

Rocky Flats Coalition of Local Governments

Boulder County City of Broomfield Jefferson County
City of Arvada City of Boulder City of Westminster Town of Superior

8461 Turnpike Drive, Suite 205
Westminster, CO 80031

(303) 412-1200
(303) 412-1211 (f)
www.rfclog.org

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Ms. Jessie Roberson
Manager
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

Dear Jessie:

As the recent complications with WIPP shipments suggest, disposition of Rocky Flats TRU waste remains a challenge to the Department of Energy (DOE), the regulators, and stakeholders alike. The interim TRU waste storage planning effort, with its potential impacts on cleanup, closure, and future use, is a matter of great concern to the Rocky Flats Coalition of Local Governments (Coalition). The Coalition appreciates the Site's recognition of the importance of this issue and the opportunities DOE has provided for public input during the development of its strategy.

To date, DOE has been presenting the storage issue to the community in a manner that presumes there is no choice but to expand TRU storage capacity at Rocky Flats. DOE, however, has not provided an adequate explanation why, with WIPP now being open, it cannot implement a shipping schedule that both obviates the need to develop additional storage capacity at Rocky Flats and keeps the cleanup on track for a 2006 closure. The Coalition cannot support any additional on-site storage until questions regarding the shipping schedule and any other factor that contributes to the logjam are addressed. DOE must develop and implement a strategic plan that both ensures cleanup activities continue to support a 2006 closure and ensures DOE does not need to develop additional storage at Rocky Flats. The Coalition is prepared to explore with DOE any possible ways that the Coalition can assist in accelerating and streamlining the TRU shipments, for storage cannot compromise achieving a timely and safe cleanup of Rocky Flats.

In the meantime, the Coalition requests DOE consider the following comments on its Interim TRU Storage Environmental Assessment (EA).

- In the EA, DOE selects "Refurbishing Existing Buildings" as its preferred alternative "at this time" and indicates the final waste storage strategy "may involve a combination of actions included in the individual alternatives." DOE also states that a final preferred alternative would be selected in the future "as factors relating to WIPP shipments and TRU/TRM waste generation rates are

known." What factors are currently known that may affect DOE's TRU waste storage decision-making, and how might these factors influence the process of identifying a solution to the storage shortfall?

- As you have acknowledged, the EA is only a single step in the development of a TRU waste storage strategy, and for that reason, the Coalition requests DOE further explain its process for making storage decisions. Additionally, as DOE continues to define its strategy, the Coalition expects DOE to involve it and other interested parties in the selection of final strategies.
- The EA discussed the possibility the TRU waste may remain on site until 2015 if WIPP shipments are delayed. The Coalition cannot accept the use of interim storage facilities for long-term storage if current assumptions regarding TRU disposition do not pan out. Additionally, if assumptions regarding WIPP shipments do not hold true, when will DOE begin to consider alternative TRU disposition options?
- The American Federation of Government Employees Local 1103 has expressed to the Coalition its concerns about the radiological health and safety implications of refurbishing the Building 460 high bay area for interim TRU storage, since DOE-RFFO offices in the building are located adjacent to the high bay. What, if any, are DOE's contingency plans if federal employees sue over this plan? Would DOE try to move the employees, or would it pursue another storage option (other than Building 460)? What does DOE anticipate the actual dose will be for office workers and visitors in Building 460? Does the actual dose assume partial or full storage utilization? Does the actual dose presume all wastes will be stored in pipe overpack containers? If the Building 460 high bay is refurbished, the Coalition requests DOE include necessary protective measures in the building upgrade to guarantee the potential for exposure in adjacent offices meets DOE's ALARA radiation exposure policy. If this option proves impossible, then non-compliant offices should be vacated or interim TRU storage should be located elsewhere.
- DOE has previously stated Rocky Flats cannot handle a backlog of both TRU wastes and low-level wastes. Could the TRU waste storage facility be designed so it also meets requirements for storage of low-level wastes? Is DOE exploring this possibility?
- Certain local governments have previously expressed concerns about security at Rocky Flats. The Coalition encourages DOE to carefully examine all potential security threats to the TRU waste storage facility during this early stage of interim storage planning. Regardless of where it is located, TRU waste must be secure from any unauthorized access or other security threats.
- The Coalition also requests DOE take all reasonable precautions to avoid contaminating the storage facility under development. TRU waste containers should be carefully inspected prior to placement in newly developed storage. Any containers of questionable integrity should be replaced. Waste containers should be stored in a manner that allows easy visual access to any labels, bar codes,

valves, etc., and periodic inspections should be performed to ensure that waste remains fully contained. Facility upgrades, such as but not limited to berms, HEPA filtration, negative internal air pressure, should be considered a second line of defense.

- The EA cites an annual estimated radiological risk for a member of the public of 6.2×10^{-2} latent cancer fatalities for the tents alternative. Is this estimated risk accurate?

The Coalition expects WIPP shipments to continue at peak capacity, TRU waste to be removed from Site as soon as possible, and the Site to be completely cleaned up and closed down in 2006. Ultimately, the Coalition believes DOE's cleanup and closure responsibilities do not end until all waste, including TRU, is gone and all storage facilities are decommissioned and dismantled.

The Coalition looks forward to working collaboratively with DOE on future actions involving interim TRU storage. Please provide us with your schedule for decision-making when it is known, as it will allow us to better coordinate our process with yours. Thank you again for this opportunity to provide input.

Sincerely yours,

/s/

Thomas Brunner
Chairman