



INL Site Environmental Management

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December 15, 2010

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Mr. Lee Hamilton
and Mr. Brent Scowcroft
Blue Ribbon Commission Co-Chairs
c/o Timothy A. Frazier, Designated Federal Official
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Subject: Comments to Blue Ribbon Commission on Idaho Cleanup Project Spent Nuclear Fuel and High-Level Waste Management

Dear Mr. Hamilton and Mr. Scowcroft:

On behalf of the Idaho National Laboratory Site Environmental Management Citizens Advisory Board (INL EM CAB), I am writing to provide the Blue Ribbon Commission with our comments on issues related to long-term disposition of Idaho Cleanup Project spent nuclear fuel and high-level waste. We have reviewed the white paper prepared by the Department of Energy's (DOE) Idaho Site and are in agreement with the information presented. We have the following observations, which we are providing for the Commission's consideration.

The CAB is concerned about future disposition of the Idaho Site's 264 metric tons of spent nuclear fuel and 4,400 cubic meters of calcine high-level waste. However, our greater concern is for the calcine high-level waste. Spent nuclear fuel may have a path forward for future management using technologies for reprocessing and/or recycling. The calcine high-level waste will require treatment and disposition — reuse is not an option. We urge the Commission to keep in mind that the need for long-term, safe disposition of high-level waste continues even if technological advances are made with regard to spent nuclear fuel.

The CAB also thinks that long-term disposition issues must be approached with a sense of urgency. The high-level waste calcine must be treated to meet hazardous waste standards, but it also must be in a form acceptable for final disposition. We do not know if the current treatment plans, which fit Yucca Mountain criteria, will meet the criteria for disposition elsewhere. Until the final disposition path is known, the criteria for the final waste form cannot be determined. Given the time it took to reach a point where the final waste form for Yucca Mountain could be established, the CAB thinks the DOE must focus on moving this new process along and reaching solutions as rapidly as possible.

The white paper provided by DOE also addresses sodium-bearing waste that will be treated at the Integrated Waste Treatment Unit. DOE's preference for the treated sodium-bearing waste is to dispose of it as transuranic waste at the appropriate licensed disposal facility. The CAB supports this preference and encourages DOE to continue seeking the regulatory approvals needed for this solution. If regulatory approvals are not received, this waste would be added to the inventory of high-level waste requiring disposition.

Thank you for the opportunity to comment on these issues. We look forward to hearing more from the Commission about its activities and progress.

A handwritten signature in black ink, appearing to read "R.D. Maynard". The signature is fluid and cursive, with a long horizontal stroke at the end.

R.D. Maynard
Chair

cc: Rick Provencher, DOE-ID
Tim Frazier, DOE-HQ
Robert L. Pence, DOE-ID
CAB Members
Letter Log