

**REVISED PROPOSED PLAN FOR REMEDIAL  
ACTIONS AT  
SILOS 1 AND 2 (40700-PL-001)**

**Statement of Dennis Bechtel**



**May 3, 2000**

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Resident of Henderson, Nevada**

My name is Dennis Bechtel. I am a resident of Henderson, Nevada. Although I am a member of the Nevada Test Site-Community Advisory Board my comments are as an individual and don't represent the views of the Nevada Test Site Community Advisory Board. I appreciate the fact that Fernald is holding a public hearing in Nevada on this issue. Too often public hearings and the review of public documents do not include all parties that would be impacted by a project. In this case there is a site being remediated and a site that is accepting the waste. Both parties should be party to reviewing the proposed plan.

1. **The Nevada Test Site (NTS) setting.** The Proposed Plan notes that the Nevada Test Site is located *"in a sparsely populated, arid environment with a low potential for leachate generation . . . migration, . . ."* On the bottom of Page 7-6 of the Summary Proposed Plan it also alludes to the isolation of Southern Nevada as being a reason *in the event of long-term degradation of engineered features or loss of institutional controls . . . ensure the protectiveness of human health and the environment is maintained.*

Southern Nevada has, of course, experienced rapid growth over the past several decades, a trend that it appears will continue in the future. Because the County is becoming increasingly urbanized, however, it should be noted that the communities that could be affected by issues such as the transportation of the nuclear waste are no longer small and isolated. Clark County, for example, has a population that exceeds 1.4 million.

Accordingly, the increasing numbers of Southern Nevadans in the future and the potential risk involved could make comments such as these inaccurate. Likewise, recent monitoring information seems to provide evidence that the

migration of radioactivity from areas of weapons testing may be more extensive than previously thought.

*The rationale for storage of radioactive waste at the NTS should not be supported because of the isolation of Southern Nevada (which is changing rapidly) but rather because the disposal facility will be designed to ensure that the resident population potentially impacted will be protected.*

2. **The Preferred Treatment Alternative.** Chemical Stabilization (CS) is the preferred treatment alternative for treatment and disposal of the Silos 1 and 2 wastes. The CS alternative (CS, as we understand it, is now one alternative) is preferred to the Vitrification (VT) alternatives for a number of reasons including experience in use, lower cost, lower toxicity, health and safety concerns, and lower O & M costs. While the rationale presented seems reasonable we're aware, however, that a similarly stabilized waste material, *Pondcrete* [sic] at the Rocky Flats Department of Energy (DOE) facility experienced problems in maintaining integrity. Vitrification although more complex in development seems to demonstrate more long-term integrity.

*The Plan should document how the Chemical Stabilization process proposed at Fernald will, if selected, avoid the degradation that occurred at the Rocky Flats facility? Will it maintain its integrity over the life of the risk to the public and environment. Also, it is uncertain in the documents whether the CS material meet the State of Nevada Waste Acceptance Criteria?*

3. **Number of shipments.** The number of shipments for the preferred CS alternative is considerably higher than that for the VT option. At a recent meeting DOE/Fernald personnel noted that the proposed Silo shipments to the NTS are equivalent to current shipment levels. The NTS, however, was recently named as one of two sites that can receive low-level and mixed low-level radioactive waste from all DOE sites throughout the

Complex. Fernald thus will be only one of many sites transporting waste to the NTS. As a number of DOE plans this avoids discussion of cumulative impacts- e.g., the Fernald shipments plus those from other sites using the NTS.

*Since the majority of Fernald shipments may occur during the same time frame as shipments from other sites, DOE needs to evaluate these shipments in a cumulative sense. In addition to listing shipments from Fernald, DOE must provide information to enable the public to understand the totality of shipments from DOE sites to the NTS to enable the public and governments to understand how these shipments add to the risk.*

4. **Routing of nuclear waste shipments.** Transportation information in the Planning documents indicated that truck shipments carrying Silos 1 and 2 wastes will continue to utilize the Northern and Southern routing options described in the Proposed Plan. DOE/Fernald continues to be responsive to the concerns of Southern Nevadans associated with transporting the Silos waste through a rapidly growing area with congestion and, therefore, a greater potential for accident.

*While it appears that DOE/Fernald is actively involved in encouraging certain routes for the transportation of the waste to be used, it is unclear why, based on the experience of the Waste Isolation Pilot Project (WIPP) with the transportation of waste, that routes can be specified in contracts. Also needing to be noted is how DOE/Fernald intends on monitoring the shipments to ensure that their carriers comply with the routing designations and Department of Transportation criteria. Tourism is, of course, Nevada's bread and butter. Given the fact that rightly or wrongly the public does not distinguish between types of low-level radioactive waste, it is important that DOE avoid situations that could potentially adversely impact our economy and quality of life.*

5. **State Acceptance/Community Acceptance.** The Program Planning document needs to describe how the *State Acceptance and Community Acceptance* criteria are defined, analyzed and weighted by DOE in selecting a preferred alternative.

*Community acceptance, of course, should be more than the statements of those attending public hearings. It should be the total record of meetings with communities and stakeholders. The record of community acceptance should be derived from a number of sources and not merely the results of one hearing.*

Thank you again for convening the meeting in Southern Nevada. We look forward to Fernald and the Nevada Operations office to considering my comments.