes in relation to Special Isotope Separation (SIS) Project percolation ponds were requested along with an explanation of why adding "water" to the system will not increase conductance of already contaminated water.

Response:

References cited in both the Draft Environmental Impact Statement (EIS) and the Final EIS contain waste burial maps and the calculated and measured downgradient plumes. The "contaminated water" in the Idaho Chemical Processing Plant (ICPP) area was the result of the previous use of an injection well that is no longer used and is expected to be plugged with cement in 1989. The SIS discharges of nonradioactive and nonhazardous liquid effluents to percolation ponds without attentuation through the unsaturated subsurface would be less than about 0.0007 percent of the annual discharge of ground water to the Snake River Plain aquifer. Given such a small percentage, it is highly unlikely that the SIS discharges would increase conductance.

As part of DOE's goal of improving waste management practices, a new percolation pond or ponds will be constructed at the ICPP. The liquid effluents discharged to the new pond(s) will be nonhazardous and nonradioactive and will meet all Federal and state regulations. The SIS liquid effluents will be discharged to the new ponds, not the existing percolation ponds, and thus would not impact the existing ponds. Also see the response to comment 5.30.1.5.

5.30.1.2 Comment:

It was pointed out that the Draft EIS lacks details of handling/mitigating SIS contaminated water resulting from an accident or normal operations. Concern was expressed that it would percolate into the groundwater system.

Response:

The liquid waste systems of the SIS Project as discussed in Section 2.1.5.1 of the Final EIS are designed to preclude potentially contaminated water from being discharged to the service waste system. The only liquid waste streams that would be discharged on a routine basis would be process steam condensate and cooling water blowdown. To ensure that these nonradioactive and nonhazardous liquid waste streams are nonhazardous and nonradioactive, these liquid wastes would be monitored prior to discharge. All liquid waste streams that are potentially contaminated by processes would be handled as either transuranic (TRU) waste, low-level waste, mixed waste, or hazardous waste. Liquid waste infrequently generated from floor drains would be collected in catch tanks that would normally be empty, sampled to determine whether they were hazardous and/or radioactive, and then handled in accordance with the results of sampling.

The SIS facilities would be designed in accordance with U.S. Department of Energy (DOE) Orders, which require containment of all radioactive spills in the event of a design-basis accident. See response to comment 5.8.14.

5.30.1.3 Comment:

It was stated that the Final EIS must analyze aquifer vulnerability to contamination, including U.S. Geological Survey (USGS) monitoring reports of the Idaho National Engineering Laboratory (INEL) site. It was conversely stated that assumptions used by USGS in estimating contamination migration are incorrect.

Response:

The Final EIS assesses the potential impacts of the SIS Project with respect to ground water. Sections 4.1.2.2 (nonradioactive) and 4.1.2.3 (for postulated impacts of storing low-level waste at the INEL) of the Final EIS, describe the impacts on the aquifer. Based on the data listed, the impacts are minor. Existing contamination at the INEL is briefly addressed in Section 3.1.4.4.

The USGS models are predictive mathematical models which have been validated with field-collected data. As additional data are collected, the assumptions and values used in the models are revised as appropriate. Model results compare favorably with field-collected data, and the "assumptions" used by the USGS appear to be representative, not inaccurate.

5.30.1.4 Comment:

It was stated that the questions about unresolved problems with, and provision for, the SIS-generated waste have not been addressed.

Response:

The Draft EIS and Final EIS in Section 2.1.5.1 address the disposition of all SIS-generated wastes. Also see the response to comment 5.30.2.1 regarding the Waste Isolation Pilot Plant (WIPP).

5.30.1.5 Comment:

Concern was expressed over the cursory treatment in the EIS of existing contamination of the Snake River Plain aquifer and groundwater, which makes it impossible to determine the extent of contamination from previous activities. It was stated that the Draft EIS attempts to cover up past contamination at the INEL. Conversely, others stated that the Draft EIS adequately addresses aquifer safety and that the SIS Project will not present a threat to the aquifer.

Response:

The purpose of this EIS is to assess the impact of the proposed action of constructing and operating the SIS Project and its reasonable alternatives. Existing ground water contamination at the INEL is briefly addressed in Section 3.1.4.4 of both the Draft EIS and Final EIS.

Radioactive releases at the INEL have been extensively documented in numerous reports for more than 30 years. These reports have described the waste products discharged and mapped the plumes in the perched-water bodies and in the Snake River Plain aquifer. A national decision was made about 35 years ago to store intermediate- and high-level radioactive waste, and to discharge low-level waste (LLW) to the environment in the preferred manner for that site. Most of the waste products in the aquifer are a result of this policy of intentional disposal of LLW. Since the late 1970s, considerable effort has been expended to minimize the quantities of waste generated. The following plant processes have been changed: recycling has been utilized when feasible, discharge and treatment methods have been improved, and future plans call for less discharge to the environment. As a result

of these changes, the concentrations of contaminants in the Snake River Plain aquifer are decreasing and it is anticipated that concentrations will continue to decrease. These wastes in the aquifer currently do not pose a health risk to the public.

Design of the SIS Project has incorporated new methods to minimize waste generation during normal operation and to mitigate releases to the environment resulting from postulated accidents. The SIS Project will not contribute to future groundwater contamination at the INEL. DOE Orders and compliance with the Resource Conservation and Recovery Act (RCRA) will require continued groundwater monitoring to track existing contaminant plumes and to initiate remedial actions where required. The results will be documented in publicly available reports. Further, under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), remedial action may also be implemented as required.

5.30.1.6 Comment:

It was stated that an adequate assessment of the aquifer condition must address the following:

1. The probability of two or three Superfund sites being identified at the INEL for potential problems and solutions.

2. Trichloroethylene (TCE) in Test Area North (TAN) drinking water.

3. Chromium contamination in the perched water zone above the aquifer at the Test Reactor Area (TRA).

4. Trichloroethylene and carbon tetrachloride (CCl_4) in the ground water at the Radioactive Waste Management Complex (RWMC).

5. Tritium contamination of the aquifer migrating off the INEL site.

6. Mercury contamination of the aquifer by injection wells.

7. Low-level radioactive waste contamination of the groundwater at ICPP.

8. The 29 existing ICPP contamination sites prior to SIS construction.

Response:

See the response to comment 5.30.1.5 regarding the scope of this EIS relative to existing contamination.

TCE has been identified in water from wells that tap the Snake River Plain aquifer at TAN at the INEL. The results were documented and reported in USGS open file report 87-766, published in December 1987. TCE was detected in three of five drinking water wells at TAN in concentrations of 5.4, 7.7, and 7.5 parts per billion (ppb), which are slightly above the Environmental Protection Agency (EPA) drinking water guidelines of 5 ppb. A suspected source of the TCE contamination is a disposal well that has not received waste water since 1972. There are currently no injection well disposal practices at TAN that involve TCE or other hazardous wastes. Prior practices at TAN have no relationship with the proposed SIS Project. All SIS Project TCE as identified in Section 2.1.5.1 of the Draft EIS and Final EIS would be handled as a hazardous waste in accordance with RCRA requirements.

Chromium was used in cooling towers at TRA from 1952 through 1972 for corrosion inhibition. Chromium contamination is a result of waste management practices that are no longer utilized. The SIS Project would not use chromium as a corrosion inhibitor as listed in Table 2-8 of the Final EIS.

TCE has been detected in groundwater below TAN but not at the RWMC as discussed in Section 3.1.4.4 of the Final EIS. CCl_4 has been detected in low concentrations (0.2 to 6.6 micrograms/liter) in aquifer samples collected near the RWMC. The SIS Project would not discharge TCE or CCl_4 to the aquifer.

In 1983, tritium was detected at low levels in water from wells that tap the Snake River Plain aquifer near the southern INEL boundary and south of the TRA-ICPP areas. This is close to the 1980 arrival time that was predicted by use of mathematical models. Tritium had migrated about 9 miles in 30 years, or at an approximate groundwater velocity of 4.3 feet per day. The tritium came from pond disposal at the TRA and from well injection disposal at the ICPP. The tritium concentrations are very low--about one-fortieth of the EPA guidelines for tritium. Predictive mathematical models and other calculations indicate that the tritium concentrations beyond the southern INEL boundary will never exceed EPA guidelines, and the tritium does not impair the water for any use. Thus, tritium is barely detectable and does not exceed EPA guidelines, nor is it expected to do so. The SIS Project would not discharge tritium.

The extent and concentration of contamination in the Snake River Plain aquifer have been well characterized and defined by a comprehensive, on-going monitoring and testing program. Mercury contamination has been detected in trace quantities at the ICPP injection well. All contamination at the INEL is currently being investigated, under the guidance of EPA's Region X, including existing sites at or near the ICPP. The results of characterization activities and any proposed plans to address contamination at these sites under the Consent Order and Compliance Agreement will be governed by appropriate RCRA/CERCLA requirements.

5.30.1.7 Comment:

A lack of detail was noted concerning hazardous waste handling and generation at various points in the SIS process (e.g., no recycle in the true sense is being used, and the EIS identifies disposition of wastes based on results of sampling).

Response:

As identified in Section 2.1.5.1 of the Final EIS, steam condensate from the heating system would be recycled to the ICPP steam plant and, as described in Section 2.1.1.2, Sidestream Processing, salts would also be recycled. The disposition of wastes based on monitoring is not based on uncertainties in the composition of the liquid waste streams but rather is intended to provide for the absolute certainty that liquid wastes are handled in accordance with the appropriate regulatory requirements.

5.30.1.8 Comment:

Reviewers stated that the EIS should assess added contamination onsite and offsite due to enhanced operations at the ICPP.

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5.30.1.14 Comment:

It was requested that the EIS include a promise from DOE to promptly remove TRU waste from Idaho. It was noted that nothing has been done concerning the Governor of Idaho's request for information concerning waste storage at the INEL. It was stated that the SIS Project is unnecessary and that DOE has not kept its promise to only store wastes at the INEL temporarily.

Response:

The Record of Decision (ROD) for the WIPP states DOE's objective is to transfer to the WIPP facility existing TRU wastes currently being stored at the INEL. The Final EIS on WIPP also states that while the INEL is unsuitable for long-term storage or disposal, TRU wastes could be safely stored for up to 100 years at the INEL. DOE has kept the Governor and the State of Idaho informed on its plans for TRU waste disposal and on the current status of the WIPP. The most recent briefing occurred in mid-October 1988. The current status of the WIPP is summarized in the response to comment 5.30.2.1.

The need for the SIS Project as a contingency means of addressing weapon-grade plutonium supply is stated in Section 1.1.1 of the Draft EIS and Final EIS.

5.30.1.15 Comment:

It was stated that the Draft EIS offers a safe and sunny version of the SIS Project--the same as the sunny and tidy look at the INEL and at the aquifer, which is polluted with tritium and threatened with leaching TRU wastes.

Response:

See the response to comment 5.30.1.6 regarding tritium concentrations in the Snake River Plain aquifer. All TRU wastes since the early 1970s are stored on above-ground covered pads and are no longer placed in shallow landfills. The threat to groundwater from current practice is minimal. All TRU wastes, including those currently stored at the INEL and those to be generated from the SIS Project, would be transported to the planned WIPP in New Mexico.

5.30.1.16 Comment:

Reviewers stated that the Draft EIS needs to address whether additional water withdrawals will exacerbate groundwater contamination, and whether irrigation and municipal water use may accelerate movement of contaminated water to the surface.

Response:

The additional water withdrawals required by the SIS Project would be a very small amount of the water available in the Snake River Plain aquifer. The expected use of the water of 285 gallons per minute (gpm) or 0.64 cubic feet per second (cfs) would have minimal impact on any ground water contamination or upon the water level in the aquifer. The waste plumes will not be affected by this withdrawal. The present and anticipated irrigation and municipal wells are not, and will not, be located to pump from the waste plume and, therefore, will not pump contaminants to the surface. The pumping water levels are minimal compared to the volume of the aquifer and would not cause the plume to move rapidly. The plume concentrations are below EPA guidelines and the water at the INEL boundary meets drinking water standards.

5.30.1.17 Comment:

Detailed characterization and identification information for hazardous wastes produced by the SIS process was requested, including standards applicable to generators of hazardous wastes and applicable sections contained in 40 CFR Part 265, Subpart J, "Tank Systems."

Response:

Hazardous wastes (as defined by RCRA) and the corresponding quantity expected to be generated annually at the SIS Facility have been listed in Table 2-6 of the Final EIS.

All hazardous wastes would be handled in accordance with DOE Orders and RCRA requirements implemented through 40 CFR 260-280 as stated in Section 2.1.5.1 of the Draft EIS and the Final EIS. This includes placing hazardous wastes in DOT-approved containers and shipping the wastes to an offsite RCRA-approved treatment, storage, or disposal (TSD) area in accordance with DOT and EPA requirements (49 CFR 100-199 and 40 CFR 263). Should an offsite RCRA TSD facility not be available, DOE would provide onsite storage facilities meeting RCRA requirements until an offsite TSD is available. Specific RCRA requirements for documenting all aspects of handling, packaging, interim storage, transport, and disposal would be followed as outlined in 40 CFR 262.

Substances designated as hazardous wastes, regardless of specific characteristics, are treated the same way with respect to the guidelines set forth by RCRA (i.e., RCRA regulations establish safe, correct handling, storage, transport, treatment, and disposal requirements for the hazardous wastes).

As shown in Figure 2-9, which displays the liquid waste streams based on current designs, and as discussed in Section 2.1.2.2, the only waste tanks consist of catch tanks, sampling tanks, and two ethanol tanks that would meet all requirements for underground tanks containing hazardous substances. The catch tanks that would normally be empty and the sampling tanks for nonradioactive nonhazardous liquid waste [i.e., Plutonium Processing Building (PPB) cooling tower blowdown and PPB process steam condensate] would not be used for the storage of hazardous waste and, therefore, 40 CFR Part 265, Subpart J, would not be applicable.

5.30.1.18 Comment:

It was noted that the EIS didn't discuss partitioning of waste into TRU and low-level, in effect leaving "nontransuranic wastes" forever at the INEL despite their content of significant inventories of transuranic nuclides.

Response:

There are essentially three classifications of radioactive wastes generated at DOE facilities. They are:

1. High-Level Waste (HLW) - The highly radioactive waste material that results from the reprocessing of spent nuclear fuel, including liquid waste produced directly in reprocessing and any solid waste derived from the liquid containing a combination of TRU-waste and fission products in concentrations requiring permanent isolation.

2. Transuranic Waste (TRU) - Without regard to source or form, radioactive waste that at the end of institutional control periods is contaminated with alpha-emitting transuranium radionuclides with half-lives greater than 20 years and concentrations greater than 100 nanocuries per gram.

3. Low-Level Waste (LLW) - The contaminated waste products which are not high-level or transuranic waste.

The 100 nanocuries/gram "partitioning level" applies to all DOE facilities, as specified in the Defense Waste Management Plan, DOE-DP-0015, 1983, and has been in effect for several years. It is not specific to this EIS or the SIS Project. The quantities of the different types of solid wastes have been estimated and are shown in Tables 2-6 and 2-7 of the Draft EIS and Final EIS, respectively. The SIS Project will not produce any HLW. Current projections indicate less than 440 tons of TRU wastes would be generated annually at the SIS Facility under maximum throughput conditions. Less than 30 tons of LLW would be produced. All SIS TRU wastes would be sent to the WIPP in New Mexico. Only the SIS-generated LLW would be permanently disposed of at the INEL RWMC.

5.30.1.19 Comment:

It was noted that the SIS EIS needs to address hazardous waste characteristics and constituents of off-gas scrubbers, scrap processing leachate, and concentrator bottoms.

Response:

The quantities of hazardous wastes projected to be generated by the SIS Facility are identified in the Final EIS in Table 2-6. The compositions of the off-gas scrubber solution scrap processing leachate and evaporator bottoms would make these streams "TRU, but not hazardous" in character. The hazardous wastes listed in Table 2-6 would be generated by the laser process and the Material Process Control Laboratory.

5.30.1.20 Comment:

It was stated that the Idaho Department of Health and Welfare needs assurance from DOE that compliance with the Idaho Hazardous Waste Management Act is adequate to guarantee the safe operation of the INEL facility.

Response:

The proposed SIS Facility will comply with all applicable Federal and state requirements. A single law or statute is not sufficient to provide a comprehensive health, safety, and environmental protection program. Rather, all of the various requirements taken together establish a tight net of requirements that seek to minimize, avoid, or deter problems and hazards with respect to public health, safety, and the environment.

Hazardous waste would be staged temporarily onsite in a facility meeting RCRA requirements. The hazardous wastes would then be shipped offsite to a RCRA-approved treatment, storage and disposal (TSD) site. Should an offsite RCRA TSD not be available, DOE would provide onsite storage facilities meeting RCRA requirements until an offsite TSD is available.

5.30.1.21 Comment:

It was stated that the specific EPA-approved treatment, storage, and disposal facility for SIS hazardous waste should be identified and its EPA licensing documents cited and included for reference.

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storage facilities meeting RCRA requirements until an offsite TSD is available. Mixed wastes would be stored onsite in RCRA-approved facilities until their disposition is determined, or an offsite TSD for such waste is available.

5.30.1.25 Comment:

It was requested that the explanation of mixed waste management practices (including facilities to be used) be expanded in the Final EIS to include contingencies relative to holding times and regulatory requirements that are pertinent.

Response:

Mixed wastes would be stored onsite in RCRA-approved facilities until their disposition is determined, or an offsite TSD for such waste is available. See Response to comment 5.30.1.9 for discussion of facilities.

5.30.1.26 Comment:

It was requested that the amount of waste reduction between SIS and blending process be addressed.

Response:

The amount of waste which would be generated by the SIS process cannot be compared directly with the amount of waste generated by a blending process since SIS neither produces additional quantities of plutonium nor requires the processing of fuel and targets associated with the additional plutonium produced. Qualitatively, however, it can be stated that the SIS Project would generate less waste and would not result in the generation of high-level radioactive waste that is associated with the processing of newly produced plutonium of higher than weapon-grade purity.

5.30.1.27 Comment:

It was noted that the Final EIS should state that the Liquid Effluent Treatment and Disposal (LET&D) Facility will be operational prior to SIS startup.

Response:

It is currently planned that the LET&D Facility will be operational prior to the startup of the SIS Project. However, the liquid effluent from the SIS Facility would not be connected to or treated by the LET&D. As part of DOE's goal of improving waste management practices, a new percolation pond or ponds will be constructed at the ICPP. The liquid effluents discharged to the new pond(s) will be nonhazardous and nonradioactive and will meet all Federal and state regulations. The SIS liquid effluents will be discharged to the new ponds, not the existing percolation ponds, and thus would not impact the existing ponds.

5.30.2 WIPP Availability/Alternatives

5.30.2.1 Comment:

It was noted that a panel of scientists from New Mexico and, subsequently, a panel of experts from the National Academy of Sciences have identified problems with the WIPP facility which

could reduce or eliminate its capacity for accepting waste from the SIS Project. It was stated that this EIS should address the basis for concerns including leaks, brine infiltration, and transportation (including containers).

It was noted that the Draft EIS assumes that SIS wastes will be disposed of at the WIPP and that the Draft EIS did not adequately address alternatives for waste disposal if the WIPP facility is not available as scheduled, or if the WIPP proves unsuitable for permanent storage as determined by DOE or Congress. It was further stated that SIS construction should not begin until the WIPP is open.

Response:

TRU wastes from the SIS Project could be safely stored for up to 100 years at the INEL. However, DOE still plans to transport all stored and newly generated TRU waste to the WIPP in New Mexico, as stated in its ROD prepared with the Final EIS for the WIPP (DOE/EIS-0026). DOE is currently working with the National Academy of Sciences to address concerns leading to WIPP performance assessments for compliance with the standards of 40 CFR 191 to deal appropriately with the issues. In addition, WIPP will comply with all applicable requirements of the Resource Conservation and Recovery Act (RCRA). DOE is currently working with the EPA and the State of New Mexico to resolve uncertainties regarding the procedures for obtaining a RCRA permit for WIPP.

Recent discussions on the storage capacity limitations of TRU waste at the WIPP have focused on the amount of TRU waste that would be initially received by the WIPP for experimental purposes to support assessment studies prior to full-scale operation. These discussions are unrelated to the planned capacity of the WIPP for TRU waste disposal if the WIPP becomes fully operational as a disposal facility. Reports of the WIPP's leaking appeared to involve the intertwining of two separate issues: (1) water, coming from water-bearing strata in the rocks overlying the salt beds that ran down the walls of shafts before grouting was completed, and (2) brine migration within the salt beds themselves. With respect to water from overlying strata, the flow would be eliminated by grouting the shaft walls above the salt to seal off the water. When the facility is decommissioned, the shafts will be entirely backfilled and sealed at several locations with engineered materials designed to minimize any leakage. Inflow from this source will then be inconsequential. With respect to brine migration within the salt beds, measurements to date indicate that brine migration between facility closure and pressure equalization due to salt creep can be absorbed by backfill materials, preventing the accumulation of liquids. The amount of brine migration is less than that originally contained in the salt mined out of the room. DOE will continue to cooperate with the National Academy of Sciences to resolve and conduct those studies that are required to demonstrate the WIPP's suitability.

In the unlikely event that the WIPP performance assessments were to indicate that the WIPP was unsuitable for the emplacement of TRU waste, DOE would undertake studies and evaluations to determine acceptable alternatives. These alternatives would be covered by a separate NEPA review, as the DOE would be faced with a general issue regarding disposal of TRU waste from several sources, of which TRU waste generated by SIS would be only a small part. In summary, assessments of alternatives to the WIPP as part of the SIS Project are not considered appropriate, as (1) DOE has received no evidence nor has it been made aware of any scientific study which negates continuing to plan for the emplacement of TRU waste at the WIPP, and (2) the WIPP has been and would continue to be the subject of a separate NEPA review as part of an independent decision-making process.

Reference:

DOE (U.S. Department of Energy), 1980. Final Environmental Impact Statement, Waste Isolation Pilot Plant, DOE/EIS-0026, Washington, DC.

5.30.2.2 Comment:

Concern was expressed that waste is produced, processed, held for interim storage, and transported over Idaho's water supply without a consent order, but that New Mexico, will be compensated for disposal of wastes at the WIPP. Specifically, the reviewer questioned how DOE can admit and support the need for expensive and thorough precautions (for instance, road upgrading) in New Mexico and ignore the same issues in Idaho.

Response:

As part of the enabling legislation for the WIPP facility, Congress directed DOE to enter into an agreement for consultation and cooperation with the State of New Mexico. This agreement was originally signed by both parties in July 1981, and has since been modified to clarify specific responsibilities and obligations. The funding provided by DOE to the State of New Mexico is based on the specific responsibilities as defined by the agreement, rather than on the basis of the risks of TRU waste transport, storage, or emplacement.

5.30.2.3 Comment:

It was stated that shipment of waste to a facility of uncertain safety in New Mexico solves nothing. It merely translocates a hazard, with a deadly trail in between.

Response:

No credible scientific information has been provided to DOE which negates continuing to plan for the disposal of TRU waste at WIPP. See the response to comment 5.30.2.1.

5.30.2.4 Comment:

Reviewers noted that the Draft EIS does not adequately address whether WIPP has allocated adequate space for SIS/INEL-generated waste. It was asked what will happen if the WIPP is shut down.

Response:

The WIPP has adequate space for the proposed SIS TRU waste and those TRU wastes currently stored on an interim basis at the INEL. Also see the response to comment 5.30.2.1 regarding alternatives for storage if WIPP is proven unsuitable for disposal of TRU waste..

5.30.2.5 Comment:

Concern was expressed that the Draft EIS did not address the fact that the INEL could become a "de facto" nuclear waste dump if the WIPP facility should prove unsuitable to accept the waste stored temporarily at the INEL for the past 35 years. Also, it was stated that the INEL could become a permanent disposal site for all types of radioactive waste. Reviewers maintained that the State of Idaho needs assurance that the SIS Project would not transform the INEL into a "de facto" nuclear waste dump and stated that the people of Idaho are not interested in a project that develops into a permanent waste storage facility.

Response:

It is currently planned to emplace all stored and generated TRU waste from the INEL in the WIPP near Carlsbad, NM. TRU waste now stored at the INEL, and TRU waste which would be generated by the SIS Project, would be transported to the WIPP for emplacement.

In the unlikely event that the WIPP performance assessments were to indicate that the WIPP was unsuitable for the emplacement of TRU waste, DOE would undertake studies and evaluations to determine acceptable alternatives. These alternatives would be covered by a separate National Environmental Policy Act (NEPA) review similar to the Final EIS on the WIPP (DOE/EIS-0026). Assessments of alternatives to the WIPP as part of the SIS Project are not considered appropriate, as (1) DOE has received no evidence nor has it been made aware of any scientific study which negates continuing to plan for the emplacement of TRU waste at the WIPP, and (2) the WIPP has been and would continue to be the subject of a separate NEPA review as part of an independent decision-making process.

5.30.2.6 Comment:

It was asked if the bulk of the plutonium waste will be disposed of onsite as low-level waste, since there is a financial incentive to do so to save the expense of transportation of TRU waste to the WIPP.

Response:

State-of-the-art processing and recovery technology and equipment would be used in the SIS design to minimize the quantity of TRU waste generated and to meet the economic incentive of plutonium recovery. As listed in Table 2-7 of the Final EIS, the quantity of TRU waste projected to be sent to the WIPP is approximately 10 times the quantity being disposed of as low-level waste at the INEL. DOE defense wastes are managed to ensure the health and safety of the public and the protection of the environment, rather than on the basis of financial incentives. TRU waste would not be diluted to meet low-level waste criteria in order to save on transportation costs.

5.30.3 Storage/Disposal Adequacy

5.30.3.1 Comment:

It was noted that the Draft EIS fails to consider critical information regarding waste disposal. Concern was expressed over the lack of safe storage and permanent disposal facilities for nuclear waste and over long-term lack of institutional control regarding SIS wastes. Others noted that the INEL is ill-suited for storage of TRU waste, citing seismic/volcanic activity, potential impacts to the aquifer, and unresolved transportation, financial, and long-term disposal issues. It was conversely noted that waste has been safely stored at the INEL and that adequate safeguards will be used to store and dispose of the SIS-generated wastes.

Response:

The SIS Facility would generate TRU waste, low-level waste, hazardous waste, and mixed waste. The SIS Project would also generate nonradioactive, nonhazardous waste such as sanitary waste, industrial waste, and nonprocess wastes.

TRU wastes currently stored at the INEL and those generated by the SIS Project would be transported to the WIPP in New Mexico for disposal. See the response to comment 5.30.2.1 on the status of the WIPP and potential alternatives. TRU waste has been stored at the INEL's RWMC (on above-ground covered storage pads) for over 15 years without any significant release of contamination to the environment. However, as stated in the WIPP Final EIS (Reference), the INEL is not suitable for long-term isolation (i.e., more than 100 years) of TRU waste. A discussion of long-term institutional control for TRU waste is contained in the referenced EIS.

The TRUPACT-II shipping container is currently undergoing testing to obtain NRC certification or DOT approval. Transportation routes from the INEL to the WIPP have been established, and the coordination with the states continues. As stated in the Draft EIS and Final EIS, Section 4.1, the impact of the normal operation of the SIS Project or severe postulated accidents is very small.

Low-level waste would be permanently disposed of onsite by placing the waste in containers and burying the containers in a subsurface disposal area at the RWMC. Both the Draft EIS and Final EIS in Section 4.1.2.3 conservatively assess the potential impacts associated with low-level waste disposal.

Hazardous waste would be staged temporarily onsite in a facility meeting RCRA requirements. The hazardous wastes would then be shipped offsite to a RCRA-approved TSD site. Should an offsite RCRA TSD not be available, DOE would provide onsite storage facilities meeting RCRA requirements until an offsite TSD is available. See also the response to comment 5.30.1.21.

Mixed wastes would be stored onsite in RCRA-approved facilities until their disposition is determined, or an offsite TSD for such waste is available. See also the response to comment 5.30.1.9.

Reference:

DOE (U.S. Department of Energy), 1980. Final Environmental Impact Statement, Waste Isolation Pilot Plant, DOE/EIS-0026. Washington, DC.

5.30.3.2 Comment:

Information was requested on an ultimate storage site which would allow radioactive material to decay to a state that is no longer considered harmful.

Response:

The selection of permanent waste disposal sites takes into consideration the half-lives of the radionuclides to be disposed. DOE has designated the WIPP as the emplacement site for all DOE Defense Program-generated TRU waste. See the response to comment 5.30.2.1 for more information on WIPP.

5.30.3.3 Comment:

It was requested that, due to problems at WIPP, the source of all "legally noncompliant waste (since the INEL is not a storage facility)" be indicated and that the shutdown schedule for onsite waste generating sources be provided.

Response:

The quantity, categories, and source of all waste generated and handled by the INEL is beyond the scope of this NEPA action. The quantity, categories, and handling of nonradioactive and radioactive wastes generated by the proposed SIS Facility are addressed in the Final EIS.

The wastes generated and stored at the INEL are handled and disposed of in compliance with Federal and State of Idaho regulations. There are no "legally noncompliant wastes," and thus there is no technically credible reason for shutting down onsite waste generation sources. For a discussion on WIPP, see the response to comment 5.30.2.1.

5.30.3.4 Comment:

It was stated that no civilian industry would be allowed to operate a single day under current Federal environmental laws the way the INEL does. It was also stated that the INEL doesn't fully comply with the waste disposal requirements and that proper monitoring has not been forthcoming since the 1950s.

Response:

The vast majority of present contamination is the result of early waste management practices which, when initiated, were thought to be environmentally sound, and which met regulations that were in place at that time. Currently, waste management practices meet all applicable Federal environmental regulations.

SIS releases are projected to be well below applicable regulations. A DOE onsite and offsite monitoring program is in place and will be used to ensure that releases are in compliance with regulations. Monitoring results are, and have long been, published annually in the publicly available Environmental Monitoring Program Report covering the INEL. In addition, DOE, in consultation with the State of Idaho, is establishing an agreement with Idaho State University (ISU) to provide independent verification of the environmental monitoring program at the INEL.

5.30.3.5 Comment:

It was noted that the EPA does not shut down the INEL for RCRA violations.

Response:

DOE's RCRA compliance is closely monitored by the EPA. The EPA and the INEL have entered into a Consent Order and Compliance Agreement signed in July 1987. This agreement identifies corrective action requirements for INEL facilities. RCRA permitting at the INEL is conditional with respect to meeting these requirements. The EPA conducts regular inspections at the INEL to determine compliance with the terms of this administrative order as well as with regulatory requirements. Any deficiencies or violations identified would become the subject of a separate enforcement response or decision by the EPA, depending on the nature, extent, and seriousness of the deficiency.

5.30.3.6 Comment:

It was stated that wastes, including military wastes, are already transported to the INEL and threaten the public and environment. Specifically, reviewers expressed concern over temporary storage of Three Mile Island (TMI) waste at the INEL and questioned why public hearings on TMI waste were not held.

Response:

The waste from TMI is stored at the INEL in canisters designed for safe containment. A detailed discussion of the storage of the TMI waste at the INEL or the question of public hearings on such waste is beyond the scope of this EIS.

Very little waste being transported to the INEL is Department of Defense waste; most is DOE waste. Great care is taken in the handling and transportation of all radioactive wastes to ensure protection of the environment and the health and safety of the public and INEL workers.

5.30.3.7 Comment:

It was stated that the Draft EIS provides no assurance from the EPA that the increase in wastes caused by SIS operation can be safely or adequately stored at the INEL.

Response:

The Final EIS represents an undertaking by DOE to fulfill its responsibilities under the NEPA process. The SIS EIS is not an EPA-generated document. Therefore, the EIS does not contain EPA assurances or statements with respect to specific discussions. However, the EPA has reviewed the Draft EIS and identified the inadequacies or deficiencies it considers important.

5.30.3.8 Comment:

General concern was expressed over the inadequate storage of wastes at the INEL over the Snake River Plain aquifer from both SIS and other sources. It was stated that no more waste should be generated or stored at the INEL; however, some felt that by not building the SIS Project at the INEL, radioactive waste in Idaho would not be alleviated.

Response:

The principal sources of contamination of groundwater at the INEL are not related to current practices associated with the storage of waste, but rather result from the previous practices of using an injection well or discharging hazardous waste to percolation ponds. See the responses to comments 5.30.1.2, 5.30.1.5, and 5.30.1.6. Waste will continue to be generated at the INEL irrespective of the decision on whether to construct the SIS Project and DOE will continue to devote resources to monitor, characterize, and correct, where necessary, contamination problems.

5.30.4 Contamination Considerations

5.30.4.1 Comment:

Concern was expressed over current and future contamination of soil, groundwater, and the Snake River. Reviewers questioned the INEL's environmental record, citing contamination by radioactive, hazardous, and mixed wastes, and expressed concern that the SIS Project would aggravate existing waste management problems. Conversely, it was stated that wastes from the SIS Project would not pose a danger to the Snake River Plain aquifer.

Response:

Existing contamination at the INEL is the result of prior practices which either have been stopped or have been changed to meet current regulatory requirements (e.g., mixed wastes are no longer placed in shallow landfills or discharged as liquid effluents but are stored in above-ground RCRA interim-status facilities; since the early 1970s, TRU wastes have no longer been buried in shallow landfills but placed on above-ground covered storage pads). The handling of waste generated by the SIS Project would be done in accordance with all current regulatory requirements and is not anticipated to pose a danger to the Snake River Plain aquifer.

5.30.4.2 Comment:

It was stated that the INEL was already contaminating water in a local hot spring.

Response:

The USGS has conducted groundwater monitoring at the INEL since its inception. Water samples collected from hot springs located in eastern Idaho have not shown contaminants from the INEL.

5.30.4.3 Comment:

Concern was expressed that the roads and soil will be impacted by contamination associated with the transport of materials and wastes for the SIS Project.

Response:

Transport of nuclear materials and wastes associated with the SIS Project would have a minimum impact to the environment, and increased exposure levels to the general public are exceedingly small. Transuranic waste has been shipped to the INEL for 34 years without any indication of resulting contamination of roadways.

5.30.4.4 Comment:

It was stated that DOE has yet to rectify INEL groundwater contamination; Idaho already has a temporary waste dump on a major aquifer, with no action being taken about the pollution of ground water and air from this dump. Requests were made for DOE to give assurances as to the safety of the Snake River Plain aquifer, and it was asked whether DOE is studying the extent of the problem or taking remedial action.

Response:

As a first step in the rectification of groundwater contamination, the INEL has either stopped or changed those practices which have led to groundwater contamination (e.g., termination of routine use of injection wells, change in the use of corrosion inhibitors used in cooling water, placement of TRU waste on above-ground storage pads, and discontinuation of the placement of hazardous or mixed waste in shallow landfills). The INEL has carefully documented and monitored waste products in the Snake River Plain aquifer, in perched groundwater bodies, in sediments beneath the RWMC, and at other locations. Concentrations of contaminants in the Snake River Plain aquifer have been decreasing as a result of changes in practices, especially in the past 4 years. Detailed investigations to determine the extent of groundwater contamination have been initiated, and remedial/corrective actions as required will be implemented. Current studies and predictive computer models indicate that contaminants above EPA guidelines will not migrate beyond the INEL boundary.

With respect to the SIS Project, all waste would be handled in accordance with current regulatory requirements, including those specifically for the protection of groundwater. All hazardous and radioactive wastes would be handled and managed as solid wastes and would not be discharged in liquid effluents.

5.30.4.5 Comment:

Reviewers noted that some contamination has been released to the environment as a result of INEL activities. It was stated that SIS Project would have a negative impact on the Snake River Plain aquifer, and that the Draft EIS did not adequately address the cumulative impacts that the SIS Project would be adding to the INEL. Reviewers stated that the history of contamination at the INEL shows an inability of the INEL to protect the environment and a lack of cooperation by the DOE with those

interested in doing so. It was stated that the INEL should be a leader in waste disposal research, rather than a creator of more waste. It was asked if the SIS Project would add costs to the decontamination effort at the INEL. Conversely, it was noted that the INEL has reprocessed fuel for 30 years without contaminating the environment and that the handling of radioactive material at the INEL is performed very safely.

Response:

The extent and concentration of contamination in the Snake River Plain aquifer have been well characterized and defined by a comprehensive, on-going monitoring and testing program. All contamination at the INEL is currently being investigated under the guidance of EPA Region X and in coordination with the State of Idaho.

An evaluation program is currently underway to determine what corrective action, if any, should be taken relative to the contamination of the environment at the INEL, as the waste management practices that led to contamination are no longer employed. Also see the response to comment 5.30.1.6. The discussion on cumulative effects in Section 4.5 of the Final EIS concludes that the SIS Project would not significantly impact existing contamination at the INEL or increase the costs of remedial or corrective action. The INEL has been and will continue to be involved in research on waste reduction, storage, and disposal.

5.30.4.6 Comment:

It was noted that EPA has stated that hazardous wastes have been released to the aquifer.

Response:

Section 3.1.4.4 of the Final EIS discusses the three sites at the INEL that currently require corrective action under RCRA, which is being implemented in accordance with the Consent Order and Compliance Agreement between DOE and EPA.

5.30.4.7 Comment:

Concern was expressed about leakage from wastes stored or disposed of at the INEL, and about the effects of contamination on the aquifer, waterways, wildlife, tourism, agriculture, food chain, recreation, and nearby residents.

Response:

See the responses to comments 5.30.1.6, 5.30.4.9, and Section 3.1.4.4 of the Final EIS regarding existing contamination at the INEL. DOE continuously monitors the environment to determine the extent and concentration of contaminants, including those in groundwater, the food chain, air, and surface water as described in Section 3.1.6 of the Final EIS. Results of the monitoring program have detected no significant impact to wildlife or vegetation from contamination and, as a result of changes in waste management practices, waste plumes--particularly in the last four years--are shrinking.

5.30.4.8 Comment:

It was stated that millions of curies of radionuclides have been released in exhaust and waste plumes and the past studies have shown the existence of radiation-contaminated soil, water, plants, and animals at the INEL.

Response:

Response:

Response:

The plutonium migration problem of the RWMC is currently being evaluated as part of an agreement with Region X of the EPA. Appropriate corrective actions under the Consent Order and Compliance Agreement or any remedial actions deemed necessary under the CERCLA as amended will be discussed with EPA and the state. The proposed plan will be subjected to public review and comment in public meetings, as set forth in RCRA/CERCLA/NEPA requirements. The INEL is exploring the feasibility of removing the source of the plutonium in the RWMC as part of its evaluation activities.

Plutonium is subject to ion exchange (absorption) reactions, which bind the plutonium to soil and organic particles as it is carried by water down through the soil column. Newer management techniques at the RWMC have been implemented to decrease the amount of surface water entering the RWMC. Without water percolation, the only method of transport available to plutonium, solution transport, will be eliminated. The most recent data suggest that plutonium will not reach the aquifer in detectable amounts based on current plutonium levels in the soil and the engineered elimination of the transport medium (water) as implemented in the new RWMC Management Plan.

5.30.4.11 Comment:

It was stated that total INEL waste-associated radioactivity released by injection well disposal during the lifetime of the injection wells was 7,577 curies, or many times the lethal amount of 8 millicuries.

Response:

Health effects are based on rems and not on curies. To calculate a lethal dose based upon curies, the radioactive isotope must first be known. A conversion factor based on the toxicity, activity, and availability of the isotope to the designated receptor must then be used to calculate rem. The conversion factors vary widely, and therefore the statement that so many curies are lethal is misleading unless it is isotope- and receptor-specific.

To imply that 7,577 curies are all readily available to a receptor population is incorrect. The vast majority of radioactivity which was injected into the wells was from tritium. Tritium has a relatively short half-life of only 12.5 years. The aquifer will be able to retain the tritium long enough to prevent water that is above the EPA's drinking water criterion of 4 millirem/yr from ever reaching the INEL boundary.

5.30.4.12 Comment:

It was stated that past activities have not been protective of the Snake River Plain aquifer and that toxic radioactive substances and carcinogenic organic chemicals have been used, causing the site to be considered as a Superfund site.

Response:

Section 3.1.4.4 of the Final EIS identifies the three sites at the INEL requiring corrective action in accordance with RCRA requirements. Also see the responses to comments 5.30.1.6, 5.30.4.9, and 5.30.4.10.

5.30.4.13 Comment:

Reviewers noted that a plume has already been identified beneath the TRA radioactive waste percolation ponds at the INEL.

Response:

Response:

The small amount of radionuclides (including plutonium) released during normal operations and postulated accidents are described in the Draft EIS and Final EIS (Sections 4.1.2 and 4.1.3). These releases would not have a significant impact on Idaho's air quality or on human health and the environment. Other emissions, such as Freons and NO_x, are also addressed in the Final EIS. The SIS Facility will employ the Best Available Control Technology (BACT) in accordance with the Prevention of Significant Deterioration (PSD) Permit Application being prepared for the SIS Facility in order to reduce significant pollutants. The DOE concludes that all pollutant emissions will be kept well below EPA limits and will therefore pose no health hazards.

5.30.5 Waste-Miscellaneous

5.30.5.1 Comment:

It was requested that the DOE concentrate on properly managing and cleaning up existing nuclear waste at the INEL, rather than building and operating the SIS Project; additionally it was stated that the jobs are not worth the waste.

Response:

Efforts by the DOE are continuing to characterize, monitor, and implement mitigation actions at the INEL. The SIS Project would not hamper or aid the current INEL cleanup efforts nor would the additional waste generated by the SIS Project impact current or planned waste handling and disposal activities. Section 1.1.1 of the Draft EIS and Final EIS discusses the need for the SIS Project. Local economic considerations were considered; however, they are not the primary criteria for siting the SIS Facility.

5.30.5.2 Comment:

It was stated that SIS emissions and effluents would be within all applicable environmental standards.

Response:

All SIS emissions and effluents will be within all applicable state and EPA standards.

5.30.5.3 Comment:

It was stated that "evaporation ponds" will allow pollution of the groundwater.

Response:

As stated in the Draft EIS, the percolation ponds are an interim measure until other alternatives have been assessed and approved for implementation. Effluent to the service waste system from the SIS Project would be monitored for both RCRA- (hazardous wastes) and DOE- (radioactive effluents) controlled contaminants to ensure that releases are all below applicable limits. As part of DOE's continuing efforts to upgrade wastes, a new percolation pond or ponds will be installed at the ICPP, after the appropriate NEPA evaluations are completed. The new pond(s) will be located such that it (they) will not impact the existing percolation ponds at the ICPP. Discharges to the pond(s) will be nonhazardous and nonradioactive and will meet all appropriate Federal and state regulations. Therefore, wastes released to the evaporation ponds would not pollute the ground water.

5.30.5.4 Comment:

It was stated that RCRA compliance is easier said than done when dealing with hazardous/toxic waste. It was stated that the waste evaporator is a hazardous waste treatment unit and requires a hazardous waste treatment permit under RCRA.

Response:

Liquid waste streams to be sent to the evaporator would only be hazardous because of pH (see Figure 2-9 of the Final EIS). Prior to being sent to the evaporator, the liquid waste streams would be neutralized in a totally enclosed system; therefore, the evaporator would not be a hazardous waste treatment system requiring a RCRA permit.

5.30.5.5 Comment:

It was asked if the ethanol-ethanol/dye mixture is considered a waste or a product.

Response:

The ethanol/dye mixture is both a product used as part of the dye-laser system and a hazardous waste when the mixture requires replenishment. As a hazardous waste, it will be handled and managed in accordance with all applicable RCRA regulations.

5.30.5.6 Comment:

Reviewers stressed that waste minimization should remain a top priority relative to the SIS process and that the Final EIS should emphasize the DOE commitment to continue to study methods for waste minimization and reduction of existing waste stockpiles.

Response:

DOE maintains a strong on-going commitment to minimize and reduce the quantities of generated waste. In the design and operation of the SIS Project, waste minimization is being stressed, together with the separation of all contaminated liquid waste processing streams from nonprocess liquid waste streams. Throughout all DOE operations, methods to reduce and minimize waste are constantly being implemented as technology and applications advance.

5.30.5.7 Comment:

General comments were received on the impact of additional SIS waste on current INEL waste management programs. On the one hand, the increase was considered small while, on the other, it was considered that the SIS Project would compound current waste management problems and increase toxic waste and its transportation.

Response:

The total quantities of hazardous and radioactive wastes projected to be generated by the SIS Project are small (see Table 2-7 of the Final EIS) compared to the total quantity of similar wastes handled currently at the INEL. Hazardous waste would be staged temporarily onsite in a facility meeting RCRA requirements. The hazardous wastes would then be shipped offsite to a RCRA-approved TSD site. Should an offsite RCRA TSD not be available, DOE would provide onsite storage

facilities meeting RCRA requirements until an offsite TSD is available. Transport of hazardous wastes would be performed in accordance with DOT and EPA requirements 49 CFR 100-199 and 40 CFR 263, respectively. Low-level waste would be disposed of onsite. TRU waste would be transported to the WIPP in New Mexico. See also the response to comment 5.30.3.1.

5.30.5.8 Comment:

Reviewers noted that SIS-generated TRU waste would increase TRU waste production at the INEL by 2,700 percent and would remain a potential hazard for thousands of years.

Response:

The SIS Facility is projected to generate less than 440 tons of TRU waste annually, which is about 10 percent of the total volume handled and managed at the INEL and about 50 percent of the TRU waste generated at the INEL on an annual basis. Most types of TRU waste do remain radioactive for tens of thousands of years; however, the purpose of the WIPP is to provide a disposal site for TRU wastes in a manner providing safe isolation from the environment. The INEL would provide safe, adequate interim storage for SIS TRU waste (as is currently done for TRU waste from other sources) before final emplacement.

5.30.5.9 Comment:

It was noted that at one time it was considered undesirable by the State of Idaho to store or process plutonium above the Snake River Plain aquifer, and that this history should be reviewed.

Response:

The Final EIS on the WIPP facility indicated that there were no environmental reasons why plutonium should not be processed or why TRU waste should not be safely stored at the INEL in the near term (i.e., for up to 100 years); however, long-term isolation of TRU waste at the INEL was not considered acceptable.

5.30.5.10 Comment:

General concern was expressed over the generation, accumulation, transportation, and disposal of additional wastes in Idaho, the length of time that wastes will remain toxic to the environment, and the resultant impact. Others stated the SIS wastes would be more safe and less expensive to deal with than reactor wastes.

Response:

The wastes that would be generated by the SIS Project would include TRU waste, mixed waste, hazardous waste, and low-level radioactive waste. TRU waste would be transported to the WIPP in New Mexico. Hazardous waste would be staged temporarily onsite in a facility meeting RCRA requirements. The hazardous wastes would then be shipped offsite to a RCRA-approved TSD site. Should an offsite RCRA TSD not be available, DOE would provide onsite storage facilities meeting RCRA requirements until an offsite TSD is available. Mixed wastes would be stored onsite in RCRA-approved facilities until their disposition is determined, or an offsite TSD for such waste is available. The low-level radioactive waste would be disposed of at the INEL and is by definition a low-activity waste that does not require long-term isolation from the environment, unlike TRU and high-level radioactive waste. Measures and practices consistent with the low-activity nature of this waste would be used to ensure that any potential impacts would be minimal and kept well below all appropriate regulatory standards. The transport of wastes is addressed in Sections 2.1.5.2, 4.1.2.4, 4.3.1.3, and Appendix A of the Final EIS.

The wastes that would be generated by the SIS Project cannot be directly compared to the wastes of reactor-produced plutonium; however, it is noted that the SIS Project would not produce high-level wastes such as commercial reactor spent fuel or high-level waste from the chemical processing of production reactor fuels and targets.

