

Rocky Flats Citizens Advisory Board Recommendation 95-14:

**To the Department of Energy, the Colorado Department of Public Health and
Environment, and the Environmental Protection Agency**

Waste Management: Storage and Disposal at Rocky Flats

Approved October 5, 1995

INTRODUCTION AND BACKGROUND

Following is a list of guiding principles and assumptions, recommendations and a list of deliverables for the U.S. Department of Energy, its contractors, the Environmental Protection Agency and the State of Colorado. The purpose of this document is to give the Department, its contractors and the regulators a sense of where the Rocky Flats Citizens Advisory Board (CAB) is on the issues of waste storage and disposal at Rocky Flats. CAB feels it is important to provide guidelines, early on, while the agencies are developing plans and proposals for waste management at Rocky Flats. The following document shall be used as a tool for DOE, its contractors and CAB when addressing more specific waste management projects.

The term "waste" refers to all wastes and other materials of concern at Rocky Flats including hazardous, low-level, low-level mixed, "ER" environmental restoration, process, transuranic, transuranic mixed, soil and water contamination, plutonium solutions, plutonium residues, plutonium oxide, plutonium metal, enriched uranium and highly enriched uranium.

Definitions

Disposal: The placement of wastes, either permanent or interim, in any facility that makes it physically and financially unrealistic to retrieve and monitor.

Long-term Storage: The conditions whereby wastes remain at Rocky Flats in the event that plans for shipment off-site fail to take place or do not transpire within the planned and desired time frame set out by the Department and the stakeholders. Thereby ensuring the safest possible storage of wastes for as long as the wastes remain at Rocky Flats.

GUIDING PRINCIPLES

The Guiding Principles should be viewed as general guidelines.

1. Different categories of waste will remain at Rocky Flats for some period of time.
2. Waste at Rocky Flats shall be stored in the safest possible manner.
3. Waste shall be stored in such a manner that it cannot escape into the surrounding environment during the time that it remains a potential hazard.
4. Waste shall be stored in such a manner that it is fully monitorable and retrievable. In addition, there shall be institutionalized review systems in place ensuring inspection on a regular basis.
5. It is not acceptable for Rocky Flats to send waste to a facility that would not meet CAB criteria for storage at Rocky Flats. (NOTE: Broad criteria for storage at Rocky Flats are outlined below. These criteria may need more development by the Board before inclusion into the guiding principles.)
6. Any waste storage or "disposal" facility must be selected through an objective, scientific process and include public participation.
7. The concept of "disposal" of radioactive waste is misleading due to the toxic and long lived nature of the wastes. Because wastes are out of sight, does not mean that the problem is solved.

RECOMMENDATIONS

CAB understands there are financial and budgetary constraints. However, constraints should not prohibit achievement of waste management plans envisioned in the following recommendations:

1. Because it is unlikely that a waste "disposal" facility can be guaranteed to contain the contaminants for the life of the waste, CAB opposes the development of such a facility at Rocky Flats.
2. DOE shall develop plans for long-term storage of all wastes currently at Rocky Flats.
3. Any waste facility must be fully monitorable, with regular inspections, and the waste must be fully and easily retrievable.
4. To ensure the safest possible storage, any waste storage facility must be able to be upgraded; and if the facility cannot be upgraded the facility must be replaced.
5. No waste from other facilities shall be accepted at Rocky Flats for treatment or storage.
6. Because radioactive waste is a national issue, and because there is no guarantee that proposed "solutions" will proceed, a national dialogue must be convened that addresses the issue of waste storage and "disposal". CAB agrees to support and participate in such discussions.
 - Near term activities include a national stakeholder meeting between now and December 22 to discuss the Waste Management Programmatic Environmental Impact Statement and a Site Specific Advisory Board roundtable in February at the Waste Management 1996 conference. Tom Marshall, Linda Murakami and Lisa Hanson have been asked to participate on both planning committees.
7. DOE shall vigorously pursue a research program aimed at developing technologies to make radioactive waste benign (not a potential hazard).
8. The Rocky Flats Citizens Advisory Board and other external stakeholders (including regulators)

shall be involved in the development and approval of all waste management plans and activities.

DELIVERABLES

The Rocky Flats Citizens Advisory Board requests DOE and Kaiser-Hill to provide the following information by the end of the 1995 calendar year:

1. A summary describing/outlining how CAB's recommendation impacts DOE/Kaiser-Hill's plans for the low-level waste cell.
2. Supporting documentation for costs under all scenarios in the DOE/Kaiser-Hill proposal for the low-level waste cell.
3. Definition of the various wastes and other materials of concern -- hazardous, low-level, low-level mixed, "ER" environmental restoration, process, transuranic, transuranic mixed, soil and water contamination, plutonium solutions, plutonium residues, plutonium oxide, plutonium metal, enriched uranium and highly enriched uranium. The definitions must include an explanation of what makes the waste-type a potential hazard and how much radioactivity is in the waste.
4. Specifically, provide a description of what waste types will go into the proposed DOE/Kaiser-Hill low-level waste cell. And, provide a list and/or description of the hazardous and radioactive constituents of this waste and at what levels.
5. Costs and supporting documentation for an above ground monitored and retrievable storage facility for Rocky Flats for low-level, low-level mixed and transuranic wastes.
6. Descriptions, background information, and life-cycle documentation/information on the "Butler" building and the "Drigg Facility" options.
7. List of any studies completed or under way by DOE on waste storage technology.
8. List of any technology on the horizon that might lead to waste minimization and reduction.
9. Contingency plans for storage of transuranic waste in the event that Waste Isolation Pilot Plant (WIPP) does not open.
10. Current plans for treatment and storage of plutonium residues.

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.

[Back to Index CAB Recommendations](#)

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