



## INL Site Environmental Management

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October 28, 2011

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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 on July 2011 Draft Reports of the Blue Ribbon Commission**

Dear Mr. Hamilton and Mr. Scowcroft:

The Idaho National Laboratory Site Environmental Management Citizens Advisory Board (INL EM CAB) appreciates this opportunity to comment on the draft reports issued by the Blue Ribbon Commission on America's Nuclear Future to the Secretary of Energy.

The INL EM CAB is a group of citizen volunteers who provide advice to the Department of Energy on cleanup at the INL. We are organized as part of the EM Site-Specific Advisory Board (SSAB), a Federal Advisory Committee Act chartered organization. The INL EM CAB has had a long-standing interest in disposition of high-level waste (calcine and sodium-bearing waste) and spent nuclear fuel currently in storage at the INL. One of our key areas of focus is the 1995 Settlement Agreement between the State of Idaho and the Department, which provides that by 2035, the high-level waste will be treated and ready for disposal elsewhere, and the spent nuclear fuel will be removed from the state.

We cannot over emphasize the urgency of the need to establish paths forward for high-level waste and spent nuclear fuel in order to meet the Idaho Settlement Agreement. The high-level waste is of particular concern, because, as recognized in your draft reports, there is no future use or value in this waste while there is the possibility that technologies may be used or developed to reprocess or recycle spent nuclear fuel. The draft reports address issues of long-term storage, but the development of storage capacity as an interim step must be balanced against the absolute need for a permanent solution.

We believe it is also important to set and pursue an early goal to determine the final waste form and packaging for high-level waste. The Commission identifies activities that are needed to assure that high-level waste and spent nuclear fuel can be safely transported, stored and disposed. The Commission should include in these activities the establishment of criteria for the final waste form and packaging. These criteria could then be considered when assessing performance of transportation systems, the safety and security of interim storage options, and suitability of potential disposal facilities. We should not wait until decisions are reached on transport, storage or disposal to decide what the final waste forms should be.

Finally, we request the Commission to include efforts to involve stakeholders in its list of near-term actions that can be taken while the Commission's recommendations involving longer term actions (such as legislative changes) are being pursued. Ongoing stakeholder involvement in issues of transportation, storage and disposal, as well as stakeholder support for the longer term actions, will be critical to maintaining the necessary focus on the problem and on potential solutions.

We suggest that a stakeholder structure such as the EM SSAB may be useful. At the site level, the INL EM CAB represents a diversity of interests including local government, tribes, business and academia. Liaisons from EPA and the State of Idaho actively participate and provide input. At the national level, each active DOE cleanup site interacts through regular meetings and communications between the local board chairs. This structure provides a coordinated approach coupled with sufficient flexibility to support the work of providing informed advice on issues affecting cleanup at individual sites as well as the EM program overall. Beyond the EM SSAB, there are other models for stakeholder involvement such as the State and Tribal Government Working Group (STGWG), the National Transportation Stakeholder Forum (NTSF), and the Environmental Management Advisory Board (EMAB), a group that is recognized in your draft reports. The Commission's recommendations should include specific steps that could be taken to increase meaningful opportunities for stakeholder involvement in the issues you are addressing.

Thank you again for this opportunity to comment on the draft reports. We look forward to receiving your final reports.

Regards,



Willie Preacher, Chair  
INL EM CAB

cc: Rick Provencher, DOE-ID  
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Cate Alexander, DOE-HQ  
CAB Members