### THE U.S. DEPARTMENT OF ENERGY



Final Environmental Impact Statement for the





Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375)

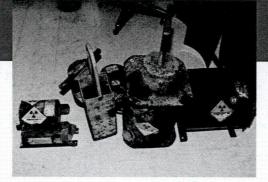


### U.S. DEPARTMENT OF ENERGY





Final Environmental Impact Statement for the





Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375)

Volume 5: Appendix J, Comment Response Document (Cont.) (Sections J.3.3 through J.4)



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21			
20			

**NOTATION** 1 2 3 (The following list of acronyms and abbreviations and units of measure is a duplication of the list 4 in the main portion of the GTCC EIS and is provided here for the convenience of the reader.) 5 6 7 ACRONYMS AND ABBREVIATIONS 8 9 **ACHP** Advisory Council on Historic Preservation 10 **AEA** Atomic Energy Act of 1954 U.S. Atomic Energy Commission 11 **AEC** Agreement in Principle 12 AIP American Indian Religious Freedom Act of 1978 13 **AIRFA** as low as reasonably achievable 14 ALARA **AMC** activated metal canister 15 **AMWTP** 16 Advanced Mixed Waste Treatment Project 17 **ANOI** Advanced Notice of Intent 18 **AQRV** air-quality-related value 19 **ARP Actinide Removal Process** Advanced Test Reactor (INL) 20 ATR 21 22 bgs below ground surface 23 **BLM** Bureau of Land Management 24 **BLS** Bureau of Labor Statistics 25 Burlington Northern Santa Fe **BNSF** Blue Ribbon Commission on America's Nuclear Future 26 BRC 27 **BSL** Biosafety Level 28 **BWR** boiling water reactor 29 30 CAA Clean Air Act 31 **CAAA** Clean Air Act Amendments 32 CAP88-PC Clean Air Act Assessment Package 1988-Personal Computer (code) 33 complementary cumulative distribution function **CCDF** 34 **CEDE** committed effective dose equivalent 35 **CEO** Council on Environmental Quality 36 CERCLA Comprehensive Environmental Response, Compensation, and Liability Act 37 **CFA** Central Facilities Area (INL) 38 **CFR** Code of Federal Regulations 39 CGTO Consolidated Group of Tribes and Organizations 40 CH contact-handled 41 Cultural Resource Management Office **CRMD** 42 **CTUIR** Confederated Tribes of the Umatilla Indian Reservation **CWA** 43 Clean Water Act 44 CX Categorical Exclusion 45

1	DOE	1
1	DCF	dose conversion factor
2	DCG	derived concentration guide
3	DOE	U.S. Department of Energy
4	DOE-EM	DOE-Office of Environmental Management
5	DOE-ID	DOE-Idaho Operations Office
6	DOE-NV	DOE-Nevada Operations Office
7	DOE-RL	DOE-Richland Operations Office
8	DOI	U.S. Department of the Interior
9	DOT	U.S. Department of Transportation
10	DRZ	disturbed rock zone
11	DTRA	Defense Threat Reduction Agency
12	DWPF	Defense Waste Processing Facility
13	DWII	Detense waste i locessing i active
14	EAC	Early Action Area
15	EDE	·
		effective dose equivalent
16	EDNA	Environmental Designation for Noise Abatement
17	EIS	environmental impact statement
18	EPA	U.S. Environmental Protection Agency
19	ERDF	Environmental Restoration Dispersal Facility
20	ESA	Endangered Species Act of 1973
21	ESRP	Eastern Snake River Plain (INL)
22		
23	FFTF	Fast Flux Test Facility (Hanford)
24	FGR	Federal Guidance Report
25	FONSI	Finding of No Significant Impact
26	FR	Federal Register
27	FTE	full-time equivalent
28	FY	fiscal year
29		·
30	GAO	U.S. Government Accountability (formerly General Accounting) Office
31	GMS/OSRP	Office of Global Material Security/Off-Site Source Recovery Project
32	GSA	General Separations Area (SRS)
33	GTCC	greater-than-Class C
34	Gree	Security than Class C
35	HAP	hazardous air pollutant
36	HC	Hazard Category
37	HEPA	- The state of the
		high-efficiency particulate air
38	HEU	highly enriched uranium
39	HF	hydrogen fluoride
40	HFIR	High Flux Isotope Reactor (ORNL)
41	HMS	Hanford Meteorology Station
42	HOSS	hardened on-site storage
43	h-SAMC	half-shielded activated metal canister
44	HSW EIS	Final Hanford Site Solid (Radioactive and Hazardous) Waste Program
45		Environmental Impact Statement
46		
47		