5.30.5.11 Comment:

It was noted that the INEL budget for environment and safety is less than other sites', even though significant quantities of waste are shipped to the site.

Response:

The INEL budget for waste management, environmental monitoring, waste cleanup, and related activities is commensurate with the required work. Strong emphasis has always been, and will continue to be, placed on monitoring and evaluation activities related to detecting wastes in the environment and promoting safe interim storage and disposal methods for waste.

5.30.5.12 Comment:

Concern was expressed that improper disposal of waste could cause problems for future generations.

Response:

The most important goal of the DOE Defense Waste Management Plan (see Reference) is the safe, permanent disposal of radioactive and hazardous wastes. The aim of the overall waste disposal program is to eliminate current waste inventories and provide for prompt, permanent disposal of wastes generated on an on-going basis.

There are many complex technical, environmental, political, socioeconomic, and other factors involved in the overall program. These are some of the contributing reasons why developing and implementing a comprehensive national waste management program has been such a lengthy process. However, the end result will be the safe, permanent disposal of wastes associated with U.S. nuclear defense. The objective is to ensure that the environment, its current inhabitants, and future populations will be protected from the problems arising from improper waste disposal.

Reference:

DOE (U.S. Department of Energy), 1983. The Defense Waste Management Plan, DOE/DP-0015, Washington, DC.

5.30.5.13 Comment

It was stated that it is unlikely that low-level waste would get 200 to 1,000 feet down to the aquifer.

Response:

Section 4.1.2.3 of the Draft EIS and Final EIS provides a very conservative analysis of the potential impact on groundwater from the disposal of low-level waste. It is unlikely that low-level waste would migrate downward to the cited depths, since methods such as soil covers and sloping of

caps are used to prevent surface water (from rainfall and snow melt) from migrating through the buried low-level waste.

5.30.5.14 Comment:

It was stated that a considerable amount of water will be used in the SIS process. Concern was expressed on the ultimate fate of the contaminated water which will be discharged to seepage ponds, with specific concerns about the aquifer.

Response:

The quantity of water used by the SIS Project is small (2.9×10^6 gal/yr) compared to that withdrawn for other uses (1.8×10^9 gal/yr) from the aquifer. As part of DOE's continuing efforts to upgrade wastes, a new percolation pond or ponds will be installed at the ICPP after the appropriate NEPA evaluations are completed. The new pond(s) will be located such that it (they) will not impact the existing percolation ponds at the ICPP. Discharges to the pond(s) will be nonhazardous and nonradioactive and will meet all appropriate Federal and state regulations.

See the response to coment 5.12.1 for information on the aquifer.

5.30.5.15 Comment:

Concern was expressed about construction practices at the INEL site (e.g., at a structure that is to contain high-level radioactive waste).

Response:

The structure for the SIS Project would be Category I, and all appropriate quality assurance requirements for materials, construction practices, inspections, etc., will be followed. See the response to comment 5.14.2 for additional information on waste management structure construction.

5.30.5.16 Comment:

It was requested that normal operating limits be established for the SIS Facility and that a plan be developed for identifying actions to be taken if these limits are exceeded.

Response:

The Final EIS in Section 2.1.5 discusses the normal effluents, emissions, and solid wastes produced from SIS operation. DOE-ID Order 5484.1A establishes the requirements for reporting, and the corrective action to be taken, if limits of emissions are exceeded. The actual numerical values of normal emissions cannot be established, however, until the design of the plant is completed, nor can a detailed emergency plan be developed.

Currently the State of Idaho and EPA are reviewing the design of waste handling systems for proposed projects at the INEL and will review the SIS waste handling system design as part of the permitting process. The State of Idaho and EPA are currently conducting onsite inspections of waste handling systems operations, and these inspections will continue as called for in current or future agreements.

5.30.5.17 Comment:

It was asked how much more waste would be generated at Hanford to support SIS commitments and if funding would be available to ensure that such wastes are disposed of safely and permanently.

Response:

The DOE is committed to continue supporting the long-range Defense Waste Management Plan at Hanford. This program will provide the funding required for the safe disposal of Hanford wastes. The amount of waste generated by decladding Fast Flux Test Facility (FFTF) fuel, should that material be approved as a feed for the SIS Project, would be covered by other NEPA evaluations. See the responses to comments 5.26.7 and 5.29.102 regarding waste generated at Hanford if the SIS Project is located at the INEL. See the response to comment 5.26.1 regarding potential use of the FFTF fuel.

5.31 MISCELLANEOUS

5.31.1 Comment:

Concern was expressed that plutonium technology generates chemical toxins which cannot be absorbed into the environment without harm.

Response:

The U.S. Department of Energy (DOE) recognizes the radiological and chemical hazards of plutonium. The Special Isotope Separation (SIS) Facility is being designed such that these potential hazards will not present a significant hazard to workers, members of the public, or the environment.

The design of the SIS Facility is discussed in Section 2.1 of the Final Environmental Impact Statement (EIS). The Final EIS discusses effluent releases from SIS operations under routine and accident conditions and indicates that there would be no significant adverse impacts to environmental quality or public health and safety as a result of those releases.

5.31.2 Comment:

It was stated that there are only limited agreements with state regulatory agencies which allow restricted Idaho National Engineering Laboratory (INEL) access, and that actual regulation lies solely with the Federal government. It was also noted that states have no authority to regulate Federal nuclear facilities.

Response:

Congress has mandated in Federal environmental standards that facilities under the jurisdiction, custody, or control of Federal agencies or departments comply with the requirements of Federal and state laws. Examples of this include the Clean Air Act, the Resource Conservation and Recovery Act (RCRA), the Safe Drinking Water Act, and the Clean Water Act. In the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended, Congress directs that even if a state law or requirement is not legally applicable to a Federal facility, the law or requirement must be considered to the extent that it may be relevant and appropriate within the context of a National Priorities List (NPL) remedial action at the Federal facility. For non-NPL remedial actions, state laws and requirements are made directly applicable in CERCLA Section 120. Thus, states have an important role in regulating environmental compliance at Federal facilities.

The DOE-Idaho Operations office (DOE-Idaho) has also negotiated a Consent Order and Compliance Agreement (COCA) with Environmental Protection Agency (EPA) Region X that subjects INEL operations to EPA oversight and enforcement for RCRA activities. DOE-Idaho has fully coordinated with the State of Idaho on all activities being carried out under the COCA in recognition of the state's role and in view of its efforts to obtain authorization to administer the Federal RCRA program. Regulatory agency personnel must comply with standard security requirements to acquire INEL access. These requirements include security clearances, escorts, and demonstrations of information needs regarding restricted facilities. These are the same basic requirements that all DOE and DOE-contractor personnel must meet.

5.31.3 Comment:

It was stated that several State of Idaho statutes, rules, regulations, and standards should be included as part of the applicable regulations concerning hazardous and mixed waste. Specifically, Idaho Code Section 39-4403 (13)(a)(iv) defines restricted wastes not covered under RCRA.

Response:

Idaho Code Section 39-4403 (14) contains two definition of restricted wastes, and a reference to these has been included in Section 5.5 of the Final EIS. Neither Idaho Code Section 39-4403 (14)(a)(iv) nor any other subsection therein would be applicable to the SIS Facility, because the SIS Project does not produce liquid hazardous waste streams of the type or quantity identified in this section. See also the responses to comments 5.30.1.20 and 5.31.2.

5.31.4 Comment:

It was stated that neither DOE nor the Nuclear Regulatory Commission (NRC) were managing a coherent, comprehensive program to adequately regulate the SIS Project.

Response:

The DOE's Major System Acquisition order is being used to manage the SIS Project and development activities. This system provides a coherent, comprehensive, and detailed approach to the SIS Project. The safety and environmental impacts of the SIS Project have been evaluated in this EIS using industry-accepted evaluation criteria, including many used by the NRC. The impacts have been evaluated against Federal and state regulations and the consequences determined to be small or insignificant.

While DOE uses standards that meet, or are equivalent to, those developed by the NRC, EPA, Department of Transportation (DOT) and other Federal agencies, the NRC would not be involved in regulating the SIS Project.

5.31.5 Comment:

It was questioned how DOE would be able to ensure that no radioactive waste (as defined by State of Oregon) would be shipped to the Arlington Hazardous Waste Disposal Site in Oregon.

Response:

As discussed in Section 2.1.5 of the Final EIS, all hazardous waste generated by the SIS Project would be handled in accordance with DOE and RCRA requirements. Additionally, all applicable EPA and DOT regulations for handling, packaging, and preparation for shipment would be followed.

The SIS Project would have approved procedures in place to ensure that waste material generated at the SIS Facility is properly segregated according to the SIS Project and DOE guidelines and according to disposal site acceptance criteria. Since the Arlington Hazardous Waste Disposal Site is not authorized to receive radioactive waste, none would be shipped to that site.

5.31.6 Comment:

It was claimed that, contrary to what is stated in the Draft EIS, a Prevention of Significant Deterioration (PSD) permit would be required for the SIS Project.

Response:

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Response:

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Response:

5.31.9 Comment:

It was stated that Idaho and Washington do not have adequate agency resources for the monitoring and enforcement of environmental and safety regulations.

Response:

State environmental monitoring/enforcement agencies are reviewed periodically by the EPA to verify adequate implementation of Federal requirements. States lacking adequate programs may request temporary assistance from the regional EPA office or they can relinquish enforcement authority to the EPA.

5.31.10 Comment:

It was stated that the state legislature should confirm the state's right to regulate nuclear waste storage and forbid interstate waste shipment in order to avoid inadequate Federal government management.

Response:

The Final EIS addresses the handling, storage, and transportation of all waste generated by the proposed SIS Facility. The question of the state's right or desire to regulate nuclear waste and shipment is beyond the scope of this EIS.

5.31.11 Comment:

It was stated that the INEL would be a good place for the SIS Project because of its desert climate and remote location.

Response:

As discussed in the Final EIS, many factors are to be considered in the decision as to whether to construct and operate the proposed project, and its resultant location.

5.31.12 Comment:

It was stated that the INEL was chosen as the preferred site for the SIS Project because of its low population density and remote location.

Response:

The INEL is identified in the Draft EIS and the Final EIS as DOE's preferred alternative based on the recommendation of a panel, as discussed in Section 1.1.4. A decision on whether to proceed to construct and operate the SIS Project, and its location if it is to be constructed and operated, will be contained in a publicly available Record of Decision (ROD). Also see the responses to comments 2.12.4 and 2.12.5.

5.31.13 Comment:

It was stated that it has not been shown that Idaho is the most economical location for the SIS Project. It was also stated that the SIS Project could be built better and more economically in Idaho than anywhere else.

Response:

As discussed in Section 1.1.4 of the Draft EIS and the Final EIS, the potential location for the SIS Project was evaluated by a team of scientists and engineers who considered environmental, health, and safety factors as well as project cost, schedule, socioeconomics, and other related factors. DOE management, working with information provided by the team, determined that the INEL would be the preferred location for the SIS Project. The publicly available ROD on this EIS will identify whether DOE will proceed with the construction and operation of the SIS Project and its location if DOE decides to proceed. Also see the responses to comments 2.12.4 and 2.12.5.

5.31.14 Comment:

It was questioned whether the cost of constructing the SIS Project at the INEL would be less than constructing it at Hanford, given the labor pool available at Hanford.

Response:

The Final EIS, in Sections 3.2 and 4.2, acknowledges the recent employment layoffs associated with placement of N-Reactor in cold stand-by status and the suspension of repository characterization studies. The identification of the preferred alternative within the Draft EIS was based on the recommendations of an independent panel, as discussed in Section 1.1.4. The publicly available ROD on this EIS will identify whether DOE will proceed with the construction and operation of the SIS Project and its location if DOE decides to proceed. Also see the responses to comments 2.12.4 and 2.12.5.

5.31.15 Comment:

It was stated that the SIS Project would be only a short distance from the channel of the Big Lost River and within 8 miles of Big and Little Lost River sinks.

Response:

The SIS Project will neither withdraw water nor discharge liquid effluents to the Big and Little Lost Rivers. All liquid effluents that would be discharged to a new Idaho Chemical Processing Plant (ICPP) percolation pond would be nonradioactive and nonhazardous.

5.31.16 Comment:

Concern was expressed that the estimated the SIS Project costs were too high. More complete cost data were also requested. It was stated that SIS expenditures ($1 billion) are unnecessary because the proposed action is not needed.

Response:

DOE has determined that the SIS Project is a cost-effective means of ensuring a contingent supply of weapon-grade plutonium. Additional cost data will be developed based on more detailed design data when available. See Section 1.1.1 of the Final EIS regarding the need for the SIS Project. The publicly available ROD on this EIS will identify whether DOE will proceed with the construction and operation of the SIS Project and its location if DOE decides to proceed.

5.31.17 Comment:

Concern was expressed that neutron-induced radioactivity in the SIS building would shorten the accessible lifetime to only a few years.

Response:

The inducement of radioactivity by neutron activation in nonradioactive material is well understood and documented. The plutonium associated with the SIS Project in the form of feed, product, and by-product does produce spontaneous neutron emission. However, the number of neutrons emanating from the plutonium would be insufficient to induce significant radioactivity in the building structure or process equipment.

5.31.18 Comment:

It was noted that without Special Nuclear Material (SNM) accountability methods and procedures, quantities of SNM could end up as "materials unaccounted for" or released to the environment.

Response:

Recognizing the importance of SNM accountability, the design of the SIS Plutonium Processing Building (PPB) includes a Material and Process Control Laboratory (MPCL) and in-line process nondestructive assay (NDA) glove boxes. Analytical work required by the PPB for both process control and nuclear material accountability would be performed in the MPCL. Each process glove box line (pyrochemical, separator systems, and aqueous sidestream) would interface to the process storage vault through NDA glove boxes to provide on-line accountability. Also, all waste streams would undergo NDA to verify and account for SNM in the SIS waste streams.

5.31.19 Comment:

Concern was expressed over the perceived failure to properly consider meteorological conditions in dose/dispersion calculations. Specifically, the discharge array in wind-speed measurement height (10 m) and the SIS Facility stack height (36.6 m) was questioned.

Response:

The use of 10-m meteorological data (instead of data from a greater height) is more conservative (i.e., tends to result in higher calculated doses), as is discussed in the Final EIS in Section A.1.

5.31.20 Comment:

It was requested that following the "Decommissioning" section of the Draft EIS, a section entitled "Maintainability" be inserted.

Response:

The SIS facilities would be maintained in accordance with DOE Order 6430.1A, which was listed in the references in the Final EIS. Its predecessor Order (6430.1) was referenced in the Draft EIS.

6.0 GENERAL

6.1 POTENTIAL IMPACTS/RISKS

6.1.1 Comment:

Concern was expressed that Special Isotope Separation (SIS) would pose unreasonable risks to human health and safety, produce psychological impacts, contaminate the environment, and increase the risks of nuclear war, sabotage, and accidents. Additional information on transportation risks and accidents effects was requested.

Response:

The Final Environmental Impact Statement (EIS) discusses both routine and accidental releases and their consequences to the human environment. The analyses presented indicate that, even for a potentially severe facility or transportation accident, the risks are small and will not have any significant environmental impacts.

Psychological impacts as well as the risks of nuclear war are, understandably, deeply felt issues; however, they are beyond the scope of the EIS, which is intended to assess the environmental consequences of the proposed construction and operation of the SIS Project.

Additional information on transportation risks and accidents has been incorporated into the Final EIS in Appendix A.3 as well as the appropriate sections on routine and accidental consequences for each of the alternative sites in Chapter 4. For information on sabotage see the response to comment 5.25.5.

6.1.2 Comment:

Reviewers made general statements relating to environmental and socioeconomic impacts from the SIS Project. Concern was expressed that the SIS Project would have adverse impact on plants, animals, the atmosphere, tourism, agriculture, state and local economics, groundwater, and surface water, and could threaten world peace. In addition, concern was expressed over the effects that accidents would have on the environment, both as a result of natural phenomena (volcanoes, earthquakes, etc.) and facility accidents. Others felt the impacts would be negligible.

Response:

The Final EIS discusses both routine and accidental releases and their consequences to the human environment. The analyses presented indicate that, even for a potentially severe facility or transportation accident, the risks are well below those that have been previously accepted and the SIS Project would not contaminate the environment above any level considered to be scientifically unsafe.

Construction and operation of the SIS Project are not expected to require a large in-migrating workforce for either construction or operation. Most of the construction and operational workforce would be employed from within the surrounding regions of each of the alternative sites, and each of the regions has an adequate infrastructure to support the expected number of in-migrating workers without major investments in new services. Each alternative DOE site has been engaged in nuclear

defense material operations for more than 20 years. It is therefore unlikely that continuation of nuclear defense material operations would affect either tourism or the "image" that may be attributed to the surrounding regions of these facilities. The construction and operation of the SIS Project could have a small beneficial economic impact on the region surrounding each of the sites. Adverse impacts on tourism would be small because a significant percentage of travel to Idaho is to visit relatives and friends.

Construction and operation of the SIS Project at the Idaho National Engineering Laboratory (INEL) would not result in discharges of liquid effluents to surface waters. All liquid effluents that would eventually be discharged to percolation ponds would be nonhazardous and nonradioactive. The design of the SIS facilities, as reflected in this Final EIS, separates all potentially contaminated liquid process streams to further ensure that no radioactive or hazardous liquid wastes would be discharged. The only waste generated by the SIS Project that would be disposed of, and hence would come into contact with the ground, would be solid low-level radioactive waste. An extremely conservative scenario (see Section 4.1.2.3 of the Final EIS) for analyzing the potential impacts on groundwater from the disposal of this waste indicates that potential contamination would be well below drinking water standards.

With respect to world peace, see the responses to comments 4.13 and 4.14 regarding nuclear weapons and arms reduction. See the responses to comments in section 5.10 regarding earthquakes and volcanoes.

6.1.3 Comment:

Concern was expressed over the negative environmental impacts that both facility and transportation accidents would have on the environment, and it was asked whether the actions to be taken following an accident would be adequate.

Response:

The Final EIS discusses both routine and accidental releases and their consequences to the human environment. The analyses presented indicate that, even for a potentially severe facility accident, the release would be of insufficient magnitude to require costs for mitigation. The discussion of emergency preparedness and response in Section 4.6 of the Final EIS has been expanded to include further discussion of responsibilities, procedures, training, and coordination.

See the responses to comments 5.1.1 (accidents in general), [5.1.45 relevance of a Three Mile Island (TMI) and Chernobyl comparison], and 5.29.1 (transportation accidents).

6.1.4 Comment:

General concern was expressed that environmental contamination from SIS would affect and/or ruin the region's atmosphere, aquifer, and Snake River.

Response:

The Final EIS discusses both routine and accidental releases and their consequences to the human environment. The analyses presented indicate that, even for a potentially severe facility or transportation accident, the risks are well below those that have been previously accepted and the SIS Project would not contaminate the environment above any level considered to be scientifically unsafe.

Construction and operation of the SIS Project at the INEL would not result in discharges of liquid effluents to surface waters. All liquid effluents that would eventually be discharged to percolation ponds would be nonhazardous and nonradioactive. The design of the SIS facilities, as reflected in the Final EIS, separates all potentially contaminated liquid process streams to further ensure that no radioactive or hazardous liquid wastes would be discharged. The only waste generated by the SIS Project that would be disposed of onsite, and hence would come into contact with the ground, would be solid low-level radioactive waste. An extremely conservative scenario (see Section 4.1.2.3 of the Final EIS) for analyzing the potential impacts on groundwater from the disposal of this waste indicates that potential contamination would be well below drinking water standards. Contamination of the Snake River would not occur as a result of the SIS Project. Refer to responses to comments 5.19.3 and 5.12.1 relating to contamination of the atmosphere and aquifer by the SIS Project, respectively.

6.1.5 Comment:

Concern was expressed that the U.S. Department of Energy (DOE) has polluted air and water elsewhere and caused increased cancer and mortality rates, and the that SIS will do the same.

Response:

The Draft EIS and the Final EIS discuss the potential environmental consequences of the SIS Project, including the waste management practices that would be used for SIS-generated waste. The analyses of potential environmental impacts indicate that the SIS Project and the disposition of its waste would not result in pollution of the air or water above any level considered scientifically safe. Analogies to other facilities and problems are not appropriate without accounting for the specific differences in the facilities and the waste management practices that are to be employed. No scientifically derived mortality rates have been determined to have occurred with respect to other facilities. (Also see the response to comment 5.13.11).

6.1.6 Comment:

It was stated that the Draft EIS indicated it is acceptable to sacrifice the vegetation at the proposed SIS construction site.

Response:

In the Final EIS in Section 4.1.6, it is noted that construction of SIS would unavoidably impact a total of 49.8 acres. About 54 percent of the land has been previously disturbed, and a reclamation plan for disturbed areas outside the final facility boundaries will be developed. The area has been evaluated for rare and endangered species, including flora, and none was identified nor is the area a critical habitat for any endangered species. The area to be impacted by SIS is small in relation to the undeveloped portion of the INEL.

6.1.7 Comment:

Concern was expressed over the potential impact from accidents and normal operations resulting in contamination of the Snake River Plain aquifer. It was noted that the Snake River flows into the Columbia River, and contamination to either river would be a great tragedy to the Northwest.

Response:

Construction and operation of the SIS Project at the INEL would not result in discharges of liquid effluents to surface waters. All liquid effluents that would eventually be discharged to

percolation ponds would be nonhazardous and nonradioactive. The design of the SIS facilities, as reflected in this Final EIS, separates all potentially contaminated liquid process streams to further ensure that no radioactive or hazardous liquid wastes would be discharged. The only waste generated by the SIS Project that would be disposed of onsite, and hence would come into contact with the ground, would be solid low-level radioactive waste. An extremely conservative scenario (see Section 4.1.2.3 of the Final EIS) for analyzing the potential impacts on groundwater from the disposal of this waste indicates that potential contamination would be well below drinking water standards. See also the response to comment 5.12.1 relating to contamination of the aquifer by the SIS Project.

6.1.8 Comment:

Reviewers stated that the socioeconomic benefits of SIS would be relatively short-lived, whereas the wastes produced would pose long-term hazards and economic burdens.

Response:

The benefits of the SIS Project include not only the beneficial economic impacts that would be associated with the construction and operation, but also the fulfillment of the need for the SIS Project, as identified in Section 1.1.1 of both the Draft and Final EIS. All wastes generated by the SIS Project would be handled as part of on-going waste management activities at each of the alternative DOE sites where the SIS Project could be located. These wastes would be handled in accordance with state and Federal regulations and would not be long-term hazards or economic burdens. The hazards associated with storage of the low-level waste from the SIS Project are described in Section 4 of the Final EIS for the 30-year design life. Waste management programs at the alternative DOE sites are on going programs which are not dependent on the length of a project or activity and are specifically directed at the continued management of all wastes to ensure that the wastes do not pose long-term hazards.

6.1.9 Comment:

Concern was expressed that the SIS Project would impact the quality of life in Idaho, including the loss of personal well-being and safety.

Response:

As required by the National Environmental Policy Act (NEPA), the EIS discusses the impact of the SIS Facility for construction, normal operation, and severe postulated accidents. The analyses presented in Section 4.1 of the Draft EIS and the Final EIS indicate that for normal operation, even for a potentially severe facility or transportation accident, the risks are well below those that have been previously accepted by the public living in the proximity of the INEL, and the SIS Project would not significantly impact the quality of life or the safety of Idaho's citizens.

6.1.10 Comment:

Concern was expressed that the SIS Project would increase the amount of radioactive material in Idaho's environment.

Response:

The DOE acknowledges that small releases of radioactive material to the atmosphere would occur from the SIS facility; however, all releases would be well below all regulatory limits and would not pose a threat to the environment.

6.1.11 Comment:

It was noted that negative impacts of INEL operations including the SIS Project are few compared to the impacts of drunk drivers.

Response:

No response required.

6.1.12 Comment:

Concern was expressed that rumors about plutonium-contaminated water in Idaho, stemming from an accident or from knowledge of accumulating waste at the SIS Facility, could have a devastating effect on the marketability of food products grown in Idaho.

Response:

The potential impacts of rumors are speculative. It is acknowledged that some rumors could have economic effects, but it is unlikely that any such economic effect would be significant, as rumors would have to be persistent, have some measure of credibility, and have some means of verification. DOE and each of its field offices have personnel who are readily available to verify the accuracy of statements and to respond to rumors.

6.1.13 Comment:

Concern was expressed that the SIS Project would add toxic gases and toxic waste to the environment and that the SIS Project would produce waste for which there is no disposal solution.

Response:

The only hazardous air pollutant, as defined under the Clean Air Act, that would be emitted by the SIS Project to the environment is radioactivity in extremely small qunatities within applicable regulatory limits. The consequences of the release of radioactivity are fully assessed in the Draft EIS and the Final EIS. Both the Draft EIS and the Final EIS also discuss disposition of all the wastes that would be generated by the SIS Project. As indicated by the Draft EIS and the Final EIS, all of the wastes to be generated would be stored or disposed of in compliance with current regulatory requirements. Also see the response to comments in Section 5.30 regarding more details on waste management/disposal practices.

6.2 COSTS/RISKS VERSUS BENEFITS

Comment:

Reviewers voiced general concern that the cost or risks of the Special Isotope Separation (SIS) Project were greater than, or not offset, by the benefits. The costs or risks most often cited included contamination of the environment, effects on public health, tourism, drinking water, agriculture, the aquifer, Idaho's wildlife, and the impact on Idaho's pristine beauty and ecosystems, quality of life, and future Idaho generations. The benefits most often cited were jobs or economic benefits.

Response:

The purpose of an Environmental Impact Statement (EIS) is to assess the potential environmental consequences of the proposed action and its reasonable alternatives in order to provide decision-makers with environmental input into a decision as to whether or not to proceed. The EIS itself does not weigh or balance the potential costs and risks against the need to proceed or potential benefits in a cost-benefit analysis, but does indicate those considerations which are likely to be important to a decision (40 CFR 1502.23). The Record of Decision (ROD) prepared as a result of this National Environmental Policy Act (NEPA) process will identify whether the U.S. Department of Energy (DOE) will or will not construct and operate the SIS Project and, if it is to be constructed and operated, its location. The ROD will identify and discuss all factors, including any essential consideration of national policy, that were used by DOE in making its decision.

6.3 USE OF RESOURCES

Comment:

It was stated that the government's resources could be better used to address other environmental, sociological, educational, technological, and economic needs--such as schools, social programs, domestic programs,and Idaho National Engineering Laboratory (INEL) cleanup--and to decrease the Federal deficit. Reviewers also felt that the Special Isotope Separation (SIS) would be a wasteful use of the government's money, and that the government should be concentrating on disarmament treaties instead of building a facility which is not needed.

Response:

The purpose of an Environmental Impact Statement (EIS) is to assess the potential environmental consequences of the proposed action and its reasonable alternatives in order to provide decision-makers with environmental input into the decision on whether or not to proceed. The use or application of resources for other than the proposed action and reasonable alternatives is not within the scope of an EIS. The allocation of Federal resources is the responsibility of elected officials and representatives. The need for the SIS Project with respect to disarmament treaties and further negotiations is addressed in response to comment 4.14.

6.4 SPECIFIC INEL CONSIDERATIONS

6.4.1 Comment:

It was stated that the Idaho National Engineering Laboratory (INEL)/Special Isotope Separation (SIS) will have many regional and technical benefits.

Response:

The INEL has benefitted the Idaho economy, and the SIS Project is expected to provide beneficial impacts. A technology-transfer program exists to promote the potential commercial applications of research at the INEL.

6.4.2 Comment:

It was asked why the INEL does not allow the commerical use of INEL-generated.

Response:

Because of the research-related nature of reactor operations at the INEL, it is not generally feasible to use INEL reactors as an assured, dedicated source for commercial power production.

6.4.3 Comment:

It was stated that the INEL has failed to remove nuclear wastes from previous projects. One reviewer objected to the SIS Project because the U.S. Department of Energy (DOE) has not removed temporarily stored waste from the INEL as was stated by DOE.

Response:

Section 2.1.5 of the Final Environmental Impact Statement (EIS) identifies the waste that would be generated by the SIS Project, and Section 4.1.2 discusses and assesses the disposition of this waste. Of the radioactive waste generated by the SIS Project, low-level waste would be disposed of onsite, hazardous and mixed waste would be stored in a facility that meets Resource Conservation and Recovery Act (RCRA) requirements, and transuranic (TRU) wastes would be transported to the Waste Isolation Pilot Plant (WIPP). DOE has previously announced its intention to proceed with the construction and operation of the WIPP facility. No scientific evidence has been provided to DOE which indicates that the WIPP facility would be unsuitable, and DOE is still proceeding with its plans to make the WIPP facility fully operational for the disposal of TRU waste, including TRU waste currently stored at the INEL.

6.4.4 Comment:

It was stated that the INEL is too dependent on Department of Defense programs, and that the INEL should seek more nongovernmental work in order to plan for projected reductions in defense spending and in order to help decrease the Federal deficit.

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Response:

6.5 NON-CATEGORIZED

6.5.1 Comment:

Reviewers stated that the Special Isotope Separation (SIS) Project will benefit only a few [e.g., military personnel, Idaho National Engineering Laboratory (INEL) workers and developers] at the expense of others (e.g., humans/environment).

Response:

The purpose of the SIS Project is to provide a contingent capability for the production of weapon-grade plutonium that would be used for national defense. Within this broad context, the SIS Project has a national benefit, rather than the more limited benefit as suggested.

6.5.2 Comment:

Reviewers stated that the SIS Project conflicted with the following positive images and values that are associated with and important to Idaho: efforts to preserve the wilderness and environment; efforts to attract permanent business to Idaho; efforts to promote Idaho's image, tourism, and peace; efforts to exercise religious values; and efforts to maintain one's good health.

Response:

The INEL and the conduct of both defense- and nondefense-related activities have been a part of the State of Idaho for more than 35 years. The INEL, which is designated a National Research Park, has provided extensive information on the ecology of the Snake River Plain and also provides an undisturbed refuge for wildlife, both of which are directly associated with Idaho's image. By employing more than 10,000 persons, the INEL has also substantially contributed to the economy of Idaho, including the tourism and recreation industries. There is little factual basis to either assume or conclude that the SIS Project will detract or alter the values and perceptions of Idaho that the INEL has helped to shape.

6.5.3 Comment:

It was noted that the Draft Environmental Impact Statement (EIS) implied that the land and people of Idaho are expendable.

Response:

The EIS assesses the environmental consequences of constructing and operating the SIS Project alternatively at the INEL, the Hanford Site, and the Savannah River Plant. The lower population doses attributable to the smaller population surrounding the INEL is not intended to imply that people in Idaho are better able to withstand radiation, but rather to identify that fewer persons would be at risk. The identification of the INEL as the preferred alternative was based on the recommendations of a team providing an independent technical evaluation of production and/or reactor fuel processing sites, as discussed in Section 1.1.4 of the Final EIS. After the issuance of the Final EIS, but no sooner than 30 days after issuance, the U.S. Department of Energy (DOE) will publish a publicly available Record of Decision (ROD) on this EIS process that will identify whether it will proceed to construct and operate the SIS Project, and, if so, where.

6.5.4 Comment:

It was noted that DOE is not responsive to Freedom of Information Act requests on items of concern.

Response:

DOE always responds to Freedom of Information requests and makes every effort to do so in a timely fashion. The information requested is provided, unless the requested information is (or contains) classified information or is in a Preliminary or Draft stage (termed Predecisional) which does not represent an approved department position. Release of classified information could result in a threat to the national security of the United States and is unlawful.

6.5.5 Comment:

Reviewers stated that the SIS Project would negatively impact children and future generations because of plutonium waste's long half-life. Many cited the need for responsible, unselfish decisions which will prevent either direct harm or irreversible jeopardy to the environmental legacy of future generations.

Response:

The Final EIS discusses both routine and accidental releases and their consequences to the human environment. The analyses presented indicate that, even for a potentially severe facility or transportation accident, the risks are well below those that have been previously accepted and the SIS Project would not contaminate the environment to any level considered scientifically unsafe. See the responses to comments 2.12.4 and 2.12.5 regarding a publicly available ROD on this EIS.

6.5.6 Comment:

It was stated that the public lacks the right to sue anyone, based upon legal experiences following the Three Mile Island accident.

Response:

There are several bases for relief for injuries stemming from a nuclear incident, including the Price-Anderson Act, Federal Tort Claims Act, Comprehensive Environmental Response Compensation and Liability Act, and state worker's compensation laws. See the responses to comments 3.6.2 and 5.27.7.15 for more information.

6.5.7 Comment:

It was stated that DOE has indicated that environmental problems are the Environmental Protection Agency's (EPA's) problems.

Response:

Neither the Draft EIS nor any other DOE document has indicated that environmental problems are those of the EPA. The EPA is the Federal agency with legal jurisdiction over environmental matters. By virtue of such laws as the Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, Clean Air Act, Clean Water Act, Safe Drinking Water Act, and others, the EPA is charged with monitoring and enforcing environmental requirements against private parties and other Federal agencies. DOE's environmental problems are its own responsibility, but DOE

coordinates with the EPA as well as with state environmental agencies on how best to meet those responsibilities. DOE accepts responsibility to design and operate its facilities with minimum environmental impacts and to avoid environmental problems.

6.5.8 Comment:

It was stated that DOE has no standardized reactor design, construction methods, or materials, and that this can lead to increased safety hazards in operation, higher costs for construction and maintenance, and uncertainty regarding spare parts to keep the reactors on-line.

Response:

The SIS is not a reactor. The SIS process involves the physical separation of plutonium isotopes, using laser technology. Standardization of DOE reactors is beyond the scope of this EIS.

6.5.9 Comment:

It was requested that the Final EIS clarify whether the isotopic percentages in Table 2-4 are by weight or activity and that the Final EIS illustrate the lower relative index of harm of a cleansed SIS product versus the usual weapon-grade material handled by civilian and military personnel.

Response:

The SIS product would have the same isotopic specifications as currently produced weapon-grade plutonium; therefore, a relative index of harm would not demonstrate either an increase or decrease in potential exposures.

6.5.10 Comment:

It was stated that a "Scalar potential interferometry technology" (Scalar physics) makes SIS technology obsolete and has significant future benefits as well.

Response:

The DOE is unaware of "Scalar potential interferometry technology," as described in the comment. Therefore, a comparison of this technology with that of laser isotope separation technology is not possible.

6.5.11 Comment:

Some felt that concerns over the risks associated with the operation of the SIS Project would be so great that reviewers and others will leave Idaho if the SIS Facility is built.

Response:

The INEL has been in operation since 1949 and has a long history of safely operating defense- and nondefense-related facilities. The SIS Project would account for only a small portion of the site's current activities. As assessed in the Final EIS, the risks associated with the SIS Project would be extremely small. The SIS Project will be designed, built, and operated in a manner to protect the health and safety of the public.

6.5.12 Comment:

It was reported that petitions containing the names of 8,001 people who are against the SIS Project will be submitted at a later date.

Response:

The number of petition signatures submitted to the DOE and the resultant distribution are contained in the response to comment 1.1.

6.5.13 Comment:

It was stated that there is no place for the SIS Project in DOE's "comprehensive and balanced national energy plan" (plan identified in the U.S. Government Manual, 1986/1987).

Response:

DOE's national energy plan deals with sources of energy (such as coal, oil, natural gas, nuclear power, conservation) and establishes policies and strategies regarding development of these sources of energy. The purpose of the SIS Project is to produce weapon-grade plutonium from fuel-grade plutonium. The SIS Project is not considered an energy source.

7.0 WRITTEN QUESTIONS SUBMITTED AT DRAFT EIS PUBLIC HEARINGS

7.1 Comment:

It was asked where transuranic (TRU) waste would be stored, what the method of disposal for TRU waste would be, if nuclear waste was stored at Rocky Flats, what the effects of closure of the Special Isotope Separation (SIS) Project would be on Idaho Falls, and why the SIS process was selected over blending.

Response:

SIS-generated TRU waste is scheduled to be temporarily staged at the Idaho National Engineering Laboratory (INEL) Radioactive Waste Management Complex (RWMC) for a short period of time prior to shipment to the Waste Isolation Pilot Plant (WIPP) Facility in New Mexico. A detailed description of the WIPP facility is provided in the Final Environmental Impact Statement (EIS) for the WIPP (DOE/EIS-0026), as referenced in the Draft EIS and the Final EIS. If the WIPP facility is unavailable, TRU waste generated by the SIS Project will be temporarily stored at the RWMC in accordance with current practice, until a suitable repository is in service. See the response to comment 5.30.2.1

Rocky Flats Plant (RFP) does not maintain TRU waste storage facilities; rather, historically its TRU waste has been packaged and shipped to the INEL (RWMC) for temporary storage. Once the WIPP facility is operational, RFP will ship TRU waste directly to this repository. Also, TRU waste that has been received from Rocky Flats and is currently stored at the INEL will eventually be shipped to the WIPP in New Mexico. In November 1988, the Governor of the State of Idaho placed an embargo on further shipments from the RFP until progress on the opening of WIPP is achieved. The DOE is working with the Governors and the Congress to complete key milestones which would allow the WIPP verification tests to begin.

The proposed workforce (Section 4.1.1.1 of the Draft EIS and the Final EIS) at the SIS Facility would comprise only a small percentage of the current total INEL personnel; thus, the impact of a potential closure on the community at large would be expected to be low. A reduction of force at the SIS Project would probably occur over a length of time that would tend to lessen the impact (i.e., personnel could be placed in other jobs at the INEL, or find work elsewhere in the community). It is not likely that the entire SIS workforce would be released at one time.

The process selected for the SIS Project is referred to as the Atomic Vapor Laser Isotope Separation (AVLIS) technique. This method has been selected because there is a need to create a reliable, nonreactor capability for the production of weapon-grade plutonium to support our national defense goals. The SIS was not selected over blending; blending may or may not continue irrespective of SIS deployment. Blending is a method for providing weapon-grade plutonium in which plutonium of higher-than-weapon-grade purity must be produced by a reactor to blend with fuel-grade plutonium; therefore, it is reactor-dependent and does not fulfill the need described in Section 1 of the Draft EIS and the Final EIS.

7.2 Comment:

It was asked who would make the final decision on which alternative in the Draft EIS is chosen and what this decision would be based on.

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Response:

Safe handling, storage, and disposal of wastes mean these activities are performed in a manner that does not cause significant impact to people or the environment. The aim of the DOE is to protect the water, air, soil, plants, animals, and people from adverse effects associated with defense-generated wastes. Information pertaining to safe waste transportation and safety analysis of postulated transportation accidents is located in Sections 4.1.1.3, 4.1.2.2 through 4.1.2.4, 4.1.3.3, and Appendix A of the EIS.

7.8 Comment:

It was stated that by-product material would not be stored onsite in the stand-alone vault forever; eventually, it must be used at INEL or elsewhere, or declared waste and shipped to a permanent waste disposal facility. It was also stated that the Final EIS should address the transportation risks of moving this material offsite to the various possible termini.

Response:

By-product material would be stored in a Stand-Alone Storage Vault until DOE determines the ultimate use and/or disposal of the material. The by-product contains isotopes that are a potential resource for other missions. In the event that no mission involving the by-product is proposed and/or approved, the by-product would be packaged and transported to the WIPP in New Mexico as waste.

The transportation risks associated with the transport of by-product to the WIPP are included in the Final EIS (e.g., Sections 4.1.2.4, 4.1.3.3, and A.3).

7.9 Comment:

It was asked where the confidence limits and sensitivity analysis for RADTRAN III were published. Also questioned was whether the DOE would commit to using Nuclear Regulatory Commission NRC)-certified Type B containers for shipping feed, product, by-product, and waste materials. It was asked whether the DOE would commit to using safe secure transport (SSTs) for all feed and product shipments for the lifetime of the SIS Project. Also requested was a reference that would support Neuhauser comments on SST drivers stopping four-fifths less often than other drivers.

Response:

RADTRAN was originally developed to support the analyses in NUREG-0170. The code has been modified and refined considerably since that time, and was the source code for the International Atomic Energy Agency's INTERTRAN code (See the following listed References). Since RADTRAN III (Madsen et al., 1986 in the EIS) was first issued, additional refinements have been made. This was the code used for the EIS analysis, and it is available free of charge to all public users on the TRANSNET system (see "Final EIS on the Transportation of Radioactive Material by Air and Other Modes," References). The code has been used to perform numerous risk analyses for the DOE's Office of Civilian Radioactive Waste Management and Office of Defense Programs, for the U.S. Department of Transportation (DOT), for the Government Accounting Office (GAO), and for other Federal and private users. The single greatest "limitation" facing users of RADTRAN or any code of this type is a scarcity of statistical data for certain input parameters. This difficulty can be overcome by using conservative estimates of these parameters (i.e., values that tend to maximize the risk). The resulting risks tend to be overestimates (see the following listed References), but are appropriate for use as bounding estimates in environmental documents. In this context, use of confidence limits as a measure of uncertainty would be inappropriate. See Reference (Chapter 11, Uncertainties in Assessment Models) for a discussion of the limitations of parameter uncertainty analysis.

An extensive analysis of the sensitivity of RADTRAN risk calculations to variations in parameters was performed in 1986 (see References) for a sample truck-transport case. The parameters that had the greatest effect on the incident-free risk calculations for truck transport were found to be, in order of importance: exposure distance while stopped; TI value; packages per shipment; shipments per year; K_0 (a factor that accounts for the shape of the package); distance traveled; number of persons exposed while stopped; stop time; shipments per year; distance from source to crew; and number of crew members. All of these are either deterministic (i.e., have known, fixed values for the problem being analyzed) or can be appropriately bounded by a conservative assumption. The accident risk calculation was sensitive to values for release fraction and for probability of occurrence of accident-severity categories; it was relatively insensitive to changes in accident rate or fractions of travel in urban and suburban population-density zones. Consequently, where data are not available, conservative assumptions regarding package release fractions and accident-severity category probabilities are used, as described in Appendix A of the Final EIS.

Certified or approved Type B shipping containers would be used for the transport of feed, product, and by-product to and from the SIS Project; the TRUPACT II will be used for the shipment of TRU waste (in drums) and potentially by-product (in Type B containers) to the WIPP. Extensive testing of the Type B container presently in use by DOE (the model 1518 6M) is described in references that have been added to the Final EIS. The inner and outer containers of each Type B container are individually leak-tested during fabrication, and must be inspected prior to each shipment.

The TRUPACT II for transport of TRU waste to the WIPP is currently undergoing NRC certification tests. Regardless of whether the present TRUPACT II design passes this series of tests or will require modification, the end result will be that waste will be transported to the WIPP in certified containers that have passed the NRC certification tests.

The basis for the Neuhauser comment that SST drivers stop four-fifths less often than regular drivers is from actual operational requirements for SST shipments. It should be noted that this did not have a significant effect on the accident risk calculation. The Reference provided for this assumption was a personnel communication with an individual knowledgeable about SST requirements. The specific requirements are classified.

References:

Neuhauser, K. S. and P. C. Reardon, "A Demonstration Sensitivity Analysis for RADTRAN III," SAND85-1001, Sandia National Laboratories, Albuquerque, NM, October 1986.

Ericsson, A. M. and M. Elert, "INTERTRAN: A System for Assessing the Impact from Transporting Radioactive Material," IAEA-TECDOC-287, International Atomic Energy Agency, Vienna, Austria, 1983.

Till, J. E. and H. R. Meyer, Eds., "Radiological Assessment," NUREG/CR-3332, ORNL-5968, Nuclear Regulatory Commission, Washington, DC, September 1983.

Cashwell, J. W., "TRANSNET -- Online Transportation Risk Analysis for Public Use," SAND88-05680, Sandia National Laboratories, Albuquerque, NM, March 1988.

McWhirter, M., R. O. Brooks, O. M. Stomp, and L. A. Dillingham, "Final Report on Special Tests of Plutonium Oxide Shipping Containers to FAA Flight Recorder Survivability Standards," SAND75-0446, Sandia National Laboratories, Albuquerque, NM, September 1975.

Bonzon, L. L., "Final Report on Special Impact Tests of Plutonium Shipping Containers, Descriptions of Test Results," SAND76-0477, Sandia National Laboratories, Albuquerque, NM, February 1977.

7.10 Comment:

It was asked whether RADTRAN III was run with site-specific large truck accident rate data. It was further questioned whether population zones mentioned in the Draft EIS were based solely on the 1980 census data or if they reflected population growths described elsewhere in the Draft EIS. A request was made to include how and by what factors the SSTs reduce release fractions from NUREG-0170. It was suggested that the release fractions were taken from Model 2 instead of Model 1 and, if so, that an explanation be provided. Lastly, a request was made to include the costs of transportation with the EIS, including infrastructure upgrade, additional maintenance, emergency response training, and cleanup costs in the event of an accident.

Response:

The accident rates used in the Draft EIS and the Final EIS are from DOT data for the entire commercial shipping industry (i.e., accidents on interstate highways involving at least one commercial tractor-trailer regardless of payload) and are based on millions of total vehicle-kilometers of travel. Available unclassified accident/incident data for radioactive materials shipments indicate, for example, that for the 11-year period from 1971 to 1982, a single shipment containing plutonium 239 (and uranium isotopes) was involved in a highway accident (see References). Twenty-five other shipments in Type B packagings were also involved in truck or rail accidents in this period, but none carried plutonium. In the plutonium case, a Type B truck cask was involved in a rollover accident. There was no release of radioactive material in any of these accidents. Accident rates derived from this information should not be used; the statistical significance would be questionable because the total truck-kilometers involved are relatively small and because few accidents (none with releases) occurred. Data for site-specific and classified shipments suffer from similar statistical limitations. For this reason, general-commerce data were used instead of nuclear industry shipments for the accident rate in the Final EIS.

The calculated population zones are based on the 1980 census and do not reflect growth discussed elsewhere in the Draft EIS and the Final EIS. There is a 1986 update which has not yet become available.

The basis for the release fractions used in the transportation risk analysis is discussed in Appendix A of the Final EIS. For transport of feed, product, and by-product, the release fraction values used represent a Type B/SST shipment configuration rather than a single packaging or transport vehicle. The Type B contribution was based on release fraction values in NUREG-0170 for a plutonium transport container (NRC, 1977b in Draft EIS, Appendix A). These values are derived mainly from the references, which describe a series of experimental overtests (i.e., tests that exceed the Type B performance standards) of a Type B container. The SST contribution was taken from the Classified Safety Analysis Report for the SST (Reference SNL, 1976 in Draft EIS, Appendix A).

Model II in Table 5-8 from NUREG-0170 (Reference NRC, 1977b in Draft EIS, Appendix A) was used as the source of release fraction data for Type B containers. No "modification" of these release fractions was made. The calculation for the Draft EIS, which is explained in detail in Appendix A, Section A.3, used the Type B release fractions as part of the calculation, and took into account the additional protection provided by the SST. Thus, the overall shipment configuration quite reasonably has release fractions different from those for a Type B container alone.

The actual cost, and number of SST shipments are classified; however, it can be stated that the number of shipments would be only a small fraction of the plutonium shipments identified in NUREG-0170 (see the following listed References) and would thus not require infrastructure, maintenance, or upgrade costs for roads. Emergency response training has been, and will continue to be, provided by the DOE Albuquerque Operations Office upon request, as exemplified by recent training conducted in the State of Idaho on TRU waste transport. Cleanup costs in the event of a severe transportation accident are not expected to exceed those identified in NUREG-0170.

