



**Comments on the Draft Environmental Impact Statement (EIS)
for the Disposal of Greater Than Class C (GTCC) Low-Level
Radioactive Waste and GTCC Like Waste (DOE/EIS-0375-D)**

The Department of Energy (DOE) recently released the Draft Environmental Impact Statement (EIS) for the Disposal of Greater-Than-Class-C (GTCC) Low-Level Radioactive Waste and GTCC Like Waste (DOE/EIS-0375-D). In conjunction with the release of this draft EIS, the DOE also has conducted public meetings in Idaho Falls, ID, as well as opening a 120-day public comment period.

The Environmental Management (EM) Site-Specific Advisory Board in Idaho, locally known as the Idaho National Laboratory Site EM Citizens Advisory Board (CAB) has been briefed on this draft EIS, and a CAB member attended the public meeting held in Idaho Falls, ID. The CAB had also provided comments on this EIS as part of the scoping process in 2007 (Recommendation #133).

The purpose of this recommendation is to provide the CAB's comments on this draft EIS.

The CAB notes that no preferred alternative has been identified in this draft EIS, but it does identify the INL as a potential site for the disposal of these waste forms.

The INL has a long history of involvement in the management of radioactive waste generated by DOE and its predecessor agencies. In general, the citizens of Idaho have supported the INL role in managing the agency's waste. In 1988, due to the amount and types of waste being brought into the INL from outside the state, and the lack of long-term disposal strategies for some of these wastes, then Governor Cecil Andrus instituted a moratorium on DOE waste shipment into the state. This moratorium ultimately resulted in a Settlement Agreement between the DOE and the State of Idaho (1995). This agreement set forth conditions under which radioactive wastes at the INL would be managed. It also defined a framework under which spent nuclear fuel could be received and managed at the INL. The Settlement Agreement has never identified GTCC Low-Level Radioactive Waste and GTCC Like Waste to be brought into the state of Idaho-INL.

The action by Governor Andrus received wide-spread public support at the time. It has also been supported by all subsequent governors. It also continues to be supported by the public.

The current EM mission at the INL is to complete the clean-up of EM facilities, and to meet the requirements of both the Idaho Settlement Agreement and the current Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) records of decision. The current plans call for completing the EM mission at INL by the end of 2015. Completion of the EM mission early at INL has been identified by DOE as having the potential for significant cost saving.

In addition, the neighboring Shoshone-Bannock Tribes do not support the idea of having the INL as a potential disposal location for the GTCC Low-Level Radioactive Waste and GTCC Like Waste.

In conclusion, the INL EM CAB is opposed to consideration of the INL as a potential disposal location for GTCC Low-Level Radioactive Waste and GTCC Like Waste because:

- Such action would be in conflict with previously negotiated agreements between DOE and the State of Idaho.
- Based on the experience of the INL EM CAB, the citizens of the State of Idaho do not support such an action.
- Such action would be in conflict with the current EM mission for the INL.