1	ICRP	International Commission on Radiological Protection
2	IDA	intentional destructive act
3	IDAPA	Idaho Administrative Procedures Act
4	IDEQ	Idaho Department of Environmental Quality
5	IDF	Integrated Disposal Facility
6	INL	Idaho National Laboratory
7	INTEC	Idaho Nuclear Technology and Engineering Center (INL)
8	ISFSI	independent spent fuel storage installation
9		
10	LANL	Los Alamos National Laboratory
11	LCF	latent cancer fatality
12	$L_{dn}$	day-night sound level
13	$L_{eq}$	equivalent-continuous sound level
14	LEU	low-enriched uranium
15	LLRW	low-level radioactive waste
16	LLRWPAA	Low-Level Radioactive Waste Policy Amendments Act of 1985
17	LMP	Land Management Plan (WIPP)
18	LWA	Land Withdrawal Act (WIPP)
19	LWB	Land Withdrawal Boundary (WIPP)
20	2,12	Zana Windiawa Zoanaanj (Will)
21	MCL	maximum contaminant level
22	MCU	modular caustic side solvent extraction unit
23	MDA	material disposal area (LANL)
24	MOA	Memorandum of Agreement
25	MOU	Memorandum of Understanding
26	MOX	mixed oxides
27	MPSSZ	Middleton Place-Summerville Seismic Zone
28	MSL	mean sea level
29	WISE	mean sea level
30	NAAQS	National Ambient Air Quality Standard(s)
31	NAGPRA	Native American Graves Protection and Repatriation Act of 1990
32	NASA	National Aeronautics and Space Administration
33	NCRP	National Council on Radiation Protection and Measurements
34	NDA	NRC-licensed disposal area (West Valley Site)
35	NEPA	National Environmental Policy Act of 1969
36	NERP	National Environmental Research Park
37	NESHAP	National Emission Standard for Hazardous Air Pollutants
38	NHPA	National Historic Preservation Act
39	NI PEIS	Nuclear Isotope PEIS
40	NLVF	North Las Vegas Facility
41	NMAC	New Mexico Administrative Code
42	NMED	New Mexico Environment Department
43	NMFS	National Marine Fisheries Services
44	NNHP	Nevada Natural Heritage Program
45	NNSA	National Nuclear Security Administration (DOE)
46	NNSA/NSO	NNSA/Nevada Site Office
40	DOMAGNIM	INTISATIVE VALUE OFFICE

1	NNSS	Nevada National Security Site (formerly Nevada Test Site or NTS)
2	NOAA	National Oceanic and Atmospheric Administration
3	NOI	Notice of Intent
4	NPDES	National Pollutant Discharge Elimination System
5	NPS	National Park Service
6	NRC	U.S. Nuclear Regulatory Commission
7	NRHP	National Register of Historic Places
8	NTS SA	Nevada Test Site Supplemental Analysis
9	NTTR	Nevada Test and Training Range
10		
11	ORNL	Oak Ridge National Laboratory
12	ORR	Oak Ridge Reservation
13		
14	PA	programmatic agreement
15	PCB	polychlorinated biphenyl
16	PCS	primary constituent standard
17	PEIS	programmatic environmental impact statement
18	P.L.	Public Law
19	PM	particulate matter
20	$PM_{2.5}$	particulate matter with an aerodynamic diameter of 2.5 µm or less
21	$PM_{10}$	particulate matter with an aerodynamic diameter of 10 µm or less
22	PPV	Peak Particle Velocity
23	PSD	Prevention of Significant Deterioration
24	PSHA	Probabilistic Seismic Hazards Assessment
25	PWR	pressurized water reactor
26		
27	R&D	research and development
28	RCRA	Resource Conservation and Recovery Act
29	RDD	radiological dispersal device
30	RH	remote-handled
31	RH LLW EA	Remote-Handled Low-Level Waste Environmental Assessment (INL)
32	RLWTF-UP	Radioactive Liquid Waste Treatment Facility-Upgrade (LANL)
33	ROD	Record of Decision
34	ROI	region of influence
35	ROW	right-of-way
36	RPS	Radioisotopic Power Systems
37	RSL	Remote Sensing Laboratory
38	RWMC	Radioactive Waste Management Complex (INL)
39	RWMS	Radioactive Waste Management Site (NNSS)
40		
41	SA	Supplemental Analysis
42	SAAQS	State Ambient Air Quality Standards
43	SALDS	State-Approved Land Disposal Site
44	SCDHEC	South Carolina Department of Health and Environmental Control
45	SCE&G	South Carolina Electric Gas
46	SDA	state-licensed disposal area (West Valley Site)

1	SDWA	Safe Drinking Water Act
2	SHPO	State Historic Preservation Office(r)
3	SNF	spent nuclear fuel
4	SR	State Route
5	SRS	Savannah River Site
6	SWB	standard waste box
7	SWEIS	Site-Wide Environmental Impact Statement
8.		
9	TA	Technical Area (LANL)
10	TC&WM EIS	Tank Closure and Waste Management EIS (Hanford)
11	TEDE	total effective dose equivalent
12	TEDF	Treated Effluent Disposal Facility
13	TEF	Tritium Extraction Facility
14	TLD	thermoluminescent dosimeter
15	TRU	transuranic
16	TRUPACT-II	Transuranic Package Transporter-II
17	TSCA	Toxic Substances Control Act
18	TSP	total suspended particulates
19	TTR	Tonapah Test Range
20 21	TVA	Tennessee Valley Authority
22	US	United States
23	USACE	U.S. Army Corps of Engineers
24	USC	United States Code
25	USFS	U.S. Forest Service
26	USFWS	U.S. Fish and Wildlife Service
27	USGS	U.S. Geological Survey
28		
29	VOC	volatile organic compound
30		
31	WAC	waste acceptance criteria or Washington Administrative Code
32	WHB	Waste Handling Building (WIPP)
33	WIPP	Waste Isolation Pilot Plant
34	WSRC	Westinghouse Savannah River Company
35	WTP	Waste Treatment Plant (Hanford)
36	WVDP	West Valley Demonstration Project
37		·
38		