References:

McWhirter, M., R. O. Brooks, J. M. Stomp, and L. A. Dillingham, "Final Report on Special Tests of Plutonium Oxide Shipping Containers to FAA Flight Recorder Survivability Standards," SAND75-0446, Sandia National Laboratories, Albuquerque, NM, September 1975.

Bonzon, L. L., "Final Report on Special Impact Tests of Plutonium Shipping Containers, Description of Test Results," SAND76-0437, Sandia National Laboratories, Albuquerque, NM, February 1977.

U.S. Nuclear Regulatory Commission, "Final Environmental Impact Statement on the Transportation of Radioactive Material By Air and Other Modes," NUREG-1070, Office of Standards Development, Washington, DC, December 1977.

7.11 Comment:

It was questioned as to what legal authority DOE used to determine that the issue of "need" is beyond the scope of the Final EIS for the project.

Response:

DOE does not assert that the need for the project is beyond the scope of the EIS. As required by the regulations of the CEQ (40 CFR 1502.13), the statement of need "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." CEQ comments on this section of the regulation at the time of its adoption indicate that this brief statement should normally be made in one page or less. See 43 Fed. Reg. 55, 983 (Nov. 29, 1978). Chapter 1 of the Final EIS addresses the underlying purpose and need for the SIS Project. The need for defense materials, i.e., weapon-grade plutonium, is, however, beyond the scope of this EIS.

7.12 Comment:

It was asked if the feedstock for the SIS Project would include Fast Flux Test Facility (FFTF) fuel and plutonium from Zero Power Plutonium Reactor (ZPPR); if so, where could it be chemically separated, how much it would cost, and how much this would add to the cost of plutonium from the SIS Project.

Response:

Currently, the policy of DOE is not to use plutonium from the ZPPR critical facility as SIS feedstock. The EIS states in the Foreword that an additional potential source of fuel-grade plutonium is the DOE-owned plutonium within the FFTF fuel. DOE is assessing alternatives for decladding this fuel and subsequent fuel processing. A discussion of costs for processing the FFTF fuel and the subsequent added cost for plutonium from the SIS Facility is beyond the scope of this proposed NEPA

action. A determination of whether FFTF fuel would be used as feedstock for the SIS Facility is not a necessary prerequisite to the decision to build the SIS Facility. See the response to comment 2.13.11 for additional discussions on processing FFTF fuel.

7.13 Comment:

It was stated that the EIS safety analysis assumes that the Pu-240 content of the feedstock is 18.5 percent, which, it is assumed, is an upper limit. It was asked if DOE contemplated using any reactor-grade plutonium as feedstock in the SIS Project, and if so, why the Draft EIS did not cover reactor-grade plutonium. Also requested was information on the amount of reactor-grade plutonium in the DOE plutonium inventory.

Response:

Although not stated, it is assumed that reactor-grade plutonium as referred to by the commentor is the plutonium material from commercial light water reactors (LWRs). DOE does not contemplate using commercial LWR reactor-grade plutonium in the SIS Project. As stated in the Foreword, the DOE fuel-grade plutonium that would be processed by the SIS Project would consist entirely of DOE-owned plutonium that is not derived from commercial reactor spent fuel. The term "reactor-grade" has been used in the past to refer to certain DOE-owned materials with Pu-240 mass fraction higher than 18 percent. Small amounts of this material will be processed in the SIS Facility and have been referred to in the EIS by the more general term "fuel-grade." The actual quantity of such material is classified.

7.14 Comment:

It was requested that the ratio of the cost of weapon-grade plutonium from blending to that from SIS, as well as any unclassified economic data on SIS cost and any analyses comparing SIS to blending, be provided.

Response:

The SIS Project represents a cost-effective means of meeting future requirements for weapon-grade plutonium compared to reactor-based production. A cost analysis between alternatives including blending is beyond the scope of this EIS. For purposes of complying with NEPA, the various merits and drawbacks of the alternatives in a monetary cost/benefit analysis are subordinated to the important qualitative environmental characterizations and assessments contained in the Final EIS. SIS-processed plutonium is projected to be less costly than the production of weapon-grade plutonium by blending of reactor-produced 3 percent Pu-240 with existing fuel-grade plutonium. SIS Project is comparable in unit cost to the incremental cost associated with blending only, not taking into account the cost of production of the 3 percent Pu-240 material from a reactor. The fully allocated costs of blended plutonium are higher than the costs of weapon-grade plutonium from SIS. Unit costs of special nuclear material (SNM), incuding weapon-grade plutonium are classified. Blending, as stated in the EIS, does not constitute a reactor-independent alternative nor does it provide the needed contingency capability.

7.15 Comment:

It was requested that a description be given of any unclassified results pertaining to the cost and time that would be required to upgrade the Lawrence Livermore National Laboratory (LLNL) facility to a production facility if a national emergency were to arise.

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completed one year later. The plutonium test facility will not run continuously for that entire period. With the exception of unscheduled events, such as a power outage, the laser demonstration facility is planned to operate continuously. The laser facility has regularly operated around the clock for several years. The individual plutonium separation runs will range from tens to hundreds of hours, consistent with and representative of the planned batch operating scenario of the plant.

7.28 Comment:

It was requested that DOE list all possible follow-on missions for the SIS Facility after its currently defined mission (i.e., to convert DOE-owned fuel-grade plutonium to weapon-grade plutonium) would be completed.

Response:

In addition to the currently defined mission addressed in the Draft EIS and the Final EIS, it is anticipated that the flexibility and capability of the SIS Facility could provide support for other missions. Section 1.1.2 of the Final EIS includes a brief discussion of other potential missions. Listing all possible missions in the absence of detailed technical, safety, and environmental evaluations which have not been performed would be speculative as to their feasibility, and they therefore have not been addressed.

7.29 Comment:

It was requested that the initial date be provided for when DOE first proposed to Congress that funding be made available for a program to research and develop laser isotope separation technology for plutonium isotope separation. The justification for this process was also requested.

Response:

In Fiscal Year 1980, Congress, on its own initiative and based on hearing testimony, included $5 million in the DOE budget for the SIS Project. According to the House Report 96-162, the House Committee on Armed Services "heard testimony which strongly indicates that certain techniques of a classified nature can be developed to the pilot plant stage within a period of approximately five years." As a result, the $5 million was included in the Fiscal Year 1980 authorization bill (HR 2603) and later appropriated (HR 438). In the Fiscal Year 1981 budget request, DOE formally requested $3.815 million.

7.30 Comment:

It was asked if DOE would lack "contingency, flexibility, and redundancy" in its sources of weapon-grade plutonium if the SIS Facility were not built.

Response:

Yes. As identified in Table S-1 of the Draft EIS and the Final EIS, the "no action" alternative is defined as not constructing and operating the SIS Project. The DOE complex would continue to provide plutonium but would not provide the needed redundancy, technological diversity, and flexibility.

7.31 Comment:

It was asked if DOE is considering the use of the ICPP (with possible modifications) to declad spent fuel from the FFTF at Hanford for subsequent processing at the SIS Facility.

Response:

No. The ICPP is used to recover (separate) highly enriched uranium, but does not have the capability to recover plutonium from spent fuels. DOE is preparing NEPA documentation assessing the feasibility and associated environmental impacts of decladding FFTF fuel, including alternatives to process the fuel in Plutonium Uranium Extraction (PUREX) at Hanford, in the fuel reprocessing canyons at Savannah River Plant (SRP), or in a commercial facility, but not at ICPP. See the response to comment 2.13.11 for additional information on processing FFTF fuel.

7.32 Comment:

It was noted that DOE is considering an NRC-licensed facility to declad FFTF spent fuel (Draft EIS, p. 1-3), and it was requested that the name of that facility be made available as well as any other methods DOE has considered for decladding FFTF spent fuel.

Response:

The NRC-licensed facility that is being considered as a NEPA alternative for decladding FFTF fuel is Rockwell's Hot Cell Complex at Santa Susanna, CA; however, this is not currently the DOE preferred alternative. See the response to comment 7.31 for information on other options that were considered.

7.33 Comment:

It was requested that a figure for the percentage of construction funds that would be spent in Idaho for the SIS Project be stated.

Response:

It is estimated, based on past construction experience, that approximately 60 to 70 percent of the SIS construction funds would be spent in Idaho if the decision is made to construct and operate the SIS at INEL. Of this, the exact percentage would depend upon the results of the competitive bidding process. DOE has an aggressive program to make INEL construction packages biddable by local subcontractors; however, out-of-state subcontractors may also submit bids.

It is estimated that the construction payroll base, including labor costs of subtier subcontractors, would comprise approximately 45 to 50 percent of the construction costs, and would be paid to employees working at the INEL and residing in Idaho.

7.34 Comment:

It was asked if the so-called "weapon return" mission for the SIS Project has been abandoned, and if so, why.

Response: See the response to comment 7.20.

7.35 Comment:

It was asked if the EIS had considered a worst-case-scenario accident under the NEPA regulations as amended, and if not, why not.

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7.42 Comment:

It was asked if the INEL is currently using other methods to refine plutonium. Also questioned were the waste's half-life and where and how the waste would be stored.

Response:

The current missions of the INEL do not include refining plutonium. The wastes to be produced by the SIS Project will contain both short-lived isotopes and long-lived isotopes, including an isotope of plutonium which has a half-life of approximately 24,000-years. Sections 4.1.2.2 and 4.1.2.3 of the Final EIS discuss how and where these wastes would be stored. See also the response to comment 5.30.3.1 for additional information on waste management.

7.43 Comment:

It was asked why State Senator Anne Rydalch was allowed to speak about irrelevant issues such as jobs and lasers, and whether DOE would grant the SIS opponents such leeway.

Response:

The testimony of State Senator Anne Rydalch was in keeping with the hearing procedures established (in consultation with DOE) by Hearing Officer Roy Eiguren and read into the record at the beginning of each hearing session. Specifically on the issue of testimony, Mr. Eiguren stated, "I will allow comment...on issues related to this project that the individual reviewers feel are relevant." To that extent, the testimony of Senator Rydalch, as well as that of all other testifiers, was not prejudged or strictly limited to the proper scope of these hearings and all comments were duly accepted into the hearing record. All testifiers were accorded the same latitude to respond within the time constraints established for individual and organizational testimony.

7.44 Comment:

It was asked why the transportation containers have not been physically tested. It was asked if the SIS Project could be used for purposes other than plutonium enrichment if the need for the SIS Project were removed.

Response:

Certified or approved Type B shipping containers would be used for the transport of feed, product, and by-product to and from the SIS Project; the TRUPACT II will be used for the shipment of TRU waste (in drums) and potentially by-product (in Type B containers) to the WIPP. Extensive testing of the Type B container presently in use by DOE (the model 151B 6M) is described in references that have been added to the Final EIS. The inner and outer containers of each Type B container are individually leak-tested during fabrication, and must be inspected prior to each shipment.

The TRUPACT II for transport of transuranic waste to the WIPP is currently undergoing NRC certification tests. Regardless of whether the present TRUPACT II design passes this series of tests or will require modification, the end result will be that waste will be transported to the WIPP in certified containers that have passed the NRC certification tests.

Regarding other potential missions for the SIS Project, see the response to comment 7.2B.

7.45 Comment:

It was noted that the SIS separation of plutonium has been described as the most expensive method of obtaining weapon-grade plutonium, and it was requested that relative costs of reactor-produced, blending-produced, and SIS-produced weapon-grade plutonium be stated.

Response:

Unit costs for producing weapon-grade plutonium by various methods and comparisons thereof are classified. As stated in the EIS, DOE is required to develop and maintain the capabilities necessary to produce plutonium. The SIS Project provides a contingency method, that is not reactor-based, of meeting that requirement. Therefore, the SIS Project is not being proposed based on a monetary cost/benefit analysis, but rather on important qualitative considerations. See also the response to comment 5.28.2.

7.46 Comment:

It was noted that the Executive Summary claims that the "No Action" alternative would have greater risks (for transport of SIS feed, product and by-product) than the preferred alternative. The reviewer requested that the Final EIS provide this comparison, preferably in the Transport Analysis section in Appendix A.

Response:

With respect to the production of weapon-grade plutonium through utilization of fuel-grade plutonium, the transport of feed and product for the no action alternative discussed in the Draft EIS and the Final EIS is identical to that for locating the SIS Project at the SRP; hence, the risks are slightly greater due to increased transportation than the preferred alternatives' risks and were discussed and presented in Appendix A.

7.47 Comment:

It was questioned why more plutonium-239 is said to be needed when, according to DOE officials, DOE has plenty of plutonium to meet current demands and the INF treaty calls for cuts in nuclear warheads. In addition, it was stated that the write-up on the impact to the environment in a "worst-case scenario" as presented in the Draft EIS was not satisfactory.

Response:

Secretary Herrington clarified his "awash in plutonium" statement by saying that there are adequate supplies in the short term but there is a projected need in the mid-1990s and beyond. Although the successful Intermediate Nuclear Force Treaty (INF) shows progress in arms reduction, both the President and Congress believe that the SIS Project is required as a contingency to meet demand for weapon-grade plutonium in the mid-1990s. The aging SRP reactors are dedicated to tritium production and, because of curtailed operations pending the resolution of safety issues, may not be able to produce plutonium in the future. Preliminary START negotiations have the potential for significant mutual reductions in nuclear weapons stockpiles of the United States and USSR; however, successful negotiations are only speculative.

See the response to comment 7.35 regarding the EIS discussion of a "worst-case scenario" accident.

7.48 Comment:

Information was requested on the peaceful applications of the SIS Project (excluding uranium enrichment), and in particular on any studies on the use of the SIS technology to isotopically purify elements for use in fluorescent lights. It was also requested that an economic analysis on the cost of such applications be included.

Response:

The Draft EIS and the Final EIS specifically assess the construction and operation of the SIS Project for the production of weapon-grade plutonium from fuel-grade plutonium. Thus, questions on other uses of the AVLIS technology and economic analyses thereof are beyond the scope of this EIS.

7.49 Comment:

It was requested that the ratio of the number of separator modules at the proposed SIS Facility to that of the LLNL demonstration facility, when it is completed, be stated.

Response:

The SIS Project would have four separator lines. A separator line represents the basic modular building block for the plant. The LLNL demonstration facility has one separator line.

7.50 Comment:

It was requested that the ratio of laser output (light energy output at the appropriate frequencies) of the laser facility at the proposed SIS Facility to that of the LLNL demonstration facility, when it is completed, be stated.

Response:

For the demonstration at the LLNL, approximately one-quarter of the total laser output power required for the SIS Facility would be delivered. This is commensurate with the one separator line being installed at LLNL as compared to four lines in the SIS Facility.

7.51 Comment:

It was noted that opponents to the SIS Project state that there is ample plutonium available, while proponents of the SIS Project state that there is an insufficient supply of plutonium to meet needs. It was requested that information pertaining to the amount of plutonium currently in stock, the length of time plutonium will last in its refined state, how fast the United States uses plutonium, how much plutonium the SIS Project will refine, and how much plutonium the SIS Project will produce be provided. It was also requested that a time frame be given for when the government will identify a permanent repository.

Response:

See the response to comment 7.47 concerning the availability of sufficient amounts and quantities of plutonium. The plutonium has a half-life approximately of 24,000 years. The other information relative to plutonium is classified.

DOE still plans to transport all stored and newly generated TRU waste to the WIPP in New Mexico, as stated in its ROD prepared on the Final EIS for the WIPP (DOE/EIS-0026). DOE is currently working with the National Academy of Sciences (NAS) to address experimentation and research activities supporting the performance assessment being conducted to demonstrate compliance with EPA disposal standards for TRU waste (40 CFR 191). In addition, WIPP will comply with all applicable requirements of the Resource Conservation and Recovery Act (RCRA). DOE is currently working with the EPA and the State of New Mexico to resolve uncertainties regarding the procedures for obtaining a RCRA permit for WIPP.

7.52 Comment:

It was asked what type of shipping cask would be used to ship materials to and from the SIS Facility, how the casks were constructed, and if the NRC had tested and certified the casks.

Response:

Certified or approved Type B shipping containers would be used for the transport of feed, product, and by-product to and from the SIS Project; the TRUPACT II will be used for the shipment of TRU waste (in drums) and potentially by-product (in Type B containers) to the WIPP. Extensive testing of the Type B container presently in use by DOE (the model 1518 6M) is described in references that have been added to the Final EIS. The inner and outer containers of each Type B container are individually leak-tested during fabrication, and must be inspected prior to each shipment.

The TRUPACT II for transport of TRU waste to the WIPP is currently undergoing NRC certification tests. Regardless of whether the present TRUPACT II design passes this series of tests or will require modification, the end result will be that waste will be transported to the WIPP in certified containers that have passed the NRC certification tests.

7.53 Comment:

It was asked if there are any future SIS spinoff technologies presently being researched for possible development, such as the separation of other various elements by DOE.

Response:

See the response to comment 7.28.

7.54 Comment:

Information was requested on actual radiation accidents in which contamination was released. Information was also requested concerning EPA Superfund sites at the INEL, Hanford, and the SRP.

Response:

The proper vehicle for making a request for actual numbers of radiation accidents is through the FOIA. In regard to EPA superfund sites, the Final EIS in Section 3.1.4.4 identifies three sites at the INEL that require corrective action, and the Draft EIS and the Final EIS referenced a recent EIS (DOE/EIS-0120) which provides an extensive discussion of hazardous waste sites at the SRP. Present information indicates that there are four sites requiring corrective action at the Hanford Site.

7.55 Comment:

It was requested that the reference in Table 2-4 be clarified to indicate whether the percentages of plutonium and americium are percent by weight or by activity. It was also requested that the "relative index of harm" be used to illustrate the advantage of cleansed product versus the usual weapon-grade material to civilian and military personnel who handle the weapons.

Response:

The percentages of plutonium and americium in footnote b were by weight. Although there is an advantage in decreasing the amount of Pu-241 and Am-241 in plutonium to be handled or transported, the SIS Project will be used to convert fuel-grade plutonium to weapon-grade specification that would produce the same relative exposures as present weapons. A "relative index of harm" is therefore not presented. Also see the response to comment 7.20.

APPENDIX A

INDIVIDUAL, ORGANIZATION, OR AGENCY

Name	Location	Order No.	Vol.	Page	Response Section Numbers
Ada County Citizens for Peace and Justice	Boise, ID	B055	3	100	See Hall, Patricia
Ada County Citizens for Peace and Justice	Boise, ID	E228	5	110	See Hall, Patricia
Admire, Patricia	Boise, ID	B241	3	261	1.1, 2.1.1, 3.4
Admire, Patricia	Boise, ID	E667	5	624	1.1, 2.1.1, 3.4
Adolfson, Ed	Idaho Falls, ID	W509	6	571	1.1, 4.9.4, 5.28.7
Ahlberg, Jerry	Idaho Falls, ID	E399	5	381	4.9.4, 5.24.23, 5.27.7.7, 5.28.3
Ahlberg, Jerry	Idaho Falls, ID	T520	3	753	3.2.7, 4.9.4, 5.27.6.1, 5.28.3
Aho, Margaret	Pocatello, ID	E151	4	861	2.7.2, 2.7.9
Aho, Margaret	Pocatello, ID	I085	3	458	2.7.9
Aiken County, South Carolina	Aiken, SC	E501	5	462	See Smith, Garry R.
Aiken County, South Carolina	Aiken, SC	W057	6	68	See Smith, Garry R.
Airhart, David		E210	5	98	1.1, 4.13
Akersten, William A.	Pocatello, ID	W285	6	311	5.15
Alban, Daniel L.	Ketchum, ID	T024	3	632	2.1.1, 2.1.6, 2.3, 5.24.25, 5.30.2.1, 5.30.3.7, 5.30.4.4, 5.30.4.9, 5.30.4.14, 6.5.7
Alban, Daniel L.	Ketchum, ID	W015	6	39	1.1, 4.13, 4.14, 6.2
Alban, Susan	Ketchum, ID	E502	5	463	1.1, 5.27.2, 6.2

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Alban, Susan	Ketchum, ID	T031	3	643	1.1, 2.1.1, 5.12.1, 6.2
Alban, Susan	Ketchum, ID	W058	6	68	1.1, 5.27.2, 6.2
Albinson, Betsy	Nampa, ID	E519	5	480	1.1
Albinson, Betsy	Nampa, ID	W069	6	74	1.1
Albinson, Betsy	Nampa, ID	W207	6	164	1.1
Albright, David	Washington, DC	E011	4	235	3.2.1, 3.4, 3.5.2, 4.1, 4.2.1, 4.3, 4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6, 4.4.7, 4.8.2, 4.9.1, 4.10.1, 4.14, 5.2.3, 5.2.10, 5.2.14, 5.2.15, 5.26.1, 5.26.2
Albright, David	Washington, DC	I011	3	326	1.1, 2.7.14, 4.3, 4.4.3, 4.4.4, 4.4.6, 4.4.7, 4.10.1, 4.15.1, 5.2.14
Albright, David	Washington, DC	W621	6	695	7.48
Albright, David	Washington, DC	W622	6	695	7.49
Albright, David	Washington, DC	W623	6	696	7.50
Allen, Duane	Shelley, ID	E082	4	784	1.1, 5.24.23, 5.27.11.3, 5.27.12.6
Allen, Duane	Shelley, ID	I053	3	407	1.1, 5.24.23, 5.27.11.3, 5.27.12.6
Allen, Lowell R.	Pocatello, ID	E542	5	499	1.1, 5.27.6.1, 5.27.15.1, 6.1.2
Allen, Lowell R.	Pocatello, ID	W081	6	80	1.1, 5.27.6.1, 5.27.15.1, 6.1.2
Allgood, Lane	Idaho Falls, ID	E085	4	786	1.1, 4.9.4, 5.27.6.1, 5.27.7.16, 5.27.12.4, 5.27.12.5
Allgood, Lane	Idaho Falls, ID	I056	3	410	4.9.4, 5.27.6.1, 5.27.7.16, 5.27.12.4, 5.27.12.5
Alvarez, Susan K.	Boise, ID	E570	5	513	5.2.11, 5.10.7, 5.12.1, 5.30.2.1, 6.2

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Alvarez, Susan K.	Boise, ID	W031	6	51	5.2.11, 5.10.7, 5.12.1, 5.30.2.1, 6.2
Ambuehl, Randall A.	Boise, ID	W529	6	590	1.1, 3.2.7, 4.9.4, 5.24.23, 5.27.6.1
Americal Nuclear Society Idaho Section	Idaho Falls, ID	E083	4	785	See Liebenthal, Jack
American Nuclear Society Idaho Section	Idaho Falls, ID	I054	3	408	See Liebenthal, Jack
Amrit, Family	Ketchum, ID	E291	5	222	1.1, 6.2
Amrit, Family	Ketchum, ID	T019	3	627	1.1, 6.2
Anderson, Candice	Ketchum, ID	E432	5	405	1.1, 3.4, 4.15.4, 5.1.21, 5.1.42, 5.27.10
Anderson, Cathy	Idaho Falls, ID	E520	5	481	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Anderson, Cathy	Idaho Falls, ID	W063	6	71	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Anderson, Cinda	Sun Valley, ID	E809	5	774	1.1, 5.30.3.1, 6.2
Anderson, Jack P.	Idaho Falls, ID	E734	5	686	1.1, 2.10, 3.2.2, 3.3.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.9.3, 5.28.2
Anderson, Jack P.	Idaho Falls, ID	I519	3	540	1.1, 2.10, 3.1.1, 3.2.2, 3.3.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.9.3, 5.28.2
Anderson, Jay E.	Pocatello, ID	W519	6	578	1.1, 2.11.11, 4.1, 4.3, 4.15.4, 4.15.5, 5.12.1, 5.23.4, 5.25.5, 5.29.31, 5.31.14
Anderson, Philip A.	Pocatello, ID	E014	4	260	1.1, 2.12.4, 3.2.2, 5.24.27, 5.24.31, 5.27.9.1, 5.29.41, 5.30.5.7
Anderson, Philip A.	Pocatello, ID	E039	4	746	1.1, 2.12.4, 3.2.2, 5.24.27, 5.24.31, 5.27.9.1, 5.29.41, 5.30.5.7
Anderson, Philip A.	Pocatello, ID	I033	3	364	1.1, 2.12.4, 3.2.2, 5.24.27, 5.24.31, 5.27.9.1, 5.29.41, 5.30.5.7

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Anderson, Randon C.	Idaho Falls, ID	W624	6	696	
Anderson, Reid	Idaho Falls, ID	I531	3	558	
Andrus, Cecil, Governor	Boise, ID	E005	4	32	
Andrus, Cecil, Governor	Boise, ID	I001	3	299	
Ankersmit, Karen	Jackson, WY	W470	6	541	
Anthony, George W.	Filer, ID	T560	3	815	
Anthony, George W.	Filer, ID	W501	6	565	
Aquilina, Charles A.	Idaho Falls, ID	W141	6	119	
Armstrong, Michael H.	Idaho Falls, ID	E075	4	778	
Asay, Larry	Blackfoot, ID	E744	5	697	
Asay, Larry	Blackfoot, ID	I526	3	551	
Aschenbrenner, Paul	Pocatello, ID	E509	5	467	
Aschenbrenner, Paul	Pocatello, ID	W119	6	102	
Ash, Virginia	Buhl, ID	E775	5	739	
Ash, Virginia	Buhl, ID	T072	3	699	
Ashcom, Ken	Ketchum, ID	E475	5	445	Section Numbers

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Ashcom, Ken	Ketchum, ID	T540	3	780	2.3, 4.13, 5.30.3.1, 6.2, 6.3
Aslett, Marvin	Twin Falls, ID	E553	5	505	1.1, 5.27.6.1
Aslett, Marvin	Twin Falls, ID	W091	6	85	1.1, 5.27.6.1
Audin, Lindsay	Ossining, NY	B016	3	39	3.2.16, 3.2.32, 5.23.28, 5.29.1, 5.29.6, 5.29.33, 5.29.34, 5.29.38, 5.29.42, 5.29.43, 5.29.44, 5.29.49, 5.29.52, 5.29.76, 5.29.81, 5.29.110
Audin, Lindsay	Ossining, NY	E179	5	43	3.2.16, 3.2.32, 5.1.5, 5.5.1, 5.24.5, 5.27.2, 5.29.1, 5.29.6, 5.29.7, 5.29.10, 5.29.12, 5.29.18, 5.29.25, 5.29.27, 5.29.28, 5.29.33, 5.29.34, 5.29.35, 5.29.38, 5.29.41, 5.29.42, 5.29.43, 5.29.44, 5.29.45, 5.29.46, 5.29.49, 5.29.52, 5.29.53, 5.29.54, 5.29.58, 5.29.64, 5.29.67, 5.29.72, 5.29.73, 5.29.74, 5.29.76, 5.29.81, 5.29.89, 5.29.103, 5.29.110, 5.30.5.7
Augustus, Bruce	Sun Valley, ID	E422	5	398	1.1, 3.4
Augustus, Janet	Sun Valley, ID	E419	5	396	1.1, 6.2
Auld, Brandy	Boise, ID	E716	5	669	1.1, 3.3.3
Autry, Vern	Idaho Falls, ID	I037	3	370	1.1, 5.24.23
Babayco, Vickey	Sun Valley, ID	W013	6	37	1.1, 4.13, 5.30.3.1, 6.5.5
Bachelder, Carol	Boise, ID	B024	3	52	1.1, 4.1, 5.27.6.11, 6.3
Backstatter, Stuart	Hailey, ID	E340	5	266	1.1, 4.3, 4.14, 4.15.2, 4.15.4, 5.24.18, 5.28.2, 5.30.3.1, 5.31.13
Backstatter, Stuart	Hailey, ID	T051	3	665	1.1, 4.1, 4.3, 4.14, 4.15.2, 5.24.18, 5.28.2, 5.30.3.1, 5.31.13
Bagnard, David L.	Boise, ID	W423	6	487	1.1

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Baker, Alicia	Boise, ID	B112	3	200	4.13, 5.27.7.17, 6.3
Baker, Dick	Boise, ID	B066	3	124	5.27.6.11
Baker, Kenneth and Heather	Sun Valley, ID	E547	5	502	1.1, 3.3.1, 4.4.6, 4.15.5, 5.10.4, 5.12.1, 5.27.2, 5.29.97, 5.30.3.8
Baker, Kenneth and Heather	Sun Valley, ID	W101	6	92	1.1, 3.3.1, 4.4.6, 4.15.5, 5.10.4, 5.12.1, 5.27.2, 5.29.97, 5.30.3.8
Baldwin, Burton	Shelby, ID	E013	4	260	6.5.9
Ballard, Joyce E.	Twin Falls, ID	W399	6	469	1.1, 4.15.5, 5.30.5.1
Ballesteros, Lucy B.	Blackfoot, ID	E491	5	457	1.1, 4.15.4, 5.27.6.1
Ballesteros, Lucy B.	Blackfoot, ID	W111	6	98	1.1, 4.15.4, 5.27.6.1
Balsley, Ronald	Pocatello, ID	B029	3	58	1.1, 2.1.1, 4.9.4, 5.2.1, 5.24.21, 5.27.12.5, 5.27.12.8, 5.29.9.2
Balsley, Ronald	Pocatello, ID	E195	5	80	1.1, 2.2.1, 4.9.4, 5.2.1, 5.24.21, 5.27.9.2, 5.27.12.5, 5.27.12.8
Bamberry, Ed	Pocatello, ID	I098	3	491	2.1.1, 3.3.1, 5.24.23, 5.27.9.2, 5.28.6
Bamberry, Ed	Pocatello, ID	W366	6	447	1.1
Barfield, Patricia	Ontario, OR	W503	6	567	1.1, 4.13, 4.14, 4.15.4, 4.15.5, 5.30.5.7, 5.30.5.12, 6.3, 6.5.5
Barge, Levy,, and Oswalt, Karen	Ketchum, ID	E336	5	264	1.1, 4.15.5
Barker, Mary Jane and Donna L.	Pocatello, ID	W451	6	507	1.1, 5.27.6.1
Barnes, Alison	Hailey, ID	T519	3	753	1.1

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	Boise, ID	W010	6	36	1.1, 4.13			
	Boise, ID	B211	3	229	1.1, 3.4, 4.15.1, 6.2, 6.5.1			
	Boise, ID	E631	5	596	1.1, 3.4, 4.15.5, 6.2, 6.5.1			
	Twin Falls, ID	E508	5	466	1.1, 3.2.2, 3.2.9, 3.2.21, 4.3, 4.4.6, 4.13, 5.12.1, 5.24.27, 5.30.3.1, 6.3			
	Twin Falls, ID	W029	6	48	1.1, 3.2.2, 3.2.9, 3.2.21, 4.4.6, 4.13, 4.15.2, 5.12.1, 5.24.27, 5.30.3.1, 6.3			
	Nampa, ID	B041	3				74	1.1, 5.27.6.1, 5.27.7.16, 5.27.15.1
Bartholomew, Rory		Nampa, ID		B207	3	224	1.1, 5.27.7.16	
Bartholomew, Rory		Nampa, ID		E202	5	87	1.1, 5.27.6.1, 5.27.7.16, 5.27.15.1	
Batchelder, Patsy		Twin Falls, ID		T511	3	743	1.1, 2.7.9, 4.4.2, 4.13, 4.15.5, 5.10.4, 5.12.1, 5.27.3.3, 6.1.1	
Bates, Dale		Ketchum, ID		E295	5	226	1.1, 5.1.3, 5.24.25	
Bates, Dale		Ketchum, ID		T023	3	632	5.1.3, 5.24.25	
Bauman, Lois		Boise, ID		B023	3	51	1.1	
Bauman, Marilyn		Caldwell, ID		B020	3	44	1.1, 2.7.4, 3.2.1, 3.2.2, 3.2.18, 3.2.25, 3.6.1, 5.24.14, 5.30.4.12, 6.2, 6.5.1, 6.5.2, 6.5.6	
Bauman, Marilyn		Caldwell, ID		E180	5	55	1.1, 2.7.8, 3.1.5, 3.2.2, 3.2.17, 3.2.18, 3.2.24, 3.2.25, 3.6.1, 5.2.14, 5.7.8, 5.12.1, 5.19.4, 5.19.6, 5.24.14, 5.29.41, 5.29.48, 5.29.95, 5.29.97, 5.30.3.6, 5.30.4.12, 5.30.4.14, 5.31.9, 5.31.10, 6.2, 6.3, 6.5.1, 6.5.2, 6.5.3, 6.5.6	
Beal, Renee		Boise, ID		W488	6	556	1.1, 5.29.87, 6.5.5	

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Beard, James	Seattle, WA	I049	3	396	1.1, 2.1.1, 2.10, 4.1, 4.2.1, 4.4.2, 4.6, 4.7.4, 4.10.5, 5.27.7.2, 5.27.10
Beasley, Lawrence M.	Blackfoot, ID	E545	5	501	1.1, 4.15.4, 5.27.6.1
Beasley, Lawrence M.	Blackfoot, ID	W085	6	82	1.1, 4.15.4, 5.27.6.1
Beasley, Marlese	Blackfoot, ID	T076	3	707	5.12.1
Beechert, Alison	Hailey, ID	E415	5	393	1.1, 3.4, 5.1.45, 5.27.2
Beemer, Terry L.	Idaho Falls, ID	E427	5	401	1.1, 3.4
Beezley, Carrie	Twin Falls, ID	E461	5	426	1.1
Beezley, Carrie	Twin Falls, ID	T553	3	805	1.1
Beezley, Thomas R.	Twin Falls, ID	E462	5	427	1.1, 6.1.1, 6.3
Beitz, Leonard F.	Inkom, ID	E567	5	512	1.1, 2.1.1, 2.2.1, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.7.1
Beitz, Leonard F.	Inkom, ID	W061	6	70	1.1, 2.1.1, 2.2.1, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.11.1
Bell, Jock	Hailey, ID	E777	5	741	6.5.10
Bell, Jock	Hailey, ID	T075	3	706	6.5.10
Bell, Zeb	Kimberly, ID	W543	6	601	1.1
Bellem, Clarence	Rupert, ID	E354	5	278	1.1, 5.12.1, 5.23.23, 5.24.23, 5.27.6.1, 5.27.6.12, 5.27.9.2, 5.29.32
Bellem, Clarence	Rupert, ID	T501	3	725	1.1, 5.12.1, 5.23.23, 5.24.23, 5.27.6.1, 5.27.6.12, 5.27.9.2, 5.29.32

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Belson, Janice	Sun Valley, ID	E447	5	415	2.7.2, 3.3.1, 3.3.2, 4.15.4, 5.27.7.17
Belson, Janice	Sun Valley, ID	T529	3	765	3.3.1, 3.3.2, 4.1, 5.27.7.17
Belzer, Frederick F.	Pocatello, ID	E742	5	696	1.1, 4.15.4, 6.1.2
Bennett, George	Boise, ID	B110	3	197	1.1, 2.1.1, 4.15.1, 5.27.6.1, 5.27.9.2
Bennett, George	Boise, ID	E614	5	575	1.1, 2.1.1, 4.15.1, 5.27.6.1
Bennett, Virginia	Boise, ID	B104	3	189	1.1, 2.1.1, 5.29.16, 5.29.24, 5.29.63, 5.29.66, 5.29.73
Bennett, Virginia	Boise, ID	E609	5	571	1.1, 2.1.1, 5.29.24, 5.29.63, 5.29.66, 5.29.73
Bennion, David K.	Boise, ID	W234	6	183	1.1, 5.27.7.16, 5.27.9.1, 6.1.2, 6.2
Benson, Charles S., Jr.	Pocatello, ID	W190	6	154	2.7.2, 2.11.10, 3.3.1, 4.1, 4.2.1, 4.12, 4.15.2, 5.1.39, 5.2.9, 5.5.2, 5.22.2, 5.22.4, 5.22.5, 5.27.1.5, 5.27.4.3, 5.27.7.1, 5.27.7.4, 5.27.9.6
Benson, Charles S., Jr.	Pocatello, ID	W329	6	344	2.1.1, 2.7.2, 2.11.10, 3.3.1, 4.1, 4.2.1, 4.12, 4.15.2, 5.1.39, 5.2.9, 5.5.2, 5.22.2, 5.22.4, 5.22.5, 5.27.1.5, 5.27.4.3, 5.27.7.1, 5.27.7.4, 5.27.9.6
Benson, Lanie	Driggs, ID	E044	4	752	1.1, 3.2.1, 3.2.4, 4.7.3, 5.2.1, 5.27.9.1, 5.29.41, 5.30.2.1
Benson, Lanie	Driggs, ID	I039	3	371	1.1, 3.2.1, 3.2.4, 4.7.3, 5.2.1, 5.27.9.1, 5.29.41, 5.30.2.1
Bergerson, Linda	Ketchum, ID	E477	5	447	1.1, 3.2.1, 3.3.1, 4.3, 4.4.2, 4.13, 4.15.2, 5.1.42, 5.12.1, 5.26.1, 5.27.2, 5.27.3.3, 5.30.1.14, 5.30.2.1, 5.30.4.9, 6.5.2
Bergerson, Linda	Ketchum, ID	T541	3	781	1.1, 3.2.1, 3.3.1, 4.2.2, 4.3, 4.13, 4.15.2, 5.12.1, 5.26.1, 5.27.2, 5.27.3.3, 5.30.1.14, 5.30.2.1, 5.30.4.9, 6.5.2

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Bergstrom, Gene	Pocatello, ID	E328	5	256	1.1, 5.24.22, 5.24.27, 5.27.6.1, 5.27.9.1
Berier, Bret	Ketchum, ID	E503	5	463	1.1, 2.7.2, 3.2.1, 4.1, 4.7.1, 5.30.1.13
Berier, Bret	Ketchum, ID	W092	6	86	1.1, 2.7.2, 3.2.1, 4.1, 4.7.1, 5.30.1.13
Beritich, Danny	Hailey, ID	W243	6	190	1.1, 4.15.5, 5.27.10, 5.29.95, 6.1.1
Berman, Katrina V.	Moscow, ID	W524	6	582	2.1.1, 2.8.6, 2.11.12, 2.13.10, 4.1, 4.3, 4.12, 4.15.5, 5.1.2, 5.1.8, 5.1.9, 5.1.10, 5.1.21, 5.2.14, 5.10.4, 5.12.1, 5.12.1, 5.13.5, 5.13.9, 5.13.14, 5.22.3, 5.22.4, 5.22.6, 5.23.15, 5.25.5, 5.27.7.1, 5.27.7.3, 5.27.7.4, 5.27.9.5, 5.29.2, 5.29.12, 5.29.18, 5.29.24, 5.29.28, 5.29.81, 5.29.97, 5.30.3.1, 6.2
Bernatas, Susan	Boise, ID	B250	3	271	1.1, 3.2.16, 4.7.3, 5.4.1, 5.27.5.3, 5.30.2.5, 6.3
Bernatas, Susan	Boise, ID	E678	5	635	1.1, 3.2.16, 4.7.3, 5.4.1, 5.27.5.3, 5.30.2.5, 6.3
Bernthal, E. J.	Twin Falls, ID	E287	5	218	1.1, 2.1.1, 2.3, 3.2.1, 4.1, 4.2.1, 4.3, 4.7.1, 4.13, 4.14, 4.15.2, 5.10.7, 5.12.1, 5.24.17, 5.27.6.4, 5.30.2.1
Bernthal, E. J.	Twin Falls, ID	E780	5	744	2.1.1, 2.3, 3.2.1, 4.1, 4.2.1, 4.3, 4.7.1, 4.13, 4.14, 4.15.2, 5.10.4, 5.12.1, 5.24.17, 5.27.6.4, 5.30.2.1
Bernthal, E. J.	Twin Falls, ID	T082	3	712	1.1, 2.1.1, 4.1, 4.2.1, 4.3, 4.7.1, 4.13, 4.14, 5.10.4, 5.12.1, 5.24.18, 5.27.6.4, 5.30.2.1
Berriochoa, Randy	Twin Falls, ID	E530	5	492	1.1, 5.29.95, 5.30.5.12
Berriochoa, Randy	Twin Falls, ID	W229	6	179	1.1, 5.29.95, 5.30.5.12
Beu, Larry N.	Idaho Falls, ID	E078	4	779	1.1, 5.24.23, 5.27.6.1, 5.27.7.3
Beuscher, Brent	Idaho Falls, ID	I529	3	555	1.1, 3.3.1, 4.10.2, 4.15.5, 5.27.6.8, 6.1.2

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Bille, Donna	Ketchum, ID	E455	5	421	2.7.2
Bille, Donna	Ketchum, ID	T536	3	772	1.1, 2.7.2, 6.5.5
Bird, James Michael	Idaho Falls, ID	E690	5	645	1.1, 2.2.2, 3.3.1, 5.24.27, 5.27.7.16, 5.27.9.1, 5.27.15.1, 6.4.1
Bitton, Kathy	Idaho Falls, ID	E016	4	262	1.1, 3.4, 5.27.9.3, 5.27.13.2, 5.28.1, 5.28.9
Bjonberg, Family		E534	5	495	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
Bjonberg, Family		W118	6	102	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
Bjornsen, Fritz	Boise, ID	B249	3	270	4.7.2, 4.14, 4.15.4, 5.24.18, 5.24.27, 5.27.2, 5.27.3.3, 5.27.7.4, 5.27.10, 5.29.31, 6.3
Bjornsen, Fritz	Boise, ID	E677	5	634	1.1, 4.3, 4.14, 4.15.4, 5.24.18, 5.24.27, 5.27.2, 5.27.3.3, 5.27.7.4, 5.27.10, 5.29.31, 6.3
Bjornsen, Robert Lind	Boise, ID	B071	3	131	1.1, 4.13, 5.10.5, 5.10.6, 5.29.87
Bjornsen, Robert Lind	Boise, ID	E246	5	161	1.1, 4.13, 5.10.5, 5.10.6, 5.29.87
Black, Viola	Burley, ID	E571	5	514	1.1, 4.13
Black, Viola	Burley, ID	W053	6	66	1.1, 4.13
Blackfoot Chamber of Commerce	Blackfoot, ID	W419	6	483	See Ranck, John
Blain, Michael J.	Boise, ID	B063	3	120	2.1.1, 2.4, 2.13.13, 5.6.5, 5.13.1, 5.13.2, 5.13.4, 5.13.12, 5.13.13, 5.23.26
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Blain, Michael J.	Boise, ID	W201	6	161	2.8.11
Blair, Maggie	Ketchum, ID	E370	5	355	1.1, 3.3.1, 3.4, 4.14, 5.27.2, 5.27.3.3, 5.27.10, 5.30.2.1
Blair, Maggie	Ketchum, ID	W397	6	468	1.1, 3.3.1, 4.14, 5.27.2, 5.27.3.3, 5.27.10, 5.30.2.1
Blanchard, 8ruce	Washington, DC	W462	6	524	5.1.29, 5.3.12, 5.11, 5.16.2
Blanchard, Florence K.	Bellevue, ID	E807	5	772	1.1, 5.28.1
Blanchard, Tom	Bellevue, ID	E395	5	377	1.1, 5.12.1, 5.27.10, 5.30.5.12
Bloom, Nancy Fitz	Driggs, ID	W430	6	493	1.1, 4.3, 5.12.1, 5.24.27, 5.27.10, 5.30.2.1, 5.30.4.14, 6.2, 6.3, 6.4.4
Bloom, Richard	Driggs, ID	W429	6	492	1.1, 4.3, 5.12.1, 5.24.27, 5.27.10, 5.30.2.1, 5.30.4.14, 6.2, 6.3, 6.4.4
8lue Ribbon Coalition	Pocatello, ID	E019	4	270	See Collins, Clark
Blue Ribbon Coalition	Pocatello, ID	I012	3	329	See Collins, Clark
Blunt, Andrew	Hailey, ID	E403	5	383	1.1, 4.15.1, 5.1.45, 5.22.6, 5.27.3.3, 5.27.7.2, 5.27.7.5, 5.29.63, 5.30.3.1, 5.30.4.7
Blunt, Andrew	Hailey, ID	T521	3	754	1.1, 4.15.1, 5.1.45, 5.22.6, 5.27.3.3, 5.27.7.2, 5.27.7.5, 5.29.63, 5.29.95, 5.30.4.7
Bodell, Robert	Idaho Falls, ID	E130	4	829	1.1, 3.4, 5.24.23, 5.27.11.1
Boe, Donna H.	Pocatello, ID	W480	6	551	1.1, 2.1.1, 4.14, 4.15.5, 5.27.10, 5.30.4.7
Boester, Robert	Boise, ID	W530	6	590	1.1, 4.13, 5.1.21, 5.10.5, 5.12.1, 5.29.2

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Boise Peace Quilt Project	Boise, ID	B056	3	103	See McElhinney, Gwynne
Boise Peace Quilt Project	Boise, ID	E229	5	112	See McElhinney, Gwynne
Boise Peace Quilt Project	Boise, ID	E230	5	114	Picture of Quilt, See Boise Peace Quilt Pro,
Bonnett, Maris (Sister)	Idaho Falls, ID	E068	4	771	1.1, 3.4, 5.10.11, 5.10.21, 5.12.6, 5.29.85, 6.3
Bonnett, Maris (Sister)	Idaho Falls, ID	I047	3	393	1.1, 5.10.11, 5.10.21, 5.12.6, 5.29.85, 6.3
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Bonneville County Republican Women	Idaho Falls, ID	E691	5	646	See Cartee, Bertha M.
Bonneville County Republican Women	Idaho Falls, ID	I087	3	470	See Cartee, Bertha M.
Boozel, Raymond D.	Meridian, ID	W563	6	664	1.1, 5.27.4.5, 5.27.6.1
Bosen, Wendall R.	Pocatello, ID	E552	5	504	1.1, 4.15.4, 5.27.6.1
Bosen, Wendall R.	Pocatello, ID	W090	6	85	1.1, 4.15.4, 5.27.6.1
Bourgette, Stephanie	Ketchum, ID	W270	6	206	1.1, 5.12.1, 5.27.3.3, 5.27.6.1, 6.2
Bowler, Ned W.	Bliss, ID	W527	6	586	1.1, 2.3, 4.3, 5.12.1, 5.30.3.1
Bowler, Peter A.	Laguna Beach, CA	W349	6	363	2.1.1, 2.7.10, 2.11.5, 2.13.17, 3.6.2, 4.4.6, 5.1.16, 5.2.15, 5.5.1, 5.6.10, 5.6.11, 5.7.16, 5.7.18, 5.10.7, 5.12.4, 5.21.1, 5.25.5, 5.29.39, 5.29.66, 5.29.77, 5.29.82, 5.29.87, 5.29.103, 5.30.1.1, 5.30.1.2, 5.30.1.4, 5.30.2.1, 5.30.2.5, 5.30.3.2, 5.30.3.3, 5.30.4.9, 5.30.5.10, 5.30.5.14

