



August 23, 2004

William Taylor
US Department of Energy
PO Box 538705
Cincinnati, OH 45253-8705

Recommendation 2004-15: Request to Assess the Feasibility of Temporary Off-Site Storage Facilities for Silo 3 Waste

Dear Mr. Taylor:

The Fernald Citizens Advisory Board is closely monitoring issues related to the removal and disposal of waste from Silo 3. We continue to support implementation of the current Record of Decision (ROD), which requires that the waste be removed from the silo, packaged in containers approved by the U.S. Department of Transportation, and shipped to an appropriate disposal facility. Delays in the implementation of the Silo 3 ROD will add significant costs to the project and create serious operational difficulties. Therefore, we believe the top priority of the U.S. Department of Energy should be the resolution of its current dispute with the State of Nevada regarding final disposal of Fernald silos waste.

In the interim, however, we believe that all potential opportunities to successfully implement the ROD must be explored and given serious consideration. This includes the possibility of temporary off-site storage of the Silo 3 materials. There is precedence for this approach; for example, the Department of Energy is currently using the Waste Control Specialists facility in West Texas for similar purposes.

We request that the Department of Energy assess the costs, operational, and regulatory components associated with temporary storage of the packaged waste at an appropriate private or government facility until a permanent disposal site is secured. This assessment should include the following information for all potential locations:

- Regulatory obstacles and/or requirements for shipping the Silo 3 waste for temporary storage
- The political climate and public sentiment regarding the storage of this kind of waste
- Operational factors that would affect the shipment and/or placement of the waste
- Total life-cycle costs of storage at the facility for periods of time ranging from 6 months to 2 years. At minimum, this should include:
 - o Costs of shipping the Silo 3 material from Fernald
 - o Costs of shipping the Silo 3 material from the facility to the Nevada Test Site
 - o Costs of storing the Silo 3 material
- Any other factors that are important to consider regarding the temporary storage of Silo 3 materials at the facility

For the purpose of comparison, we also request the following information regarding the Silo 3 Project:

- Costs of shipping the Silo 3 material from Fernald to the Nevada Test Site
- Costs of maintaining the Silo 3 packaging facility in a standby mode
- Costs associated with preparing the Silo 3 packaging facility for operation following a lengthy delay
- Availability of the trained workforce over time and any other factors related to labor for the project
- Costs of maintaining the site after the expected closure date if silo 3 waste is still on site

Chair

James C. Bierer

Vice Chair

Lisa Crawford

Members

M. Kathryn Brown
Sandy Butterfield
Marvin W. Clawson
Lisa Crawford
Stephen P. Depoe
Louis Doll
Pamela Dunn
Gary Storer
Robert G. Tabor
Gene E. Willeke

Ex Officio Members

L. French Bell
Gene Jablonowski
William Taylor
Graham Mitchell

Support Staff

The Perspectives Group

Mr. William Taylor
August 23, 2004
Page 2

Given the time-sensitive nature of this issue, this assessment should be conducted as soon as possible. The Fernald Citizens Advisory Board would hope to review the results no later than September 10, 2004.

Sincerely:

A handwritten signature in black ink that reads "Jim Bierer". The signature is written in a cursive style with a large, looping initial "J".

Jim Bierer
Chair

A handwritten signature in black ink that reads "Lisa Crawford". The signature is written in a cursive style with a large, looping initial "L".

Lisa Crawford
Vice-Chair

cc:
Assistant Secretary Paul Golan
Robert Warther
Gary Stegner