January 2016

### UNITS OF MEASURE

ac ac-ft	acre(s) acre-foot (feet)	m <sup>3</sup> MCi	cubic meter(s)
ac-11	acre-root (reet)	mg	megacurie(s) milligram(s)
°C	degree(s) Celsius	mi	mile(s)
cfs	cubic foot (feet) per second	mi <sup>2</sup>	square mile(s)
Ci	curie(s)	min	minute(s)
cm	centimeter(s)	mL	milliliter(s)
cms	cubic meter(s) per second	mm	millimeter(s)
		mph	mile(s) per hour
d	day(s)	mR	milliroentgen(s)
dB	decibel(s)	mrem	millirem
dBA	A-weighted decibel(s)	mSv	millisievert(s)
		MW	megawatt(s)
$^{\circ}\mathrm{F}$	degree(s) Fahrenheit	MWh	megawatt-hour(s)
ft	foot (feet)		
$\mathrm{ft}^2$	square foot (feet)	nCi	nanocurie(s)
ft <sup>3</sup>	cubic foot (feet)		
		oz	ounce(s)
g	gram(s) or acceleration		
	of gravity (9.8 m/s/s)	pCi	picocurie(s)
gal	gallon(s)	ppb	part(s) per billion
gpd	gallon(s) per day	ppm	part(s) per million
gpm	gallon(s) per minute	_	
		R	roentgen(s)
h	hour(s)	rad	radiation absorbed dose
ha	hectare(s)	rem	roentgen equivalent man
hp	horsepower	_	1(-)
in.	inch(es)	S	second(s)
111.	men(es)	t	metric ton(s)
kg	kilogram(s)	ι	meare ton(s)
km	kilometer(s)	VdB	vibration velocity decibel(s)
km <sup>2</sup>	square kilometer(s)	Vab	violation velocity accidents)
kph	kilometer(s) per hour	yd	yard(s)
kV	kilovolt(s)	$yd^2$	square yard(s)
		$yd^3$	cubic yard(s)
L	liter(s)	yr	year(s)
lb	pound(s)	<b>J</b>	3 (-)
	• ()	μg	microgram(s)
m	meter(s)	μm	micrometer(s)
$m^2$	square meter(s)	•	. ,
	-		

### J.3.3 CREDO Campaign Form Letter

Table J.3-3 tabulates all individuals who submitted comments via the CREDO Campaign form letter along with the comment document identifiers assigned to each. One representative letter (Barber, Kristen, Comment Document ID No. L213) was used to identify the comment. The comment is identified in brackets on the left side of the page, and the corresponding response is shown on the right side of the same page. All other comment letters resemble the representative letter. The representative letter, comment identified in that letter, response, and all the other comment documents received for this campaign are presented here in Section J.3.3 on pages J-1767 through J-1827, as indicated in the table. It may be helpful for readers to review Section J.2 for an overview of the 10 Topics of Interest of this CRD.

TABLE J.3-3 Individuals Who Submitted Comments via the CREDO Campaign Form Letter

	Comment	Starting
Last Name, First Name	Document ID No.	Page No.
Barber, Kristin*	L213	J-1767
Bartholomew, Gabriele	L214	J-1768
Batts, Katherine	L215	J-1769
Bekker, Rhonda	L216	J-1770
Bering, Stacie	L217	J-1771
Borden, Phyllis	L218	J-1772
Boynton, Llory	L219	J-1773
Burns, Carl	L220	J-1774
Chastain, Jody	L221	J-1775
Chroman, J.	L222	J-1776
Davis, Galen	L223	J-1777
Dewell, Alice	L224	J-1778
Downing, Michelle	L225	J-1779
Fairchild, Jane	L226	J-1780
Frothingham, Dianne	L227	J-1781
Gray, Lee	L228	J-1782
Hansen, Heidi	L229	J-1783
Harkness, Linda	L230	J-1784
Hauer, Valerie	L231	J-1785
Herron, Andria	L232	J-1786
Hodapp, Paul	L233	J-1787
Houghton, Richard	L234	J-1788
Howard, Gary	L235	J-1789
Howe, Cheri	L236	J-1790
Iverson, Luanna	L237	J-1791
Kee, Marion	L238	J-1792
Ketchum, Deann	L239	J-1793
Knutson, Maureen	L240	J-1794
Leyrer, Sarah	L241	J-1795
Lovett, Wendell	L242	J-1796
Magnuson, John	L243	J-1797
Mattson, Dana	L244	J-1798

TABLE J.3-3 (Cont.)