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Boyles, Jean	Boise, ID	E676	5	631	1.1, 2.2.4, 2.7.2, 2.7.B, 2.7.10, 3.2.1, 3.2.1B, 3.3.1, 3.3.2, 4.3, 4.6, 4.7.1, 4.10.1, 4.10.2, 4.11.2, 4.14, 4.15.1, 4.15.4, 5.1.3, 5.1.38, 5.1.46, 5.2.7, 5.2.13, 5.2.14, 5.7.15, 5.22.4, 5.22.6, 5.24.18, 5.24.27, 5.27.2, 5.27.3.3, 5.27.6.14, 5.27.7.4, 5.27.9.4, 5.27.10, 5.29.31, 5.29.40, 5.29.45, 5.29.55, 5.30.1.14, 5.30.2.1, 5.30.3.8, 5.30.4.1, 5.30.4.9, 6.3
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Brady, Cliff	Idaho Falls, ID	E699	5	655	3.2.7, 5.27.7.16, 5.27.9.3, 5.27.11.6, 5.27.12.1, 5.27.12.8
Brady, Cliff	Idaho Falls, ID	I101	3	495	3.2.7, 3.4, 5.27.7.16, 5.27.9.3, 5.27.11.6, 5.27.12.1, 5.27.12.8
Brailsford, Beatrice	Pocatello, ID	I045	3	390	1.1, 4.15.5, 5.27.6.3, 5.27.7.5, 5.27.9.4, 5.30.3.1, 5.30.3.1, 5.30.5.1
Brailsford, Beatrice	Pocatello, ID	I506	3	515	1.1, 4.1, 4.3, 4.6, 5.17.2, 5.24.22, 5.27.6.7, 5.27.7.8, 5.27.9.5, 5.27.9.6, 5.27.12.8, 5.30.4.5, 5.30.4.12
Brailsford, Beatrice	Pocatello, ID	I542	3	577	1.1
Branch, Mary Pat	Burley, ID	E398	5	380	1.1, 3.4, 4.2.1, 4.15.7, 5.1.21, 5.1.40, 5.24.18, 5.27.6.1, 5.29.109, 5.30.1.4, 5.30.2.1, 6.3
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Brandt, Eric	Sun Valley, ID	E639	5	602	1.1, 3.4, 4.13, 4.14, 6.3
Brandt, John H.	Nampa, ID	W147	6	124	1.1, 5.27.9.1
Bray, Richard D.	Sun Valley, ID	E465	5	429	1.1, 3.4, 5.27.6.10
Brazil, Dee	McCall, ID	E191	5	78	1.1, 2.2.4, 5.2.14, 5.7.10, 5.29.31, 5.30.2.5
Breed, Michael S.	Blackfoot, ID	E755	5	712	4.15.1, 5.2.1, 5.24.23, 5.27.7.7, 5.27.12.3, 5.27.15.1
Breed, Michael S.	Blackfoot, ID	I547	3	584	4.15.1, 5.2.1, 5.24.23, 5.27.7.7, 5.27.12.3, 5.27.15.1
Breen, Ginny Blakeslee	Hailey, ID	W339	6	354	1.1
Breen, Mike	Hailey, ID	E442	5	411	1.1, 2.7.11, 3.2.2, 4.14, 5.27.7.17, 6.2, 6.3
Breen, Mike	Hailey, ID	T528	3	764	1.1, 2.7.12, 3.2.2, 4.14, 5.27.7.17, 6.2, 6.3
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Breiter, Edward	Idaho Falls, ID	I554	3	589	1.1, 5.27.12.3, 5.29.34, 5.30.2.5, 5.30.3.8, 6.2, 6.5.1, 6.5.5
Breiter, Edward	Idaho Falls, ID	W577	6	672	7.4
Brewer, Tim	Boise, ID	B048	3	81	1.1, 2.7.2, 4.2.1, 4.3, 4.13, 4.15.2, 5.27.6.10, 5.27.7.17, 6.3
Brewer, Tim	Boise, ID	E207	5	96	1.1, 4.3, 4.13, 4.15.2, 5.27.1.4, 5.27.6.11, 5.27.7.17, 6.3

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Brockett, Jason	Boise, ID	E687	5	643	1.1, 4.13, 5.1.1, 5.1.20
Broderick, Susan	Fort Hall, ID	W456	6	512	2.1.4, 2.12.5, 2.13.19, 3.2.4, 4.1, 4.2.1, 4.7.1, 4.13, 5.2.5, 5.7.14, 5.12.1, 5.12.3, 5.24.27, 5.27.1.1, 5.27.1.6, 5.27.1.7, 5.27.1.9, 5.27.1.10, 5.27.4.2, 5.27.6.1, 5.27.11.1, 5.27.11.3, 5.27.11.4, 5.27.11.5, 5.27.11.6, 5.27.13.3, 5.27.14.2, 5.27.14.3, 5.29.2, 5.29.33, 5.29.40, 5.29.97, 5.30.1.3, 5.30.1.5, 5.30.1.6
Brookshier, George W., Jr.	Blackfoot, ID	W144	6	122	1.1, 4.15.4
Brookshier, Marilyn	Blackfoot, ID	W154	6	129	1.1, 4.15.4
Broschofsky, Minette	Ketchum, ID	W424	6	487	1.1, 4.13, 5.24.30, 5.30.5.1, 6.3
Broscious, Chuck	Moscow, ID	B012	3	28	1.1, 2.8.6, 3.1.1, 3.2.1, 3.2.16, 3.2.23, 3.6.1, 5.7.12, 5.14.1, 5.29.2, 5.29.33, 5.29.42, 5.29.49, 5.29.66, 5.29.87, 5.30.2.1, 5.30.2.5, 5.30.3.4, 5.30.3.5, 5.30.3.6, 5.30.4.6, 5.30.4.11
Broscious, Chuck	Moscow, ID	E175	5	34	2.7.4, 3.1.1, 3.2.1, 3.2.2, 3.2.7, 3.2.23, 3.2.30, 3.6.1, 5.1.20, 5.1.22, 5.1.27, 5.1.46, 5.6.5, 5.10.5. 5.12.1, 5.12.6, 5.13.13, 5.14.2, 5.17.2, 5.21.4, 5.24.5, 5.24.18, 5.24.27, 5.27.6.11, 5.27.7.15, 5.29.2, 5.29.33, 5.29.42, 5.29.49, 5.29.64, 5.29.68, 5.29.89, 5.30.1.6, 5.30.3.5, 5.30.1.16, 5.30.2.1, 5.30.2.5, 5.30.3.3, 5.30.3.4, 5.30.4.8, 5.30.4.11, 5.30.4.14, 5.30.5.11, 5.30.5.15, 5.31.2, 5.31.9, 6.3, 6.4.5
Brossman, Nancy	Boise, ID	E647	5	607	1.1, 2.7.10, 3.4, 5.10.5, 5.12.1, 5.27.10, 5.29.96, 5.29.98, 6.5.1

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Brostron, Jody	Idaho Falls, ID	W542	6	601	1.1, 4.15.5, 5.27.10, 6.1.9, 6.3
Brower, Bill	ID	T078	3	708	1.1
Brown, Arthur	Coeur d'Alene, ID	W253	6	195	1.1, 4.15.4
Brown, Carolyn	Ketchum, ID	T558	3	811	1.1, 4.15.1, 5.1.36, 5.13.14, 5.27.2, 6.1.1, 6.2
Brown, Linda S.	Meridian, ID	W546	6	603	1.1, 4.3, 4.15.5, 5.2.13, 5.2.14, 5.10.5, 5.12.1, 5.30.2.5, 6.2
Brown, Michael	Idaho Falls, ID	E478	5	448	5.27.6.1, 5.27.7.4, 5.27.7.5
Brown, Nellie	Idaho Falls, ID	W471	6	541	1.1, 4.9.4, 5.28.7
Brown, Scott	Boise, ID	B224	3	244	1.1, 2.1.2, 2.7.2, 3.3.1, 3.4, 4.2.1, 4.15.2, 4.15.4, 5.27.7.4, 6.1.1, 6.3
Brown, Scott	Boise, ID	E654	5	614	1.1, 2.7.2, 3.2.2, 3.2.4, 3.3.1, 3.4, 4.2.1, 4.15.2, 4.15.4, 5.1.43, 5.27.7.4, 5.29.85, 5.30.2.1, 6.1.1, 6.3
Browning, Elizabeth	Idaho Falls, ID	E558	5	507	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Browning, Elizabeth	Idaho Falls, ID	W022	6	43	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Brownsmith, Cynthia	Boise ID	B075	3	136	2.7.2
Brownwell, Mark	Boise, ID	W303	6	324	1.1, 4.13, 6.2, 6.3
Brudenell, Ingrid (Mrs. William)	Boise, ID	E562	5	509	1.1, 4.3, 4.13, 5.29.87, 6.2
Brudenell, Ingrid (Mrs. William)	Boise, ID	W036	6	54	1.1, 4.3, 4.13, 5.29.87, 6.2
Brudenell, Ingrid (Mrs. William)	Boise, ID	W240	6	188	1.1, 4.14, 5.8.3, 5.12.6, 5.29.92, 5.30.3.1
Bruha, George J.	Idaho Falls, ID	E487	5	455	1.1, 4.15.4, 5.27.6.1

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	Idaho Falls, ID	W215	6	171	1.1, 4.15.4, 5.27.6.1			
	Boise, ID	W499	6	564	1.1, 6.2			
Kemble	Ketchum, ID	W317	6	335	1.1			
	Hailey, ID	W247	6	192	1.1, 4.15.2, 4.15.5, 5.1.42			
	Pocatello, ID	E058	4	764	1.1, 2.7.2, 4.13, 5.12.6, 5.24.27			
	Pocatello, ID	I067	3	430	1.1, 4.13			
	Pocatello, ID	E097	4	804	1.1, 3.4, 3.29.31, 4.3, 4.7.3, 5.2.15, 5.4.1, 5.27.10, 5.27.11.5, 5.29.1, 6.5.2			
	Pocatello, ID	I066	3	428	1.1, 3.4, 4.3, 4.7.3, 5.2.15, 5.4.1, 5.27.10, 5.27.11.5, 5.29.1, 5.29.31, 6.5.2			
	Nampa, ID	B053	3			96	1.1	
Buehler, Verna		Pocatello, ID		W294	6	318	1.1, 3.2.3, 4.13, 5.29.92, 6.2, 6.3	
Burgess, J. Roger		Boise, ID		B093	3	174	3.2.4, 3.2.21, 4.15.1, 5.1.46, 5.13.15, 5.27.9.5, 5.29.33, 5.29.73, 5.29.85, 5.30.1.14, 5.30.4.1, 5.30.4.12, 6.2	
Burgess, J. Roger		Boise, ID		E600	5	563	3.2.4, 3.2.21, 4.15.4, 5.1.46, 5.13.15, 5.27.9.5, 5.29.33, 5.29.73, 5.29.85, 5.30.1.14, 5.30.4.1, 5.30.4.12, 6.2	
Burke, Linda		Pocatello, ID		I057	3	412	1.1, 3.2.1, 4.1, 4.3, 5.10.4, 5.12.5, 5.29.45, 5.29.67, 5.29.104, 5.30.1.14, 5.30.2.1, 5.30.2.5, 5.30.4.9, 5.30.4.14	
Burke, Linda		Pocatello, ID		I521	3	544	1.1, 2.7.2, 2.7.8, 4.13, 4.14	
Burke, Reece W.		Idaho Falls, ID		E132	4	832	1.1, 3.3.1, 5.20.2, 5.24.23, 5.27.7.3, 5.27.9.2	
Burke, Stoney		Sun Valley, ID		W273	6	208	1.1, 4.15.5, 5.12.1, 5.27.3.3, 5.27.3.3	

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Burkholder, Agnes	Boise, ID	E189	5	77	1.1, 2.1.1, 2.1.2
Burks, Diane	Twin Falls, ID	E345	5	270	1.1, 2.2.1, 2.3, 3.4, 4.3, 4.9.3, 4.15.2, 5.29.45, 5.30.2.1, 5.30.4.9, 5.30.4.12, 5.30.5.7
Burks, Diane	Twin Falls, ID	T058	3	672	1.1, 2.2.1, 2.3, 2.7.10, 3.2.2, 4.3, 4.4.6, 4.10.4, 4.13, 4.15.2, 5.10.1, 5.29.45, 5.29.55, 5.29.67, 5.30.3.8
Burley Area Development Commission	Burley, ID	W552	6	607	See Matthews, Paul W.
Burnes (Cepren), Fr. Sergus	Boise, ID	B031	3	61	2.6.1, 2.12.5, 3.2.2, 4.10.2
Burnes (Cepren), Fr. Sergus	Boise, ID	E527	5	488	Poems
Burnes (Cepren), Fr. Sergus	Boise, ID	W032	6	52	Discussion
Burnes (Cepren), Fr. Sergus	Boise, ID	W199	6	160	Removed by Author
Burnes (Cepren), Fr. Sergus	Boise, ID	W236	6	184	1.1, 2.6.1, 2.12.5, 3.2.2, 4.9.4, 4.10.2
Burnes (Cepren), Fr. Sergus	Boise, ID	W286	6	311	4.13
Burnes (Cepren), Fr. Sergus	Boise, ID	W287	6	312	4.13
Burns, Robert	Ketchum, ID	E435	5	407	1.1, 3.4, 4.15.4, 5.26.2, 5.27.2, 5.29.31, 5.29.41, 5.30.2.1
Burns, Robert E.	McCall, ID	W248	6	193	1.1, 6.2
Burns, Steve	Idaho Falls, ID	W304	6	325	1.1, 3.4, 5.27.7.16
Burns, Tony	Idaho Falls, ID	W326	6	343	1.1, 3.4
Burtenshaw, Clyde	Idaho Falls, ID	E008	4	42	1.1, 2.1.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.11.1, 5.27.12.8, 5.27.15.1
Burtenshaw, Clyde	Idaho Falls, ID	I004	3	306	1.1, 5.27.6.1, 5.27.9.2, 5.27.12.8, 5.27.15.1

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Burton, Ralph C.	Ogden, UT	W155	6	129	1.1, 5.24.23, 5.27.6.1
Burwell, Dick	Twin Falls, ID	E576	5	516	1.1, 6.4.1
Burwell, Dick	Twin Falls, ID	W066	6	72	1.1, 6.4.1
Burwell, Merlin D.	Pocatello, ID	E467	5	430	1.1
Butikofer, Robert	Idaho Falls, ID	I058	3	414	1.1, 5.24.23, 5.27.9.1, 5.29.32, 5.29.46
Butikofer, Robert	Idaho Falls, ID	W625	6	697	7.52
Butters, Mary	Moscow, ID	B054	3	97	5.7.1, 5.29.33, 5.29.41, 5.29.42, 5.29.45, 5.29.49, 5.29.66, 5.29.81, 5.29.84, 5.29.89, 5.29.98
Bybee, Rita	Inkom, ID	E758	5	714	1.1, 2.7.11, 5.27.7.3, 5.27.10, 5.29.95, 5.30.4.1, 6.3, 6.5.1
Byrom, John P.	Idaho Falls, ID	E689	5	644	1.1, 2.2.15, 5.2.11, 5.4.2, 5.24.23, 5.26.6, 5.27.7.16, 5.27.9.2, 5.28.2, 5.29.95
Byrom, John P.	Idaho Falls, ID	I040	3	373	1.1, 2.2.15, 5.4.2, 5.24.23, 5.27.7.3, 5.27.7.16, 5.28.2, 5.29.95
Caccia, John C.	Ketchum, ID	W316	6	335	1.1
Cagen, Richard M.	Pocatello, ID	E498	5	460	1.1, 5.27.11.2, 6.2
Cagen, Richard M.	Pocatello, ID	W228	6	178	1.1, 5.27.11.2, 6.2
Cahoon, Jim	Firth, ID	W174	6	143	1.1, 5.27.6.1, 5.28.1, 5.29.41, 5.29.84
Cahoon, Jim	Firth, ID	W175	6	144	
Call, Lloyd S.	Pocatello, ID	E523	5	483	1.1, 5.27.6.1, 5.27.11.1
Call, Lloyd S.	Pocatello, ID	W039	6	56	1.1, 5.27.6.1, 5.27.11.1

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Cameron, Joyce L.	Twin Falls, ID	W387	6	463	1.1, 2.7.5, 4.15.5, 5.27.9.2, 5.30.3.1, 6.2
Campbell, Bruce	Rigby, ID	E694	5	648	1.1, 3.2.2, 4.15.4, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.2, 5.27.15.1, 5.28.2
Campbell, Bruce	Rigby, ID	I091	3	477	1.1, 3.2.2, 4.15.4, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.2, 5.27.15.1, 5.28.2
Campbell, Mary L.	McCall, ID	W544	6	602	1.1, 5.12.1, 6.1.2
Campbell, Robert	Boise, ID	E262	5	188	1.1, 3.2.1, 4.2.1, 4.3, 6.2, 6.5.2
Campbell, Thomas, Mayor	Idaho Falls, ID	I003	3	305	1.1, 5.27.11.1
Cannon, Joanne	Boise, ID	B232	3	253	1.1, 4.13, 6.3
Cano, J., Cano, P., Craven, E. M.	Pocatello, ID	E062	4	767	1.1, 2.7.2, 5.27.10, 6.5.11
Cantrell, Ric	Rexburg, ID	E148	4	855	1.1, 2.7.9, 2.7.12, 3.3.1, 3.4, 4.2.1, 4.3, 4.4.7, 4.13, 4.15.2, 4.15.3, 5.27.10
Cantrell, Ric	Rexburg, ID	I082	3	453	2.7.9, 2.7.12, 3.4, 4.2.1, 4.3, 4.4.7, 4.13, 4.15.2, 4.15.3, 5.27.10
Cantrill, Dante	Pocatello, ID	E764	5	726	3.2.1, 5.27.6.1, 5.27.10, 6.2, 6.5.5
Cantrill, Judie C.	Pocatello, ID	E760	5	724	1.1, 4.13, 6.1.4, 6.3
Capek, John	Idaho Falls, ID	W421	6	485	1.1, 5.27.9.1, 6.2
Caputo, Paula	Ketchum, ID	E810	5	774	4.15.5, 5.10.4, 5.12.1, 5.30.1.14, 6.1.9, 6.2
Carlson, Bette	Boise, ID	B266	3	285	1.1, 4.13, 6.3
Carlson, Bette	Boise, ID	E688	5	643	1.1, 5.1.36, 5.12.1, 5.24.25, 5.24.27, 5.29.85, 5.30.5.10
Carlson, Blair	Idaho Falls, ID	E089	4	794	1.1, 4.5, 5.24.23, 5.27.6.1, 5.27.9.3, 5.27.15.1, 5.27.17

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Carlson, Carl S.	Idaho Falls, ID	W478	6	550	1.1, 4.9.4, 5.28.7
Carlson, L. Ray	Blackfoot, ID	E544	5	500	1.1, 5.27.4.5, 5.27.6.1, 5.27.11.1, 6.2
Carlson, L. Ray	Blackfoot, ID	W084	6	82	1.1, 5.27.4.5, 5.27.6.1, 5.27.11.1, 6.2
Carlson, Leta	Idaho Falls, ID	W506	6	570	1.1, 4.9.4, 5.27.6.1, 5.28.7
Carney, Kathleen	Pocatello, ID	E765	5	727	1.1, 4.13, 4.15.5, 5.27.7.17
Carney, Phil	Ketchum, ID	E439	5	409	1.1, 4.15.5
Carpenter, Lynne	Mtn. Home, ID	E271	5	195	3.4, 5.24.30
Carpenter, Lynne	Mountain Home, ID	W615	6	692	7.42
Carpenter, Rocky	Boise, ID	B067	3	126	1.1, 4.13, 5.1.37, 5.27.2, 5.27.7.3, 5.27.7.4, 5.27.7.17, 5.27.12.8, 5.29.63, 5.29.80, 5.29.85, 5.29.86, 5.29.88, 5.30.2.5, 6.2
Carpenter, Rocky	Boise, ID	E243	5	158	1.1, 4.13, 5.27.2, 5.27.7.4, 5.27.7.17, 5.27.12.8, 5.29.63, 5.29.80, 5.29.85, 5.29.86, 5.29.88, 5.30.2.5, 6.2
Carriveau, Lori	Boise, ID	B259	3	280	1.1, 5.10.5, 5.12.1, 5.20.1, 5.27.3.4, 5.27.7.14, 5.29.63, 5.29.92
Carriveau, Lori	Boise, ID	E670	5	627	1.1, 2.2.7, 4.2.1, 4.14, 5.27.3.4, 5.30.5.12, 6.3, 6.5.5
Carson, Laura	Boise, ID	E643	5	605	1.1, 4.15.1, 5.12.1, 6.2
Cartee, Bertha M.	Idaho Falls, ID	E691	5	646	1.1, 3.4, 4.5, 5.2.10, 5.3.8, 5.27.7.16, 5.27.9.5, 5.28.2, 5.28.6, 5.29.32, 5.29.97
Cartee, Bertha M.	Idaho Falls, ID	I087	3	470	1.1, 3.4, 4.5, 5.2.10, 5.3.8, 5.27.7.16, 5.27.9.5, 5.28.2, 5.28.6, 5.29.32, 5.29.97
Cartee, L. T.	Idaho Falls, ID	I090	3	476	1.1, 5.24.23, 5.27.12.5, 5.29.97, 6.1.2

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Carter, Jerry	Boise, ID	B037	3	68	1.1, 2.7.2, 3.2.2, 3.4, 4.7.3, 5.2.6, 5.27.6.2, 5.29.111, 6.2, 6.3
Carter, Jerry	Boise, ID	E199	5	84	1.1, 3.2.2, 3.4, 5.2.6, 5.27.6.2, 5.27.9.1, 5.29.111, 6.2, 6.3
Carter, Linda	Idaho Falls, ID	E721	5	674	1.1, 3.4, 4.15.1, 4.15.4, 5.12.1, 5.24.23, 5.24.31, 5.27.3.3, 5.27.4.4, 5.27.6.1, 5.27.9.2, 5.27.11.1, 5.27.11.3, 5.27.12.8, 6.1.2
Carter, Linda	Idaho Falls, ID	I508	3	519	1.1, 3.4, 4.15.1, 4.15.4, 5.12.1, 5.24.23, 5.24.31, 5.27.3.3, 5.27.4.4, 5.27.6.1, 5.27.9.2, 5.27.11.1, 5.27.11.3, 5.27.12.8, 6.1.2
Casbeau, Max	Twin Falls, ID	T046	3	660	1.1, 5.1.2
Casey, Gregory	Boise, ID	B013	3	31	1.1, 2.1.1, 2.8.2, 4.9.4, 5.24.22, 5.27.3.1, 5.27.6.1, 5.27.9.2, 5.27.9.3, 5.27.12.4, 5.29.32, 5.29.108, 6.1.2
Casey, Gregory	Boise, ID	E176	5	39	1.1, 2.1.1, 2.8.2, 4.9.4, 5.24.22, 5.27.3.1, 5.27.6.1, 5.27.9.2, 5.27.9.3, 5.27.12.4, 5.29.32, 5.29.108, 6.1.2
Casler, Sally	Boise, ID	B079	3	143	1.1, 2.7.2, 6.5.2
Casler, Sally	Boise, ID	E254	5	169	1.1, 2.7.2, 6.2, 6.5.2
Casper, Phil	Pocatello, ID	W365	6	446	4.15.4, 5.24.23, 5.27.6.1
Cassen, Melinda					See Kassen, Melinda
Casson, Mark D.	Boise, ID	W476	6	547	1.1, 2.8.1, 3.2.2, 3.4, 5.8.3, 5.24.11, 6.3
Cates, Garth	Boise, ID	E277	5	201	1.1, 3.4, 4.9.4, 5.24.30, 5.27.6.1, 5.27.9.2, 6.1.2
Cates, Garth	Boise, ID	T005	3	605	1.1, 3.4, 4.9.4, 5.24.30, 5.27.6.1, 5.27.9.2, 6.1.2
Celick, Janet R.	Boise, ID	B113	3	200	1.1, 5.1.21, 5.1.24, 5.8.3, 5.8.9, 5.24.18, 6.1.1
Cernera, Phillip	Pocatello, ID	W351	6	436	1.1, 6.5.5

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Chandler, Asa	Ketchum, ID	T517	3	751	1.1
Chapman, Charles J.	Twin Falls, ID	E796	5	763	1.1, 2.3, 4.13, 5.9.3, 5.10.4, 5.12.1, 5.20.11, 5.24.2, 5.25.5, 5.29.85, 5.30.3.1, 6.3
Chapman, Charles J.	Twin Falls, ID	T568	3	832	1.1, 5.20.11, 5.24.1
Charlson, Kirk	Twin Falls, ID	T041	3	653	1.1, 5.12.1, 5.17.2, 5.27.2, 5.27.7.8
Chase, Patsy	Boise, ID	E215	5	101	1.1, 5.27.6.1, 5.27.9.2
Cheney, Kelly	Rigby, ID	I031	3	362	1.1, 5.24.23, 5.24.31, 5.27.7.16, 6.1.2
Cherry, Rex	Rigby, ID	E035	4	744	1.1, 3.4, 5.27.12.4
Cherry, Rex	Rigby, ID	I032	3	363	1.1, 3.4, 5.27.12.4
Chisholm, William K.	Buhl, ID	T060	3	674	1.1, 2.7.9, 2.13.4, 3.2.20, 6.1.4
Chisholm, William K.	Buhl ID	T561	3	817	1.1, 4.14, 5.6.2, 5.10.4, 5.12.1
Christensen, Alan L.	Menan, ID	W312	6	330	1.1, 2.2.7, 5.24.23, 5.27.3.4, 5.27.4.5, 5.27.6.1, 5.27.9.1, 5.27.11.1, 6.1.2
Christensen, Ann L.	Stanley, ID	W500	6	564	1.1, 5.12.1, 5.21.4, 5.30.2.5, 5.30.4.9, 5.30.5.7
Christensen, Fred A. and Dorothy	Nampa, ID	W182	6	149	1.1, 2.3, 4.2.1, 5.27.7.4, 5.30.3.1
Christensen, Scott A.		E468	5	431	1.1, 5.30.4.5, 5.30.5.7
Christians Praying for Peace	Idaho Falls, ID	E068	4	771	See Bonnett, Maris (Sister)

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Christians Praying for Peace	Idaho Falls, ID	I047	3	393	See Bonnett, Maris (Sister)
Christofferson, John E.	Idaho Falls, ID	E018	4	266	1.1, 4.15.1, 5.24.23, 5.24.27, 5.29.84, 6.1.1, 6.4.1
Chu, Ted	Idaho Falls, ID	W541	6	600	1.1, 4.15.5, 5.27.17, 6.1.9, 6.3
Chubb, Mary Ann	Ketchum, ID	E414	5	392	1.1, 5.27.3.3
Chupa, Marge	Twin Falls, ID	E472	5	443	1.1, 2.7.2, 3.2.22, 4.6, 5.30.5.14
Chupa, Marge	Twin Falls, ID	T563	3	821	1.1, 2.7.12
Church Women United	Caldwell, ID	B020	3	44	See Bauman, Marilyn
Church Women United	Caldwell, ID	E180	5	55	See Bauman, Marilyn
Citizens Against Nuc Weapons & Extermination	Coeur d'Alene, ID	W528	6	586	See Hanson, Gertrude
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Clark, Beverly	Idaho Falls, ID	W222	6	175	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
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Clark, Patricia	Boise, ID	B036	3	68	1.1, 3.2.1, 4.2.1, 4.3, 5.29.78, 5.30.2.1, 5.30.3.6, 6.2
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Clark, Robert L.	Pocatello, ID	W508	6	571	1.1, 5.27.11.1, 5.27.15.1
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Cooke, Kerry	Boise, ID	E629	5	593	1.1, 5.1.32, 5.8.2, 5.10.9, 5.10.10
Coon, Maggie	Boise, ID	B057	3	107	2.1.1, 2.3, 4.1, 4.7.1, 4.11.1, 5.10.2, 5.10.3, 5.29.91, 5.30.1.11, 5.30.2.1, 5.30.2.3, 5.30.2.5, 5.30.3.1, 5.30.3.1, 5.30.3.8
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Donovan, Richard	Boise, ID	B009	3	24	3.2.31, 5.7.1, 5.17.3, 5.19.3, 5.19.4, 5.19.6, 5.23.25, 5.30.5.6, 5.31.7
Donovan, Richard	Boise, ID	E173	5	31	3.2.31, 5.7.1, 5.17.3, 5.19.3, 5.19.4, 5.19.6, 5.23.25, 5.30.5.6, 5.31.7
Donovan, Richard	Boise, ID	W556	6	615	2.4, 2.11.6, 2.11.7, 5.1.10, 5.1.23, 5.1.47, 5.1.48, 5.3.1, 5.3.2, 5.3.3, 5.3.4, 5.3.5, 5.3.7, 5.3.14, 5.3.15, 5.3.16, 5.3.18, 5.3.19, 5.3.20, 5.4.1, 5.6.6, 5.6.7, 5.7.1, 5.7.2, 5.7.3, 5.7.4, 5.7.5, 5.8.5, 5.8.11, 5.8.12, 5.8.14, 5.8.15, 5.8.18, 5.8.19, 5.9.2, 5.13.7, 5.13.20, 5.16.3, 5.17.1, 5.18.1, 5.18.3, 5.19.1, 5.19.2, 5.19.3, 5.19.4, 5.19.5, 5.19.6, 5.21.4, 5.21.7, 5.23.6, 5.23.12, 5.23.20, 5.23.25, 5.29.51, 5.29.67, 5.29.75, 5.30.1.17, 5.30.1.20, 5.30.1.22, 5.30.1.23, 5.30.1.24, 5.30.1.27, 5.30.2.1, 5.30.2.4, 5.30.2.5, 5.30.4.10, 5.30.5.5, 5.30.5.6, 5.30.5.16, 5.31.3, 5.31.6
Douglas, David	Boise, ID	B069	3	128	1.1, 2.13.3, 4.14, 5.24.27, 5.30.3.1, 5.31.12, 6.1.1, 6.3
Douglas, David	Boise, ID	E244	5	159	1.1, 2.13.3, 4.14, 5.24.27, 5.30.3.1, 5.31.12, 6.1.1
Douglas, Norma	Sun Valley, ID	T006	3	606	1.1, 4.15.4, 5.24.20, 5.27.3.3, 5.30.3.6
Douglas, Norma	Sun Valley, ID	W307	6	326	1.1, 4.15.4, 5.24.20, 5.27.3.3, 5.30.3.6
Dow, Barry	McCall, ID	E214	5	100	5.27.3.3, 5.30.1.6, 5.30.4.5, 5.30.4.9, 6.1.1
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Drougas, Thomas C.	Sun Valley, ID	W200	6	161	1.1, 4.3, 5.27.3.4
Drown, Lynn R. and Nola E.	Filer, ID	W382	6	460	1.1, 4.13, 6.5.5
Drown, Teresa	Ketchum, ID	E383	5	363	1.1, 4.13, 5.27.7.17, 6.5.5
Drown, Teresa	Ketchum, ID	E800	5	767	1.1, 4.13, 5.27.7.17, 6.5.5
Drown, Teresa	Ketchum, ID	T571	3	836	1.1, 4.13, 5.27.7.17, 6.5.5
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DuFosse, Bryan	Boise, ID	E249	5	163	1.1, 2.5.4, 4.15.5, 5.29.87, 5.30.4.14, 5.30.5.7, 6.1.8, 6.2
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Duncan, Larry and Jeraldine	Blackfoot, ID	W123	6	106	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
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Galindo, Luiz	Boise, ID	B248	3	269	1.1, 4.14, 4.15.5, 5.27.2, 5.27.7.4, 6.1.1, 6.3
Galindo, Valerie	Boise, ID	B245	3	266	1.1, 2.7.2, 4.2.1, 4.3, 4.13, 5.27.7.4, 5.29.63, 5.29.87, 6.1.8, 6.3, 6.5.5
Galindo, Valerie	Boise, ID	E674	5	629	1.1, 2.7.2, 4.2.1, 4.3, 4.13, 5.27.7.4, 5.29.63, 5.29.87, 6.1.8, 6.3, 6.5.5
Galpin, Amos	Sun Valley, ID	W306	6	326	1.1, 6.2
Galpin, Carol J.	Sun Valley, ID	W425	6	488	1.1, 6.2
Gardner, Kathyrn Ann	Twin Falls, ID	E784	5	751	1.1, 2.7.8, 5.24.23, 5.27.6.1, 5.27.7.16, 5.27.11.6, 5.27.16
Gardner, Kathyrn Ann	Twin Falls, ID	T578	3	844	1.1, 2.7.8, 5.24.23, 5.27.6.1, 5.27.7.16
Garman, Steven P.	Ketchum, ID	E382	5	362	1.1, 5.1.21, 5.1.30, 5.1.40, 5.29.87
Garn, Troy	Idaho Falls, ID	W626	6	698	7.53
Garvin, Chuck	Boise, ID	B114	3	202	1.1, 5.27.1.4, 5.27.6.1, 5.27.7.4, 5.27.7.16, 5.27.11.1, 5.27.11.3
Garvin, Chuck	Boise, ID	E616	5	576	1.1, 5.27.1.4, 5.27.6.1, 5.27.7.4, 5.27.7.16, 5.27.11.1, 5.27.11.3
Gauchay, Vickie	Dubois, ID	I553	3	589	1.1, 6.4.2, 6.5.5
Geery, Daniel	Shelley, ID	E099	4	806	1.1, 2.7.2, 4.10.5, 4.13, 6.3, 6.5.2, 6.5.5
Geery, Daniel	Shelley, ID	I069	3	433	1.1, 2.7.2, 4.13, 6.3, 6.5.2
Geery, Daniel	Shelley, ID	W575	6	671	7.2

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Gehrke, Craig	Boise, ID	B210	3	228	1.1, 2.1.1, 4.1, 4.9.1, 4.15.4, 5.27.2, 5.27.7.1, 5.27.10, 5.30.2.5, 6.5.2
Gehrke, Craig	Boise, ID	E630	5	594	1.1, 2.1.1, 4.1, 4.9.1, 4.15.4, 5.27.2, 5.27.7.1, 5.27.10, 5.30.1.14, 5.30.2.5, 6.2, 6.5.2
Gehrke, Pamela	Boise, ID	W292	6	317	1.1, 2.1.1, 2.3, 5.1.28, 5.12.1, 5.27.2, 6.2
Geisler, Trish		E710	5	666	1.1
Gentillon, Jill	Pocatello, ID	E112	4	816	1.1, 2.7.2, 3.3.2
Gerhart, Joann S. and Philip A.	Ketchum, ID	E448	5	417	1.1, 3.4, 5.1.21, 6.1.2
Gertschen, Christine A.	Sun Valley, ID	W293	6	318	1.1, 5.30.4.1
Gertschen, R. J.	Ketchum, ID	W358	6	442	1.1, 2.5.4, 2.10, 4.3, 5.1.36, 5.27.3.3, 5.27.10
Getusly, Karen	Boise, ID	W535	6	596	1.1, 5.1.3, 5.29.97, 5.30.5.7
Gibson, Diane P.	Ketchum, ID	E436	5	408	1.1, 2.2.7
Gibson, Glenda	Burley, ID	E459	5	425	1.1, 4.13, 5.7.13, 5.12.1, 5.30.3.1
Gibson, John E.	Ketchum, ID	E801	5	768	1.1, 4.13
Gifford, Merlin	Pocatello, ID	W193	6	157	1.1, 4.15.4
Gilchrist, Holly	Boise, ID	E707	5	664	1.1, 4.13
Gilmore, Bob	La Grande, OR	W300	6	323	1.1, 4.13, 5.29.92, 5.30.3.1
Gilmour, Bridget	Wood River Valley, ID	E300	5	229	3.3.1, 4.14, 5.10.4, 5.12.1, 5.27.2, 5.27.3.3, 6.1.9
Gilmour, Bridget	Wood River Valley, ID	T028	3	640	3.3.1, 4.14, 5.10.4, 5.12.1, 5.27.2, 5.27.3.3, 6.1.9

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Glaccum, Ellen	Ketchum, ID	T039	3	651	4.15.4, 5.12.1, 5.30.1.5, 5.30.1.6, 5.30.4.1, 5.30.4.12
Glasgow, JoAnn	Boise, ID	W513	6	574	1.1, 4.15.5, 5.12.1, 5.29.97, 6.1.9, 6.2
Glasscock, Virginia and Daniel	Picabo, ID	E434	5	406	1.1, 3.4, 5.12.1, 5.27.5.2, 5.27.7.4, 6.2, 6.5.1
Global Environmental Project Institute	Ketchum, ID	E356	5	282	See Hawkes, Judith
Global Environmental Project Institute	Ketchum, ID	T503	3	730	See Hawkes, Judith
Glover, Sandy	Boise, ID	E539	5	498	1.1, 5.29.63, 5.29.83, 5.29.87, 5.30.5.10
Glover, Sandy	Boise, ID	W078	6	79	1.1, 5.29.63, 5.29.83, 5.29.87, 5.30.5.10
Goepel, David	Pocatello, ID	E697	5	653	1.1, 2.7.2
Goepel, David	Pocatello, ID	I094	3	485	1.1, 2.7.2
Goldschmidt, Neil, Governor	Salem, OR	W628	6	699	1.1, 3.2.8, 3.5.1, 4.1, 4.6, 4.15.1, 5.9.5, 5.21.5, 5.22.3, 5.24.18, 5.26.2, 5.26.7, 5.29.1, 5.29.102, 5.29.113, 5.30.2.6, 5.30.4.14, 5.30.5.17, 5.31.5, 6.2
Goldsmith, Glen	Lava Hot Springs, ID	W549	6	605	1.1, 5.24.23, 5.27.6.1, 5.27.9.1
Gore, Jonathan	Ketchum, ID	E401	5	382	1.1, 4.15.5, 5.1.45, 5.13.15, 5.30.4.1, 6.1.12, 6.2
Graham, Carolyn	Ketchum, ID	E379	5	361	1.1, 2.7.2, 3.4, 5.27.7.17, 6.1.2, 6.3
Grant, Mary	Hailey, ID	W291	6	317	1.1, 5.29.92, 6.1.2, 6.1.9
Grayson, Ken	Ketchum, ID	W275	6	209	1.1, 5.12.1, 5.27.3.3, 5.27.6.1, 6.2
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Greater Pocatello Economic Growth Council	McCammon, ID	E521	5	482	See Conroy, Richard A.
Greater Pocatello Economic Growth Council	McCammon, ID	I019	3	344	See Conroy, Richard A.
Greater Pocatello Economic Growth Council	McCammon, ID	W038	6	55	See Conroy, Richard A.
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Greathouse, Lowell	Filer, ID	E308	5	240	1.1, 4.13, 5.1.45, 5.10.4, 5.27.6.1, 5.29.92, 5.30.3.8, 5.30.5.12
Greathouse, Lowell	Filer, ID	T030	3	641	1.1, 5.10.4, 5.27.6.1, 5.29.92, 5.30.3.8, 5.30.5.12, 6.1.2
Green, Judie	Jerome, ID	E771	5	737	1.1, 6.1.1, 6.5.5
Green, Judie	Jerome, ID	T068	3	694	1.1, 6.5.5
Green, Ron C.	Pocatello, ID	E466	5	429	1.1, 5.27.7.16, 5.27.9.2, 6.1.2
Green, Sylvia	Hailey, ID	E311	5	242	1.1, 4.13, 5.27.3.3, 6.1.2
Green, Sylvia	Hailey, ID	T034	3	646	1.1, 4.13, 5.27.3.3, 6.1.2
Greenpeace	Seattle, WA	E070	4	773	See Beard, James
Greenpeace	Seattle, WA	I049	3	396	See Beard, James
Griffin, Louis H.	Idaho Falls, ID	W539	6	599	1.1, 2.1.1, 5.27.2, 6.3
Griffith, David J. and Jacqueline	Idaho Falls, ID	W269	6	206	1.1, 3.2.2, 3.2.7, 5.27.6.1, 5.27.7.9, 5.27.9.1
Griffith, John	Ketchum, ID	W168	6	139	1.1, 4.15.4

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Guelzow, Harry L.	Idaho Falls, ID	W422	6	486	1.1, 4.2.1, 4.13, 5.27.6.11, 5.30.4.14
Guiles, Peggy	Boise, ID	B215	3	234	1.1, 4.15.5, 5.30.3.1
Guiles, Peggy	Boise, ID	E634	5	598	1.1, 4.15.4, 6.2
Gundersen, Lorraine	Nampa, ID	B105	3	190	1.1, 2.7.9, 4.15.2, 5.12.1, 5.24.27, 6.2
Gundersen, Lorraine	Nampa, ID	E610	5	571	1.1, 2.7.9, 4.15.2, 5.12.1, 5.24.27, 6.2
Gutierrez, David J.	Boise, ID	W436	6	497	2.7.10, 5.7.8, 5.24.25, 5.27.2, 5.29.95, 5.30.4.12
Hackbarth, Phil	Idaho Falls, ID	W267	6	205	1.1
Haddon, Bill D.		E517	5	476	1.1, 5.27.6.1, 5.27.11.1, 6.1.2
Haddon, Bill D.		W047	6	61	1.1, 5.27.6.1, 5.27.11.1, 6.1.2
Haddon, Bill D.		W129	6	110	1.1, 5.27.6.1, 5.27.11.1, 6.1.2
Haddon, Verlow	Boise, ID	E098	4	805	1.1, 3.4, 5.24.21, 5.24.23, 5.27.7.3, 5.27.12.6
Haddon, Verlow	Boise, ID	I068	3	432	1.1, 3.4, 5.24.21, 5.24.23, 5.27.7.3, 5.27.12.6
Hahn, Richard	Boise, ID	B094	3	175	1.1, 2.1.1, 2.13.8, 5.24.21, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.4, 5.27.12.5, 5.29.2, 6.1.2
Hahn, Richard	Boise, ID	E601	5	564	1.1, 2.1.1, 2.13.8, 5.24.21, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.4, 5.27.12.5, 5.29.2, 6.1.2
Hailey, City of	Hailey, ID	W553	6	607	See Mix, Mary Ann
Hall, Blake	Idaho Falls, ID	E086	4	788	1.1, 2.1.1, 3.3.1, 3.4, 4.9.4, 5.12.1, 5.23.23, 5.24.23,

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Hall, Blake	Idaho Falls, ID	I008	3	317	1.1, 2.1.1, 3.3.1, 3.4, 4.9.4, 5.12.1, 5.23.23, 5.24.21, 5.24.23, 5.27.6.1, 5.27.7.16, 5.27.9.1, 5.27.12.5, 5.27.13.2, 5.28.6, 5.29.41, 5.30.5.7
Hall, Dale O.	Boise, ID	B217	3	235	2.1.1, 2.5.1, 2.5.4, 3.2.2, 5.1.12, 5.13.13, 5.14.1, 5.23.22, 5.30.4.9
Hall, Dale O.	Boise, ID	E635	5	598	2.1.1, 2.5.1, 2.5.4, 3.1.3, 3.1.4, 3.2.2, 3.3.1, 5.1.12, 5.13.9, 5.14.1, 5.20.10, 5.23.22, 5.30.4.9
Hall, Dale O.	Boise, ID	W152	6	126	2.1.1, 2.5.1, 2.5.4, 3.1.3, 3.2.2, 3.3.1, 5.1.12, 5.13.9, 5.14.1, 5.20.10, 5.23.22, 5.30.4.9, 6.4.7
Hall, Dennis	Boise ID	E625	5	589	1.1, 5.27.6.1
Hall, Gary R.	Boise, ID	E705	5	663	1.1, 4.1, 5.2.10, 5.27.6.3
Hall, Patricia	Boise, ID	B055	3	100	1.1, 2.7.3, 2.7.8, 4.13, 4.15.1, 5.2.1, 5.24.27, 5.27.3.1, 5.27.3.3, 6.3, 6.5.5
Hall, Patricia	Boise, ID	E228	5	110	1.1, 2.7.2, 2.7.8, 4.13, 4.15.1, 5.2.1, 5.24.27, 5.27.3.1, 5.27.3.3, 6.3, 6.5.5
Hall, Rick	Twin Falls, ID	E313	5	245	1.1, 5.27.6.9, 6.2
Hall, Rick	Twin Falls, ID	T036	3	649	1.1, 5.27.6.9, 6.2
Hall, Susan	Ketchum, ID	W341	6	355	1.1, 5.27.3.3, 6.2
Hamilton, Curtis	Boise, ID	B219	3	237	5.30.2.5, 5.30.5.1, 5.30.5.7, 5.31.10, 6.4.3
Hamilton, Curtis	Boise, ID	E636	5	599	5.30.2.5, 5.30.5.1, 5.30.5.7, 5.31.10, 6.4.3
Hammann, Linda	Ketchum, ID	W258	6	199	1.1, 4.1, 4.15.1, 5.29.97, 5.30.3.1, 5.30.4.7, 6.3, 6.5.2

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Hammond, Waynette	Moreland, ID	E484	5	453	1.1, 4.15.4, 5.27.6.1
Hammond, Waynette	Moreland, ID	W227	6	177	1.1, 4.15.1, 5.27.6.1
Hammond, Wendy	Blackfoot, ID	E568	5	512	1.1, 4.15.4, 5.27.6.1
Hammond, Wendy	Blackfoot, ID	W028	6	47	1.1, 4.15.4, 5.27.6.1
Hanawalt, Vance	Hailey ID	T064	3	686	1.1, 2.3, 4.13, 4.14, 6.1.2
Hand, David	Idaho Falls, ID	E550	5	503	1.1, 5.27.6.1, 5.27.9.1, 5.27.12.5
Hand, David	Idaho Falls, ID	W096	6	88	1.1, 5.27.6.1, 5.27.9.1, 5.27.12.5
Haney, Carl	McCammon, ID	W197	6	159	1.1, 2.10, 3.2.7, 5.27.4.5, 5.30.5.10
Hanggi, Pat	Ketchum, ID	E407	5	386	1.1, 4.1, 5.1.32, 5.1.40, 5.30.3.1, 6.2, 6.3
Hansen, Dorothy	Boise, ID	B035	3	67	1.1, 4.2.1, 4.3, 5.27.6.10, 5.29.85, 5.30.2.5, 5.30.3.1, 6.3
Hansen, Dorothy	Boise, ID	E198	5	84	4.2.1, 4.3, 5.27.6.10, 5.29.85, 5.30.2.5, 5.30.3.1, 6.3
Hansen, Eric D.	Shelley, ID	W617	6	693	7.44
Hansen, Mary Lou and Paul B.	Tetonia, ID	W412	6	480	1.1, 4.15.5
Hansen, Virgil D.	Idaho Falls, ID	E560	5	508	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Hansen, Virgil D.	Idaho Falls, ID	W024	6	44	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Hansom, Virginia	Hailey, ID	E408	5	387	1.1, 4.13, 4.15.4, 5.27.7.17
Hanson, Clayne A.	Idaho Falls, ID	E574	5	515	1.1, 4.15.4, 5.24.23, 5.27.6.1, 5.27.12.5, 6.2, 6.4.1

