

**Rocky Flats Citizens Advisory Board
Recommendation 98-4**

to the U.S. Department of Energy

Comments on the Residues EIS

Approved February 5, 1998

February 5, 1998

Mr. Charles R. Head
U.S. Department of Energy
Office of Environmental Management, EM-60
1000 Independence Avenue, SW
Washington, D.C. 20585-0001

Dear Mr. Head:

The members of the Rocky Flats Citizens Advisory Board (RFCAB) have reviewed the *Draft Environmental Impact Statement (EIS) on Management of Certain Plutonium Residues and Scrub Alloy Stored at the Rocky Flats Environmental Technology Site* and have developed the following comments, questions and recommendations.

1. RFCAB notes that the focus of this EIS is to prepare residues and scrub alloy to meet the Safeguards Termination Limits (STLs) in order to ship the materials to the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico for disposal. RFCAB is also aware that many of the residues analyzed in this EIS currently are stored in configurations that do not meet safety requirements as determined by the Defense Nuclear Facilities Safety Board and outlined in its Recommendation 94-1.

RFCAB supports the concept of one-step processing to meet both the 94-1 criteria and the WIPP Waste Acceptance Criteria. There is concern, however, that delays might occur in the opening of WIPP, and that the residues would need to remain at Rocky Flats for an extended period of time. RFCAB is concerned that if delays occur, the one-step treatment program may result in materials remaining at Rocky Flats that would not be in the safest extended storage configuration.

Therefore, RFCAB needs more information. Would the one-step treatment program provide

residue storage configurations that provide for maximum safety in the event that extended storage is necessary at Rocky Flats, or would additional processing beyond the current one-step program be necessary?

If additional processing would be necessary, RFCAB requests that a contingency be developed to implement these additional treatments should the opening of WIPP be delayed. Ideally, however, RFCAB would like to see an initial treatment program be developed that would meet WIPP Waste Acceptance Criteria and 94-1 requirements, and additionally would provide maximum safety for extended storage at Rocky Flats should the need arise.

2. For several of the residue forms and scrub alloy, DOE has outlined a strategy of plutonium separation. RFCAB asks that DOE carefully weigh any separation treatment options and that they be implemented only in those instances where dramatic reductions in cost or worker exposures can be demonstrated.

3. DOE anticipates shipping some of the residue forms and scrub alloy to other DOE sites for treatment and plutonium separation. RFCAB believes that due to political concerns and other considerations, offsite treatment options may not be implementable, and therefore recommends that DOE seriously consider and be ready to implement back-up options that would meet all Defense Board 94-1 deadlines to provide maximum safety for the storage of the materials at Rocky Flats.

4. RFCAB questions why there has been such a long delay in developing plans for the treatment and disposition of the residues at Rocky Flats and why DOE has waited until almost the end of the deadline periods established by the State of Colorado and the Defense Nuclear Facilities Safety Board to present a plan. This delay has resulted in lost opportunity time to develop new and innovative treatment methods for the residues.

During the lengthy period of time it has taken to develop a residue treatment and disposition strategy, RFCAB would like to know whether DOE has evaluated alternative treatment methods? Specifically, has DOE looked at Cold Ceramification currently being developed at the Idaho National Engineering and Environmental Laboratory, and the Glass Material Oxidation and Dissolution System (GMODS) being developed at the Oak Ridge National Laboratory? If DOE did consider these technologies, why were they rejected as treatment options for the residues at Rocky Flats?

RFCAB appreciates the opportunity to comment on this EIS and asks that DOE carefully consider and incorporate our comments and recommendations into the final EIS and Record of Decision. We look forward to a complete written response to the comments, questions and recommendations raised above.

Sincerely,

Tom Marshall
Chair

cc: Jessie Roberson, DOE-RFFO



The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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