	Comment	Starting
Last Name, First Name	Document ID No.	Page No.
Mccracken, Philip	L245	J-1799
Mckay, Barbara	L246	J-1800
Meinz, Vern	L247	J-1801
Methe, Leslie	L248	J-1802
Mikkelsen, Susan	L249	J-1803
Morey, Barbara	L250	J-1804
Morgan, Donald	L251	J-1805
Parish, Dave	L252	J-1806
Paul, Hollis	L253	J-1807
Pearson, Sharon	L254	J-1808
Rabinowitz, Alan	L255	J-1809
Ray, Beth	L256	J-1810
Rosen, Susan	L257	J-1811
Rosenthal, Elizabeth	L258	J-1812
Rozenbaum, Scott	L259	J-1813
Sanders, Aurelia	L260	J-1814
Seymore, Lee Roy	L261	J-1815
Sheldon, Sue	L262	J-1816
Siverts, Linda	L263	J-1817
Swalla, Billie	L264	J-1818
Todd, Therald	L265	J-1819
Trowbridge, Cynthia	L266	J-1820
Twisdale, March	L267	J-1821
Verschuyl, Sharon	L268	J-1822
Walsh, Terry	L269	J-1823
Webster, Theresa	L270	J-1824
Winsor, Robert	L271	J-1825
Woods, Paul	L272	J-1826
Zeiler, Telle	L273	J-1827

<sup>\*</sup> Barber, Kristin (Comment Document No. L213) is the representative letter.

#### **CREDO** Campaign Barber, Kristin, Commenter ID No. L213 (Representative Letter)

JULY - 17/1/22

Kristin Barber 2306 Henry St Bellingham, WA 98226-2209



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Avo SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

I'm writing to demand that you halt Dept. of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

As you know, Hanford is the most contaminated nuclear site in the Western hemisphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.

The promised cleanup at Hanford has still not begun in sarmest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

Kristin Barber

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L213-1

L213-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.

# CREDO Campaign Bartholomew, Gabriele, Commenter ID No. L214

Gabrielo Bartholomew 711 Linden St Everett, WA 98201-1222

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20685

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reginder of the threat posed by all nuclear facilities.

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The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely.

Gabriele Bartholomew

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CREDO :

#### **CREDO Campaign** Batts, Katherine, Commenter ID No. L215

Katherine Batts 21815 State Route 9 SE Woodinville, WA 98072-9784

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

· Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meitdown at the Fukushima nuclear plant -- are a werrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

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The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough:

Please let'me know how you intend to address this issue.

Sinceraly. Katherine Batts

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#### **CREDO Campaign** Bekker, Rhonda, Commenter ID No. L216

Rhonda Bekker 1704 Skyllne Dr Wenatchee, WA 98801-3238

May 14, 2011

DOE Socretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu, '.

The carthquake and tsunomi in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

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The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely.

Rhonda Bekker

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#### **CREDO Campaign** Bering, Stacie, Commenter ID No. L217

Stacle Bering 421 W Shoshone Pl Spokane, WA 99203-2059

May 14, 2011

DDE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DDE Secretary Steven Chu.

The earthquake and tsunemi in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Henford, which a former Henford engineer called "a ticking time bomb."

I'm writing to demand that you halt bept, of Energy plans to truck more nuclear waste to Henford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

As you know, Hanford is the most conteninated nuclear site in the Western hemisphere. It has 68 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.

The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

Stacle Bering

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#### <u>CREDO Campaign</u> Borden, Phyllis, Commenter ID No. L218

Phyllis Borden 220 Cozy Ln Sequim, WA 98382-6843



May 17, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20586

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

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The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue. .

Sincerely. .

Phyllis Borden

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Citizenterrers are a service of CREDO.

CREDO:

#### CREDO Campaign Boynton, Llory, Commenter ID No. L219

Liory Boynton 73, Enchantment Way Segulm, WA 98382-9038



May 14. 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DDE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

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The promised cleanup at Hanford has still not begun in carnest and yet your department proposes to dump even more waste here. The people of Washington have had enough

Please let me know how you intend to address this lasue.

Sincerely.

Liory Boynton

ChizenLetters are a service of CREDO.

#### **CREDO Campaign** Burns, Carl, Commenter ID No. L220

Carl Burns 213 NW 6TH St Renton, WA 98057-3408

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20685

Dear DOE Secretary Steven Chu,

The earthquake and tsumami in Japan -- and subsequent meitdown: the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

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The promised cleanup at Henford has still not begun in earnest and t your department proposes to dump even more waste here. The people Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

· Carl Burns

Citizentetters are a service of CREDO:

#### CREDO Campaign Chastain, Jody, Commenter ID No. L221

Jody Chastain PO Box 2994 Longview, WA 98632-6971

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC, 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent moltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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The promised Cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely,

Jody Chastain

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#### CREDO Campaign Chroman, J., Commenter ID No. L222

Abintra Wellhess Center J Chroman 7114 5TH Ave NE Unit 2 Seattle, WA 98115-5423

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Stoven Chu,

The earthqueke and tsunomi in Japan -- and subsequent moltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

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Please Let me know how you Intend to address this issue.