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Hanson, Gertrude	Coeur d'Alene, ID	W528	6	586	2.2.10, 2.8.7, 3.2.1, 4.15.5, 5.7.12, 5.22.4, 5.24.31, 5.27.7.3, 5.29.97, 5.30.4.5
Hanson, Mark	Boise, ID	W346	6	359	1.1, 4.13, 6.2
Harbison, John W.	Blackfoot, ID	E546	5	501	1.1, 2.5.3, 4.15.4, 5.24.23, 5.27.7.3
Harbison, John W.	Blackfoot, ID	W100	6	92	1.1, 2.1.1, 2.5.3, 4.15.4, 5.24.23, 5.27.7.3
Harding, Andrew	Ketchum, ID	E344	5	270	4.15.1, 5.30.5.1, 6.2, 6.3
Harding, Andrew	Ketchum, ID	T057	3	671	1.1, 5.30.5.1, 6.3
Harding, Chris	Ketchum, ID	T055	3	669	1.1
Hardman, Patti	Hailey, ID	W169	6	140	1.1, 4.13, 4.14
Harker, Barbara	Boise, ID	B095	3	177	3.2.11, 5.13.16, 5.24.22, 5.29.65, 5.29.107
Harker, Barbara	Boise, ID	E602	5	565	1.1, 3.2.11, 5.13.16, 5.24.22, 5.29.42, 5.29.65, 5.29.107
Harker, Dan	Boise, ID	B097	3	182	1.1, 4.13, 5.13.16, 5.27.6.9, 6.2
Harker, Dan	Boise, ID	E603	5	566	1.1, 4.13, 5.27.6.9, 6.2
Harmon, J. Frank	Pocatello, ID	E279	5	212	1.1, 2.1.1, 4.9.4, 5.2.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.5, 5.30.5.7
Harmon, J. Frank	Pocatello, ID	T010	3	615	1.1, 2.1.1, 4.9.4, 5.2.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.5, 5.30.5.7
Harms, John	Boise, ID	B099	3	183	3.3.1, 5.30.3.1, 5.30.3.6, 5.30.3.8
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Harper, Marvin J.	Blackfoot, ID	W150	6	125	1.1, 4.15.4
Harrington, James A.	Blackfoot, ID	E087	4	791	1.1, 3.4, 5.2.1, 5.24.23, 5.25.3, 5.27.6.1, 5.28.2
Harris, Kenneth E. and Sarah J.	Twin Falls, ID	W390	6	464	1.1, 2.1.1, 4.13, 5.4.1, 5.12.1, 5.30.2.1, 5.30.4.12
Harrison, Lex L.	Pocatello, ID	E551	5	504	1.1, 4.15.4, 5.27.6.1
Harrison, Lex L.	Pocatello, ID	W106	6	96	1.1, 4.15.4, 5.27.6.1
Harron, John	Boise, ID	W282	6	214	1.1
Harry, Jeff	Boise, ID	B265	3	284	2.7.9
Hart, Ray	Idaho Falls, ID	E515	5	474	5.27.11.6
Hart, Ray	Idaho Falls, ID	W095	6	87	5.27.11.6
Hartline, Ralph A.	Idaho Falls, ID	W627	6	698	7.54
Hastings, Leanne	Boise, ID	E712	5	667	1.1, 3.3.1, 4.13
Hatab, Christine	Boise, ID	B240	3	259	1.1, 2.10, 4.14, 5.10.4, 5.24.27, 5.27.7.4, 5.27.7.17, 5.29.63, 6.5.5
Hatab, Christine	Boise, ID	E666	5	623	1.1, 2.10, 4.14, 5.10.4, 5.24.27, 5.27.7.3, 5.27.7.17, 5.29.92, 6.5.5
Hatch, Dawn	Pocatello, ID	W049	6	62	1.1
Hatch, R. Terry	Boise, ID	W335	6	352	1.1, 5.12.1, 5.24.23
Hauder, Larry	Boise, ID	B030	3	59	1.1, 2.7.2, 2.7.9, 4.13
Hauder, Larry	Boise, ID	E196	5	81	1.1, 2.7.9, 2.7.10, 4.13

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Hawker, Milburn, Jr.	Monteview, ID	E506	5	465	1.1, 4.1, 5.29.31, 5.30.4.14
Hawker, Milburn, Jr.	Monteview, ID	W231	6	180	1.1, 4.1, 5.29.31, 5.30.4.14
Hawkes, Judith	Ketchum, ID	E356	5	282	1.1, 2.1.1, 2.3, 2.8.2, 2.12.2, 5.1.38, 5.1.40, 5.1.45, 5.9.3, 5.24.28, 5.27.7.17, 5.29.56, 5.30.2.1, 6.1.8, 6.3
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Hawkins, James	Boise, ID	B008	3	23	5.27.6.1, 5.27.9.1
Hawkins, James	Boise, ID	E172	5	30	5.27.6.1, 5.27.9.1
Hayden, Michael	Pocatello, ID	E109	4	814	1.1, 2.7.2, 3.3.2, 4.13
Hayes, Michael A.	Hailey, ID	W149	6	125	1.1, 6.2
Hayes, Roger	Boise, ID	B214	3	232	1.1, 2.1.2, 2.3, 2.5.4, 2.7.8, 2.8.7, 4.1, 4.3, 4.15.5, 5.22.2, 6.3
Hayes, Roger	Boise, ID	E633	5	597	1.1, 2.5.4, 2.7.8, 2.8.7, 4.1.1, 5.22.4, 5.30.2.1, 6.3
Haynes, Catherine	Twin Falls, ID	T567	3	830	1.1, 2.3, 3.2.7, 4.13, 5.12.1, 5.17.2, 5.21.3, 5.27.3.3, 5.27.7.4, 5.27.11.6, 5.30.1.6, 5.30.4.9, 5.30.4.14, 6.2
Haynes, Karen and Tom	Sun Valley, ID	W290	6	316	1.1
Hayward, LaMar	Idaho Falls ID	I063	3	424	1.1, 5.24.23, 5.28.2
Hayward, Myna	Blackfoot, ID	E511	5	470	1.1, 3.2.2, 3.3.1, 5.27.10, 5.30.3.8
Hayward, Myna	Blackfoot, ID	W128	6	109	1.1, 3.2.2, 3.3.1, 5.27.10, 5.30.3.8

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Heberger, Roy	Boise, ID	B106	3	191	1.1, 2.12.1, 2.12.2, 3.2.2, 5.23.3, 5.24.27, 5.30.3.1
Heberger, Roy	Boise, ID	E611	5	572	1.1, 2.7.2, 3.2.2, 5.1.36, 5.23.3, 5.24.27, 5.27.2, 5.30.3.1, 6.3
Hedden-Nicely, Andy and Deborah	Boise, ID	W438	6	498	1.1, 6.1.9
Hedge, Anne L.	Sun Valley, ID	E342	5	267	1.1, 2.2.4, 2.2.12, 2.8.6, 3.3.1, 4.3, 4.11.1, 4.12, 4.15.2, 5.10.5, 5.12.1, 5.22.2, 5.22.4, 5.24.17, 5.27.6.1, 5.27.9.5, 5.27.10, 5.27.11.5, 5.30.1.13, 5.30.2.1, 5.30.2.5, 5.30.4.1, 6.4.4
Hedge, Anne L.	Sun Valley, ID	T053	3	667	2.2.4, 4.15.2, 5.10.5, 5.12.1, 5.30.2.1
Hedge, David	Twin Falls, ID	E310	5	242	1.1, 3.2.18, 4.2.1, 4.3, 4.7.1, 4.10.2, 4.11.1, 4.15.2, 5.1.40, 5.2.10, 5.12.1, 5.24.22, 5.26.1, 5.26.2, 5.27.2, 5.29.99, 5.30.2.1, 6.2
Hedge, David	Twin Falls, ID	T033	3	645	1.1, 2.1.1, 3.2.18, 4.1, 4.2.1, 4.7.1, 4.10.2, 4.11.1, 4.15.2, 5.1.40, 5.2.10, 5.12.1, 5.14.16, 5.24.22, 5.26.1, 5.26.2, 5.27.2, 5.27.3.3, 5.29.99, 5.30.2.1, 6.2
Hefferman, Lois	Boise, ID	W437	6	498	1.1
Heilman, June E.	Pocatello, ID	E061	4	766	1.1, 4.1, 5.10.4, 5.12.5, 5.22.2, 5.27.6.11, 6.1.1, 6.2, 6.5.5
Heilman, June E.	Pocatello, ID	E808	5	773	1.1, 4.1, 5.10.4, 5.12.5, 5.22.2, 5.27.6.11, 6.1.1, 6.2, 6.5.5
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Hendricks, Sylvia	Idaho Falls, ID	W453	6	510	1.1
Hendrickson, Brad	Idaho Falls, ID	W377	6	456	1.1, 4.1, 4.13, 5.28.6
Henna, Anita	Twin Falls, ID	E779	5	743	1.1, 4.15.5, 5.1.36, 5.12.1, 5.24.30, 5.27.6.3, 5.29.97, 6.2
Hensel, David	Victor, ID	E037	4	745	1.1, 3.2.11, 4.3, 4.13, 4.15.5, 5.27.2, 5.27.10, 5.29.45, 5.30.3.8, 5.30.4.9, 6.1.2, 6.1.7, 6.1.12, 6.3
Herbert, John W. and Geraldine A.	Ketchum, ID	W548	6	604	1.1, 4.13, 4.15.5, 5.1.21, 5.10.4, 5.12.1, 5.27.6.1, 5.30.3.1, 6.3
Herrington, Ruth	Boise, ID	W189	6	153	1.1, 5.24.30
Hesselbarth, Woody	McCall, ID	B051	3	84	1.1, 4.13, 5.1.40, 5.27.6.5, 6.1.5
Hesselbarth, Woody	McCall, ID	E209	5	97	1.1, 4.13, 5.1.40, 5.27.6.5, 6.1.5
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Heylmun, Gail	Boise, ID	E617	5	577	1.1, 3.2.1, 3.2.2, 5.3.10, 5.7.20, 5.13.9, 5.13.13, 5.24.27, 5.29.1, 5.29.73, 5.29.107, 5.29.111, 5.30.4.14, 6.2
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Higginson, K. Keith	Boise, ID	W630	6	701	5.16.3
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Hill, Beth	Pocatello, ID	W060	6	69	1.1, 5.27.11.1, 5.27.15.1, 6.1.2, 6.2
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Hill, Deloris G.	Idaho Falls, ID	W018	6	41	1.1, 4.3, 4.13
Hill, Von J.	Idaho Falls, ID	E076	4	778	1.1, 5.24.23, 5.27.6.1
Hitz, Bebe	Idaho Falls, ID	W574	6	671	7.1
Hixon, Melissa H.	Sun Valley, ID	E594	5	531	1.1, 4.15.4, 6.1.1
Hixon, Melissa H.	Sun Valley, ID	W220	6	174	1.1, 4.15.4, 6.1.1
Hoefnagels, Cees	Boise, ID	B244	3	265	1.1, 5.9.3, 5.24.5, 5.24.18, 5.30.5.12
Hoefnagels, Cees	Boise, ID	E673	5	629	1.1, 5.9.3, 5.30.5.12
Hoene, Ann	Hailey, ID	W314	6	333	1.1, 6.1.9, 6.2
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Hon, William A.	Boise, ID	W094	6	87	1.1, 5.27.6.1
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Jackson, Andrea	Boise, ID	E660	5	620	1.1, 4.2.1, 5.27.2, 5.27.7.4, 6.3, 6.5.5
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Jensen, Dwight	Pocatello, ID	E563	5	510	1.1, 5.24.22, 5.27.6.1, 5.27.11.1, 5.27.11.3
Jensen, Dwight	Pocatello, ID	W026	6	45	1.1, 5.24.22, 5.27.6.1, 5.27.11.1, 5.27.11.3
Jensen, J. Allen	Idaho Falls, ID	E094	4	799	1.1, 2.10, 3.3.1, 3.4, 5.2.1, 5.24.22, 5.27.6.1, 5.27.9.2, 5.29.32, 5.29.95
Jensen, J. Allen	Idaho Falls, ID	I062	3	422	1.1, 3.4, 5.24.22, 5.27.6.1, 5.27.9.2
Jensen, Peter and Janice	Island Park, ID	W384	6	461	1.1, 4.13, 5.7.10, 5.26.2, 5.27.3.3, 5.30.2.5, 6.3
Jergins, Colvin	Idaho Falls, ID	I081	3	451	1.1, 2.2.1, 2.2.2, 3.4, 4.9.4, 4.15.1
Jobe, Lowell A.	Rigby, ID	W557	6	657	3.3.1, 4.15.1, 5.24.23
Johnson, Al B.	Buhl, ID	T556	3	809	1.1, 6.1.1
Johnson, Joann Crane	Pocatello, ID	E134	4	833	1.1, 4.15.2, 5.27.7.17, 6.3, 6.5.5
Johnson, Karen	Pocatello, ID	E145	4	840	1.1, 5.24.30, 5.30.3.1
Johnson, Melissa	Rexburg, ID	I532	3	559	4.13
Johnston, Jeff	Boise, ID	B201	3	215	1.1, 2.2.1, 2.3, 3.4, 4.14, 6.3
Johnstone, Jim	Blackfoot, ID	E495	5	459	1.1, 4.15.4, 5.27.6.1
Johnstone, Jim	Blackfoot, ID	W083	6	81	1.1, 4.15.4, 5.27.6.1
Jolley, Bryce D.	Firth, ID	W202	6	162	1.1
Jones, Caron R.	Pocatello, ID	E139	4	837	1.1, 5.24.30, 5.30.2.1
Jones, Glenn	Boise, ID	B239	3	258	1.1, 2.2.10, 5.12.1, 5.27.2, 5.27.10, 6.1.1

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Jones, Glenn	Boise, ID	E665	5	622	1.1, 2.2.10, 5.12.1, 5.27.2, 5.27.10, 6.1.1
Jones, Jim, Attorney General	Boise, ID	B003	3	12	1.1, 2.1.1, 5.27.9.2, 5.29.97, 6.1.2
Jones, Jim, Attorney General	Boise, ID	E162	5	7	1.1, 2.1.1, 5.27.6.1, 5.27.9.2, 5.29.2, 5.29.97, 5.30.3.8, 6.1.2
Jones, Mary	Ketchum, ID	E341	5	267	1.1, 4.13, 6.1.4, 6.5.5
Jones, Mary	Filer, ID	E456	5	422	1.1, 2.7.2, 5.12.1, 5.13.5, 5.13.13, 5.27.2, 6.5.5
Jones, Mary	Ketchum, ID	T052	3	666	1.1, 4.13, 6.1.4, 6.5.5
Jones, Mary	Filer, ID	T537	3	773	1.1, 5.12.1, 5.13.5, 5.13.13, 5.27.2, 6.5.5
Jones, Mary and Steve	Garden Valley, ID	E469	5	431	1.1, 4.4.6, 4.15.5, 5.27.3.4, 5.30.1.13, 6.3
Jones, Michael R.	Boise, ID	B077	3	140	1.1, 4.1, 4.15.4, 5.10.1, 5.10.14, 5.24.26, 5.30.1.13, 6.2, 6.3
Jones, Michael R.	Boise, ID	E251	5	166	1.1, 4.1, 4.15.4, 5.2.6, 5.10.1, 5.10.14, 5.24.25, 5.30.1.13, 6.2, 6.3
Jones, Ross	Idaho Falls, ID	E040	4	747	1.1, 5.24.23, 6.2
Jones, Ross	Idaho Falls, ID	I034	3	366	1.1, 5.24.23, 6.2
Jones, Teresa	Boise, ID	B235	3	256	1.1, 3.5.1, 4.15.4, 5.27.2, 6.1.2, 6.2, 6.3
Jones, Teresa	Boise, ID	E661	5	620	1.1, 3.5.1, 4.15.4, 5.27.2, 6.1.2, 6.2, 6.3
Jones, Virgil Lee	Boise, ID	E185	5	73	1.1, 5.27.7.3
Joseph, Jill	Hagerman, ID	W332	6	350	1.1, 2.3, 3.2.1, 4.1, 4.7.1, 5.12.1, 5.12.4, 5.27.2, 5.27.10, 5.30.1.6, 6.3
Josephy, Melissa	Hailey, ID	E285	5	217	1.1, 5.27.2, 6.3

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Joslyn, Alvin W.	Meridian, ID	B208	3	224	1.1, 5.9.3, 5.12.1, 6.1.2
Joslyn, Alvin W.	Meridian, ID	E169	5	13	1.1, 5.12.1, 6.1.2
Joslyn, Alvin W.	Meridian, ID	E628	5	591	1.1, 5.12.1, 6.1.2
Juant, Dana	Blackfoot, ID	E079	4	780	1.1, 5.24.23, 5.27.6.1
Judd, Sean D.	Pocatello, ID	E138	4	836	1.1, 3.4
Jull, Paula	Pocatello, ID	E133	4	833	1.1, 4.1, 4.13, 5.2.15, 5.24.22, 6.3, 6.5.2
Jull, Paula	Pocatello, ID	I076	3	445	1.1, 4.1, 4.3, 4.13, 5.2.15, 5.24.22, 5.27.7.17, 6.3, 6.5.2
Justice, Norma K.	Meridian, ID	W181	6	148	5.27.7.17, 5.30.3.1
Kanemasu, Richard T.	Boise, ID	W137	6	117	1.1, 3.3.1, 5.27.6.1
Karban, Diane	Ketchum, ID	E337	5	264	1.1, 4.15.5, 5.27.10, 6.2, 6.3
Kassen, Melinda	Denver, CO	I009	3	320	5.29.3, 5.29.7, 5.29.13, 5.29.15, 5.29.16, 5.29.18, 5.29.19, 5.29.21, 5.29.22, 5.29.33, 5.29.36, 5.29.46, 5.29.49, 5.29.62, 5.29.81, 5.29.114
Kassen, Melinda	Boulder, CO	W559	6	658	5.24.14, 5.29.3, 5.29.7, 5.29.8, 5.29.9, 5.29.11, 5.29.15, 5.29.16, 5.29.18, 5.29.19, 5.29.21, 5.29.22, 5.29.24, 5.29.26, 5.29.29, 5.29.30, 5.29.33, 5.29.36, 5.29.38, 5.29.42, 5.29.44, 5.29.49, 5.29.50, 5.29.58, 5.29.69, 5.29.70, 5.29.81
Kassen, Melinda	Boulder, CO	W581	6	675	7.8
Kassen, Melinda	Boulder, CO	W582	6	675	7.9
Kassen, Melinda	Boulder, CO	W583	6	676	7.10
Kassen, Melinda	Boulder, CO	W619	6	694	7.46

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Kastores, Cris and Rebecca	Ketchum, ID	W551	6	606	1.1, 2.1.1, 4.10.4, 4.13, 5.27.3.3, 5.27.6.1, 5.27.7.4, 6.3
Kaufman, R. Lynn	Pocatello, ID	E141	4	838	4.13, 6.2
Kaufmann, Theresa M.	Pocatello, ID	E741	5	695	1.1, 2.1.1
Kavanagh, Ken	Boise, ID	B228	3	250	4.1, 4.2.1, 4.15.5, 5.27.6.11
Kavanaugh, Ken	Boise, ID	E657	5	618	4.1, 4.2.1, 4.15.5, 5.27.6.11
Kaye, Scott	Boise, ID	B206	3	223	2.2.11, 3.4, 5.24.27, 5.30.5.1
Kearney, John P.	Ketchum, ID	W166	6	138	1.1
Keener, Margaret	Boise, ID	B065	3	123	1.1, 2.3, 5.10.7, 6.3
Keener, Margaret	Boise, ID	E242	5	157	1.1, 2.3, 5.10.7, 6.3
Kelly, Christine M.	Logan, UT	I096	3	488	1.1, 2.3, 2.4, 2.8.7, 2.12.2, 2.12.5, 2.13.12, 3.2.19, 5.29.40
Kelly, Christine M.	Logan, UT	W460	6	520	1.1, 2.3, 2.8.7, 2.9, 2.12.2, 2.12.5, 2.13.1, 2.13.9, 2.13.12, 3.2.19, 4.1, 5.2.6, 5.30.1.13
Keltner, Wallace G.	Idaho Falls, ID	W184	6	150	1.1, 2.10, 4.15.4, 5.2.1, 5.2.11
Kemp, Dale V.	Idaho Falls, ID	W233	6	181	1.1, 2.2.15, 2.8.1, 2.10, 2.13.1, 3.2.7, 4.10.2, 4.15.4, 5.27.9.1, 5.30.4.14
Kemper, Don	Boise, ID	E668	5	625	1.1, 5.1.30, 6.1.1
Kendall, Mr. & Mrs. Vernon	Jerome, ID	W409	6	478	1.1, 3.4, 4.13, 4.15.5, 5.1.42, 5.24.27, 5.27.7.17
Kennevick, Jack, Representative	Boise, ID	B005	3	15	1.1, 5.24.23, 5.27.6.1, 5.27.11.3
Kennevick, Jack, Representative	Boise, ID	E165	5	10	1.1, 5.24.23, 5.27.6.1, 5.27.11.3

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Kent, Arlo	Twin Falls, ID	T071	3	699	1.1, 3.2.2
Keresty, Laura	Washington, DC	E333	5	260	1.1, 4.7.3, 4.9.4, 4.14, 4.15.1, 4.15.8, 5.24.27, 5.24.28, 5.27.7.2, 5.31.16
Keresty, Laura	Washington, DC	T047	3	661	1.1, 4.7.3, 4.9.4, 4.14, 4.15.5, 4.15.8, 5.10.2, 5.24.27, 5.24.28, 5.27.7.2, 5.31.16
Kerns, James E	Boise, ID	B014	3	34	1.1, 5.24.21, 5.24.23, 5.27.7.3, 5.27.11.3, 5.27.12.6
Kerns, James E	Boise, ID	E177	5	41	1.1, 5.24.21, 5.24.23, 5.27.7.3, 5.27.11.3, 5.27.12.6
Ketchum, City of	Ketchum, ID	E274	5	199	See Young, Lawrence, Mayor
Ketchum/Sun Valley Chamber of Commerce	Sun Valley, ID	W200	6	161	See Drougas, Thomas C.
Key, Doran and Chris	Ketchum, ID	W459	6	519	1.1, 5.12.1, 5.27.2, 6.3
Keyes, David	Boise, ID	B092	3	172	4.13, 5.24.30, 6.1.2
Kiebert, Kermit	Boise, ID	B010	3	26	5.7.2, 5.29.2, 5.29.69, 5.29.97
Kincannon, Linn	Sun Valley, ID	E315	5	246	4.4.6, 4.13, 4.15.4, 5.1.42, 5.27.6.11, 6.1.4
Kincannon, Linn	Sun Valley, ID	T038	3	650	4.13, 4.15.4, 5.1.42, 5.27.6.11, 6.1.4
King, Marden R.	Idaho Falls, ID	W191	6	156	2.1.1, 2.3, 4.1, 5.22.2, 5.27.2
Kinney, Family	Boise, ID	W433	6	494	1.1, 5.10.18, 5.24.18, 5.24.25, 5.29.69
Kirby, Kent	Missoula, MT	W266	6	204	1.1, 4.15.2, 4.15.4, 4.15.5, 5.1.42, 6.2
Kirgis, Gail	Boise, ID	B032	3	63	1.1, 5.27.1.4, 5.27.1.5, 5.27.2, 5.27.6.9, 5.27.6.11, 5.27.7.3, 5.27.7.4, 6.1.1
Kirgis, Gail	Boise, ID	E197	5	83	1.1, 5.27.1.5, 5.27.2, 5.27.6.9, 5.27.6.11, 5.27.7 3, 5.27.7.4, 6.1.1

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Kirkpatrick, Dorthy	Pocatello, ID	E537	5	497	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
Kirkpatrick, Dorthy	Pocatello, ID	W113	6	99	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
Kirkpatrick, John R.	Pocatello, ID	E555	5	506	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.1
Kirkpatrick, John R.	Pocatello, ID	W127	6	109	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
Kiser, Ellie	Boise, ID	E644	5	606	1.1, 4.13, 5.24.27
Kissler, L. H.	Boise, ID	E538	5	497	1.1, 6.1.2
Kissler, L. H.	Boise, ID	W114	6	100	1.1, 6.1.2
Klein, Beverly A.	Pocatello, ID	E063	4	767	1.1, 3.2.8, 4.15.2, 5.10.4, 5.30.2.1
Klein, Noah W.	Pocatello, ID	E064	4	768	1.1, 3.2.12, 3.2.23, 4.13, 5.12.1
Klingler, Ronald D. and Nita B.	Rexburg, ID	W278	6	211	1.1, 3.2.2, 3.2.7, 5.27.6.1, 5.27.7.9, 5.27.9.1
Knapp, Jon	Eagle, ID	B246	3	267	1.1, 5.27.7.2
Knapp, Jon	Eagle, ID	E675	5	630	1.1, 5.27.6.9
Knaup, George	Jerome, ID	T575	3	842	1.1, 2.8.1, 3.4, 6.3
Knight, Philip R.	Bozeman, MT	W342	6	356	1.1, 3.2.1, 4.1, 4.13, 5.6.3, 5.12.1, 5.29.87, 5.30.2.1, 5.30.3.8, 6.2
Knighton, R. B.	Firth, ID	E483	5	453	1.1, 4.15.4, 5.27.6.1
Knighton, R. B.	Firth, ID	W112	6	99	1.1, 4.15.4, 5.27.6.1
Knowles, Lois	Pocatello, ID	E115	4	817	1.1

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Kobe, Edward	Boise ID	E624	5	589	1.1, 5.27.6.1, 5.28.2
Kocheuff, Faye L.	Twin Falls, ID	E317	5	247	1.1, 4.15.4, 6.1.1
Koger, Robert	Nampa, ID	E235	5	126	1.1, 2.1.1, 4.15.4, 5.27.7.12, 5.28.2
Koplow, Ira	Idaho Falls, ID	E010A	4	233	1.1, 3.2.2, 3.3.1, 4.7.1, 5.24.23, 5.27.6.1, 5.27.7.9, 5.27.11.3, 5.27.12.4, 5.27.12.8, 6.1.1, 6.1.2
Koplow, Ira	Idaho Falls, ID	I010	3	324	1.1, 3.2.2, 3.3.1, 4.7.1, 5.24.23, 5.27.6.2, 5.27.7.9, 5.27.11.3, 5.27.12.4, 5.27.12.8, 6.1.1, 6.1.2
Kraal, Debi	Twin Falls, ID	W262	6	202	1.1, 4.13, 5.24.30
Kraal, Kevin	Twin Falls, ID	W263	6	202	1.1, 4.15.4, 5.13.14, 5.24.27, 6.3
Kreider, C. Fuji	LaGrande, OR	B058	3	111	1.1, 2.13.7, 5.7.6, 5.7.8, 5.29.6, 5.29.45, 5.29.66, 5.29.71, 5.29.81, 6.2
Kreider, C. Fuji	LaGrande, OR	E236	5	127	1.1, 2.2.6, 2.13.7, 3.2.1, 3.2.2, 3.3.2, 3.5.1, 4.1, 4.3, 4.9.3, 4.13, 4.14, 4.15.5, 5.1.41, 5.7.1, 5.7.6, 5.7.8, 5.7.10, 5.12.1, 5.13.17, 5.24.22, 5.24.27, 5.24.31, 5.26.2, 5.27.2, 5.27.6.1, 5.29.6, 5.29.23, 5.29.27, 5.29.42, 5.29.55, 5.29.60, 5.29.61, 5.29.63, 5.29.64, 5.29.66, 5.29.71, 5.29.74, 5.29.81, 5.29.85, 5.29.87, 5.29.90, 5.29.91, 5.29.95, 5.29.97, 5.29.101, 5.29.106, 5.30.1.2, 5.30.1.11, 5.30.3.1, 5.30.4.14, 6.1.1, 6.1.2, 6.2, 6.3, 6.5.2, 6.5.5
Kreilkamp, Korrine	Buhl, ID	E804	5	770	1.1
Kreilkamp, Korrine	Buhl, ID	T577	3	844	1.1
Kriz, John	Boise, ID	B218	3	236	1.1
Kruskopf, Mark	Boise, ID	B222	3	240	5.27.6.9, 6.2
Kruskopf, Mark	Boise, ID	E669	5	626	5.27.6.9, 5.27.7.17

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Kunz, Sam	Moreland, ID	E149	4	857	1.1, 2.7.10, 4.5, 5.27.6.1, 5.27.7.11, 5.27.7.16, 5.27.9.4, 5.27.9.6, 5.27.11.6, 5.27.12.8, 5.27.15.1, 5.30.2.1, 5.30.3.8, 5.30.5.7
Kunz, Sam	Moreland, ID	I083	3	455	1.1, 5.27.6.1, 5.27.7.11, 5.27.7.16, 5.27.9.4, 5.27.9.6, 5.27.11.6, 5.27.12.8, 5.27.15.1, 5.30.2.1, 5.30.3.8, 5.30.5.7
Kunz, Thayne	Moreland, ID	I552	3	587	1.1, 5.27.4.5, 5.27.7.7
Kvanvig, Russell G.	Twin Falls, ID	W206	6	164	1.1, 3.2.2, 5.27.6.1
Labor International Local 155	Idaho Falls, ID	E084	4	786	See Larsen, Donn
Labor International Local 155	Idaho Falls, ID	I055	3	409	See Larsen, Donn
Lafey, Kevin	Hailey, ID	E292	5	223	1.1, 2.7.2, 4.13, 6.3
Lafey, Kevin	Hailey, ID	T020	3	628	1.1, 2.7.2, 4.13, 6.3
Lagergren, Ginna	Hailey, ID	E374	5	358	2.2.4, 3.2.11, 5.1.21, 5.7.1, 5.7.15, 5.22.2, 5.24.18, 5.27.6.2, 5.27.7.3, 5.27.7.4, 5.27.10, 5.30.2.1, 5.30.4.9, 6.5.1
Lagergren, Ken	Hailey, ID	E369	5	355	1.1, 3.3.1, 5.27.7.17, 5.29.87, 5.30.4.7, 5.30.5.12
Lagergren, Ken	Hailey, ID	T513	3	747	1.1, 3.3.1, 5.27.7.17, 5.29.87, 5.30.4.7, 5.30.5.12
Lamet, Carol	Boise, ID	W440	6	499	1.1, 3.2.1, 3.2.9, 3.2.25, 4.10.2, 4.14, 5.10.5, 5.12.1, 5.13.6, 5.22.6, 5.27.7.17, 5.29.95, 5.30.1.14, 5.30.2.6, 5.30.3.1, 5.30.4.9, 5.30.4.14, 5.30.5.7, 6.1.1, 6.3
Landon, Janice L.	Idaho Falls, ID	E409	5	388	1.1, 2.1.1, 2.8.2, 3.2.2, 4.1, 4.9.4, 5.19.4, 5.31.11

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Lane, Robert J.	Boise, ID	E588	5	528	1.1, 5.27.6.1
Lane, Robert J.	Boise, ID	W216	6	171	1.1, 5.27.6.1
Langenstein, Stephen J. and Annette	Shoshone, ID	W313	6	332	1.1, 2.3, 2.7.2, 2.7.9, 3.4, 4.7.3, 4.12, 4.13, 5.30.1.5, 5.30.3.1, 5.30.3.8, 6.1.4, 6.3
Langer, S.	Idaho Falls, ID	W618	6	693	7.45
Langer, Sidney	Idaho Falls, ID	E091	4	796	1.1, 4.1, 5.28.6
Langer, Sidney	Idaho Falls, ID	I059	3	418	1.1, 4.1, 4.11.3, 5.28.2, 5.28.6
Langworthy, Helen	Boise, ID	W420	6	484	1.1, 5.27.6.11, 6.3
Lapioli, Max	Rigby, ID	E745	5	699	1.1, 2.2.1, 2.2.10, 3.4, 5.24.23, 5.24.30, 5.27.12.4, 5.29.32, 6.1.2
Lapioli, Max	Rigby, ID	I527	3	552	1.1, 2.2.1, 2.2.10, 3.4, 5.24.23, 5.24.30, 5.27.12.4, 5.29.32, 6.1.2
Larkey, Charles	Ketchum, ID	E406	5	386	1.1, 4.9.4, 4.15.5, 5.1.21, 5.12.1, 5.27.1.11, 6.2
Larsen, Donn	Idaho Falls, ID	E084	4	786	1.1, 3.2.2, 5.24.23, 5.27.7.3, 5.27.9.2, 5.27.11.3
Larsen, Donn	Idaho Falls, ID	I055	3	409	1.1, 3.2.2, 5.24.23, 5.27.7.3, 5.27.9.2, 5.27.11.3
Larsen, Sandi Skott	Mtn. Home, ID	E272	5	196	6.1.2, 6.2, 6.3, 6.5.3
Laverty, Denise	Salmon, ID	E312	5	243	1.1, 2.1.1, 4.3, 4.10.2, 4.14, 5.12.1, 5.27.2, 5.27.6.11, 5.27.7.17, 5.27.10, 5.29.87, 5.30.2.1, 5.30.3.1, 5.30.4.14, 6.1.2
Laverty, Denise	Salmon, ID	T035	3	647	1.1, 2.1.1, 4.3, 4.14, 5.27.7.17, 5.30.3.1, 5.30.4.14, 6.1.2

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Laverty, Kent	Hailey, ID	T523	3	757	1.1, 3.3.1, 5.10.2, 5.23.19, 5.27.7.17, 5.28.8, 5.29.68, 5.30.2.5, 5.30.3.6, 5.30.5.8, 6.1.9
Lawroski, Harry	Idaho Falls, ID	W560	6	662	1.1, 2.7.2, 3.4, 5.28.6, 5.28.7
Leavitt, Kim H.	Blackfoot, ID	W145	6	123	1.1, 4.15.4
Lee, Randolph D.	Boise, ID	W254	6	196	1.1, 5.12.1, 5.24.12, 5.24.22, 5.24.27
Leeson, Jane	Boise, ID	B096	3	179	1.1, 2.2.5, 2.4, 2.6.2, 2.13.9, 3.2.2, 5.1.21, 5.10.5, 5.10.17, 5.12.1, 5.24.18, 5.29.2, 5.29.20, 5.29.31, 5.30.3.1, 6.1.1, 6.1.4, 6.3
Leeson, Jane	Boise, ID	W296	6	319	1.1, 2.2.5, 2.3, 2.4, 2.6.3, 2.13.9, 3.2.2, 4.14, 5.1.21, 5.10.5, 5.10.17, 5.12.1, 5.24.18, 5.29.2, 5.29.31, 5.30.3.1, 6.1.1, 6.3
Lehr, Eugene L.	Washington, DC	W004	6	4	Acknowledgement Receipt
Leim, Bruce, Dr.	Hailey, ID	E443	5	412	1.1, 2.7.2, 4.1, 4.15.4, 5.20.1, 5.29.37, 5.30.1.2, 5.30.1.13, 6.3
Leir, Kermit	Twin Falls, ID	E182	5	71	1.1, 3.3.2, 3.4, 5.24.21, 5.27.7.4, 5.27.7.16, 5.27.9.1, 5.27.12.5
Leisk, Alan	Boise, ID	B082	3	149	1.1, 5.24.23, 5.27.12.2, 5.27.12.6
Leisk, Alan	Boise, ID	E257	5	174	1.1, 5.24.23, 5.27.11.2, 5.27.12.5
Lempke, Chris	Idaho Falls, ID	E730	5	684	1.1, 3.4, 5.27.6.1
Lenkner, Charles A.	Twin Falls, ID	E782	5	749	1.1, 2.7.2, 3.2.2, 4.14, 5.1.36, 5.2.7, 5.12.1, 5.24.30, 5.30.3.1, 5.30.3.6

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Leonardson, Evelyn K.	Idaho Falls, ID	W030	6	49	1.1, 5.6.9, 5.10.4, 5.12.1, 5.13.13
Letter Deleted, Interoffice Memorandum	Albuquerque, NM	W572	6	669	Interoffice Memorandum
Letters, Submitted by Margo Proksa	Pocatello, ID	E147	4	841	1.1, 2.1.1, 2.7.2, 2.7.8, 3.3.1, 3.4, 4.2.1, 4.3, 4.13, 4.15.1, 4.15.2, 4.15.3, 5.2.1, 5.2.9, 5.2.15, 5.7.10, 5.12.1, 5.27.1.12, 5.24.31, 5.27.1.1, 5.27.1.11, 5.27.3.3, 5.27.5.3, 5.27.6.10, 5.27.7.4, 5.27.8, 5.27.9.1, 5.27.10, 5.29.5, 5.29.60, 5.29.87, 5.29.95, 5.30.1.11, 5.30.2.5, 5.30.3.1, 5.30.3.8, 5.30.4.14, 6.1.1, 6.1.4, 6.2, 6.3, 6.4.2, 6.5.2
Lever, Thane	Ketchum, ID	E293	5	223	1.1, 5.24.30, 5.27.2, 5.30.4.7, 6.2
Lever, Thane	Ketchum, ID	T021	3	629	1.1, 5.24.30, 5.27.2, 5.30.4.7, 6.2
Levinskas, David	Pocatello, ID	E330	5	258	2.1.1, 5.29.6
Lewis, Suzanne	Boise, ID	B039	3	72	2.7.2, 5.10.7, 5.12.1, 5.30.4.1, 5.30.4.5, 6.2, 6.3, 6.4.3
Lewis, Suzanne	Boise, ID	E201	5	86	1.1, 2.7.2, 2.7.2, 5.10.7, 5.30.4.1, 6.2, 6.3, 6.4.3
Lichtenstein, Peter M.	Boise, ID	W283	6	214	1.1, 5.27.1.3, 5.27.1.5, 5.27.6.11, 6.3, 6.3
Liebenthal, Deanah	Boise, ID	B049	3	83	1.1, 4.13, 4.14
Liebenthal, Jack	Idaho Falls, ID	E083	4	785	1.1, 5.24.23, 5.27.9.2, 5.28.2
Liebenthal, Jack	Idaho Falls, ID	I054	3	408	1.1, 5.24.23, 5.27.9.2, 5.28.2
Lieder, Ruth, Mayor	Sun Valley, ID	E273	5	197	1.1, 5.27.3.3, 5.27.3.4, 5.27.5.1
Lieder, Ruth, Mayor	Sun Valley, ID	T001	3	599	1.1, 5.27.3.3, 5.27.5.1
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Lipovac, Peter A.	Blackfoot, ID	W337	6	353	2.7.2, 4.1, 5.30.1.13
Lish, Alan	McCammon, ID	E074	4	777	1.1, 5.27.6.1, 5.27.7.3
Livermore, Stacy Pell	La Grande, OR	W457	6	517	1.1, 4.15.5, 5.29.60
Lodahl, Claire S.	Hailey, ID	W434	6	496	1.1, 5.9.3, 5.12.1, 6.3
Loft, Andrea	Boise ID	B074	3	135	1.1, 4.7.2, 4.7.3, 5.10.5, 5.27.10, 5.29.41, 5.29.63, 5.29.66, 5.29.87, 6.3
Londer, Brenda Larsen	Twin Falls, ID	E282	5	215	1.1
Long, Darrell G.	Shelley, ID	E327	5	255	5.27.9.1
Lords, Arvin	Rigby, ID	W252	6	195	1.1, 4.15.4, 5.27.6.1
Lowe, William B.	Ketchum, ID	W472	6	542	4.13, 5.12.1, 5.27.3.3, 5.30.3.1, 5.30.4.5, 5.30.4.14, 5.30.5.1, 6.2, 6.3
Lowry, John M.	Pocatello, ID	W442	6	502	1.1, 4.7.1, 4.13, 5.30.2.1, 6.1.1, 6.2
Lucchesi, Marsha and Robert	Boise, ID	E167	5	12	1.1, 4.14, 4.15.2, 6.1.2
Lucere, Judd	Sun Valley, ID	E347	5	272	1.1, 4.15.1, 5.1.42, 6.1.9, 6.2
Lufkin, Elise	Ketchum, ID	E334	5	263	1.1, 3.2.7, 4.3, 4.13, 5.1.1, 5.27.10
Lufkin, Elise	Ketchum, ID	T048	3	662	1.1, 3.2.7, 4.3, 4.13, 4.15.2, 5.1.1, 5.27.3.4, 5.27.7.2, 5.27.10
Luke, Marie	Boise, ID	E684	5	641	1.1, 5.1.1, 5.24.30

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Lundquist, Nathan	Boise, ID	E682	5	639	1.1, 3.2.13, 4.13, 5.1.46, 5.29.97
Luntey, Robert S.	Buhl, ID	W526	6	585	1.1, 4.15.5, 5.12.1, 5.27.7.2, 6.3
Luras, Alaina	Pocatello, ID	W183	6	149	1.1, 5.27.7.16, 5.27.11.1, 6.1.2
Lutz, Anthony D.	Ketchum, ID	W432	6	494	1.1, 2.1.1, 4.15.5, 5.10.1, 5.24.7, 5.29.33, 5.30.3.8
MacMurran, Donald	Twin Falls, ID	T550	3	801	2.12.2, 5.29.94, 6.1.1, 6.1.9
Macdonald-Steward, Margaret	Twin Falls, ID	E480	5	450	1.1, 4.1, 5.22.3
Macdonald-Steward, Margaret	Twin Falls, ID	T544	3	785	1.1, 2.2.17, 4.1, 5.22.3
Machacek, Cheryl	Buhl, ID	E320	5	249	1.1, 4.14, 5.12.1, 5.29.64, 5.30.3.8, 6.2
Machacek, Naedene	Buhl, ID	E321	5	250	1.1, 5.1.42
Magic Valley Peace Project	Twin Falls, ID	T009	3	613	See Massoth, Nick
Mahr, Monica	Sun Valley, ID	E302	5	230	1.1, 2.1.1, 2.2.10, 2.12.5, 3.2.15, 4.3, 4.11.1, 4.14, 5.1.1, 5.22.2, 5.26.2, 5.27.1.11, 5.27.2, 5.27.3.3, 5.27.3.4, 5.27.10, 5.28.2, 5.30.1.14, 5.30.2.5, 5.30.4.7
Mahr, Monica	Sun Valley, ID	T016	3	623	1.1, 2.12.5, 3.2.15, 4.11.1, 4.14, 5.1.1, 5.24.22, 5.26.2, 5.27.3.3, 5.30.1.14, 5.30.2.5, 5.30.4.7, 6.2
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Mallory, Bill and Rose	Hailey, ID	E286	5	217	1.1, 6.2
Manata, Susan F.	Santa Barbra CA	W631	6	702	1.1, 5.24.31, 6.2
Manheim, Bruce S.	Sun Valley, ID	E416	5	393	1.1, 3.4, 5.2.1, 5.9.1, 5.24.30, 5.27.3.4, 5.27.6.9, 5.27.10

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Marchbanks, Brent	Boise, ID	W616	6	692	7.43
Marshall, Glen	Pocatello, ID	W380	6	458	1.1
Marshall, Quay	Hailey, ID	E361	5	350	4.14, 4.15.1, 5.24.27, 5.24.30, 5.30.3.8
Marshall, Quay	Hailey, ID	T508	3	740	4.14, 4.15.1, 5.24.27, 5.24.30, 5.30.3.8
Martin, Linda S.	Idaho Falls, ID	E095	4	801	1.1, 3.3.1, 4.1, 5.27.5.2, 5.30.4.3, 6.5.2
Martin, Linda S.	Idaho Falls, ID	I064	3	425	1.1, 3.3.1, 4.1, 5.27.5.2, 5.30.4.3, 6.5.2
Martin, William K.	Idaho Falls, ID	W507	6	570	1.1, 4.9.4, 5.28.7
Marvel, Jonathan	Hailey, ID	E325	5	253	1.1, 4.3, 4.13, 4.15.4, 5.12.2, 5.30.3.1, 6.1.8, 6.3, 6.5.1
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Massoth, Harry	Buhl, ID	E373	5	357	1.1, 2.7.2, 4.3, 4.7.1, 4.15.2, 5.27.10, 6.2
Massoth, Nick	Twin Falls, ID	T009	3	613	1.1, 5.27.2, 6.1.2, 6.1.8
Masterson, Mrs. Torhild	LaGrande, OR	W299	6	322	1.1, 4.13, 5.29.103
Mathias, Matthew C.	Boise, ID	E183	5	72	1.1, 2.1.1, 4.9.4, 5.27.6.1, 6.2
Mattell, Walt	Idaho City, ID	B033	3	65	1.1, 3.6.1, 5.27.2, 5.27.4.4, 5.27.7.17, 6.3
Matthews, Paul W.	Burley, ID	W552	6	607	5.24.23, 5.24.30, 5.27.6.1, 5.27.9.1, 6.2
Matzek, Betty	Eagle, ID	B242	3	263	1.1, 2.11.5, 5.30.2.5
Matzek, Betty	Eagle, ID	E671	5	627	1.1, 2.1.1, 2.11.5, 4.3, 5.2.10, 5.30.2.5, 5.30.3.1

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Mayor of Ketchum	Ketchum, ID	T002	3	601	See Young, Lawrence, Mayor
Maytag, Marquita M.	Driggs, ID	W179	6	146	1.1, 4.15.4, 5.13.19, 5.30.3.4, 6.3
McAllister, Judy	Twin Falls, ID	E781	5	745	1.1, 2.7.2, 3.2.2, 4.3, 4.7.3, 4.15.2, 5.4.1, 5.9.3, 5.12.1, 5.21.3, 5.24.13, 5.24.14, 5.24.25, 5.27.7.17, 5.30.2.5, 5.30.3.1, 5.30.4.9, 5.30.5.7, 6.5.5
McAllister, Judy	Twin Falls, ID	T083	3	714	1.1, 3.2.2, 5.4.1, 5.9.3, 5.12.1, 5.21.3, 5.24.13, 5.24.14, 5.24.25, 5.30.3.1, 5.30.4.9, 6.5.5
McCall, J. Karen	Hailey, ID	W371	6	452	1.1, 4.7.3, 5.9.3, 5.10.1, 5.12.1, 5.27.3.3, 5.29.87, 6.1.1, 6.2, 6.5.5
McCann, Anita	Twin Falls, ID	T008	3	611	1.1, 2.7.8, 2.7.11, 5.13.14, 5.24.30, 5.27.6.7, 5.27.7.17, 6.3
McCann, Michael	Twin Falls, ID	T029	3	641	4.2.1
McCarthy, Kent and Barbara	Hailey, ID	W525	6	585	1.1, 4.15.4, 6.1.2, 6.3
McCarthy, Michael	Boise, ID	T085	3	717	1.1, 3.3.1, 4.1, 5.24.30, 5.27.6.1, 5.27.6.10, 5.27.10, 5.29.97
McCarty, Willy	Twin Falls, ID	T516	3	750	1.1, 2.3
McClaran, Connie	McCall, ID	E223	5	106	1.1, 2.7.8, 4.15.5, 5.30.3.1, 6.5.1, 6.5.5
McClaran, Don	McCall, ID	B046	3	81	1.1, 4.15.2, 6.2
McClaran, Don	McCall, ID	E226	5	108	1.1, 4.15.2, 6.2
McClure, James, Senator	Washington DC	B001	3	8	1.1, 2.12.5, 4.15.4, 5.12.1, 5.24.23, 5.24.30, 5.27.6.1