Sincerely,

Abintra Wellness Conter J Chroman

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#### **CREDO** Campaign Davis, Galen, Commenter ID No. L223

Galen Davis 9114 8TH Ave NE Seattle, WA 98115-2811

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave 5W Washington, DC 20585

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fokushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerely.

Galen Davis

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#### CREDO Campaign Dewell, Alice, Commenter ID No. L224

Alice Dowell 2425 33RD Ave W Unit 402 Seattle, WA 98199-3259

May 14, 2011

DOE Secretary Steven Chu-US Department of Energy 1000 Independence Ava SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Allcer Dewell

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## CREDO Campaign Downing, Michelle, Commenter ID No. L225

Michelle Downing 3103 NW River Ln Poulsbo, WA 98370-7267



May 14, 2011.

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meitdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerety, Michelle Downing

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## CREDO Campaign Fairchild, Jane, Commenter ID No. L226

Jane Fairchlid 9437 58TH Ave S Seattle, WA 98118-5528

CitizenLeiter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Doar DOE Secretary Steven Chu;

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Sincerely,

Jane Fairchild

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#### **CREDO Campaign** Frothingham, Dianne, Commenter ID No. L227

Dianne Frothingham 1105A N 5TH St Tacoma. WA 98403-1610

May 14, 2011

DOE Socretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20385

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerely,

Dianne Frothingham

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#### CREDO Campaign Gray, Lee, Commenter ID No. L228

Lee P Gray 801 Pine St Apt 21B Seattle, WA 98101-180



Bay 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Avo SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincerely, Lee P Gray

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#### **CREDO Campaign** Hansen, Heidi, Commenter ID No. L229

Heidl Hansen 610 W Church St Palouse, WA 99161-8761

May 14, 2011 2

DDE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Stèven Chu.

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Sincerely,

Heidi Hansen

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## CREDO Campaign Harkness, Linda, Commenter ID No. L230

Linda Harkness 14903 Linden Ave N Shoreline, WA 98133-6516



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Indopendence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerelý,

Linda Harkness

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#### **CREDO** Campaign Hauer, Valerie, Commenter ID No. L231

Valerie L Hauer 8900 S Mullen Hill Rd Lot 608 Spokane, WA 99224-7402

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunaml in Japan -- and subsequent moltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you Intend to address this issue.

Sincerely,

Valerie L Hauer

CitizonLetters are a service of CREDOT,

#### <u>CREDO Campaign</u> <u>Herron, Andria, Commenter ID No. L232</u>

Andria Herron 2012 E 11TH St Vancouver, WA 98661-4110



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DDE Secretary Steven Chu,

The earthquake and tsunami in Jopan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely,

Andria Herron

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#### **CREDO Campaign** Hodapp, Paul, Commenter ID No. L233

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20885

Dear DOE Secretary Stoven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Pukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerely,

Paul W Hodapp

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## CREDO Campaign Houghton, Richard, Commenter ID No. L234

Richard Houghton 7538 Guemes Island Rd Anacortes, WA 98221-9570



May 17, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely,

Richard Houghton

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#### **CREDO Campaign** Howard, Gary, Commenter ID No. L235

Gary R Howard 512 N Bowdoin Pi Seattle, WA 98103-7704



May 14, 2011

DDE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincerely,

Gary R Howard

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#### **CREDO Campaign** Howe, Cheri, Commenter ID No. L236

Cheri Howe 3300 Carpenter Rd SE # C76 Lacoy, WA 98503-4072



May 14, 2011

DDE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincoroly,

Cherl Howe

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# CREDO Campaign Iverson, Luanna, Commenter ID No. L237

Luanna Iverson 3609 72ND PI SE Morcer Island, WA 98040-3343

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC -20585

Dear DOE Secretary Steven Chu.

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. Sincerely,

. Lûenria Iverson

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### **CREDO Campaign** Kee, Marion, Commenter ID No. L238

Marion R Kee 5618 162ND Ave NE . Redmond, WA 98052-5217



May 14, 2011

DOE Secretary Stoven Chu US Department of Energy 1000 Independence Avo SW Washington, DC 20585

Dear DOE Socretary Steven Chu,

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Please let mo know how you intend to address this Issue.

Sincerely,

Marton R Kee

# CREDO Campaign Ketchum, Deann, Commenter ID No. L239

Deann Ketchom 903 Bellevue Pl E Apt 202 Seattle, WA 98102-4408

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Indopendence Ave SW Washington, DC 20585

Dear DOE Sécretary Steven Chu,

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Sincerely,

Deann Ketchum

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CREDO -

### **CREDO Campaign** Knutson, Maureen, Commenter ID No. L240

Mauroen F Knutson 9119 NE 316TH St La Center, WA 98629-2869

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincerely,

Maureen F Knutson

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### CREDO Campaign Leyrer, Sarah, Commenter ID No. L241

Sarah Leyrer 1030 W Columbia Ave Apt A Moses Lake, WA 98837-2033



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Sarah Loyrer

CitizenLetters are a service of CREDO:

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# CREDO Campaign Lovett, Wendell, Commenter ID No. L242

Wendell H Lovett 420 34TH Ave Seattle, WA 98122-6408



May 14, 2011

DOE Secretary Stoven Chu US Department of Energy 1000 Independence Ave. SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Wendell H Lovett

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### <u>CREDO Campaign</u> <u>Magnuson, John, Commenter ID No. L243</u>

John Magnuson 13772 NE GOTH St Apt 187 Podmand WA 98052-4533

CitizenLetter Mannetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincerely.

John Magnuson

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COFOO BURNES

#### **CREDO Campaign** Mattson, Dana, Commenter ID No. L244

Dana L Mattson PO Box 4031 Bellingham, WA 98227-4031



May 17, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

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Please let me know how you intend to address this issue:

Sincorely,

Dana L Mettson

CitizenLetter's are a service of CREDO:

### **CREDO Campaign** Mccracken, Philip, Commenter ID No. L245

Philip Mccracken 5029 Guemes Island Rd # B Anacortes, WA 98221-9039



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

· Dear DOE Secretary Steven Chu,

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Sincerely,

Philip Mccracken

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### <u>CREDO Campaign</u> <u>Mckay, Barbara, Commenter ID No. L246</u>

Barbara J Mckay 2521 W Summit Blvd Spokane, WA 99201-2973



May 14, 2011 .

DOE Secretary Steven Chu US Department of Energy 1000 Independence Avo SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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. Please let me know how you intend to address this issue.

Sincerely,

Barbara J Mckay

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CDEDO CONCREDENT

### **CREDO Campaign** Meinz, Vern, Commenter ID No. L247

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequenthe Fukushima nuclear plant -- are a worrying reminder of posed by all nuclear facilities.

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Please let me know how you intend to address this lesue.

Sincerely,

CitizonLetters are a service of CREDO....

### CREDO Campaign Methe, Leslie, Commenter ID No. L248

Lesile A Methe 1600 121ST St SE.Apt H103 Everett, WA 98208-7907



May 14, 2011

DDE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Lesile A Methe

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### **CREDO Campaign** Mikkelsen, Susan, Commenter ID No. L249

Susan Mikkelsen 4710 Burke Ave N Seattle, WA 98103-6820 \*



3 May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Doar DOE Secretary Steven Chu, .

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Sincerely. .

Susan Mikkelsen

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CREDO ::::::

### **CREDO Campaign** Morey, Barbara, Commenter ID No. L250

Barbara E Morey 707 O St Port Townsend, WA 98368-4111

Nay 14, 2011 ·

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Barbara E Morey

nLetters are a service of GREDO.

### **CREDO Campaign** Morgan, Donald, Commenter ID No. L251

Donald A Morgan 3008 N Hogen St Spokane, WA 992

May 17, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear. DOE Secretary Steven Chu,

The earthquake and tsunaml In Japan -- and subsequent meltdown at the Fukushina nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincerely:

Donald A Morgan

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### **CREDO** Campaign Parish, Dave, Commenter ID No. L252

Dave Parish 2403 N 75TH St Soattle, WA 98103-4959

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Indopendence Avo SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely,

Dave Parish

### **CREDO** Campaign Hollis, Paul, Commenter ID No. L253

May 14, 2011 ..

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Hallis Paul

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### <u>CREDO Campaign</u> <u>Pearson, Sharon, Commenter ID No. L254</u>

Sharon Pearson 1210 E 5TH St Apt 14 Arlington, WA 98223-1157



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington; DC 20585

Dear DDE Socretary Steven Chu,

The earthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely.

Sharon Pearson

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CREDO STATES

### CREDO Campaign Rabinowitz, Alan, Commenter ID No. L255



May 14, 2011

DOE Secretary Steven Chu US Dopartment of Energy 1000 Independence Ave SW Washington, DC 20585

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Pleaso let me know how you intend to address this issue.

Sinceraly,

Alan Rabinovitz

Citizen Letters are a service of CREDO:

### CREDO Campaign Ray, Beth, Commenter ID No. L256

Beth L Rey 28611 N River Estates Dr Chattaroy, WA 98003-8848

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Please let me know how you intend to address this issue.

Sincerely,

Beth L Ray

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### CREDO Campaign Rosen, Susan, Commenter ID No. L257

Susan Rosen 3912 Martin Way E Ste B Olympia, WA 98506-5220

Citizen Letter

May .14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

. Dear DOE Secretary Steven Chu,

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Please lot me know how you intend to address this issue.