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McCollum, Lyn	Boise, ID	B091	3	171	1.1, 4.2.1, 5.24.18, 5.27.6.9, 5.27.6.11, 5.30.2.1, 5.30.4.14, 6.3
McCollum, Lyn	Boise, ID	E599	5	562	1.1, 4.2.1, 5.24.18, 5.27.6.9, 5.27.6.11, 5.30.2.1, 5.30.4.14, 6.3
McConnell, Larry M.	Ketchum, ID	W376	6	456	4.14, 5.1.42, 5.10.7, 6.1.2, 6.3
McDorman, Bill	Twin Falls, ID	T014	3	620	5.24.27, 5.30.3.1, 6.2, 6.5.5
McElhinney, Gwynne	Boise, ID	B056	3	103	1.1, 2.7.2, 3.2.4, 3.3.1, 4.13, 4.15.1, 5.12.1, 5.13.13, 5.27.3.1, 5.27.5.3, 5.27.6.9, 5.27.9.4, 5.27.10, 5.27.11.1, 5.29.80, 5.29.104, 5.30.1.4, 5.30.2.5, 6.1.2, 6.5.5
McElhinney, Gwynne	Boise, ID	E229	5	112	1.1, 2.7.2, 3.2.4, 3.3.1, 4.13, 4.15.1, 5.12.1, 5.13.13, 5.27.3.1, 5.27.5.3, 5.27.6.9, 5.27.9.4, 5.27.10, 5.27.11.1, 5.29.80, 5.29.104, 5.30.1.4, 5.30.2.5, 6.1.2, 6.5.5
McGary, Janet	Pocatello, ID	E113	4	816	1.1
McGee, Dr. K. C.	Pocatello, ID	E493	5	458	1.1, 4.15.4, 5.27.6.1
McGee, Dr. K. C.	Pocatello, ID	W105	6	95	1.1, 4.15.4, 5.27.6.1
McGee, Karen	Pocatello, ID	E494	5	458	1.1, 4.15.4, 5.27.6.1
McGee, Karen	Pocatello, ID	W104	6	95	1.1, 4.15.4, 5.27.6.1
McGinley, Kathleen	Bellevue, ID	E326	5	254	4.13, 4.15.5, 6.1.1, 6.2, 6.3
McGinley, Kathleen	Bellevue, ID	T059	3	673	1.1, 4.13, 4.15.5, 6.1.1, 6.3
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McGlinsky, Alfred M.	Boise, ID	E259	5	185	1.1, 2.1.2, 2.3, 3.3.1, 5.2.7, 5.27.7.17, 6.3
McGrew, John and Jane	Hailey, ID	E642	5	605	1.1
McGrew, John and Jane	Hailey, ID	W205	6	163	1.1
McHugh, John W.	Coeur d'Alene, ID	E543	5	500	1.1, 5.27.6.1
McHugh, John W.	Coeur d'Alene, ID	W082	6	81	1.1, 5.27.6.1
McKim, Chris	Pocatello, ID	E754	5	710	1.1, 2.1.1, 2.8.3, 3.2.1, 3.2.4, 4.15.1, 5.1.21, 5.2.7, 5.10.1, 5.10.2, 5.10.3, 5.10.8, 5.10.17, 5.12.1, 5.24.25, 5.30.2.1, 6.1.8
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McKinley, Ted	Arco, ID	I020	3	347	5.14.2, 5.20.4, 5.24.23, 5.30.5.15, 6.5.4
McLain, Elaine	Bellevue, ID	E297	5	228	1.1, 2.7.2
McLain, Elaine	Bellevue, ID	T026	3	637	2.7.2, 6.3
McLain, Fred	Blackfoot, ID	E030	4	739	1.1, 2.2.15, 3.4, 5.27.4.5, 5.27.7.16, 5.27.9.1, 5.28.2
McLaine, Fred	Blackfoot, ID	I025	3	355	1.1, 3.4, 5.27.4.5, 5.27.7.16, 5.27.9.1, 5.28.2
McLaughlin, Robert A.	Pocatello, ID	W012	6	37	1.1, 5.27.11.1
McLuskie, Ed	Boise, ID	B025	3	53	2.7.1, 2.7.8, 3.4, 5.27.7.4, 5.29.111, 6.2
McMahan, Jeff	Ketchum, ID	T063	3	677	1.1, 4.13, 4.14, 5.1.42, 5.27.2, 5.27.7.9, 5.30.3.1, 6.1.2, 6.3

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McMurtrie, Mary	Eagle, ID	B038	3	70	Poem
McMurtrie, Mary	Eagle, ID	E200	5	85	Poem
McNamar, Laurie	Pocatello, ID	E140	4	837	1.1, 5.24.30, 6.2
McNamara, Debby	Ketchum, ID	W405	6	473	1.1, 2.1.1, 5.12.1, 5.24.27
McNevin, Anne E.	Jerome, ID	E778	5	742	1.1, 2.1.6, 2.7.3, 3.2.18, 4.1, 4.13, 5.17.2, 5.27.3.4, 5.27.6.3, 5.27.6.9, 5.27.7.4, 5.29.85, 5.30.1.14, 6.1.8
McNevin, Anne E.	Jerome, ID	T080	3	710	1.1, 2.1.1, 2.7.3, 2.8.5, 3.2.2, 3.2.18, 5.17.2, 5.27.3.4, 5.27.6.3, 5.27.6.9, 5.27.7.4, 5.29.85, 5.30.1.14, 6.1.8
McNevin, Tony E.	Jerome, ID	E359	5	286	1.1, 2.7.2, 4.13, 5.27.7.1
McNevin, Tony E.	Jerome, ID	T505	3	736	1.1, 2.7.2, 4.13, 5.27.7.1
Medes, Elizabeth	Boise, ID	W239	6	187	1.1, 4.14, 6.2
Meierotto, Larry E.	Boise, ID	W350	6	395	2.1.1, 2.11.4, 5.1.8, 5.8.13, 5.13.3, 5.13.4, 5.20.1, 5.20.5, 5.20.7, 5.23.10, 5.23.21, 5.23.22, 5.27.4.1, 5.30.1.25, 5.31.20
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Meis, Richard R.	Bozeman, MT	W441	6	501	1.1, 2.7.2, 2.7.8, 2.8.6, 2.8.9, 2.13.16, 3.3.2, 3.4, 4.8.1, 5.1.36, 5.6.3, 5.12.1, 5.27.10, 5.29.45, 5.29.93, 5.30.2.1, 5.30.4.9, 5.30.4.14
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Merrill, Liz	Boise, ID	B216	3	234	1.1, 6.5.12
Merrill, Scott D.	Boise, ID	E649	5	609	2.7.1, 4.12, 4.15.5, 5.12.1, 5.29.49, 6.1.2
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Meyer, Richard S.	Sun Valley, ID	E368	5	354	4.13
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Mikesell, Dana	Twin Falls, ID	T545	3	787	1.1, 6.5.5
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O'Brien, Kathy	Pocatello, ID	W033	6	52	1.1, 3.2.1, 4.3, 4.13, 5.22.6, 5.27.3.3, 5.27.6.1, 5.30.2.1, 5.30.2.5, 6.2
O'Connor, John C.	Buhl, IO	E376	5	359	1.1, 5.1.21, 6.2
O'Connor, K. J.	Buhl, ID	E375	5	359	1.1, 3.4, 5.12.1, 5.27.6.2, 5.27.7.2, 5.29.87
O'Crowley, Janet	Picabo, IO	E357	5	284	2.1.1, 4.1, 5.27.6.11, 5.30.3.1, 5.30.4.14, 5.30.5.1, 6.2, 6.3
O'Crowley, Janet	Picabo, IO	T504	3	733	2.1.1, 4.1, 5.30.3.1, 5.30.4.14, 6.2, 6.3
Oakes, Philip	Idaho Falls, ID	E751	5	706	1.1, 4.15.4, 5.1.30, 5.24.23, 5.27.6.1, 5.27.11.1, 5.30.5.7
Odmark, Jean	McCall, ID	B050	3	84	1.1, 4.3, 5.27.3.3, 5.27.6.9, 5.27.6.11
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Ofte, Don	Idaho Falls, ID	W005	6	4	DOE ID Distr. Letter
Oil, Chemical and Atomic Workers Local	Shelley, ID	E082	4	784	See Allen, Duane
Oil, Chemical and Atomic Workers Local	Shelley, ID	I053	3	407	See Allen, Duane
Olsen, Cheryl	Pocatello, IO	I537	3	567	3.2.23, 3.4, 5.13.13
Olsen, James Keith	Pocatello, ID	I539	3	571	1.1, 2.2.9, 3.5.1, 4.6, 4.15.2, 5.13.4, 5.13.9, 5.13.10, 5.13.12, 5.23.7

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Olson, Michael R.	Boise, ID	W580	6	674	7.7
Oregon, State of	Salem, OR	W628	6	699	See Goldschmidt, Neil, Governor
Orr, Michael C.	Boise, ID	B255	3	276	1.1, 2.1.1, 2.3, 2.11.2, 3.2.16, 3.2.18, 4.1, 4.10.5, 4.13, 5.1.21, 5.24.27, 5.29.1, 5.30.2.1
Orr, Michael C.	Boise, ID	W533	6	594	1.1, 2.1.1, 2.3, 2.11.2, 3.2.16, 3.2.18, 4.1, 4.10.5, 4.13, 5.1.21, 5.24.27, 5.29.1
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Osborne, Morris	Idaho Falls, ID	W107	6	96	1.1, 4.15.4, 5.27.6.1
Ostermiller, Daniel	McCall, ID	E222	5	104	1.1, 3.2.8, 4.1, 4.13, 5.24.30, 5.27.3.3, 5.27.6.9, 5.27.11.1, 5.30.3.1, 5.30.4.7, 6.2
Ostermiller, Lisa	McCall, ID	B034	3	66	1.1, 5.27.3.3, 5.29.63, 5.30.3.1, 6.2
Ostermiller, Lisa	McCall, ID	E224	5	107	1.1, 2.1.1, 4.14, 4.15.5, 5.12.1, 5.12.7, 5.27.3.3, 6.1.8
Ostrogorsky, Helen	Boise ID	E252	5	168	1.1, 3.4, 4.7.3, 5.1.42, 5.10.7, 5.24.30, 5.28.8, 5.30.1.4
Ovard, R. Jim	Idaho Falls, ID	W238	6	187	1.1, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.1
Pace, Charles	Blackfoot, ID	T562	3	817	2.1.1, 2.1.4, 2.13.19, 5.27.14.1, 5.27.14.3, 5.29.82, 6.4.6
Packham, Dean A.	Blackfoot, ID	E496	5	459	1.1, 5.27.6.1, 5.27.11.1, 6.2
Packham, Dean A.	Blackfoot, ID	W068	6	73	1.1, 5.27.6.1, 5.27.11.1, 6.2
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Paige, Bernice E.	Sun Valley, ID	W17B	6	145	1.1, 2.13.8, 3.2.2, 5.2.11, 5.24.23, 5.27.9.2, 5.28.6
Paige, David M.	Sun Valley, ID	W359	6	443	1.1, 5.2.1, 5.24.23, 5.28.6
Palmer, Carol	Bellevue, ID	E769	5	734	1.1, 2.7.2, 5.30.1.13, 6.1.2
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Parker, Sharon, Jack, Jill, and Sam	Bellevue, ID	W198	6	160	1.1, 2.6.1, 5.1.42, 6.1.2
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Paschall, Liza	Sun Valley, ID	E405	5	385	1.1, 2.7.2, 5.12.1, 5.30.3.1
Patchin, Mrs. Colin	Coeur d'Alene, ID	W428	6	491	1.1, 3.2.8, 4.9.4, 4.14, 5.30.3.1, 6.3
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Patterson, Paul	Idaho Falls, ID	W330	6	347	1.1, 4.13, 5.12.1, 5.27.3.3, 5.27.8, 5.27.11.6, 6.2, 6.3
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Paul, Elizabeth	Ketchum, ID	I510	3	523	1.1, 4.1, 4.3, 4.4.6, 4.7.1, 4.8.1, 4.9.1, 4.15.1
Paul, Elizabeth	Ketchum, ID	T502	3	727	1.1, 2.1.6, 2.2.17, 2.3, 2.8.3, 2.8.9, 2.8.10, 2.8.12, 2.8.13, 3.2.2, 4.2.2, 4.7.3, 4.15.1, 5.22.2, 5.22.3, 5.22.6, 5.27.7.17, 5.31.16, 6.3
Paul, Elizabeth	Ketchum, ID	T581	3	848	1.1, 4.1, 6.1.1, 6.2, 6.5.5
Paul, Elizabeth	Ketchum, ID	W007	6	6	2.8.8, 2.9, 2.13.18
Paul, Taul	Ketchum, ID	E482	5	451	1.1, 2.3, 4.1, 4.2.1, 4.6, 4.14, 6.3
Paul, Taul	Ketchum, ID	T548	3	790	1.1, 2.3, 4.1, 4.2.1, 4.6, 4.11.2, 4.14, 6.3
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	Idaho Falls, ID	E052	4			757	1.1, 2.1.1, 2.12.4, 4.9.4, 5.24.23, 5.27.6.1
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Phillips, Glenn A.	Arco, ID	E353	5	277	1.1, 4.15.4, 5.24.23, 6.1.11
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Pierce, Kenneth L.	Denver, CO	W008	6	8	5.10.12, 5.10.13
Pietri, Joseph E.	McCall, ID	W276	6	209	1.1, 2.12.3, 5.27.7.17
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Pifer, Larry E.	Idaho Falls, ID	W214	6	170	1.1, 4.15.4, 5.27.6.1
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Pomeroy, Tom	Ketchum, ID	E479	5	449	1.1, 2.7.9, 3.3.3, 4.2.1, 5.9.1, 5.10.1, 5.22.3, 5.27.3.4, 5.27.6.9, 5.29.70, 5.29.92, 5.30.3.1, 6.3

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Redfern, Bertilia L.	Buhl, ID	W259	6	200	1.1, 4.15.5, 5.27.2, 5.29.87, 5.30.4.5, 6.2
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Reed, Jim	Idaho Falls, ID	E093	4	797	1.1, 3.4
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Reed, Mark	Idaho Falls, ID	E015	4	261	1.1, 5.24.23, 5.29.31
Reed, Mary Lou	Coeur d'Alene, ID	W531	6	591	1.1, 2.8.7, 5.1.38, 5.27.7.9, 5.29.95
Reicher, Dan W.	Washington, DC	I006	3	310	2.1.3, 2.1.5, 2.1.6, 2.1.7, 2.3, 2.4, 2.7.7, 4.1, 4.10.2, 4.11.1, 4.11.2, 5.30.2.1, 5.30.2.5, 5.30.3.1
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f Commerce Rexburg, ID	W173	6	142	See Pincock, David L.		
Rexburg, ID	E096	4	802	See Porter, John, Mayor		
Rexburg, ID	I065	3	426	See Porter, John, Mayor		
Ketchum, ID	W170	6	140	1.1, 3.3.1, 3.4, 4.2.1, 4.3, 4.15.2, 5.1.38, 5.12.1, 5.27.7.1, 5.27.7.4, 5.27.7.17, 5.27.17		
Kellie Inkom, ID	E757	5	714	1.1, 5.1.42		
R. and C. L. Ketchum, ID	W518	6	578	1.1		
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Richtsmeier, Jean	Idaho Falls, ID	I018	3	343		1.1, 2.7.11, 3.3.1, 5.29.92, 6.3
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Riedel, Michael W.	Ketchum, ID	W162	6	133	1.1, 5.27.6.9
Rigby, Mary Jayne	Idaho Falls, ID	E533	5	495	1.1, 3.2.2, 5.27.6.1, 5.29.34, 5.30.5.7
Rigby, Mary Jayne	Idaho Falls, ID	W117	6	101	1.1, 3.2.2, 5.27.6.1, 5.29.34, 5.30.5.7
Rigby, Robert L.	Soda Springs, ID	E577	5	517	1.1, 4.15.4, 5.27.6.1
Rigby, Robert L.	Soda Springs, ID	W065	6	72	1.1, 4.15.4, 5.27.6.1
Rikoon, Robert	Eagle, ID	B202	3	216	2.12.2, 3.4, 4.2.1, 4.13, 4.14, 5.27.1.11, 5.30.1.13
Rikoon, Robert and Debra	Eagle, ID	E619	5	581	1.1, 3.5.1, 5.1.33, 5.25.5, 5.30.4.1, 6.1.2, 6.3
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Ritchie, Ada	Idaho Falls, ID	E029	4	737	1.1, 2.7.2, 4.2.1, 4.13, 4.14
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Ritchie, Stephen J.	Idaho Falls, ID	I092	3	480	1.1, 4.14, 5.27.7.17
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Robertson, Robert L.	Pocatello, ID	I060	3	420	1.1, 4.9.4, 5.24.23, 5.27.6.1, 5.27.7.3
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Robinson, Joe	Boise, ID	E586	5	527	1.1, 4.15.4, 5.27.12.4
Robinson, Joe	Boise, ID	W218	6	172	1.1, 4.15.4, 5.27.12.4
Robinson, Julie	Victor, ID	E036	4	744	1.1, 5.27.7.3
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Ronayne, Diane	Boise, ID	E216	5	101	1.1, 4.15.4, 5.27.2, 5.27.3.3, 6.2
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Rowden, Connie	Idaho Falls, ID	W023	6	44	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
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Shadley, Sue	Idaho Falls, ID	W020	6	42	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
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Shokal, Edward C.	Hagerman, ID	E767	5	729	1.1, 2.2.9, 2.7.5, 2.12.2, 5.12.1, 5.24.18, 5.24.18, 5.30.3.1, 6.3
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Siemon, Mark	Ketchum, ID	T539	3	775	4.1, 4.3, 4.13, 6.3, 6.5.13
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Simpson, Patrick and Karen	Ketchum, ID	W398	6	468	1.1, 5.27.10, 5.30.3.1, 5.30.4.14, 6.3
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Smith, Angie	Ketchum, ID	E476	5	446	1.1, 2.7.2
Smith, Eugene Spencer	Boise, ID	E623	5	586	1.1, 3.4, 5.29.37
Smith, Garry R.	Aiken, SC	E501	5	462	Acknowledgement Receipt
Smith, Garry R.	Aiken, SC	W057	6	68	Acknowledgement Receipt
Smith, J. G.	Pocatello, ID	W132	6	112	1.1
Smith, J. L.	Pocatello, ID	W279	6	212	1.1, 4.15.2, 4.15.4, 5.27.6.1, 5.27.9.1, 5.28.2, 6.1.2, 6.2
Smith, Keith H.	Idaho Falls, ID	E559	5	508	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Smith, Keith H.	Idaho Falls, ID	W021	6	43	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
Smith, Lisa	Pingree, ID	E488	5	455	1.1, 4.15.4, 5.27.6.1
Smith, Lisa	Pingree, ID	W108	6	97	1.1, 4.15.4, 5.27.6.1
Smith, Shelly	Pocatello, ID	W280	6	213	5.24.23, 5.24.25, 5.24.30
Snake River Aliance	Boise, ID	B021	3	48	See Wilson, Monte
Snake River Aliance	Boise, ID	E181	5	61	See Wilson, Monte
Snake River Alliance	Ketchum, ID	E355	5	280	See Paul, Elizabeth
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Snake River Alliance	Ketchum, ID	W007	6	6	See Paul, Elizabeth
Snoderly, Rick	Idaho Falls, ID	I538	3	569	1.1, 3.3.1, 4.6, 5.2.1, 5.24.23, 5.27.7.16, 5.27.9.1, 5.27.12.2
Sohman, Helen B.	Twin Falls, ID	E794	5	762	1.1
Spain, Stacy	Boise, ID	B267	3	286	1.1, 5.30.5.12
Speck, James P.	Ketchum, ID	E585	5	527	1.1
Speck, James P.	Ketchum, ID	W019	6	42	1.1
Spencer, Jon	Idaho Falls, ID	E073	4	777	1.1, 5.27.6.1, 5.27.7.3, 6.1.2
Spiller, Lynn, Keri, and Jeff		E307	5	240	1.1
Spinner, Mary	Blackfoot, ID	W134	6	113	1.1, 2.2.4, 3.2.18, 3.3.1, 4.9.2, 4.13, 4.14, 4.15.5, 5.12.5, 5.27.5.3, 5.30.1.13, 5.30.2.1, 5.30.2.5, 6.1.3, 6.2
Spoffard, Cathy	Boise, ID	W567	6	666	1.1, 2.7.2, 2.12.4, 4.13, 5.24.27, 6.5.5
Spofford, Cathy	Boise, ID	E641	5	603	1.1, 2.7.2, 2.12.4, 4.13, 5.24.27, 6.5.5
Spofford, Pauline	Boise, ID	B220	3	238	1.1, 3.2.5, 4.15.1, 5.1.42, 5.23.16, 5.24.27, 5.27.6.3, 5.27.7.4, 5.30.5.1
Spofford, Pauline	Boise, ID	E637	5	600	1.1, 2.1.1, 3.2.5, 4.1, 4.3, 4.10.1, 4.12, 4.13, 5.1.42, 5.23.16, 5.24.27, 5.27.6.3, 5.27.7.4, 5.29.55, 5.29.87, 5.30.1.14, 5.30.2.1, 6.1.2
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St. Clair, Barbara M.	Idaho Falls, ID	I093	3	482	1.1, 2.1.1, 2.2.15, 2.13.8, 3.2.2, 3.3.1, 3.4, 5.1.42, 5.24.23, 5.27.7.16, 5.27.9.1
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Stallard, Lyn L.	Ketchum, ID	E423	5	398	1.1, 5.12.1, 6.2
Stallings, Richard	Boise, ID	E006	4	35	1.1, 3.2.7, 3.3.1, 3.3.3, 4.5, 4.7.2, 4.10.2, 5.27.6.1, 5.27.9.2, 5.27.12.8, 5.28.6, 6.1.2, 6.4.1
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Stoelting, Tom	Pocatello, ID	I077	3	447	1.1, 3.4, 4.14, 4.15.4, 5.1.37, 5.24.27, 5.27.7.17, 6.3
Stoke, Jonathan	Hailey, ID	E278	5	202	1.1, 2.2.1, 2.11.3, 2.11.8, 5.1.8, 5.1.21, 5.1.46, 5.1.47, 5.6.1, 5.6.5, 5.6.7, 5.7.10, 5.7.13, 5.7.17, 5.8.17, 5.9.1, 5.10.1, 5.10.5, 5.10.8, 5.10.15, 5.14.1, 5.16.1, 5.17.1, 5.17.3, 5.20.1, 5.20.6, 5.23.1, 5.23.2, 5.23.3, 5.23.5, 5.23.13, 5.23.17, 5.23.19, 5.24.1, 5.24.18, 5.24.27, 5.27.1.1, 5.27.1.1, 5.27.2, 5.27.3.3, 5.27.3.4, 5.27.32, 5.28.8, 5.29.40, 5.30.1.6, 5.30.2.1, 5.30.4.5, 5.30.4.9, 5.31.19
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Stolz, Randy	Boise, ID	E245	5	160	1.1, 3.2.8, 5.1.37, 5.12.1, 5.27.4.4, 5.30.4.14, 6.1.1, 6.2
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Sutton, Robert B.	Boise, ID	E233	5	125	1.1, 3.2.2, 3.2.7, 4.1, 5.2.16, 5.12.1, 5.24.23, 6.3, 6.5.8
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Tomseth, Bruce	Hailey, ID	W502	6	567	2.1.1, 4.15.5, 5.24.18, 5.29.97, 5.30.3.8
Tomsic, Joan	Idaho Falls, ID	E126	4	824	1.1, 4.13, 4.14, 4.15.2, 4.15.4, 5.27.7.17, 6.3
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Torf, Mark	Boise, ID	E255	5	170	5.18.2, 5.18.5, 5.21.2, 5.21.4, 5.21.6, 5.30.1.5, 5.30.1.6, 5.30.1.7, 5.30.1.9, 5.30.1.16, 5.30.1.19, 5.30.1.21, 5.30.1.25, 5.30.2.5, 5.30.3.8, 5.30.4.4, 5.30.4.13, 5.30.5.1, 5.30.5.8, 5.30.5.10, 5.30.5.14
Torf, Mark	Boise, ID	W613	6	691	7.40
Torf, Mark	Boise, ID	W614	6	691	7.41
Town, Carol	Hailey, ID	W245	6	191	4.13, 6.1.1
Traxler, Vickie	Twin Falls, ID	W334	6	351	1.1, 4.13, 5.10.4, 5.29.87, 5.30.1.13, 5.30.4.1, 6.1.8, 6.2
Trenien, Bishop Sylvester	Boise, ID	W394	6	466	1.1, 3.4, 4.13, 5.27.6.4, 6.3
Triplett, Gary	Idaho Falls, ID	E131	4	830	1.1, 3.3.1, 4.5, 5.24.23, 5.25.3, 5.27.6.13, 5.27.7.3, 5.27.7.16, 5.27.9.1, 5.27.11.3
Troutner, Art L., Jr.	Lake Fork, ID	W466	6	536	1.1, 3.5.2, 5.1.6, 5.27.2, 5.27.6.11
Troutner, Carolyn	Lake Fork, ID	W477	6	549	1.1, 2.7.2, 5.10.7, 6.1.2, 6.3
Troutner, Katherine H.	Boise, ID	E522	5	483	1.1, 4.13, 5.29.85, 5.30.4.1, 6.2
Troutner, Katherine H.	Boise, ID	W027	6	46	1.1, 4.13, 5.29.85, 5.30.4.1, 6.2
Truman, Pat	Boise, ID	B254	3	275	1.1, 4.13, 5.24.27, 5.27.2, 5.27.10
Truman, Pat	Boise, ID	E681	5	638	1.1, 4.13, 5.24.27, 5.27.2, 5.27.10
Tschaeche, A.N.	Idaho Falls, ID	I544	3	579	1.1, 2.1.1, 4.15.4, 5.20.2, 5.23.9, 5.23.14
Tschaeche, A. N.	Idaho Falls, ID	W555	6	612	5.13.21, 5.23.9, 5.23.14, 5.23.29, 5.29.79
Tunno, Mark	Ketchum, ID	E396	5	378	1.1, 4.14, 6.3

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Turner, Claire	Boise, ID	E626	5	590	4.14, 4.15.5, 5.30.3.1, 5.30.4.14, 6.3, 6.5.5
Turner, Kaye	Pocatello, ID	E100	4	808	1.1, 2.7.1, 3.3.2, 4.13, 5.1.1, 5.24.23, 5.29.85, 5.30.4.1
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Turner, Kaye	Pocatello, ID	I070	3	436	1.1, 2.7.8, 3.3.1, 4.13, 5.1.1, 5.29.85, 5.30.4.1, 6.3
Turner, Kaye	Pocatello, ID	I524	3	548	1.1, 4.15.4, 6.1.2
Turner, Roger	Pocatello, ID	E026	4	735	1.1, 4.1, 4.7.3, 4.13, 5.13.13, 5.13.19, 5.25.2, 5.30.1.10, 5.30.4.1, 5.30.4.12
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Turvey, Ellen	8lackfoot, ID	W042	6	58	1.1, 4.15.4, 5.27.6.1
Turvey, Harold, Jr.	Blackfoot, ID	E583	5	526	1.1, 4.15.4, 5.27.6.1
Turvey, Harold, Jr.	Blackfoot, ID	W043	6	58	1.1, 4.15.4, 5.27.6.1
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Van Valkenburgh, Jack	Boise, ID	B081	3	147	1.1, 2.7.6, 2.13.17, 3.3.1, 3.3.3, 4.2.1, 4.3, 5.26.2
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Vogel, Charles	Nampa, ID	E627	5	591	1.1, 5.27.7.16
Voller, Jerry	Meridian, ID	W446	6	505	1.1, 5.27.4.5, 5.27.7.16
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Walker, Ben and Marilyn	Bellevue, ID	E289	5	220	1.1, 6.5.5
Walker, Benjamin	Twin Falls, ID	T015	3	622	1.1, 6.5.5
Walker, Patricia A.	Idaho Falls, ID	W305	6	325	1.1, 4.15.4, 5.27.6.1
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Walters, Steven J.	Blackfoot, ID	E752	5	707	1.1, 2.3, 2.8.2, 3.4, 4.9.4, 5.13.12, 5.27.1.4, 5.27.3.1, 5.27.3.3, 5.27.6.1, 5.27.11.3, 5.28.2, 5.29.97
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Ward, Mary Ann	Hailey, ID	T061	3	675	1.1, 4.2.1, 4.3, 4.11.1, 4.15.5, 5.1.20, 5.1.42, 5.12.1, 5.29.87, 5.30.3.1
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Warf, James C.	Los Angeles, CA	W242	6	189	3.4, 4.1, 4.4.1, 4.7.1, 4.14
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Wassmuth, Carol Ann	Coeur d'Alene, ID	W325	6	342	1.1, 6.2, 6.3
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Watters, Laurie	Shelley, ID	E749	5	704	1.1, 5.27.7.16, 5.27.9.4
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Weinberg, Donald E.	Idaho Falls, ID	W003	6	3	1.1, 2.6.3, 2.7.10, 4.3, 4.15.2, 5.2.11, 5.26.2, 5.30.1.26
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Whelan, Raymond	Ketchum, ID	E595	5	532	1.1
Whelan, Raymond	Ketchum, ID	W230	6	180	1.1
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White, James R.	Idaho Falls, ID	E514	5	473	1.1, 2.1.1, 2.6.3, 2.7.8, 2.7.10, 2.9, 2.12.5, 3.2.28, 5.24.25, 5.27.12.8
White, James R.	Idaho Falls, ID	I023	3	352	2.1.1, 2.6.3, 2.7.8, 2.7.10, 2.9, 2.12.5, 5.24.25, 5.27.12.8, 6.1.9
White, James R.	Idaho Falls, ID	W098	6	89	1.1, 2.1.1, 2.2.1, 2.6.3, 2.7.8, 2.7.10, 2.9, 3.2.28, 5.24.25, 5.27.12.8
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Widener, Judy	Twin Falls, ID	W295	6	319	1.1
Wieda, William	Colorado Springs, CO	I007	3	314	5.8.20
Wiegand, Gayl H.	Pocatello, ID	E723	5	676	1.1, 4.1, 4.4.6, 4.8.1, 4.9.1
Wiethorn, Edith	Hailey, ID	E770	5	735	1.1, 3.4, 4.2.1, 5.9.1, 5.12.1, 5.13.10, 5.24.30, 5.27.7.17, 5.30.1.15, 5.30.2.1, 5.31.1, 6.1.2, 6.1.8
Wiethorn, Edith	Hailey, ID	T067	3	692	1.1, 3.4, 5.9.1, 5.12.1, 5.13.10, 5.24.30, 5.27.7.17, 5.30.1.15, 5.30.2.1, 5.31.1, 6.1.2, 6.1.8
Wiethorn, Julie	Hailey, ID	E294	5	224	1.1, 2.7.2, 2.13.17, 4.13, 5.29.85, 5.30.3.6, 5.30.4.9, 5.30.5.1, 5.30.5.7, 6.1.2
Wiethorn, Julie	Hailey, ID	T022	3	630	1.1, 2.7.2, 2.13.17, 4.13, 5.29.85, 5.30.3.6, 5.30.4.9, 5.30.5.1, 5.30.5.7, 6.1.2
Wiethorn, Richard	Hailey, ID	E768	5	732	1.1, 2.3, 2.5.4, 4.13, 5.30.2.5, 5.30.5.1, 5.30.5.7
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Wilbur, Dave L.	Rexburg, ID	E729	5	682	1.1, 3.2.2, 3.4, 4.4.6, 4.13, 4.15.1, 5.27.6.11, 6.3
Wilbur, Dave L.	Rexburg, ID	I518	3	538	1.1, 3.2.2, 3.4, 4.4.6, 4.13, 4.15.1, 5.27.6.11, 6.3
Wilcke, Loree	Ketchum, ID	W485	6	554	1.1, 3.2.1, 5.12.1, 5.12.1, 5.17.2, 5.24.27, 5.30.2.1, 5.30.4.7
Williams, Mathew	Idaho Falls, ID	W620	6	694	7.47
Williams, Tim C.	Arco, ID	E080	4	780	1.1, 3.2.2, 5.27.6.1
Williamson, Darcy	McCall, ID	E218	5	102	1.1, 5.1.45, 5.27.3.1, 5.30.5.10
Wilson, Albert E.	Pocatello, ID	E329	5	257	2.1.1, 5.24.22
Wilson, Cara		E371	5	356	1.1, 5.27.6.2, 6.5.5
Wilson, Glen M.	Boise, ID	W445	6	504	1.1, 5.27.12.2
Wilson, John	Twin Falls, ID	E372	5	356	1.1, 4.15.2, 5.27.10, 6.1.2
Wilson, Kathy	Idaho Falls, ID	I543	3	578	4.15.4, 5.1.36, 5.30.3.1, 5.30.5.1, 5.31.12, 6.2, 6.5.1
Wilson, Monte	Boise, ID	B021	3	48	2.1.1, 5.1.32, 5.8.5, 5.10.1, 5.10.2, 5.10.3, 5.10.6, 5.10.9, 5.10.21
Wilson, Monte	Boise, ID	E181	5	61	5.1.32, 5.8.6, 5.10.1, 5.10.2, 5.10.6, 5.10.7, 5.10.8, 5.10.9, 5.10.10, 5.10.20, 5.10.21
Wilson, Robert	Idaho Falls, ID	W142	6	120	5.1.17, 5.1.34, 5.24.31
Winship, Ben	Victor, ID	E038	4	746	1.1, 3.4
Winter, Christopher T.	Pocatello, ID	E738	5	691	1.1, 2.1.1, 5.1.49, 5.27.6.2
Wixom, Bryan	Blackfoot, ID	I550	3	586	1.1, 5.24.23, 5.25.3, 5.27.7.16

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Wollf, Leonard	Caldwell, ID	W448	6	506	1.1, 5.27.7.16
Wood, Jim	Boise, ID	B263	3	283	Song
Wood, Jim	Boise, ID	E714	5	668	1.1, 5.24.27
Wood, R. Marlowe	Idaho Falls, ID	W177	6	145	1.1, 5.24.22, 5.27.12.5
Wood, Willard R.	Pocatello, ID	E054	4	760	1.1, 4.15.4, 5.27.7.16, 5.27.9.2, 6.1.2
Woods, Cynthia Lou	Twin Falls, ID	E464	5	428	1.1, 2.7.2, 6.2
Woods, Jack R.	Pocatello, ID	E573	5	515	1.1, 5.27.6.1, 5.27.11.3, 6.1.2
Woods, Jack R.	Pocatello, ID	W056	6	67	1.1, 5.27.6.1, 5.27.11.3, 6.1.2
Woodward, William R.	Ketchum, ID	W406	6	473	1.1, 5.27.3.3, 6.2
Wooten, Kathie	Boise, ID	B252	3	274	1.1, 2.7.2, 4.13, 6.5.5
Wooten, Kathie	Boise, ID	E679	5	637	1.1, 2.7.2, 4.13, 6.5.5
Worley, Tal	Idaho Falls, ID	E701	5	657	3.2.18, 4.2.1, 4.3, 5.12.1, 5.24.27, 5.27.6.9, 5.27.11.5, 5.27.11.6, 5.28.8, 5.30.2.1, 5.30.2.5, 5.30.3.6, 5.30.4.9, 5.30.4.14, 6.1.8
Worley, Tal	Idaho Falls, ID	I103	3	498	3.2.18, 4.2.1, 4.3, 5.12.1, 5.24.27, 5.27.6.9, 5.27.11.5, 5.27.11.6, 5.28.8, 5.30.2.1, 5.30.2.5, 5.30.3.6, 5.30.4.9, 5.30.4.14, 6.1.8, 6.2
Wren, Kathy	Boise, ID	E653	5	613	1.1, 2.7.8, 4.14, 4.15.5, 5.24.27, 5.24.30
Wright, Eugene B.	Boise, ID	E264	5	190	1.1, 5.20.2, 5.27.12.3, 5.27.12.5
Wright, Richard	Boise, ID	B236	3	257	Stated His Name
Wright, Richard	Boise, ID	E662	5	621	1.1, 6.2

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Wynn, Gillian	New Haven, CT	W379	6	457	1.1, 5.27.2, 5.27.3.1, 6.1.1, 6.2
Wytychak, Michael, III	Coeur d'Alene, ID	W372	6	453	1.1, 4.3, 5.27.6.1, 6.2
Yellen, Carl W.	Nampa, ID	W564	6	664	1.1, 5.24.23, 5.27.6.1, 5.28.3, 5.30.2.5, 6.2
Yerrity, K., and Castrovillo, P.		E645	5	606	1.1, 3.3.1, 5.1.1, 5.29.87
Yoder, Tim	Boise, ID	W373	6	454	1.1, 4.13, 5.6.2, 5.10.5, 5.24.25, 5.27.7.2, 5.27.7.4, 6.3
Young, Lawrence, Mayor	Ketchum, ID	E274	5	199	1.1, 4.2.1, 5.27.1.11, 5.27.2, 5.27.3.2, 5.27.3.3, 5.27.5.1, 5.30.2.5
Young, Lawrence, Mayor	Ketchum, ID	T002	3	601	1.1, 2.3, 4.2.1, 5.2.7, 5.27.1.11, 5.27.2, 5.27.3.2, 5.27.3.3, 5.27.5.1, 5.30.2.5
Young, Lois	Boise, ID	B047	3	81	1.1
Yount, Stuart	Boise, ID	B229	3	250	1.1, 4.3, 4.15.5, 5.24.27, 5.27.6.9, 5.28.8, 6.3
Zack, Neil R.	Dublin, CA	W450	6	507	1.1, 4.15.4, 5.24.30
Zillig, Fritz	Idaho Falls, ID	E047	4	754	1.1, 5.27.7.3, 5.27.9.6
Zimmerman, Kenneth	Salt Lake City, UT	W449	6	506	1.1, 5.24.23, 5.27.12.2
Zweifel, Lynn	Ketchum, ID	E450	5	418	1.1, 3.4, 5.9.1, 5.10.4, 5.29.95, 5.30.3.8, 6.3

APPENDIX B

ORAL TESTIMONIES BY ORDER NUMBER

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B001	McClure, James, Senator	Washington DC	3	8	1.1, 2.12.5, 4.15.4, 5.12.1, 5.24.23, 5.24.30, 5.27.6.1
B001	U.S. Senate	Washington DC	3	8	See McClure, James, Senator
B002	Craig, Larry, Congressman	Washington, DC	3	11	1.1, 4.15.4, 5.24.23
B002	U.S. House of Representatives	Washington, DC	3	11	See Craig, Larry, Congressman
B003	Idaho, State of	Boise, ID	3	12	See Jones, Jim, Attorney General
B003	Jones, Jim, Attorney General	Boise, ID	3	12	1.1, 2.1.1, 5.27.9.2, 5.29.97, 6.1.2
B004	Idaho, State of	Rexburg, ID	3	14	See Ricks, Mark, State Senator
B004	Ricks, Mark, State Senator	Rexburg, ID	3	14	1.1, 2.13.1, 3.2.2, 5.7.9, 5.7.22, 5.24.23, 5.29.73, 5.29.95, 5.29.108
B005	Idaho, State of	Boise, ID	3	15	See Kennevick, Jack, Representative
B005	Kennevick, Jack, Representative	Boise, ID	3	15	1.1, 5.24.23, 5.27.6.1, 5.27.11.3
B006	Idaho, State of	Idaho Falls, ID	3	16	See Rydalch, Ann, State Senator
B006	Rydalch, Ann, State Senator	Idaho Falls, ID	3	16	1.1, 3.2.2, 5.27.9.1, 5.27.12.5
B007	Davis, W. Jackson	Santa Cruz, CA	3	19	2.1.1, 5.1.1, 5.1.3, 5.1.10, 5.1.13, 5.1.19, 5.1.24, 5.1.26, 5.1.27, 5.1.39, 5.1.42, 5.8.9, 5.24.18, 5.28.2
B007	Nuclear Policy Program	Santa Cruz, CA	3	19	See Davis, W. Jackson
B008	Hawkins, James	Boise, ID	3	23	5.27.6.1, 5.27.9.1
B008	Idaho Department of Commerce	Boise, ID	3	23	See Hawkins, James

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B009	Donovan, Richard	Boise, ID	3	24	
B009	Idaho Department of Health & Welfare	Boise, ID	3	24	
B010	Idaho Department of Transportation	Boise, ID	3	26	
B010	Kiebert, Kermit	Boise, ID	3	26	
B011	Idaho Department of Law Enforcement	Boise, ID	3	27	
B011	Richardson, Mack	Boise, ID	3	27	
B012	Broscious, Chuck	Moscow, ID	3	28	
B012	Idaho Organization for Nuclear Safety	Moscow, ID	3	28	
B013	Casey, Gregory	Boise, ID	3	31	
B013	Idaho Association of Commerce and Industry	Boise, ID	3	31	
B014	Idaho AFL-CIO	Boise, ID	3	34	
B014	Kerns, James E	Boise, ID	3	34	
B015	Eschen, Thomas B.	Boise, ID	3	36	
B015	Idaho Health Prof. for Social Responsibility	Boise, ID	3	36	
B016	Audin, Lindsay	Ossining, NY	3	39	Section Numbers 3.2.31, 5.7.1, 5.17.3, 5.19.3, 5.19.4, 5.19.6, 5.23.25, 5.30.5.6, 5.31.7
					See Donovan, Richard
					See Kiebert, Kermit

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B016	Plutonium Challenge Coalition	Ossining, NY	3	39	See Audin, Lindsay
B017	Eschelin, Chris	Boise, ID	3	42	1.1, 5.24.18, 6.3
B017	Students for World Peace	Boise, ID	3	42	See Eschelin, Chris
B018	Davis, Spencer	Boise, ID	3	43	5.24.27, 6.3
B018	Students for World Peace	Boise, ID	3	43	See Davis, Spencer
B019	Farber, Jason	Bosie, ID	3	44	1.1
B019	Students for World Peace	Bosie, ID	3	44	See Farber, Jason
B020	Bauman, Marilyn	Caldwell, ID	3	44	1.1, 2.7.4, 3.2.1, 3.2.2, 3.2.18, 3.2.25, 3.6.1, 5.24.14, 5.30.4.12, 6.2, 6.5.1, 6.5.2, 6.5.6
B020	Church Women United	Caldwell, ID	3	44	See Bauman, Marilyn
B021	Snake River Aliance	Boise, ID	3	48	See Wilson, Monte
B021	Wilson, Monte	Boise, ID	3	48	2.1.1, 5.1.32, 5.8.5, 5.10.1, 5.10.2, 5.10.3, 5.10.6, 5.10.9, 5.10.21
B022	Stauts, Robert	Boise, ID	3	50	1.1, 2.3, 2.7.10, 5.10.1, 5.29.92
B023	Bauman, Lois	Boise, ID	3	51	1.1
B024	Bachelder, Carol	Boise, ID	3	52	1.1, 4.1, 5.27.6.11, 6.3
B025	McLuskie, Ed	Boise, ID	3	53	2.7.1, 2.7.8, 3.4, 5.27.7.4, 5.29.111, 6.2
B026	Russell, Shelley	McCall, ID	3	55	2.1.2, 2.7.2, 2.7.4, 4.13, 6.2, 6.3
B027	Hausrath, Anne Sites	Boise, ID	3	57	1.1, 2.7.9, 5.29.85, 6.1.1, 6.2
B028	Tackman, Keith	Boise, ID	3	57	1.1, 2.7.9, 5.24.27, 5.27.7.4, 5.29.87, 6.1.5

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B029	Balsley, Ronald	Pocatello, ID	3	58	
B030	Hauder, Larry	Boise, ID	3	59	
B031	Burnes (Cepren), Fr. Sergus	Boise, ID	3	61	
B032	Kirgis, Gail	Boise, ID	3	63	
B033	Mattell, Walt	Idaho City, ID	3	65	
B034	Ostermiller, Lisa	McCall, ID	3	66	
B035	Hansen, Dorothy	Boise, ID	3	67	
B036	Clark, Patricia	Boise, ID	3	68	
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B038	McMurtrie, Mary	Eagle, ID	3	70	
B039	Lewis, Suzanne	Boise, ID	3	72	
B040	Ronayne, Diane	Boise, ID	3	73	
B041	Bartholomew, Rory	Nampa, ID	3	74	
B042	Sedgwick, Allison	Boise, ID	3	74	
B043	Tobias, Nelle	McCall, ID	3	75	
B044	Neff, Steve	Boise, ID	3	76	Section Numbers 1.1, 2.1.1, 4.9.4, 5.2.1, 5.24.21, 5.27.12.5, 5.27.12.8, 5.27.9.2

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B045	Nebelsick-Carter, Becky	Boise, ID	3	79	1.1, 2.7.2, 4.14, 5.1.36, 5.25.4, 5.27.6.11, 5.29.64, 5.29.66, 5.29.87, 5.30.2.1, 5.30.3.1, 5.30.4.14
B046	McClaran, Don	McCall, ID	3	81	1.1, 4.15.2, 6.2
B047	Young, Lois	Boise, ID	3	81	1.1
B048	Brewer, Tim	Boise, ID	3	81	1.1, 2.7.2, 4.2.1, 4.3, 4.13, 4.15.2, 5.27.6.10, 5.27.7.17, 6.3
B049	Liebenthal, Deanah	Boise, ID	3	83	1.1, 4.13, 4.14
B050	Odmark, Jean	McCall, ID	3	84	1.1, 4.3, 5.27.3.3, 5.27.6.9, 5.27.6.11
B051	Hesselbarth, Woody	McCall, ID	3	84	1.1, 4.13, 5.1.40, 5.27.6.5, 6.1.5
B052	Eschen, Maria	Boise, ID	3	85	1.1, 4.13, 4.15.5, 5.1.36, 5.27.1.1, 5.29.14
B053	Budell, Carl	Nampa, ID	3	96	1.1
B053	Nampa Chamber of Commerce	Nampa, ID	3	96	See Budell, Carl
B054	Butters, Mary	Moscow, ID	3	97	5.7.1, 5.29.33, 5.29.41, 5.29.42, 5.29.45, 5.29.49, 5.29.66, 5.29.81, 5.29.84, 5.29.89, 5.29.98
B054	Palouse-Clearwater Environmental Institute	Moscow, ID	3	97	See Butters, Mary
B055	Ada County Citizens for Peace and Justice	Boise, ID	3	100	See Hall, Patricia
B055	Hall, Patricia	Boise, ID	3	100	1.1, 2.7.3, 2.7.8, 4.13, 4.15.1, 5.2.1, 5.24.27, 5.27.3.1, 5.27.3.3, 6.3, 6.5.5
B056	Boise Peace Quilt Project	Boise, ID	3	103	See McElhinney, Gwynne
B056	McElhinney, Gwynne	Boise, ID	3	103	1.1, 2.7.2, 3.2.4, 3.3.1, 4.13, 4.15.1, 5.12.1, 5.13.13, 5.27.3.1, 5.27.5.3, 5.27.6.9, 5.27.9.4, 5.27.10, 5.27.11.1, 5.29.80, 5.29.104, 5.30.1.4, 5.30.2.5, 6.1.2, 6.5.5

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B057	Coon, Maggie	Boise, ID	3	107	2.1.1, 2.3, 4.1, 4.7.1, 4.11.1, 5.10.2, 5.10.3, 5.29.91, 5.30.1.11, 5.30.2.1, 5.30.2.3, 5.30.2.5, 5.30.3.1, 5.30.3.1, 5.30.3.8
B057	Idaho Conservation League	Boise, ID	3	107	See Coon, Maggie
B058	Kreider, C. Fuji	LaGrande, OR	3	111	1.1, 2.13.7, 5.7.6, 5.7.8, 5.29.6, 5.29.45, 5.29.66, 5.29.71, 5.29.81, 6.2
B059	Skoro, Charles	Boise, ID	3	113	2.2.1, 2.7.2, 5.27.1.1, 5.27.1.4, 5.27.1.5, 5.27.7.1, 5.27.7.2, 5.27.7.4, 5.30.2.5, 6.1.2
B060	Sutton, Robert B.	Boise, ID	3	116	3.2.2, 6.5.8
B061	Conley, Pamela	Boise, ID	3	118	1.1, 2.7.11, 3.2.2, 3.2.4, 3.2.18, 3.3.1, 5.2.6, 5.27.7.17, 5.30.4.5
B062	Nolt, Leonard	Boise, ID	3	119	1.1, 4.13, 5.27.7.17, 6.3
B063	Blain, Michael J.	Boise, ID	3	120	2.1.1, 2.4, 2.13.13, 5.6.5, 5.13.1, 5.13.2, 5.13.4, 5.13.12, 5.13.13, 5.23.26
B064	Wardwell, Ed	Boise, ID	3	122	1.1, 2.1.2, 2.3, 3.2.14, 3.4, 5.27.7.2
B065	Keener, Margaret	Boise, ID	3	123	1.1, 2.3, 5.10.7, 6.3
B066	Baker, Dick	Boise, ID	3	124	5.27.6.11
B067	Carpenter, Rocky	Boise, ID	3	126	1.1, 4.13, 5.1.37, 5.27.2, 5.27.7.3, 5.27.7.4, 5.27.7.17, 5.27.12.8, 5.29.63, 5.29.80, 5.29.85, 5.29.86, 5.29.88, 5.30.2.5, 6.2
B068	Dadaby, John	Boise, ID	3	127	1.1, 6.3
B069	Douglas, David	Boise, ID	3	128	1.1, 2.13.3, 4.14, 5.24.27, 5.30.3.1, 5.31.12, 6.1.1, 6.3
B070	Stolz, Randy	Boise, ID	3	129	1.1, 3.2.8, 5.1.37, 5.12.1, 5.27.4.4, 5.30.4.14, 6.1.1, 6.2