Sincerely,

Susan Rosen

CitizenLetters are a service of CREDO:

CREDO

# CREDO Campaign Rosenthal, Elizabeth, Commenter ID No. L258

Elizabeth E Rosenthal 18808 Ashworth Ave N Shoreline, WA 98133-4026



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20685

Dear DOE Secretary Steven Chu,

The earthquake and tsunam! In Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely,

Elizabeth E Rosenthai

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CREDO ::::

### <u>CREDO Campaign</u> <u>Rozenbaum, Scott, Commenter ID No. L259</u>

Scott J Rozonbaum PD Box 238 Lopez (sland, WA 98261-0238



May 14, 2011

DDE Secretary Steven Chu US Department of Enorgy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Please let me know how you'intend to address this issue.

Sincerely,

Scott J Rozenbaum

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### <u>CREDO Campaign</u> Sanders, Aurelia, Commenter ID No. L260

Aurella Sanders 603 N 60TH St Scattle, VIA 98103-5603



Hay. 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincerely.

Aurejla Sanders

CilizeaLetters are a service of CREDO:

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### CREDO Campaign Seymore, Lee Roy, Commenter ID No. L261

Lee Roy Seymore PO Box 163 Ellensburg, WA 98926-1911

Hay 14, 2011

DOESScrotary Steven Chu US Dopartment of Energy 1000 ladopendence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

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Sincerely,

Lee Roy Seymore

CitizenLetters are a service of CREDO:

# CREDO Campaign Sheldon, Sue, Commenter ID No. L262

Suo Sheldon PO Box 1575 Shelton, WA 98584-0983

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu. US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Stoven Chu;

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Please let me know how you intend to address this issue.

Sincerely, Sue Sheldon

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### CREDO Campaign Siverts, Linda, Commenter ID No. L263

Linda Siverts 6804 N Post St Spokane, WA 99208-4138



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

CitizenLetters are a service of CREDOT ...

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Sincerely,

Linda Siverts

#### <u>CREDO Campaign</u> Swalla, Billie, Commenter ID No. L264

Bille J Swalla 620 University Rd Friday Harbor, WA 98250-9299

CitizenLetter

May 14, 2011

DOE Socretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthqueke and tsunami in Japan -- and subsequent maitdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely,

Billie J Swalla

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CREDO

### **CREDO Campaign** Todd, Therald, Commenter ID No. L265

Theraid Todd 4505 Holcomb St Port Townsend, WA 98368-2120



May 17, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The earthquake and tsunem In Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Please let me know how you intend to address this issue.

Sincercly.

Therald Todd

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#### **CREDO Campaign** Trowbridge, Cynthia, Commenter ID No. L266

Cynthia Powell Trowbridge 3537 Gylany Way Greenbank, WA 98253-9758



May 14., 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Aya SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely.

Cynthia Powell Trowbridge

CitizEALetters are a service of CREDO:

# CREDO Campaign Twisdale, March, Commenter ID No. L267

March Twisdal's 11933 SW Cove Rd Vashon, WA 98070-4008

CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SIV Washington, DC '20585

Dear DOE Secretary Steven Chu,

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Please let me know how you intend to address this issue:

Sincerely,

March Tylsdale

ChizanLetters are a service of CREDO:

CREDO .....

### CREDO Campaign Verschuyl, Sharon, Commenter ID No. L268

Sharon-Verschuyl 2604 Capitol Way S Olympia, WA 98601-3327

May 14, 2011

DDE Secretary Steven Chu US Department of Enorgy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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Sincerely,

Sharon Verschuyl

CitizenLetters are a service of CREDO:

### CREDO Campaign Walsh, Terry, Commenter ID No. L269

Terry Hyman Walsh 348 NW 112TH St Seattle, WA 98177-4841

# CitizenLetter

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

The carthquake and tsunami in Japan -- and subsequent meltdown at the Fukushima nuclear plant -- are a worrying reminder of the threat posed by all nuclear facilities.

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Sincerely,

Torry Hyman Walsh

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THE CASE OF FRANCISCO CONTRACTOR NOTE AND ADMINISTRATION OF THE CENTRAL PROPERTY AND ADMINISTRATION OF THE CONTRACTOR OF

### **CREDO Campaign** Webster, Theresa, Commenter ID No. L270

Theresa P Webster 5503 47TH Ave E Tacoma, WA 98443-2521



May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

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Sincerely,

Theresa P Webster.

Cingual etters are a service of CREDOT

### **CREDO Campaign** Winsor, Robert, Commenter ID No. L271

Robert Winsor 2821 2ND Ave Apt 1802 Seattle, WA 98121-1250

May 14, 2011.

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu,

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· Please let me know how you intend to address this issue.

\* Sincerely,

Robert Winsor

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### **CREDO Campaign** Woods, Paul, Commenter ID No. L272

Paul Woods PO Box 907 Graham, WA 98338-0907

May 14, 2011

DOE Secretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

Dear DOE Secretary Steven Chu.

The earthquake and tsunami in Japan - and subseq the Fukushima nuclear plant -- are a worrying reminder posed by all nuclear facilities.

One of the most dangerous in the U.S. is Hanford, which a former Hanford engineer called "a ticking time bomb."

I'm writing to demand that you halt bept, of Energy plans to truck more nuclear waste to Hanford, clean up what's there, and take action to ensure the site does not threaten the Columbia River and the people who live nearby.