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B071	Bjornsen, Robert Lind	Boise, ID	3	131	1.1, 4.13, 5.10.5, 5.10.6, 5.29.87
B072	Teater, Timothy	Boise, ID	3	132	3.2.13, 4.13, 5.12.1, 5.22.4, 5.27.6.9, 5.27.7.4, 5.29.63, 5.29.85, 5.29.109
B073	Eccles, Eloise Ann	Boise, ID	3	134	1.1, 4.13, 5.1.21, 5.1.24, 5.1.34, 5.1.44, 5.24.27
B074	Loft, Andrea	Boise ID	3	135	1.1, 4.7.2, 4.7.3, 5.10.5, 5.27.10, 5.29.41, 5.29.63, 5.29.66, 5.29.87, 6.3
B075	Brownsmith, Cynthia	Boise ID	3	136	2.7.2
B076	Roberts, Debra	Boise ID	3	138	1.1, 2.2.10, 5.27.7.6
B077	Jones, Michael R.	Boise, ID	3	140	1.1, 4.1, 4.15.4, 5.10.1, 5.10.14, 5.24.26, 5.30.1.13, 6.2, 6.3
B078	Parkin, Kate	Boise, ID	3	142	1.1, 5.27.6.9, 6.1.2, 6.1.8, 6.3
B079	Casler, Sally	Boise, ID	3	143	1.1, 2.7.2, 6.5.2
B080	Torf, Mark	Boise, ID	3	145	5.18.2, 5.18.5, 5.21.2, 5.21.4, 5.21.6, 5.30.2.1, 5.30.2.5, 5.30.4.14, 5.30.5.8, 5.30.5.14
B081	Van Valkenburgh, Jack	Boise, ID	3	147	1.1, 2.7.6, 2.13.17, 3.3.1, 3.3.3, 4.2.1, 4.3, 5.26.2
B082	Leisk, Alan	Boise, ID	3	149	1.1, 5.24.23, 5.27.12.2, 5.27.12.6
B083	Silva, Karen L.	Boise, ID	3	150	1.1, 5.27.7.17, 6.2, 6.3
B084	Sali, Gregory	Boise, ID	3	151	5.28.6, 6.2
B085	McGlinsky, Alfred M.	Boise, ID	3	153	2.1.2, 2.3, 3.3.1, 5.2.7, 5.27.7.17, 6.3
B086	Read, Heidi	Boise, ID	3	156	1.1, 2.1.1, 2.7.8, 4.2.1, 4.13, 5.13.13, 5.29.85, 5.30.1.4, 5.30.2.1, 6.1.4, 6.1.8

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B088	Moore, Colleen	Boise, ID	3	159	1.1, 4.15.5, 5.27.2, 5.27.3.4, 5.27.10
B089	Falconer, Mark	Boise, ID	3	168	1.1, 5.24.6, 5.24.30, 5.27.6.1, 5.27.12.4, 6.4.1
B089	Greater Boise Area Chamber of Commerce	Boise, ID	3	168	See Falconer, Mark
B090	Myers, Edie	Boise, ID	3	170	1.1, 2.7.2, 2.7.8, 4.15.1, 5.24.27, 5.29.61, 5.29.87, 5.29.95, 5.30.3.1, 5.30.4.9, 6.2
B091	McCollum, Lyn	Boise, ID	3	171	1.1, 4.2.1, 5.24.18, 5.27.6.9, 5.27.6.11, 5.30.2.1, 5.30.4.14, 6.3
B092	Keyes, David	Boise, ID	3	172	4.13, 5.24.30, 6.1.2
B093	Burgess, J. Roger	Boise, ID	3	174	3.2.4, 3.2.21, 4.15.1, 5.1.46, 5.13.15, 5.27.9.5, 5.29.33, 5.29.73, 5.29.85, 5.30.1.14, 5.30.4.1, 5.30.4.12, 6.2
B094	Hahn, Richard	Boise, ID	3	175	1.1, 2.1.1, 2.13.8, 5.24.21, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.4, 5.27.12.5, 5.29.2, 6.1.2
B095	Harker, Barbara	Boise, ID	3	177	3.2.11, 5.13.16, 5.24.22, 5.29.65, 5.29.107
B096	Leeson, Jane	Boise, ID	3	179	1.1, 2.2.5, 2.4, 2.6.2, 2.13.9, 3.2.2, 5.1.21, 5.10.5, 5.10.17, 5.12.1, 5.24.18, 5.29.2, 5.29.20, 5.29.31, 5.30.3.1, 6.1.1, 6.1.4, 6.3
B097	Harker, Dan	Boise, ID	3	182	1.1, 4.13, 5.13.16, 5.27.6.9, 6.2
B098	Hemmingway, Ruth	Boise, ID	3	183	1.1, 4.2.1, 6.3
B099	Harms, John	Boise, ID	3	183	3.3.1, 5.30.3.1, 5.30.3.6, 5.30.3.8
B100	Holt, Jane	Boise, ID	3	184	3.5.2, 4.15.4, 4.15.5, 5.27.7.6, 5.29.87
B101	Miller, Beverly	Boise, ID	3	185	1.1, 2.3, 3.2.1, 4.7.3, 4.15.1, 5.30.3.1, 5.30.4.1, 6.2

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B104	Bennett, Virginia	Boise, ID	3	189	1.1, 2.1.1, 5.29.16, 5.29.24, 5.29.63, 5.29.66, 5.29.73
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B107	Nelson, Martin	Boise, ID	3	193	1.1, 4.14, 5.24.27, 5.27.7.17
B108	Moore, Patrick	Boise, ID	3	194	2.1.1, 3.2.1, 4.2.1, 5.27.6.11, 6.5.2
B109	Sprague, Mark	Boise, ID	3	195	2.7.9, 5.27.7.17
B110	Bennett, George	Boise, ID	3	197	1.1, 2.1.1, 4.15.1, 5.27.6.1, 5.27.9.2
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B112	Baker, Alicia	Boise, ID	3	200	4.13, 5.27.7.17, 6.3
B113	Celick, Janet R.	Boise, ID	3	200	1.1, 5.1.21, 5.1.24, 5.8.3, 5.8.9, 5.24.18, 6.1.1
B114	Garvin, Chuck	Boise, ID	3	202	1.1, 5.27.1.4, 5.27.6.1, 5.27.7.4, 5.27.7.16, 5.27.11.1, 5.27.11.3
B115	Heylmun, Gail	Boise, ID	3	203	1.1, 3.2.1, 3.2.2, 5.3.10, 5.7.20, 5.13.9, 5.13.13, 5.24.27, 5.29.1, 5.29.107, 5.30.4.14, 6.2
B116	Thompson, David	Boise ID	3	206	3.4
B117	Emberton, David	Boise, ID	3	206	1.1, 3.2.2, 5.1.46, 5.12.1, 5.27.6.11, 5.30.1.13, 5.30.4.12
B201	Johnston, Jeff	Boise, ID	3	215	1.1, 2.2.1, 2.3, 3.4, 4.14, 6.3
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B206	Kaye, Scott	Boise, ID	3	223	2.2.11, 3.4, 5.24.27, 5.30.5.1
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B213	Eschen, Chris	Boise, ID	3	231	1.1, 2.2.10, 4.15.1
B214	Hayes, Roger	Boise, ID	3	232	1.1, 2.1.2, 2.3, 2.5.4, 2.7.8, 2.8.7, 4.1, 4.3, 4.15.5, 5.22.2, 6.3
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T007	Stoke, Jonathan	Hailey, ID	3	607	1.1, 2.1.1, 5.1.21, 5.6.1, 5.7.13, 5.7.17, 5.9.1, 5.10.1, 5.14.1, 5.16.1, 5.17.3, 5.20.1, 5.20.6, 5.21.3, 5.23.1, 5.23.2, 5.23.3, 5.23.13, 5.23.17, 5.23.19, 5.24.1, 5.24.18, 5.27.1.1, 5.30.4.5, 5.31.19
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T008	McCann, Anita	Twin Falls, ID	3	611	1.1, 2.7.8, 2.7.11, 5.13.14, 5.24.30, 5.27.6.7, 5.27.7.17, 6.3
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T009	Massoth, Nick	Twin Falls, ID	3	613	1.1, 5.27.2, 6.1.2, 6.1.8
T010	Harmon, J. Frank	Pocatello, ID	3	615	1.1, 2.1.1, 4.9.4, 5.2.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.5, 5.30.5.7
T011	France, Ernest	Jerome, ID	3	616	1.1, 4.3, 5.30.4.6, 5.31.15, 6.1.8
T012	Ruprecht, Family	Twin Falls, ID	3	617	1.1, 2.7.9, 4.2.1, 4.3, 5.12.1, 5.27.6.9, 5.29.87, 5.30.4.7, 6.2
T013	Stennet, Clint	Twin Falls, ID	3	618	1.1, 5.27.2, 5.27.3.3, 6.2
T014	McDorman, Bill	Twin Falls, ID	3	620	5.24.27, 5.30.3.1, 6.2, 6.5.5
T015	Walker, Benjamin	Twin Falls, ID	3	622	1.1, 6.5.5
T016	Mahr, Monica	Sun Valley, ID	3	623	1.1, 2.12.5, 3.2.15, 4.11.1, 4.14, 5.1.1, 5.24.22, 5.26.2, 5.27.3.3, 5.30.1.14, 5.30.2.5, 5.30.4.7, 6.2

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T018	Freitas, Frank	Idaho Falls, ID	3	627	1.1, 3.4, 4.15.1
T019	Amrit, Family	Ketchum, ID	3	627	1.1, 6.2
T020	Lafey, Kevin	Hailey, ID	3	628	1.1, 2.7.2, 4.13, 6.3
T021	Lever, Thane	Ketchum, ID	3	629	1.1, 5.24.30, 5.27.2, 5.30.4.7, 6.2
T022	Wiethorn, Julie	Hailey, ID	3	630	1.1, 2.7.2, 2.13.17, 4.13, 5.29.85, 5.30.3.6, 5.30.4.9, 5.30.5.1, 5.30.5.7, 6.1.2
T023	Bates, Dale	Ketchum, ID	3	632	5.1.3, 5.24.25
T024	Alban, Daniel L.	Ketchum, ID	3	632	2.1.1, 2.1.6, 2.3, 5.24.25, 5.30.2.1, 5.30.3.7, 5.30.4.4, 5.30.4.9, 5.30.4.14, 6.5.7
T025	Neill, DeWitt T.	Pocatello, ID	3	635	1.1, 2.1.1, 3.4, 4.9.4, 4.15.4, 5.28.6, 5.29.97, 6.1.2, 6.2
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T027	Huston, Joan	Twin Falls, ID	3	639	1.1, 4.7.3, 4.13, 5.27.7.17, 6.3
T028	Gilmour, Bridget	Wood River Valley, ID	3	640	3.3.1, 4.14, 5.10.4, 5.12.1, 5.27.2, 5.27.3.3, 6.1.9
T029	McCann, Michael	Twin Falls, ID	3	641	4.2.1
T030	Greathouse, Lowell	Filer, ID	3	641	1.1, 5.10.4, 5.27.6.1, 5.29.92, 5.30.3.8, 5.30.5.12, 6.1.2
T031	Alban, Susan	Ketchum, ID	3	643	1.1, 2.1.1, 5.12.1, 6.2
T032	Fallowfield, Susan Rutt	Ketchum, ID	3	644	1.1, 5.7.10, 6.5.2
T033	Hedge, David	Twin Falls, ID	3	645	1.1, 2.1.1, 3.2.18, 4.1, 4.2.1, 4.7.1, 4.10.2, 4.11.1,

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T036	Hall, Rick	Twin Falls, ID	3	649	1.1, 5.27.6.9, 6.2
T037	Edgers, Debbie	Ketchum, ID	3	649	1.1, 5.1.36
T038	Kincannon, Linn	Sun Valley, ID	3	650	4.13, 4.15.4, 5.1.42, 5.27.6.11, 6.1.4
T039	Glaccum, Ellen	Ketchum, ID	3	651	4.15.4, 5.12.1, 5.30.1.5, 5.30.1.6, 5.30.4.1, 5.30.4.12
T040	Pearson, Brad	Twin Falls, ID	3	652	1.1
T041	Charlson, Kirk	Twin Falls, ID	3	653	1.1, 5.12.1, 5.17.2, 5.27.2, 5.27.7.8
T042	Ivory, Don B.	Meridian, ID	3	655	1.1, 5.24.22, 5.27.12.4
T043	Marvel, Jonathan	Hailey, ID	3	657	1.1, 4.3, 4.7.1, 4.13, 4.15.4, 5.12.2, 5.30.3.1, 6.1.8, 6.3, 6.5.1
T044	Munter, Andy	Ketchum, ID	3	658	1.1, 5.10.5, 5.27.6.1, 6.1.2
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T050	Thiede, Cindy	Ketchum, ID	3	664	4.2.1, 5.10.5, 5.24.27, 5.27.3.1, 5.27.3.4, 5.29.87, 5.30.4.7, 5.30.5.1, 6.1.1
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T053	Hedge, Anne L.	Sun Valley, ID	3	667	2.2.4, 4.15.2, 5.10.5, 5.12.1, 5.30.2.1
T054	Whiting, Lee	Hailey, ID	3	668	1.1, 2.7.8, 4.13, 4.15.2, 5.10.5, 5.10.7, 5.12.1, 5.13.16, 6.1.2, 6.3
T055	Harding, Chris	Ketchum, ID	3	669	1.1
T056	Biggers, Homer	Bellevue, ID	3	670	3.4, 4.15.1
T057	Harding, Andrew	Ketchum, ID	3	671	1.1, 5.30.5.1, 6.3
T058	Burks, Diane	Twin Falls, ID	3	672	1.1, 2.2.1, 2.3, 2.7.10, 3.2.2, 4.3, 4.4.6, 4.10.4, 4.13, 4.15.2, 5.10.1, 5.29.45, 5.29.55, 5.29.67, 5.30.3.8
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T074	Fairchild, Doris	Buhl, ID	3	704	1.1, 3.1.3, 3.2.23, 4.13, 4.15.5, 5.12.1, 5.13.13, 5.17.2, 5.27.6.9, 5.29.97, 5.30.3.1
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T503	Hawkes, Judith	Ketchum, ID	3	730	1.1, 2.1.1, 2.3, 2.8.2, 2.12.2, 5.1.38, 5.1.40, 5.1.45, 5.9.3, 5.24.28, 5.27.7.17, 5.29.56, 5.30.2.1, 6.1.8, 6.3
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T561	Chisholm, William K.	Buhl ID	3	817	1.1, 4.14, 5.6.2, 5.10.4, 5.12.1
T562	Pace, Charles	Blackfoot, ID	3	817	2.1.1, 2.1.4, 2.13.19, 5.27.14.1, 5.27.14.3, 5.29.82, 6.4.6
T562	Shoshone-Bannock Tribes	Blackfoot, ID	3	817	See Pace, Charles
T563	Chupa, Marge	Twin Falls, ID	3	821	1.1, 2.7.12
T564	Rickards, Peter	Twin Falls, ID	3	823	1.1, 4.13, 5.24.30
T565	Hoene, Phil	Hailey, ID	3	825	1.1, 4.1, 4.3, 4.13, 4.15.2, 6.1.3, 6.3, 6.5.1
T566	Nielsen, Garry M.	Hansen, ID	3	826	1.1, 2.7.8, 2.7.10, 3.2.8, 3.2.11, 3.2.23, 4.3, 4.13, 5.27.5.3, 5.27.6.9, 5.30.3.1, 6.3
T567	Haynes, Catherine	Twin Falls, ID	3	830	1.1, 2.3, 3.2.7, 4.13, 5.12.1, 5.17.2, 5.21.3, 5.27.3.3, 5.27.7.4, 5.27.11.6, 5.30.1.6, 5.30.4.9, 5.30.4.14, 6.2
T568	Chapman, Charles J.	Twin Falls, ID	3	832	1.1, 5.20.11, 5.24.1
T569	Richardson, Regina	Twin Falls, ID	3	833	1.1, 5.6.9, 6.1.1
T570	Dillard, Sherry	Buhl, ID	3	834	1.1, 2.3, 3.1.2, 3.2.18, 5.1.36, 5.9.1, 5.23.3, 5.24.27, 6.2, 6.3
T571	Drown, Teresa	Ketchum, ID	3	836	1.1, 4.13, 5.27.7.17, 6.5.5
T572	Shockey, Carla	Burley, ID	3	837	1.1, 5.6.1, 5.27.2, 6.1.8

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T573	Hondo, Carolyn	Burley, ID	3	839	1.1, 5.2.10, 5.27.6.1, 5.27.6.11, 6.3
T574	Jarvis, Jeff	Twin Falls, ID	3	840	1.1, 4.15.4, 5.27.2, 5.27.6.9, 5.30.5.1, 6.1.4, 6.3, 6.5.5, 6.5.11
T575	Knaup, George	Jerome, ID	3	842	1.1, 2.8.1, 3.4, 6.3
T576	Sellers, Ed	Ketchum, ID	3	842	1.1, 3.4
T577	Kreilkamp, Korrine	Buhl, ID	3	844	1.1
T578	Gardner, Kathyrn Ann	Twin Falls, ID	3	844	1.1, 2.7.8, 5.24.23, 5.27.6.1, 5.27.7.16
T579	McGinnis, Mary	Twin Falls, ID	3	846	1.1, 4.13, 5.27.6.1, 6.3
T580	Walker, Amy	Bliss, ID	3	847	5.27.2, 6.5.5
T581	Paul, Elizabeth	Ketchum, ID	3	848	1.1, 4.1, 6.1.1, 6.2, 6.5.5
T581	Snake River Alliance	Ketchum, ID	3	848	See Paul, Elizabeth

APPENDIX C

EXHIBITS SUBMITTED BY ORDER NUMBER

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E005	Andrus, Cecil, Governor	Boise, ID	4	32	1.1, 3.2.2, 3.2.18, 3.2.31, 3.4, 5.7.24, 5.19.6, 5.27.6.1, 5.27.7.16, 5.27.9.2, 5.30.1.14, 5.30.2.5, 6.1.2
E005	State of Idaho	Boise, ID	4	32	See Andrus, Cecil, Governor
E006	Stallings, Richard	Boise, ID	4	35	1.1, 3.2.7, 3.3.1, 3.3.3, 4.5, 4.7.2, 4.10.2, 5.27.6.1, 5.27.9.2, 5.27.12.8, 5.28.6, 6.1.2, 6.4.1
E006	U.S. House of Representatives	Boise, ID	4	35	See Stallings, Richard
E007	Idaho Falls City Resolution	Idaho Falls, ID	4	41	1.1, 3.2.7, 3.3.1, 6.1.1
E007	Idaho Falls, City of	Idaho Falls, ID	4	41	See Idaho Falls City Res.
E008	Bonneville County Commissioners	Idaho Falls, ID	4	42	See Burtenshaw, Clyde
E008	Burtenshaw, Clyde	Idaho Falls, ID	4	42	1.1, 2.1.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.11.1, 5.27.12.8, 5.27.15.1
E009	Idaho Choice Coalitions	Colorado Springs, CO	4	43	See Weida, William
E009	Weida, William	Colorado Springs, CO	4	43	3.3.1, 4.1, 4.4.6, 4.8.1, 4.10.1, 4.10.5, 4.15.1, 5.2.15, 5.8.20, 5.22.1, 5.27.1.4, 5.27.1.5, 5.27.1.8, 5.27.2, 5.27.3.4, 5.27.5.3, 5.27.6.3, 5.27.6.12, 5.27.6.14, 5.27.7.4, 5.27.7.17, 5.27.9.3, 5.27.9.5, 5.27.11.6, 5.28.2, 5.28.8, 6.2
E010	Idaho Republic Party		4	58	See Petitions and Cards,
E010	Petitions and Cards		4	58	1.1, 5.27.12.4, 5.27.13.1
E010A	Idaho Falls Chamber of Commerce	Idaho Falls, ID	4	233	See Koplow, Ira

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E011	Albright, David	Washington, DC	4	235	3.2.1, 3.4, 3.5.2, 4.1, 4.2.1, 4.3, 4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6, 4.4.7, 4.8.2, 4.9.1, 4.10.1, 4.14, 5.2.3, 5.2.10, 5.2.14, 5.2.15, 5.26.1, 5.26.2
E011	Federation of American Scientists	Washington, DC	4	235	See Albright, David
E012	Cochran, Thomas	Washington, DC	4	249	2.2.9, 2.4, 2.12.3, 4.2.1, 4.3, 4.4.6, 4.4.7, 4.6, 4.7.1, 4.7.3, 4.9.5, 4.10.1, 4.15.1, 4.15.5, 5.2.1, 5.2.10, 5.2.13, 5.2.14, 5.2.15, 5.2.16, 5.2.18
E012	Natural Resources Defense Council	Washington, DC	4	249	See Cochran, Thomas
E013	Baldwin, Burton	Shelby, ID	4	260	6.5.9
E014	Anderson, Philip A.	Pocatello, ID	4	260	1.1, 2.12.4, 3.2.2, 5.24.27, 5.24.31, 5.27.9.1, 5.29.41, 5.30.5.7
E015	Reed, Mark	Idaho Falls, ID	4	261	1.1, 5.24.23, 5.29.31
E016	Bitton, Kathy	Idaho Falls, ID	4	262	1.1, 3.4, 5.27.9.3, 5.27.13.2, 5.28.1, 5.28.9
E017	Breiter, Edward	Idaho Falls, ID	4	264	5.27.4.3, 5.27.6.1, 5.27.7.4, 5.27.11.6, 5.27.12.3, 5.27.12.8, 6.1.9
E018	Christofferson, John E.	Idaho Falls, ID	4	266	1.1, 4.15.1, 5.24.23, 5.24.27, 5.29.84, 6.1.1, 6.4.1
E019	Blue Ribbon Coalition	Pocatello, ID	4	270	See Collins, Clark
E019	Collins, Clark	Pocatello, ID	4	270	1.1, 2.7.8, 2.10, 3.4, 5.24.6, 5.27.7.4, 5.27.7.11, 5.27.9.1
E019A	Eastern Idaho Council on Industry and Energy	Pocatello, ID	4	271	See Miller, Roy, Sr.
E019A	Miller, Roy, Sr.	Pocatello, ID	4	271	1.1, 2.1.1, 2.2.1, 2.5.3, 5.24.23, 5.27.7.16, 5.28.2

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E020	Internat.'l Brotherhood of Electrical Workers	Blackfoot, ID	4	272	See Walters, Jon F.
E020	Walters, Jon F.	Blackfoot, ID	4	272	1.1, 2.1.1, 2.2.15, 3.4, 4.5, 5.24.23, 5.27.6.1, 6.1.2, 6.2, 6.4.1
E021	Pocatello Chamber of Commerce	Pocatello, ID	4	275	See Sagness, Richard L.
E021	Sagness, Richard L.	Pocatello, ID	4	275	1.1, 2.1.1, 2.2.1, 2.5.3, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.11.1, 5.27.11.3, 5.28.2, 6.4.1
E022	Citizens for Idaho	Idaho Falls, ID	4	276	See Watkins, Dane
E022	Watkins, Dane	Idaho Falls, ID	4	276	1.1
E023	Eastern Idaho Chapter Health Physics Society	Idaho Falls, ID	4	719	See Honkus, Rochelle J.
E023	Honkus, Rochelle J.	Idaho Falls, ID	4	719	1.1
E024	Conroy, Richard A.	McCammon, ID	4	719	1.1, 5.27.6.1, 5.27.9.1, 5.27.11.1, 5.27.12.2, 5.27.12.4, 5.27.15.1, 5.28.6, 6.1.2, 6.2
E024	Greater Pocatello Economic Growth Council	McCammon, ID	4	719	See Conroy, Richard A.
E025	McKinley, Ted	Arco, ID	4	720	5.14.2, 5.24.23, 5.30.5.15, 6.5.4
E025	Nuclear Energy Contractors Accountability	Arco, ID	4	720	See McKinley, Ted
E026	Turner, Roger	Pocatello, ID	4	735	1.1, 4.1, 4.7.3, 4.13, 5.13.13, 5.13.19, 5.25.2, 5.30.1.10, 5.30.4.1, 5.30.4.12
E027	Fann, Robert	Idaho Falls, ID	4	736	1.1, 5.27.7.16
E028	White, James R.	Idaho Falls, ID	4	736	1.1, 2.1.1, 2.2.1, 2.6.3, 2.7.8, 2.7.10, 2.9, 3.2.28, 5.24.25, 5.27.12.8, 6.1.9
E029	Ritchie, Ada	Idaho Falls, ID	4	737	1.1, 2.7.2, 4.2.1, 4.13, 4.14

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E031	Philipson, James	Idaho Falls, ID	4	740	1.1, 3.2.16, 3.2.19, 3.3.2, 3.3.3, 5.12.1, 5.24.23, 6.2
E032	Saucerman, John	Idaho Falls, ID	4	741	1.1, 3.3.1, 5.24.23, 5.27.6.1, 5.27.9.2
E033	Hopkins, Tim	Idaho Falls, ID	4	742	1.1, 3.2.2, 3.4, 4.7.1, 4.9.4, 5.24.23, 6.1.2
E034	Westergard, Cory L.	Idaho Falls, ID	4	743	1.1, 3.2.23, 3.4, 4.13, 5.27.6.1
E035	Cherry, Rex	Rigby, ID	4	744	1.1, 3.4, 5.27.12.4
E036	Robinson, Julie	Victor, ID	4	744	1.1, 5.27.7.3
E037	Hensel, David	Victor, ID	4	745	1.1, 3.2.11, 4.3, 4.13, 4.15.5, 5.27.2, 5.27.10, 5.29.45, 5.30.3.8, 5.30.4.9, 6.1.2, 6.1.7, 6.1.12, 6.3
E038	Winship, Ben	Victor, ID	4	746	1.1, 3.4
E039	Anderson, Philip A.	Pocatello, ID	4	746	1.1, 2.12.4, 3.2.2, 5.24.27, 5.24.31, 5.27.9.1, 5.29.41, 5.30.5.7
E040	Jones, Ross	Idaho Falls, ID	4	747	1.1, 5.24.23, 6.2
E041	Sealander, David	Idaho Falls, ID	4	748	2.1.1, 2.7.2, 2.7.8, 2.7.10, 2.7.12, 3.2.1, 3.2.5, 3.2.6, 3.2.18, 4.1, 4.2.1, 4.7.1, 4.7.3, 4.7.4, 4.9.1, 4.10.2, 4.11.1, 4.11.2, 5.17.2, 5.26.1, 5.26.2, 5.28.8, 5.29.1, 5.29.31, 5.29.45, 5.29.67, 5.30.1.4, 5.30.1.6, 5.30.2.1, 5.30.2.5, 5.30.3.1, 5.30.4.1, 5.30.4.5, 6.3
E042	Cutting, April Hall	Pocatello, ID	4	751	1.1, 6.3
E043	Cutting, Craig Hall	Pocatello, ID	4	751	1.1, 2.7.2, 3.4
E044	Benson, Lanie	Driggs, ID	4	752	1.1, 3.2.1, 3.2.4, 4.7.3, 5.2.1, 5.27.9.1, 5.29.41, 5.30.2.1

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E046	Rowe, Mike	Blackfoot, ID	4	754	1.1, 5.27.7.3, 5.27.9.6
E047	Zillig, Fritz	Idaho Falls, ID	4	754	1.1, 5.27.7.3, 5.27.9.6
E048	Sayer, Winona	Idaho Falls, ID	4	755	1.1, 5.27.7.3, 5.27.9.6
E049	Evans, Trisha	Idaho Falls, ID	4	755	1.1, 5.27.7.3, 5.27.9.6
E050	Van Orden, Jay	Idaho Falls, ID	4	756	1.1, 5.27.7.3, 5.27.9.6
E051	Feuerborn, Pat	Pocatello, ID	4	756	1.1, 4.3, 4.13, 5.27.10, 5.30.5.1, 6.1.2, 6.3
E052	Pehrson, Joe	Idaho Falls, ID	4	757	1.1, 2.1.1, 2.12.4, 4.9.4, 5.24.23, 5.27.6.1
E053	Fichter, Edson	Pocatello, ID	4	759	1.1, 2.7.2, 2.7.8
E054	Wood, Willard R.	Pocatello, ID	4	760	1.1, 4.15.4, 5.27.7.16, 5.27.9.2, 6.1.2
E055	Molen, Carolyn	Idaho Falls, ID	4	761	1.1, 5.2.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.1
E056	Wagoner, Vaughn and Anita	Idaho Falls, ID	4	763	1.1, 5.24.23, 5.27.9.2, 5.27.11.1, 5.27.12.4
E057	Miller, Gary W.	Pocatello, ID	4	763	1.1, 2.7.2, 4.13, 5.27.7.4, 5.27.11.6, 6.2
E058	Buchli, Gary L.	Pocatello, ID	4	764	1.1, 2.7.2, 4.13, 5.12.6, 5.24.27
E059	Vitale, Kathleen M.	Pocatello, ID	4	764	1.1, 2.7.2, 3.4, 4.3, 4.4.5, 4.15.2, 5.22.6, 5.27.10, 6.3
E060	Merrill, Georgeann	Idaho Falls, ID	4	765	1.1, 5.27.9.2
E061	Heilman, June E.	Pocatello, ID	4	766	1.1, 4.1, 5.10.4, 5.12.5, 5.22.2, 5.27.6.11, 6.1.1, 6.2, 6.5.5
E062	Cano, J., Cano, P., Craven, E. M.	Pocatello, ID	4	767	1.1, 2.7.2, 5.27.10, 6.5.11

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E063	Klein, Beverly A.	Pocatello, ID	4	767	1.1, 3.2.8, 4.15.2, 5.10.4, 5.30.2.1
E064	Klein, Noah W.	Pocatello, ID	4	768	1.1, 3.2.12, 3.2.23, 4.13, 5.12.1
E065	Vasil, Joe	Pocatello, ID	4	768	1.1, 4.13, 5.12.1, 5.29.90, 6.2
E066	Dunham, Mary S.	Pocatello, ID	4	769	1.1, 4.2.1, 5.30.1.14, 5.30.2.5, 5.30.3.1, 5.30.4.9
E067	Phillips, Birney	Arco, ID	4	771	1.1, 3.2.2, 5.24.23
E067	Veterans of Foreign Wars	Arco, ID	4	771	See Phillips, Birney
E068	Bonnett, Maris (Sister)	Idaho Falls, ID	4	771	1.1, 3.4, 5.10.11, 5.10.21, 5.12.6, 5.29.85, 6.3
E068	Christians Praying for Peace	Idaho Falls, ID	4	771	See Bonnett, Maris (Sister)
E069	Drollinger, Larry	Pocatello, ID	4	772	1.1, 3.2.1, 3.4, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.11.3, 5.27.12.8, 5.28.7
E069	International Union of Operating Engineers	Pocatello, ID	4	772	See Drollinger, Larry
E070	Beard, James	Seattle, WA	4	773	2.1.6, 4.1, 4.2.1, 4.4.2, 4.6, 4.7.1, 4.7.2, 4.7.4, 4.10.5, 4.15.2, 5.27.7.2, 5.27.10, 6.1.1
E070	Greenpeace	Seattle, WA	4	773	See Beard, James
E071	Grayson, Steve	Idaho Falls, ID	4	776	1.1
E072	Cottrell, Robert L. and Gay	Blackfoot, ID	4	776	1.1
E073	Spencer, Jon	Idaho Falls, ID	4	777	1.1, 5.27.6.1, 5.27.7.3, 6.1.2
E074	Lish, Alan	McCammon, ID	4	777	1.1, 5.27.6.1, 5.27.7.3
E075	Armstrong, Michael H.	Idaho Falls, ID	4	778	1.1, 3.4, 4.5, 5.27.6.1, 5.27.11.1
E076	Hill, Von J.	Idaho Falls, ID	4	778	1.1, 5.24.23, 5.27.6.1

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E078	Beu, Larry N.	Idaho Falls, ID	4	779	1.1, 5.24.23, 5.27.6.1, 5.27.7.3
E079	Juant, Dana	Blackfoot, ID	4	780	1.1, 5.24.23, 5.27.6.1
E080	Williams, Tim C.	Arco, ID	4	780	1.1, 3.2.2, 5.27.6.1
E081	Symms, Steve, Senator	Washington, DC	4	781	1.1, 2.1.1, 2.2.2, 3.4, 4.4.5, 4.6, 4.9.4, 4.15.4, 5.1.40, 5.1.42, 5.2.11, 5.2.14, 5.7.9, 5.18.4, 5.24.15, 5.26.2, 5.29.9, 5.29.41, 5.29.95
E081	U.S. Senate	Washington, DC	4	781	See Symms, Steve, Senator
E082	Allen, Duane	Shelley, ID	4	784	1.1, 5.24.23, 5.27.11.3, 5.27.12.6
E082	Oil, Chemical and Atomic Workers Local	Shelley, ID	4	784	See Allen, Duane
E083	Americal Nuclear Society Idaho Section	Idaho Falls, ID	4	785	See Liebenthal, Jack
E083	Liebenthal, Jack	Idaho Falls, ID	4	785	1.1, 5.24.23, 5.27.9.2, 5.28.2
E084	Labor International Local 155	Idaho Falls, ID	4	786	See Larsen, Donn
E084	Larsen, Donn	Idaho Falls, ID	4	786	1.1, 3.2.2, 5.24.23, 5.27.7.3, 5.27.9.2, 5.27.11.3
E085	Allgood, Lane	Idaho Falls, ID	4	786	1.1, 4.9.4, 5.27.6.1, 5.27.7.16, 5.27.12.4, 5.27.12.5
E085	SIS Supporters	Idaho Falls, ID	4	786	See Allgood, Lane
E086	Hall, Blake	Idaho Falls, ID	4	788	1.1, 2.1.1, 3.3.1, 3.4, 4.9.4, 5.12.1, 5.23.23, 5.24.23, 5.24.30, 5.27.7.16, 5.27.9.1, 5.27.11.6, 5.27.13.2, 5.29.41, 5.29.95, 5.30.5.7
E086	Idaho Republican Party	Idaho Falls, ID	4	788	See Hall, Blake
E087	Harrington, James A.	Blackfoot, ID	4	791	1.1, 3.4, 5.2.1, 5.24.23, 5.25.3, 5.27.6.1, 5.28.2

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E089	Carlson, Blair	Idaho Falls, ID	4	794	1.1, 4.5, 5.24.23, 5.27.6.1, 5.27.9.3, 5.27.15.1, 5.27.17
E090	Stears, Allen, Linda, and Dante	Blackfoot, ID	4	796	1.1, 3.2.2, 5.24.23
E091	Langer, Sidney	Idaho Falls, ID	4	796	1.1, 4.1, 5.28.6
E092	Robertson, Robert L.	Pocatello, ID	4	797	1.1, 4.9.4, 5.24.23, 5.27.6.1, 5.27.7.3
E093	Reed, Jim	Idaho Falls, ID	4	797	1.1, 3.4
E094	Jensen, J. Allen	Idaho Falls, ID	4	799	1.1, 2.10, 3.3.1, 3.4, 5.2.1, 5.24.22, 5.27.6.1, 5.27.9.2, 5.29.32, 5.29.95
E095	Martin, Linda S.	Idaho Falls, ID	4	801	1.1, 3.3.1, 4.1, 5.27.5.2, 5.30.4.3, 6.5.2
E096	Porter, John, Mayor	Rexburg, ID	4	802	1.1, 3.2.2, 4.15.4, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.1
E096	Rexburg, City of	Rexburg, ID	4	802	See Porter, John, Mayor
E097	Buchli, Shirley	Pocatello, ID	4	804	1.1, 3.4, 5.29.31, 4.3, 4.7.3, 5.2.15, 5.4.1, 5.27.10, 5.27.11.5, 5.29.1, 6.5.2
E098	Haddon, Verlow	Boise, ID	4	805	1.1, 3.4, 5.24.21, 5.24.23, 5.27.7.3, 5.27.12.6
E098	Idaho AFL-CIO	Boise, ID	4	805	See Haddon, Verlow
E099	Geery, Daniel	Shelley, ID	4	806	1.1, 2.7.2, 4.10.5, 4.13, 6.3, 6.5.2, 6.5.5
E100	Turner, Kaye	Pocatello, ID	4	808	1.1, 2.7.1, 3.3.2, 4.13, 5.1.1, 5.24.23, 5.29.85, 5.30.4.1
E101	Howard, R. P.	Pocatello, ID	4	808	1.1, 4.15.2
E102	Kumm, July and Kelly		4	809	1.1, 3.3.2
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E114	Downing, Joan K. and Glenn Ray	Pocatello, ID	4	817	1.1, 4.13, 5.27.7.1, 6.3
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E235	Koger, Robert	Nampa, ID	5	126	1.1, 2.1.1, 4.15.4, 5.27.7.12, 5.28.2
E236	Kreider, C. Fuji	LaGrande, OR	5	127	1.1, 2.2.6, 2.13.7, 3.2.1, 3.2.2, 3.3.2, 3.5.1, 4.1, 4.3, 4.9.3, 4.13, 4.14, 4.15.5, 5.1.41, 5.7.1, 5.7.6, 5.7.8, 5.7.10, 5.12.1, 5.13.17, 5.24.22, 5.24.27, 5.24.31, 5.26.2, 5.27.2, 5.27.6.1, 5.29.6, 5.29.23, 5.29.27, 5.29.42, 5.29.55, 5.29.60, 5.29.61, 5.29.63, 5.29.64, 5.29.66, 5.29.71, 5.29.74, 5.29.81, 5.29.85, 5.29.87, 5.29.90, 5.29.91, 5.29.95, 5.29.97, 5.29.101, 5.29.106, 5.30.1.2, 5.30.1.11, 5.30.3.1, 5.30.4.14, 6.1.1, 6.1.2, 6.2, 6.3, 6.5.2, 6.5.5
E237	Skoro, Charles	Boise, ID	5	148	2.7.2, 2.7.7, 4.15.5, 5.1.38, 5.1.39, 5.1.42, 5.1.43, 5.27.1.1, 5.27.1.4, 5.27.1.5, 5.27.2, 5.27.6.4, 5.27.7.1, 5.27.7.6, 6.3
E238	Conley, Pamela	Boise, ID	5	150	1.1, 2.7.11, 3.2.4, 3.2.18, 3.3.1, 5.2.6, 5.27.7.17, 5.30.4.12
E239	Nolt, Leonard	Boise, ID	5	150	1.1, 4.13, 5.27.7.17, 6.3

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E241	Wardwell, Ed	Boise, ID	5		1.1, 2.1.1, 2.3, 3.2.26, 3.2.27, 3.4, 3.6.1, 4.1, 4.2.1, 4.10.1, 5.1.2, 5.10.1, 5.10.6
E242	Keener, Margaret	Boise, ID	5	157	1.1, 2.3, 5.10.7, 6.3
E243	Carpenter, Rocky	Boise, ID	5	158	1.1, 4.13, 5.27.2, 5.27.7.4, 5.27.7.17, 5.27.12.8, 5.29.63, 5.29.80, 5.29.85, 5.29.86, 5.29.88, 5.30.2.5, 6.2
E244	Douglas, David	Boise, ID	5	159	1.1, 2.13.3, 4.14, 5.24.27, 5.30.3.1, 5.31.12, 6.1.1
E245	Stolz, Randy	Boise, ID	5	160	1.1, 3.2.8, 5.1.37, 5.12.1, 5.27.4.4, 5.30.4.14, 6.1.1, 6.2
E246	Bjornsen, Robert Lind	Boise, ID	5	161	1.1, 4.13, 5.10.5, 5.10.6, 5.29.87
E247	Teater, Timothy	Boise, ID	5	162	1.1, 3.2.13, 4.13, 5.12.1, 5.22.4, 5.27.6.9, 5.27.7.4, 5.29.63, 5.29.85, 5.29.109
E248	Eccles, Eloise Ann	Boise, ID	5	163	1.1, 4.13, 5.1.21, 5.1.24, 5.1.25, 5.1.34, 5.1.44, 5.24.27
E249	DuFosse, Bryan	Boise, ID	5	163	1.1, 2.5.4, 4.15.5, 5.29.87, 5.30.4.14, 5.30.5.7, 6.1.8, 6.2
E250	Clifford, Kevin	Boise, ID	5	164	1.1, 2.7.4, 2.11.11, 4.3, 4.9.4, 4.10.2, 4.13, 4.15.1, 5.1.30, 5.1.36, 5.2.5, 5.4.1, 5.9.3, 5.13.6, 5.13.18, 5.25.5, 5.30.1.11, 5.30.2.1, 5.30.2.5, 6.2, 6.3, 6.5.1
E251	Jones, Michael R.	Boise, ID	5	166	1.1, 4.1, 4.15.4, 5.2.6, 5.10.1, 5.10.14, 5.24.25, 5.30.1.13, 6.2, 6.3
E252	Ostrogorsky, Helen	Boise ID	5	168	1.1, 3.4, 4.7.3, 5.1.42, 5.10.7, 5.24.30, 5.28.8, 5.30.1.4
E253	Parkin, Kate	Boise, ID	5 151	168	1.1, 5.27.6.9, 6.1.2, 6.1.8, 6.3

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E255	Torf, Mark	Boise, ID	5	170	5.18.2, 5.18.5, 5.21.2, 5.21.4, 5.21.6, 5.30.1.5, 5.30.1.6, 5.30.1.7, 5.30.1.9, 5.30.1.16, 5.30.1.19, 5.30.1.21, 5.30.1.25, 5.30.2.5, 5.30.3.8, 5.30.4.4, 5.30.4.13, 5.30.5.1, 5.30.5.8, 5.30.5.10, 5.30.5.14
E256	Van Valkenburgh, Jack	Boise, ID	5	173	1.1, 2.7.6, 2.13.17, 3.3.1, 3.3.3, 4.2.1, 4.3, 5.26.2
E257	Leisk, Alan	Boise, ID	5	174	1.1, 5.24.23, 5.27.11.2, 5.27.12.5
E258	Sali, Gregory	Boise, ID	5	175	1.1, 3.3.1, 3.4, 4.10.3, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.1, 5.27.9.3, 5.27.12.4, 5.27.15.1, 5.28.6
E259	McGlinsky, Alfred M.	Boise, ID	5	185	1.1, 2.1.2, 2.3, 3.3.1, 5.2.7, 5.27.7.17, 6.3
E260	Read, Heidi	Boise, ID	5	186	1.1, 2.1.1, 2.7.8, 4.2.1, 4.13, 5.29.85, 5.30.2.1, 5.30.2.4, 6.1.4, 6.1.5, 6.1.8
E261	Eastlake, Susan	Boise, ID	5	188	1.1, 3.3.1
E262	Campbell, Robert	Boise, ID	5	188	1.1, 3.2.1, 4.2.1, 4.3, 6.2, 6.5.2
E263	Evans-Campbell, Athena	Boise, ID	5	189	1.1, 4.2.1, 4.15.1, 5.30.3.1, 5.30.4.14
E264	Wright, Eugene B.	Boise, ID	5	190	1.1, 5.20.2, 5.27.12.3, 5.27.12.5
E265	Neilson, Leila		5	191	1.1, 4.15.2, 4.15.5, 5.10.4, 5.12.1, 5.27.2, 5.29.32, 5.30.2.5, 5.30.3.1
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E267	Nicholson, Esther A. and R. L.		5	192	1.1, 2.7.8, 3.4, 5.27.6.1, 5.30.5.10, 6.2
E268	Nelson, Wanda	Boise, ID	5	192	1.1, 2.7.9
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E271	Carpenter, Lynne	Mtn. Home, ID	5	195	3.4, 5.24.30
E272	Larsen, Sandi Skott	Mtn. Home, ID	5	196	6.1.2, 6.2, 6.3, 6.5.3
E273	Lieder, Ruth, Mayor	Sun Valley, ID	5	197	1.1, 5.27.3.3, 5.27.3.4, 5.27.5.1
E273	Sun Valley, City of	Sun Valley, ID	5	197	See Lieder, Ruth, Mayor
E274	Ketchum, City of	Ketchum, ID	5	199	See Young, Lawrence, Mayor
E274	Young, Lawrence, Mayor	Ketchum, ID	5	199	1.1, 4.2.1, 5.27.1.11, 5.27.2, 5.27.3.2, 5.27.3.3, 5.27.5.1, 5.30.2.5
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E275	Twin Falls, Chamber of Commerce	Twin Falls, ID	5	200	See Miller, Jack
E276	Moorman, Mark	Burley, ID	5	201	1.1, 5.12.2, 5.24.21, 5.27.7.3, 5.27.9.1, 6.1.2
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E277	National Electrical Contractors Association	Boise, ID	5	201	See Cates, Garth
E278	Stoke, Jonathan	Hailey, ID	5	202	1.1, 2.2.1, 2.11.3, 2.11.8, 5.1.8, 5.1.21, 5.1.46, 5.1.47, 5.6.1, 5.6.5, 5.6.7, 5.7.10, 5.7.13, 5.7.17, 5.8.17, 5.9.1, 5.10.1, 5.10.5, 5.10.8, 5.10.15, 5.14.1, 5.16.1, 5.17.1, 5.17.3, 5.20.1, 5.20.6, 5.23.1, 5.23.2, 5.23.3, 5.23.5, 5.23.13, 5.23.17, 5.23.19, 5.24.1, 5.24.18, 5.24.27, 5.27.1.1, 5.27.1.1, 5.27.2, 5.27.3.3, 5.27.3.4, 5.27.3.2, 5.28.8, 5.29.40, 5.30.1.6, 5.30.2.1, 5.30.4.5, 5.30.4.9, 5.31.19
E279	Harmon, J. Frank	Pocatello, ID	5	212	1.1, 2.1.1, 4.9.4, 5.2.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.12.5, 5.30.5.7

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E283	Perry, Alvin L.	Blackfoot, ID	5	216	1.1, 5.24.23, 5.27.7.9, 5.28.6
E284	Perry, Ailene G.	Blackfoot, ID	5	216	1.1, 5.24.23, 5.27.7.9
E285	Josephy, Melissa	Hailey, ID	5	217	1.1, 5.27.2, 6.3
E286	Mallory, Bill and Rose	Hailey, ID	5	217	1.1, 6.2
E287	Bernthal, E. J.	Twin Falls, ID	5	218	1.1, 2.1.1, 2.3, 3.2.1, 4.1, 4.2.1, 4.3, 4.7.1, 4.13, 4.14, 4.15.2, 5.10.7, 5.12.1, 5.24.17, 5.27.6.4, 5.30.2.1
E288	Stennett, Clint	Hailey, ID	5	219	1.1, 5.27.2, 5.27.3.3, 6.2
E289	Walker, Ben and Marilyn	Bellevue, ID	5	220	1.1, 6.5.5
E290	Freitas, Frank	Idaho Falls, ID	5	221	1.1, 3.4, 4.15.4
E291	Amrit, Family	Ketchum, ID	5	222	1.1, 6.2
E292	Lafey, Kevin	Hailey, ID	5	223	1.1, 2.7.2, 4.13, 6.3
E293	Lever, Thane	Ketchum, ID	5	223	1.1, 5.24.30, 5.27.2, 5.30.4.7, 6.2
E294	Wiethorn, Julie	Hailey, ID	5	224	1.1, 2.7.2, 2.13.17, 4.13, 5.29.85, 5.30.3.6, 5.30.4.9, 5.30.5.1, 5.30.5.7, 6.1.2
E295	Bates, Dale	Ketchum, ID	5	226	1.1, 5.1.3, 5.24.25
E296	Neill, DeWitt T.	Pocatello, ID	5	227	1.1, 2.1.1, 3.4, 4.9.4, 4.15.4, 5.28.8, 5.29.97, 6.1.2, 6.2
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E302	Mahr, Monica	Sun Valley, ID	5	230	1.1, 2.1.1, 2.2.10, 2.12.5, 3.2.15, 4.3, 4.11.1, 4.14, 5.1.1, 5.22.2, 5.26.2, 5.27.1.11, 5.27.2, 5.27.3.3, 5.27.3.4, 5.27.10, 5.28.2, 5.30.1.14, 5.30.2.5, 5.30.4.7
E303	Pletcher, Johnna and Del	Ketchum, ID	5	234	1.1
E304	Gabrinetti, Tom	Ketchum, ID	5	235	1.1, 4.1, 4.14, 5.9.1, 5.29.85, 6.1.2
E305	Moffett, Ed	Ketchum, ID	5	235	1.1, 2.2.1, 4.3, 5.13.6, 5.24.27, 5.27.2, 5.27.3.4, 5.27.7.15, 6.2, 6.3
E306	Moffett, Jennifer	Ketchum, ID	5	238	1.1, 4.15.4, 5.6.5, 5.13.13, 5.27.3.1, 5.27.10, 5.29.81, 5.29.92, 5.30.4.1, 5.30.4.9
E307	Spiller, Lynn, Keri, and Jeff		5	240	1.1
E308	Greathouse, Lowell	Filer, ID	5	240	1.1, 4.13, 5.1.45, 5.10.4, 5.27.6.1, 5.29.92, 5.30.3.8, 5.30.5.12
E309	Fallowfield, Susan Rutt	Ketchum, ID	5	241	1.1, 5.7.10, 6.5.2
E310	Hedge, David	Twin Falls, ID	5	242	1.1, 3.2.18, 4.2.1, 4.3, 4.7.1, 4.10.2, 4.11.1, 4.15.2, 5.1.40, 5.2.10, 5.12.1, 5.24.22, 5.26.1, 5.26.2, 5.27.2, 5.29.99, 5.30.2.1, 6.2
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E314	Edgers, Debbie	Ketchum, ID	5	245	1.1, 5.1.36
E315	Kincannon, Linn	Sun Valley, ID	5	246	4.4.6, 4.13, 4.15.4, 5.1.42, 5.27.6.11, 6.1.4
E316	Glaccum, Ellen	Ketchum, ID	5	246	4.15.4, 5.12.1, 5.30.1.5, 5.30.1.6, 5.30.4.1, 5.30.4.12
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E319	Hoskins, Bridgette	Buhl, ID	5	248	4.14, 5.29.81, 5.30.4.9
E320	Machacek, Cheryl	Buhl, ID	5	249	1.1, 4.14, 5.12.1, 5.29.64, 5.30.3.8, 6.2
E321	Machacek, Naedene	Buhl, ID	5	250	1.1, 5.1.42
E322	Pearson, Brad	Twin Falls, ID	5	250	1.1
E323	White, Terry	Idaho Falls, ID	5	251	5.27.3.4, 5.27.7.2, 6.2
E324	Ivory, Don B.	Meridian, ID	5	251	1.1, 5.24.22, 5.27.12.4
E325	Marvel, Jonathan	Hailey, ID	5	253	1.1, 4.3, 4.13, 4.15.4, 5.12.2, 5.30.3.1, 6.1.8, 6.3, 6.5.1
E326	McGinley, Kathleen	Bellevue, ID	5	254	4.13, 4.15.5, 6.1.1, 6.2, 6.3
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E328	Bergstrom, Gene	Pocatello, ID	5	256	1.1, 5.24.22, 5.24.27, 5.27.6.1, 5.27.9.1
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E332	Stevenson, John	Gannett, ID	5	260	1.1, 4.3, 5.6.4, 5.10.1, 5.16.1, 5.29.59
E333	Keresty, Laura	Washington, DC	5	260	1.1, 4.7.3, 4.9.4, 4.14, 4.15.1, 4.15.8, 5.24.27, 5.24.28, 5.27.7.2, 5.31.16
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E335	Freund, Robbie A.	Ketchum, ID	5	263	1.1, 4.14, 5.27.2, 5.27.10
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E337	Karban, Diane	Ketchum, ID	5	264	1.1, 4.15.5, 5.27.10, 6.2, 6.3
E338	Stevenson, Elizabeth	Bellevue, ID	5	265	1.1, 4.2.1, 4.3, 6.2
E339	Thiede, Cindy	Ketchum, ID	5	265	4.2.1, 5.10.5, 5.24.27, 5.27.3.1, 5.27.3.4, 5.29.87, 5.30.4.7, 5.30.5.1, 6.1.1
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E342	Hedge, Anne L.	Sun Valley, ID	5	267	1.1, 2.2.4, 2.2.12, 2.8.6, 3.3.1, 4.3, 4.11.1, 4.12, 4.15.2, 5.10.5, 5.12.1, 5.22.2, 5.22.4, 5.24.17, 5.27.6.1, 5.27.9.5, 5.27.10, 5.27.11.5, 5.30.1.13, 5.30.2.1, 5.30.2.5, 5.30.4.1, 6.4.4
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E347	Lucere, Judd	Sun Valley, ID	5	272	1.1, 4.15.1, 5.1.42, 6.1.9, 6.2
E348	Widener, Judy	Twin Falls, ID	5	273	1.1, 2.7.2, 2.8.12, 6.2
E349	Phillips, Kay	Hailey, ID	5	273	5.30.3.1, 6.3
E350	Vork, Jackie E.	Ketchum, ID	5	274	1.1, 4.1, 5.27.6.1, 6.3
E351	Miller, M. Dell	Idaho Falls, ID	5	274	1.1, 5.24.23, 5.27.6.1, 5.27.9.1
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E353	Phillips, Glenn A.	Arco, ID	5	277	1.1, 4.15.4, 5.24.23, 6.1.11
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E356	Hawkes, Judith	Ketchum, ID	5	282	1.1, 2.1.1, 2.3, 2.8.2, 2.12.2, 5.1.38, 5.1.40, 5.1.45, 5.9.3, 5.24.28, 5.27.7.17, 5.29.56, 5.30.2.1, 6.1.8, 6.3
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E357	O'Crowley, Janet	Picabo, ID	5	284	2.1.1; 4.1, 5.27.6.11, 5.30.3.1, 5.30.4.14, 5.30.5.1, 6.2, 6.3
E358	Riviera, Holly	Picabo, ID	5	285	4.15.1, 6.3
E359	McNevin, Tony E.	Jerome, ID	5	286	1.1, 2.7.2, 4.13, 5.27.7.1
E360	Von Lindern, Ian	Moscow, ID	5	287	1.1, 2.1.1, 2.2.3, 2.13.10, 3.2.4, 4.7.3, 5.2.9, 5.12.1, 5.27.2, 5.29.112, 5.30.1.4, 5.30.1.14, 5.30.2.1, 5.30.2.2, 5.30.2.4, 5.30.2.5, 5.30.4.9, 5.30.4.14, 5.30.5.4, 5.31.8, 6.1.12
E361	Marshall, Quay	Hailey, ID	5	350	4.14, 4.15.1, 5.24.27, 5.24.30, 5.30.3.8
E362	Kuhn, Faye	Hailey, ID	5	350	1.1
E363	Sullivan, Mike	Hailey, ID	5	351	1.1, 2.7.9, 2.8.2, 3.2.23, 4.13, 5.1.36, 5.24.27, 5.27.6.6, 5.27.6.11, 5.30.4.14, 6.5.1, 6.5.2
E364	Wells, Matthew	Hailey, ID	5	352	1.1, 4.15.1, 5.26.5, 6.2
E365	Coble, Daphne	Hailey, ID	5	352	1.1, 3.4, 5.1.21, 5.27.3.3
E366	Teitge, Thomas	Hailey, ID	5	353	1.1, 3.4, 4.9.3, 4.13, 5.27.3.3, 5.29.97, 5.30.5.7
E367	Cole, Christine	Sun Valley, ID	5	353	1.1, 4.15.2, 6.2, 6.3
E368	Meyer, Richard S.	Sun Valley, ID	5	354	4.13
E369	Lagergren, Ken	Hailey, ID	5	355	1.1, 3.3.1, 5.27.7.17, 5.29.87, 5.30.4.7, 5.30.5.12
E370	Blair, Maggie	Ketchum, ID	5	355	1.1, 3.3.1, 3.4, 4.14, 5.27.2, 5.27.3.3, 5.27.10, 5.30.2.1
E371	Wilson, Cara		5	356	1.1, 5.27.6.2, 6.5.5
E372	Wilson, John	Twin Falls, ID	5	356	1.1, 4.15.2, 5.27.10, 6.1.2

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E374	Lagergren, Ginna	Hailey, ID	5	358	2.2.4, 3.2.11, 5.1.21, 5.7.1, 5.7.15, 5.22.2, 5.24.18, 5.27.6.2, 5.27.7.3, 5.27.7.4, 5.27.10, 5.30.2.1, 5.30.4.9, 6.5.1
E375	O'Connor, K. J.	Buhl, ID	5	359	1.1, 3.4, 5.12.1, 5.27.6.2, 5.27.7.2, 5.29.87
E376	O'Connor, John C.	Buhl, ID	5	359	1.1, 5.1.21, 6.2
E377	Neilson, Martha Woodwell	Rupert, ID	5	360	1.1, 2.7.2, 5.27.6.9, 6.3
E378	Hopple, W. B. and Holly	Buhl, ID	5	360	1.1, 4.15.5, 5.1.21
E379	Graham, Carolyn	Ketchum, ID	5	361	1.1, 2.7.2, 3.4, 5.27.7.17, 6.1.2, 6.3
E380	Schroeder, Dianne	Twin Falls, IO	5	361	1.1
E381	Vincent, Bonnie	Ketchum, ID	5	362	1.1, 3.4, 5.1.21, 5.1.45, 6.2
E382	Garman, Steven P.	Ketchum, IO	5	362	1.1, 5.1.21, 5.1.30, 5.1.40, 5.29.87
E383	Drown, Teresa	Ketchum, IO	5	363	1.1, 4.13, 5.27.7.17, 6.5.5
E384	Persons, Lewis	Ketchum, ID	5	363	1.1, 2.7.2, 4.15.2
E385	Rodman, Julie	Bellevue, ID	5	364	1.1, 5.30.5.12, 6.5.5
E386	Nycum, John	Ketchum, ID	5	364	1.1, 2.1.1, 2.1.6, 3.4, 4.15.2, 5.1.21, 5.1.45, 5.6.4, 5.10.4, 5.29.4, 5.30.1.14, 5.30.2.1, 5.30.4.1
E387	Shokal, Edward C.	Hagerman, ID	5	366	2.2.9, 2.7.5
E388	Randell, Julie and Robert	Kimberly, ID	5	369	1.1, 2.7.2, 4.7.2, 5.24.22, 5.27.6.9
E389	Petitions, Blaine County Residents	Blaine County ID	5	370	1.1, 2.7.9, 3.4, 4.15.2, 5.1.21, 6.3

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E391	Flood, Katie and John	Picabo, ID	5	374	1.1, 2.7.9, 4.15.4, 6.1.2
E392	Ten Individuals from Picabo	Picabo, ID	5	375	1.1, 4.15.5, 5.29.85
E393	Higginbotham, Jan	Ketchum, ID	5	376	1.1, 2.7.2, 3.3.1, 3.4, 5.27.2, 5.27.7.2
E394	Nine Concerned Citizens	Mud Lake, ID	5	377	1.1, 4.15.5, 5.29.31, 5.30.4.14
E395	Blanchard, Tom	Bellevue, ID	5	377	1.1, 5.12.1, 5.27.10, 5.30.5.12
E396	Tunno, Mark	Ketchum, ID	5	378	1.1, 4.14, 6.3
E397	Branch, Tom	Burley, ID	5	378	1.1, 3.2.1, 3.2.18, 4.1, 5.1.46, 5.7.13, 5.24.17, 5.27.2, 5.27.5.3, 5.27.8, 5.27.9.4, 5.29.31, 5.30.1.13, 5.30.2.1, 5.30.2.5, 5.30.4.5, 6.1.5
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E399	Ahlberg, Jerry	Idaho Falls, ID	5	381	4.9.4, 5.24.23, 5.27.7.7, 5.28.3
E400	Maniokian, Leslie J.	Ketchum, ID	5	382	1.1, 4.15.5, 5.1.45, 5.13.15, 5.30.4.1, 6.1.12, 6.2
E401	Gore, Jonathan	Ketchum, ID	5	382	1.1, 4.15.5, 5.1.45, 5.13.15, 5.30.4.1, 6.1.12, 6.2
E402	Shockey, Carla	Burley, ID	5	383	1.1
E403	Blunt, Andrew	Hailey, ID	5	383	1.1, 4.15.1, 5.1.45, 5.22.6, 5.27.3.3, 5.27.7.2, 5.27.7.5, 5.29.63, 5.30.3.1, 5.30.4.7
E404	Conrod, Elizabeth	Ketchum, ID	5	385	1.1
E405	Paschall, Liza	Sun Valley, ID	5	385	1.1, 2.7.2, 5.12.1, 5.30.3.1

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E407	Hanggi, Pat	Ketchum, ID	5	386	1.1, 4.1, 5.1.32, 5.1.40, 5.30.3.1, 6.2, 6.3
E408	Hansom, Virginia	Hailey, ID	5	387	1.1, 4.13, 4.15.4, 5.27.7.17
E409	Landon, Janice L.	Idaho Falls, ID	5	388	1.1, 2.1.1, 2.8.2, 3.2.2, 4.1, 4.9.4, 5.19.4, 5.31.11
E410	Neilson, Curtis	Idaho Falls, ID	5	389	1.1, 5.7.12, 5.10.8, 5.12.7, 5.27.1.11, 5.29.87, 5.29.107, 5.30.2.1, 5.30.2.5, 5.30.3.1, 5.30.4.1, 5.30.4.5
E411	Reed, James and Lea	Hailey, ID	5	390	1.1
E412	Laverty, Kent	Hailey, ID	5	391	1.1, 3.3.1, 5.10.2, 5.23.19, 5.27.7.17, 5.28.8, 5.29.68, 5.30.2.5, 5.30.3.6, 5.30.5.8, 6.1.9
E413	Pemberton, Anne	Hailey, ID	5	391	1.1, 4.6, 5.2.15, 5.30.2.1, 6.2
E414	Chubb, Mary Ann	Ketchum, ID	5	392	1.1, 5.27.3.3
E415	Beechert, Alison	Hailey, ID	5	393	1.1, 3.4, 5.1.45, 5.27.2
E416	Manheim, Bruce S.	Sun Valley, ID	5	393	1.1, 3.4, 5.2.1, 5.9.1, 5.24.30, 5.27.3.4, 5.27.6.9, 5.27.10
E417	Donnelly, Dennis O.	Pocatello, ID	5	394	1.1, 2.1.1, 2.1.4, 2.7.8, 2.10, 2.11.9, 2.13.4, 5.8.7, 5.10.17, 5.10.21, 5.27.2, 5.30.1.12, 5.30.1.14, 5.30.1.18, 5.30.2.1, 5.30.2.5
E418	Schwake, Suzanne Simon	Ketchum, ID	5	395	1.1
E419	Augustus, Janet	Sun Valley, ID	5	396	1.1, 6.2
E420	Stone, Lynne	Ketchum, ID	5	396	1.1
E421	Vanderbilt, Ann S.	Ketchum, ID	5	397	1.1, 3.3.1, 3.4, 4.15.1, 5.27.2, 5.29.63, 5.30.2.1, 6.2

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E425	Hunter, Ed	Idaho Falls, ID	5	400	1.1, 3.4, 5.27.7.3, 5.27.7.16, 5.27.9.2, 5.27.9.3, 5.27.12.8, 5.28.2, 5.30.3.1
E426	Fowler, Ron	Pocatello, ID	5	401	3.2.2, 5.27.6.1, 5.27.7.3, 5.27.9.3, 5.27.12.8, 5.28.2, 6.1.2
E427	Beemer, Terry L.	Idaho Falls, ID	5	401	1.1, 3.4
E428	Murphey, Suzanne	Castleford, ID	5	402	1.1, 3.2.23, 5.1.30, 5.24.27, 6.1.2, 6.3
E429	Vladimiroff, John	Ketchum, ID	5	403	2.7.2, 4.9.1, 5.27.10, 5.30.3.1
E430	Stallard, Jack	Ketchum, ID	5	404	1.1, 3.4, 5.12.1
E431	Turzian, Jan and Michael	Sun Valley, ID	5	404	1.1, 4.15.4, 5.24.27
E432	Anderson, Candice	Ketchum, ID	5	405	1.1, 3.4, 4.15.4, 5.1.21, 5.1.42, 5.27.10
E433	Flowers, Jeanne	Ketchum, ID	5	406	1.1, 3.2.18, 3.4, 4.4.6, 4.15.1, 5.6.1, 5.9.1, 5.29.95, 5.30.2.1, 5.30.3.1, 6.3
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E435	Burns, Robert	Ketchum, ID	5	407	1.1, 3.4, 4.15.4, 5.26.2, 5.27.2, 5.29.31, 5.29.41, 5.30.2.1
E436	Gibson, Diane P.	Ketchum, ID	5	408	1.1, 2.2.7
E437	Combe, Robert	Idaho Falls, ID	5	408	1.1, 5.24.23, 5.27.6.1, 5.27.9.3
E438	Cook, William V.	Ketchum, ID	5	409	1.1, 3.4, 5.1.21, 6.2

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E442	Breen, Mike	Hailey, ID	5	411	1.1, 2.7.11, 3.2.2, 4.14, 5.27.7.17, 6.2, 6.3
E443	Leim, Bruce, Dr.	Hailey, ID	5	412	1.1, 2.7.2, 4.1, 4.15.4, 5.20.1, 5.29.37, 5.30.1.2, 5.30.1.13, 6.3
E444	Isham, S.	Ketchum, ID	5	413	1.1, 2.7.9, 3.2.1, 4.2.1, 5.12.1, 5.24.27
E445	Newman, Helen	Burley, ID	5	414	1.1
E446	Hondo, Carolyn	Burley, ID	5	415	1.1, 3.2.1, 3.2.18, 4.13, 5.27.2
E447	Belson, Janice	Sun Valley, ID	5	415	2.7.2, 3.3.1, 3.3.2, 4.15.4, 5.27.7.17
E448	Gerhart, Joann S. and Philip A.	Ketchum, ID	5	417	1.1, 3.4, 5.1.21, 6.1.2
E449	Welch, Cheryl	Hailey, ID	5	418	1.1, 5.22.2, 5.27.2, 5.27.3.3, 5.27.10, 5.29.68, 6.2
E450	Zweifel, Lynn	Ketchum, ID	5	418	1.1, 3.4, 5.9.1, 5.10.4, 5.29.95, 5.30.3.8, 6.3
E451	Freund, Gail	Ketchum, ID	5	419	1.1
E452	Davis, Michele	Ketchum, ID	5	419	1.1, 2.7.2, 4.14, 5.27.2
E453	Piotter, Karl F.	Ketchum, ID	5	420	1.1, 4.14, 6.3
E454	Schneider, Betty H.	Ketchum, ID	5	420	1.1, 5.30.3.1, 5.30.5.12, 6.1.2, 6.5.2
E455	Bille, Donna	Ketchum, ID	5	421	2.7.2
E456	Jones, Mary	Filer, ID	5	422	1.1, 2.7.2, 5.12.1, 5.13.5, 5.13.13, 5.27.2, 6.5.5

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E458	Siemon, Mark	Ketchum, ID	5	425	1.1, 4.1, 4.3, 4.13, 6.3, 6.5.13
E459	Gibson, Glenda	Burley, ID	5	425	1.1, 4.13, 5.7.13, 5.12.1, 5.30.3.1
E460	Norton, Nancy L.		5	426	1.1, 3.4, 4.15.7, 5.7.13, 5.7.19, 5.30.4.1
E461	Beezley, Carrie	Twin Falls, ID	5	426	1.1
E462	Beezley, Thomas R.	Twin Falls, ID	5	427	1.1, 6.1.1, 6.3
E463	Thompson, Becky		5	427	1.1, 3.4, 4.4.6, 4.10.1, 4.15.4, 5.24.27
E464	Woods, Cynthia Lou	Twin Falls, ID	5	428	1.1, 2.7.2, 6.2
E465	Bray, Richard D.	Sun Valley, ID	5	429	1.1, 3.4, 5.27.6.10
E466	Green, Ron C.	Pocatello, ID	5	429	1.1, 5.27.7.16, 5.27.9.2, 6.1.2
E467	Burwell, Merlin D.	Pocatello, ID	5	430	1.1
E468	Christensen, Scott A.		5	431	1.1, 5.30.4.5, 5.30.5.7
E469	Jones, Mary and Steve	Garden Valley, ID	5	431	1.1, 4.4.6, 4.15.5, 5.27.3.4, 5.30.1.13, 6.3
E470	Small, Will	Picabo, ID	5	432	1.1, 2.7.2, 2.7.8, 4.2.1, 4.4.2, 4.9.1, 4.13, 4.15.4, 4.15.5, 5.2.14, 5.10.4, 5.12.1, 5.24.17, 5.27.1.11, 5.27.2, 5.27.7.4, 5.27.10, 5.29.41, 5.30.2.1, 5.30.4.12, 5.30.4.14, 6.3
E471	Quinn, Billy	Sun Valley, ID	5	443	3.4
E472	Chupa, Marge	Twin Falls, ID	5	443	1.1, 2.7.2, 3.2.22, 4.6, 5.30.5.14
E473	Terra, Michael	Ketchum, ID	5	444	1.1, 4.15.4, 5.27.7.4, 6.1.9

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E477	Bergerson, Linda	Ketchum, ID	5	447	1.1, 3.2.1, 3.3.1, 4.3, 4.4.2, 4.13, 4.15.2, 5.1.42, 5.12.1, 5.26.1, 5.27.2, 5.27.3.3, 5.30.1.14, 5.30.2.1, 5.30.4.9, 6.5.2
E478	Brown, Michael	Idaho Falls, ID	5	448	5.27.6.1, 5.27.7.4, 5.27.7.5
E479	Pomeroy, Tom	Ketchum, ID	5	449	1.1, 2.7.9, 3.3.3, 4.2.1, 5.9.1, 5.10.1, 5.22.3, 5.27.3.4, 5.27.6.9, 5.29.70, 5.29.92, 5.30.3.1, 6.3
E480	Macdonald-Steward, Margaret	Twin Falls, ID	5	450	1.1, 4.1, 5.22.3
E481	Salonya, Cal	Hailey, ID	5	451	1.1, 3.2.2, 6.5.5
E482	Paul, Taul	Ketchum, ID	5	451	1.1, 2.3, 4.1, 4.2.1, 4.6, 4.14, 6.3
E483	Knighton, R. B.	Firth, ID	5	453	1.1, 4.15.4, 5.27.6.1
E484	Hammond, Waynette	Moreland, ID	5	453	1.1, 4.15.4, 5.27.6.1
E485	Hammond, C. E.	Idaho Falls, ID	5	454	1.1, 4.15.4, 5.27.6.1
E486	Pifer, Larry E.	Idaho Falls, ID	5	454	1.1, 4.15.4, 5.27.6.1
E487	Bruha, George J.	Idaho Falls, ID	5	455	1.1, 4.15.4, 5.27.6.1
E488	Smith, Lisa	Pingree, ID	5	455	1.1, 4.15.4, 5.27.6.1
E489	Dunlap, Paul C.	Idaho Falls, ID	5	456	1.1, 4.15.4, 5.27.6.1
E490	Taylor, Kenneth J.	Idaho Falls, ID	5	456	1.1, 4.15.4, 5.27.6.1

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E493	McGee, Dr. K. C.	Pocatello, ID	5	458	1.1, 4.15.4, 5.27.6.1
E494	McGee, Karen	Pocatello, ID	5	458	1.1, 4.15.4, 5.27.6.1
E495	Johnstone, Jim	Blackfoot, ID	5	459	1.1, 4.15.4, 5.27.6.1
E496	Packham, Dean A.	Blackfoot, ID	5	459	1.1, 5.27.6.1, 5.27.11.1, 6.2
E497	Remer, Clarence		5	460	1.1
E498	Cagen, Richard M.	Pocatello, ID	5	460	1.1, 5.27.11.2, 6.2
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E499	Hyde, William	Idaho Falls, ID	5	461	5.25.6
E500	Stopol, Richard	Hailey, ID	5	462	1.1, 4.13, 4.15.5, 5.12.1, 5.27.7.17, 5.30.3.8
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E501	Smith, Garry R.	Aiken, SC	5	462	Acknowledgement Receipt
E502	Alban, Susan	Ketchum, ID	5	463	1.1, 5.27.2, 6.2
E503	Berier, Bret	Ketchum, ID	5	463	1.1, 2.7.2, 3.2.1, 4.1, 4.7.1, 5.30.1.13
E504	Rudd, Gerald R.	Boise, ID	5	464	1.1, 5.27.6.1
E505	Ferguson, Charles and Rosalie	Idaho Falls, ID	5	464	1.1, 3.2.2, 3.4, 4.1, 5.30.4.14
E506	Hawker, Milburn, Jr.	Monteview, ID	5	465	1.1, 4.1, 5.29.31, 5.30.4.14
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E509	Aschenbrenner, Paul	Pocatello, ID	5	467	1.1, 3.2.2, 4.2.1, 5.10.5, 5.27.10
E510	Jangl, James F.	Coeur d'Alene, ID	5	469	1.1
E511	Hayward, Myna	Blackfoot, ID	5	470	1.1, 3.2.2, 3.3.1, 5.27.10, 5.30.3.8
E512	Conlin, Ron C.	Chubbuck, ID	5	471	1.1
E513	Wagner, John and Daryl	Boise, ID	5	472	4.13, 5.29.95, 5.30.3.8, 6.3
E514	White, James R.	Idaho Falls, ID	5	473	1.1, 2.1.1, 2.6.3, 2.7.8, 2.7.10, 2.9, 2.12.5, 3.2.28, 5.24.25, 5.27.12.8
E515	Hart, Ray	Idaho Falls, ID	5	474	5.27.11.6
E515	Idaho Falls School District #91	Idaho Falls, ID	5	474	See Hart, Ray
E516	Paddock, Bill	Challis, ID	5	475	1.1, 3.2.2, 3.3.1, 4.1, 4.3, 4.15.2, 5.12.5, 5.27.5.2, 5.27.10
E517	Haddon, Bill D.		5	476	1.1, 5.27.6.1, 5.27.11.1, 6.1.2
E518	Peck, David A.	Pocatello, ID	5	478	1.1, 5.24.23, 5.27.11.1, 5.27.11.6
E518	School District 25	Pocatello, ID	5	478	See Peck, David A.
E519	Albinson, Betsy	Nampa, ID	5	480	1.1
E519	Nampa Chamber of Commerce	Nampa, ID	5	480	See Albinson, Betsy
E520	Anderson, Cathy	Idaho Falls, ID	5	481	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E521	Conroy, Richard A.	McCammon, ID	5	482	1.1, 5.24.22, 5.27.11.1

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E523	Call, Lloyd S.	Pocatello, ID	5	483	1.1, 5.27.6.1, 5.27.11.1
E524	Clayton, J. E.	Idaho Falls, ID	5	484	1.1, 5.24.23, 5.27.6.1, 5.27.15.1
E525	Leonardson, Evelyn K.	Idaho Falls, ID	5	484	1.1, 5.10.4, 5.12.1, 5.13.13
E526	O'Brien, Kathy	Pocatello, ID	5	487	1.1, 3.2.1, 4.3, 4.13, 5.22.6, 5.27.3.3, 5.27.6.1, 5.30.2.1, 5.30.2.5, 6.2
E527	Burnes (Cepren), Fr. Sergus	Boise, ID	5	488	Poems
E528	Duncan, Larry and Jeraldine	Blackfoot, ID	5	490	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
E529	Eastern Idaho Council on Industry and Energy	Pocatello, ID	5	491	See Miller, Roy, Sr.
E529	Miller, Roy, Sr.	Pocatello, ID	5	491	1.1, 3.4, 4.15.4, 5.27.6.1
E530	Berriochoa, Randy	Twin Falls, ID	5	492	1.1, 5.29.95, 5.30.5.12
E531	Erickson, Richard F.	Pocatello, ID	5	493	1.1, 2.7.8, 5.27.6.1, 5.27.7.4, 5.27.11.1, 5.27.11.3, 6.2
E532	Hill, Deloris G.	Idaho Falls, ID	5	494	1.1, 4.3, 4.13
E533	Rigby, Mary Jayne	Idaho Falls, ID	5	495	1.1, 3.2.2, 5.27.6.1, 5.29.34, 5.30.5.7
E534	Bjonberg, Family		5	495	1.1, 5.27.6.1, 5.27.11.1, 5.27.11.3, 6.1.2
E535	Minow, Thomas G.	Idaho Falls, ID	5	496	1.1, 5.27.6.1
E536	Finlayson, Richard S.	Pocatello, ID	5	496	1.1, 5.27.11.1, 5.27.11.3, 6.1.2
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E538	Kissler, L. H.	Boise, ID	5	497	1.1, 6.1.2
E539	Glover, Sandy	Boise, ID	5	498	1.1, 5.29.63, 5.29.83, 5.29.87, 5.30.5.10
E540	David, Ralph M.	Idaho Falls, ID	5	498	1.1, 4.15.4, 5.27.6.1
E541	David, Anita	Idaho Falls, ID	5	499	1.1, 4.15.4, 5.27.6.1
E542	Allen, Lowell R.	Pocatello, ID	5	499	1.1, 5.27.6.1, 5.27.15.1, 6.1.2
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E545	Beasley, Lawrence M.	Blackfoot, ID	5	501	1.1, 4.15.4, 5.27.6.1
E546	Harbison, John W.	Blackfoot, ID	5	501	1.1, 2.5.3, 4.15.4, 5.24.23, 5.27.7.3
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E547	Baker, Kenneth and Heather	Sun Valley, ID	5	502	1.1, 3.3.1, 4.4.6, 4.15.5, 5.10.4, 5.12.1, 5.27.2, 5.29.97, 5.30.3.8
E548	Wells, Mary	Athol, ID	5	502	1.1, 4.13
E549	Moller, Joan	Pocatello, ID	5	503	5.27.11.1, 5.27.15.1, 6.1.2
E550	Hand, David	Idaho Falls, ID	5	503	1.1, 5.27.6.1, 5.27.9.1, 5.27.12.5
E551	Harrison, Lex L.	Pocatello, ID	5	504	1.1, 4.15.4, 5.27.6.1
E552	Bosen, Wendall R.	Pocatello, ID	5	504	1.1, 4.15.4, 5.27.6.1
E553	Aslett, Marvin	Twin Falls, ID	5	505	1.1, 5.27.6.1

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E556	Hunter, Joe W.	Boise, ID	5	506	1.1, 5.24.23
E557	Rowden, Connie	Idaho Falls, ID	5	507	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E558	Browning, Elizabeth	Idaho Falls, ID	5	507	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E559	Smith, Keith H.	Idaho Falls, ID	5	508	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E560	Hansen, Virgil D.	Idaho Falls, ID	5	508	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E561	Ikard, Dorothy J.	Blackfoot, ID	5	509	1.1, 5.27.4.5, 5.27.6.1, 5.27.11.3
E562	Brudenell, Ingrid (Mrs. William)	Boise, ID	5	509	1.1, 4.3, 4.13, 5.29.87, 6.2
E563	Jensen, Dwight	Pocatello, ID	5	510	1.1, 5.24.22, 5.27.6.1, 5.27.11.1, 5.27.11.3
E564	Hogan, Mary Jane	Pocatello, ID	5	510	1.1, 2.7.2, 5.30.3.1
E565	Neal, Gary R.	Blackfoot, ID	5	511	1.1, 4.15.4, 5.27.6.1
E566	Hoffman, Mike	Shelley, ID	5	511	1.1, 4.13, 4.15.5
E567	Beitz, Leonard F.	Inkom, ID	5	512	1.1, 2.1.1, 2.2.1, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.7.1
E568	Hammond, Wendy	Blackfoot, ID	5	512	1.1, 4.15.4, 5.27.6.1
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E575	Purdy, L. N.	Picabo, ID	5	516	1.1, 4.15.4, 6.4.1
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E581	Merrell, Gerry	Idaho Falls, ID	5	525	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
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E589	Park, Mahlon S.	Boise, ID	5	529	1.1
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E626	Turner, Claire	Boise, ID	5	590	4.14, 4.15.5, 5.30.3.1, 5.30.4.14, 6.3, 6.5.5
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E648	Merrill, Constance Y.	Boise, ID	5	608	4.13, 5.12.1, 5.30.2.5, 6.2, 6.3
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E650	Skotte, Barbara	Boise, ID	5	609	1.1, 5.12.1, 5.30.2.5, 5.30.3.1
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E667	Admire, Patricia	Boise, ID	5	624	1.1, 2.1.1, 3.4
E668	Kemper, Don	Boise, ID	5	625	1.1, 5.1.30, 6.1.1
E669	Kruskopf, Mark	Boise, ID	5	626	5.27.6.9, 5.27.7.17
E670	Carriveau, Lori	Boise, ID	5	627	1.1, 2.2.7, 4.2.1, 4.14, 5.27.3.4, 5.30.5.12, 6.3, 6.5.5
E671	Matzek, Betty	Eagle, ID	5	627	1.1, 2.1.1, 2.11.5, 4.3, 5.2.10, 5.30.2.5, 5.30.3.1
E672	Sevier, Dick	Boise, ID	5	628	1.1, 2.7.8, 3.4, 4.15.5
E673	Hoefnagels, Cees	Boise, ID	5	629	1.1, 5.9.3, 5.30.5.12
E674	Galindo, Valerie	Boise, ID	5	629	1.1, 2.7.2, 4.2.1, 4.3, 4.13, 5.27.7.4, 5.29.63, 5.29.87,

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E674	Galindo, Valerie	Boise, ID	5	629	6.1.8, 6.3, 6.5.5
E675	Knapp, Jon	Eagle, ID	5	630	1.1, 5.27.6.9
E676	Boyles, Jean	Boise, ID	5	631	1.1, 2.2.4, 2.7.2, 2.7.8, 2.7.10, 3.2.1, 3.2.18, 3.3.1, 3.3.2, 4.3, 4.6, 4.7.1, 4.10.1, 4.10.2, 4.11.2, 4.14, 4.15.1, 4.15.4, 5.1.3, 5.1.38, 5.1.46, 5.2.7, 5.2.13, 5.2.14, 5.7.15, 5.22.4, 5.22.6, 5.24.18, 5.24.27, 5.27.2, 5.27.3.3, 5.27.6.14, 5.27.7.4, 5.27.9.4, 5.27.10, 5.29.31, 5.29.40, 5.29.45, 5.29.55, 5.30.1.14, 5.30.2.1, 5.30.3.8, 5.30.4.1, 5.30.4.9, 6.3
E677	Bjornsen, Fritz	Boise, ID	5	634	1.1, 4.3, 4.14, 4.15.4, 5.24.18, 5.24.27, 5.27.2, 5.27.3.3, 5.27.7.4, 5.27.10, 5.29.31, 6.3
E678	Bernatas, Susan	Boise, ID	5	635	1.1, 3.2.16, 4.7.3, 5.4.1, 5.27.5.3, 5.30.2.5, 6.3
E679	Wooten, Kathie	Boise, ID	5	637	1.1, 2.7.2, 4.13, 6.5.5
E680	Flinn, Alicia	Boise, ID	5	638	1.1, 2.7.9, 3.4
E681	Truman, Pat	Boise, ID	5	638	1.1, 4.13, 5.24.27, 5.27.2, 5.27.10
E682	Lundquist, Nathan	Boise, ID	5	639	1.1, 3.2.13, 4.13, 5.1.46, 5.29.97
E683	Thiebert, Deanna	Boise, ID	5	640	1.1, 6.5.11
E684	Luke, Marie	Boise, ID	5	641	1.1, 5.1.1, 5.24.30
E685	Pilotte, Dan	Boise, ID	5	641	1.1, 6.5.5
E686	Fease, James	Boise, ID	5	642	1.1, 6.5.5
E687	Brockett, Jason	Boise, ID	5	643	1.1, 4.13, 5.1.1, 5.1.20
E688	Carlson, Bette	Boise, ID	5	643	1.1, 5.1.36, 5.12.1, 5.24.25, 5.24.27, 5.29.85, 5.30.5.10

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E690	Bird, James Michael	Idaho Falls, ID	5	645	1.1, 2.2.2, 3.3.1, 5.24.27, 5.27.7.16, 5.27.9.1, 5.27.15.1, 6.4.1
E691	Bonneville County Republican Women	Idaho Falls, ID	5	646	See Cartee, Bertha M.
E691	Cartee, Bertha M.	Idaho Falls, ID	5	646	1.1, 3.4, 4.5, 5.2.10, 5.3.8, 5.27.7.16, 5.27.9.5, 5.28.2, 5.28.6, 5.29.32, 5.29.97
E692	Elle, Jean	Pocatello, ID	5	647	1.1, 2.3, 2.7.8, 3.2.8, 4.7.1, 5.30.3.1, 6.2
E693	Howell, Dennis	Pocatello, ID	5	647	1.1, 3.4, 4.5, 4.10.4, 4.15.4
E694	Campbell, Bruce	Rigby, ID	5	648	1.1, 3.2.2, 4.15.4, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.2, 5.27.15.1, 5.28.2
E695	Ritchie, Stephen J.	Idaho Falls, ID	5	650	1.1, 4.14, 5.27.7.17
E696	St. Clair, Barbara M.	Idaho Falls, ID	5	651	1.1, 2.1.1, 2.2.15, 2.13.8, 3.3.1, 5.1.42, 5.24.23, 5.27.7.16, 5.27.9.1
E697	Goepel, David	Pocatello, ID	5	653	1.1, 2.7.2
E698	Clark, Robert B.	Idaho Falls, ID	5	654	1.1, 2.10, 3.4, 5.25.3, 5.27.7.16
E699	Brady, Cliff	Idaho Falls, ID	5	655	3.2.7, 5.27.7.16, 5.27.9.3, 5.27.11.6, 5.27.12.1, 5.27.12.8
E700	Park, Charles V.	Idaho Falls, ID	5	656	1.1, 2.8.1, 3.4
E701	Worley, Tal	Idaho Falls, ID	5	657	3.2.18, 4.2.1, 4.3, 5.12.1, 5.24.27, 5.27.6.9, 5.27.11.5, 5.27.11.6, 5.28.8, 5.30.2.1, 5.30.2.5, 5.30.3.6, 5.30.4.9, 5.30.4.14, 6.1.8
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E705	Hall, Gary R.	Boise, ID	5	663	1.1, 4.1, 5.2.10, 5.27.6.3
E706	Payton, Patty	Boise, ID	5	664	1.1
E707	Gilchrist, Holly	Boise, ID	5	664	1.1, 4.13
E708	Delisio, Denise	Boise, ID	5	665	1.1
E709	Hogan, Jeff	Boise, ID	5	665	1.1, 4.15.5
E710	Geisler, Trish		5	666	1.1
E711	Penz, Troy	Boise, ID	5	666	1.1, 4.14
E712	Hastings, Leanne	Boise, ID	5	667	1.1, 3.3.1, 4.13
E713	Skoye, Heather	Boise, ID	5	667	1.1
E714	Wood, Jim	Boise, ID	5	668	1.1, 5.24.27
E715	Price, Brindi L.	Boise, ID	5	669	1.1, 5.6.2
E716	Auld, Brandy	Boise, ID	5	669	1.1, 3.3.3
E717	Hunter, Ed	Idaho Falls, ID	5	670	1.1, 3.4, 5.27.7.16, 5.27.9.2, 5.27.9.3, 5.28.2
E718	Tanner, John	Idaho Falls, ID	5	671	2.2.13, 3.4, 4.7.1, 5.24.23, 5.28.7, 5.29.32
E719	Park, Gary	Idaho Falls, ID	5	671	1.1, 5.24.23, 5.24.31, 5.27.12.4, 5.28.6, 5.28.7, 6.5.2
E720	Elle, John	Pocatello, ID	5	672	1.1, 4.1, 4.3, 4.6, 5.27.6.7, 5.27.7.8, 5.27.9.5, 5.27.12.8 5.29.105, 5.30.4.4, 5.30.4.6, 5.30.4.12, 5.30.5.7, 6.3

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E722	Freeman, Lyle	Rigby, ID	5	676	1.1, 3.4, 5.24.23, 5.27.4.5, 5.27.6.1, 5.27.9.2
E723	Wiegand, Gayl H.	Pocatello, ID	5	676	1.1, 4.1, 4.4.6, 4.8.1, 4.9.1
E724	Edgely, Ronald L.	Pocatello, ID	5	677	1.1, 3.4, 5.24.23, 5.24.31, 5.27.6.1, 5.27.9.6, 5.27.12.2
E725	Day, Nick	Idaho Falls, ID	5	679	1.1, 2.2.2, 5.8.1, 5.18.4, 5.27.7.3, 5.27.7.9, 5.27.9.2, 5.27.9.3, 5.27.12.5, 5.28.5, 5.30.5.2, 5.30.5.7
E726	Proksa, Dennis J.	Pocatello, ID	5	680	1.1, 3.2.23, 4.4.6, 4.13, 6.1.5
E727	Proksa, Jessica Lynn	Pocatello, ID	5	681	1.1, 5.27.7.17, 6.2
E728	Minshall, Judy	Inkom, ID	5	681	1.1, 2.2.7, 2.11.1, 2.13.3, 3.6.1, 4.13, 4.15.1, 5.1.2, 5.1.20, 5.12.1, 5.22.6, 5.27.6.1, 5.27.6.11, 5.29.87, 6.3, 6.5.2
E729	Wilbur, Dave L.	Rexburg, ID	5	682	1.1, 3.2.2, 3.4, 4.4.6, 4.13, 4.15.1, 5.27.6.11, 6.3
E730	Lempke, Chris	Idaho Falls, ID	5	684	1.1, 3.4, 5.27.6.1
E731	Falkingham, Suzanne	Idaho Falls, ID	5	685	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E732	Falkingham, David W.	Idaho Falls, ID	5	685	1.1, 5.24.23, 5.27.6.1, 5.27.9.1, 5.27.15.1
E733	Dalton, William J.	Idaho Falls, ID	5	686	1.1, 5.24.23
E734	Anderson, Jack P.	Idaho Falls, ID	5	686	1.1, 2.10, 3.2.2, 3.3.1, 5.24.23, 5.27.6.1, 5.27.9.2, 5.27.9.3, 5.28.2
E735	Fleischmann, Pamela	Pocatello, ID	5	688	1.1, 3.4, 5.24.23
E736	Fleischmann, Gary	Idaho Falls, ID	5	689	1.1, 3.3.1, 5.24.22, 5.24.23, 5.27.4.5, 5.27.7.5, 5.27.12.5

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E739	Gagner, Lee	Idaho Falls, ID	5	691	1.1, 5.1.42, 5.27.6.1, 5.27.9.2, 5.27.11.1
E740	Reale, Carta	Pocatello, ID	5	692	1.1, 4.15.6, 5.26.2
E741	Kaufmann, Theresa M.	Pocatello, ID	5	695	1.1, 2.1.1
E742	Belzer, Frederick F.	Pocatello, ID	5	696	1.1, 4.15.4, 6.1.2
E743	Jayne, Jerry	Idaho Falls, ID	5	696	1.1, 3.1.3, 3.3.1, 3.5.1, 4.1, 4.9.1, 4.15.1, 4.15.5, 5.2.7, 5.22.6
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E746	Coates, Nancy	Pocatello, ID	5	700	2.2.10, 2.7.2, 4.15.5, 5.1.33, 5.27.10, 5.30.3.1
E747	Sucher, Dennis	Idaho Falls, ID	5	701	1.1, 2.7.2, 2.7.13, 2.8.1, 2.10, 3.4, 5.27.4.5, 5.27.6.1, 5.27.6.13
E748	Watters, Donald A.	Shelley, ID	5	702	1.1, 2.2.15, 3.3.1, 3.4, 4.15.4, 5.22.3, 5.24.23, 5.27.2, 5.27.7.9, 5.27.9.1, 5.27.9.2, 5.27.12.1, 5.27.12.3, 5.27.12.5, 5.27.15.1, 6.1.2
E749	Watters, Laurie	Shelley, ID	5	704	1.1, 5.27.7.16, 5.27.9.4
E750	Sessions, Ron	Ammon, ID	5	705	1.1, 2.2.1, 3.4, 5.24.30
E751	Oakes, Philip	Idaho Falls, ID	5	706	1.1, 4.15.4, 5.1.30, 5.24.23, 5.27.6.1, 5.27.11.1, 5.30.5.7
E752	Walters, Steven J.	Blackfoot, ID	5	707	1.1, 2.3, 2.8.2, 3.4, 4.9.4, 5.13.12, 5.27.1.4, 5.27.3.1,

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E754	McKim, Chris	Pocatello, ID	5	710	1.1, 2.1.1, 2.8.3, 3.2.1, 3.2.4, 4.15.1, 5.1.21, 5.2.7, 5.10.1, 5.10.2, 5.10.3, 5.10.8, 5.10.17, 5.12.1, 5.24.25, 5.30.2.1, 6.1.8
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E757	Rhoads, Jeff and Kellie	Inkom, ID	5	714	1.1, 5.1.42
E758	Bybee, Rita	Inkom, ID	5	714	1.1, 2.7.11, 5.27.7.3, 5.27.10, 5.29.95, 5.30.4.1, 6.3, 6.5.1
E759	Sher, Cathy	Lava Hot Springs, ID	5	723	1.1, 6.5.2
E760	Cantrill, Judie C.	Pocatello, ID	5	724	1.1, 4.13, 6.1.4, 6.3
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E763	Naftzger, Raylene A.	Pocatello, ID	5	726	1.1, 3.3.1
E764	Cantrill, Dante	Pocatello, ID	5	726	3.2.1, 5.27.6.1, 5.27.10, 6.2, 6.5.5
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E783	Tilley, Barbara	Hansen, ID	5	750	1.1, 2.7.2, 4.15.4, 5.24.30, 5.27.5.3, 5.27.6.1, 6.5.1
E784	Gardner, Kathyrn Ann	Twin Falls, ID	5	751	1.1, 2.7.8, 5.24.23, 5.27.6.1, 5.27.7.16, 5.27.11.6, 5.27.16
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W005	Department of Energy, Idaho	Idaho Falls, ID	6	4	See Ofte, Don
W005	Ofte, Don	Idaho Falls, ID	6	4	DOE ID Distr. Letter
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W631	Manata, Susan F.	Santa Barbra CA	6	702	1.1, 5.24.31, 6.2

APPENDIX E

RESPONSE - CONTRIBUTOR CORRELATION

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