As you know, Hanford is the most contaminated nuclear site in the Western hem/sphere. It has 58 million gallons of radioactive sludge stored in leaky underground tanks within dangerous proximity of the Columbia River.

The promised cleanup at Hanford has still not begun in earnest and yet your department proposes to dump even more waste here. The people of Washington have had enough.

Please let me know how you intend to address this issue.

Sincerely.

Paul Woods

#### **CREDO Campaign** Zeiler, Telle, Commenter ID No. L273

Telle Zeller .214 13TH Ave E Apt Seattle, WA 98102-

Vay 14, 2011

DOE Socretary Steven Chu US Department of Energy 1000 Independence Ave SW Washington, DC 20585

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Sincerely,

Telle Zeller

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J-1828

# J.3.4 Concerned Citizens for Nuclear Safety Campaign Form Letter

Table J.3-4 tabulates all individuals who submitted comments via the Concerned Citizens for Nuclear Safety Campaign form letter along with the comment document identifiers assigned to each. One representative letter (Abrahamsen, Chris, Comment Document ID No. L13) was used to identify the comments. The comments are identified in brackets on the left side of the page, and the corresponding responses are shown on the right side of the same page. All other comment letters resemble the representative letter. The representative letter, comments identified in that letter, responses, and all other comment documents received for this campaign are presented here in Section J.3.4 on pages J-1831 through J-1887, as indicated in the table.

TABLE J.3-4 Individuals Who Submitted Written Comments via the Concerned Citizens for Nuclear Safety Campaign Form Letter

	Comment	Starting
Last Name, First Name	Document ID No.	Page No.
Edst Hame, I list Hame	Document ID 110.	1 450 110.
Abrahamsen, Chris*	L13	J-1831
Allen, Sabrina	L14	J-1832
Bliven, Rachel	L26	J-1833
Boyer, Jan	L40	J-1834
Brenden, Robert	L88	J-1835
Buono, Gail	L29	J-1837
Cate, Mary Ray	L23	J-1838
Chiltan, Maria	L10	J-1839
Conway, Patty	L25	J-1840
Corliss, Roy	L11	J-1841
Donahue, Lisa	L47	J-1842
Dryden, Robert	L27	J-1843
Duggan, Jaime	L33	J-1844
Fair, Linda	L206	J-1845
Fairmont, Lorraine	L42	J-1846
Finney, Dee	L88	J-1847
Giles, Gail	L41	J-1849
Gregory, Michael	L36	J-1850
Hayden, Hallie	L88	J-1851
Hayden, Kimberly	L88	J-1853
Hemprling, Joe	L16	J-1855
Humason, Scott	L43	J-1856
Johnson, Jan	L38	J-1857
Kennedy, Bridgette	L39	J-1858
Keppel, Roberta	L21	J-1859
Klukkort, Jim	L15	J-1860
Koffman, Arkee	L12	J-1861
Koponen, Emmy	L45	J-1862
Kotowski, Sheri	E97	J-1863
Krysl, Marilyn	L44	J-1864
Lapalwe, Monica	L49	J-1865

TABLE J.3-4 (Cont.)

	Comment	Starting
Logt Nama First Nama	Document ID No.	Starting Page No.
Last Name, First Name	Document ID No.	rage No.
Lawless, Jessica	L32	J-1866
Martin, Bruce	E40	J-1867
Murphy, Pat	L48	J-1868
Orozco, Martha	L20	J-1869
Paulette, Robert	L88	J-1870
Phillip, Sheridan	L28	J-1872
Quintana, Marlene	L57	<b>J</b> -1873
Redondo, Petry	L31	J-1874
Robinson, Windell	L22	J-1875
Romero-Oak, Judy	L18	J-1876
Ruark, Ramona	L24	J-1877
Scarbrough, Jarrod	L19	J-1878
Seaton, Paula	L88	J-1879
Sinha, Barbara	L9	J-1881
Stangarone, Richard	L35	J-1882
Suellentrop, Ann	L46	J-1883
Unknown, Unknown	L30	J-1884
Unknown, Unknown	L321	J-1885
Unknown, Ed	L17	J-1886
Wilson, Marguerite	L37	J-1887

Abrahamsen, Chris (Comment Document ID No. L13) is the representative letter.

# Concerned Citizens for Nuclear Safety Campaign Abrahamsen, Chris, Commenter ID No. L13 (Representative Letter)

Ime	76	
May_	-	, 2011



L13-1

L13-1

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

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The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,	
Name:	Chris Abrahansen
Address:	710 W. MISSIDD SAN DIEGO
•	92/20, CA, SAD DIEGO
Email:	

DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

The disposal methods and sites evaluated in the EIS represent the range of reasonable alternatives for the disposal of GTCC LLRW and GTCC-like waste. This range is consistent with NEPA implementing regulations given in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508). In this GTCC EIS, DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, and WIPP Vicinity for which two reference locations, one within and one outside the WIPP Land Withdrawal Boundary, were considered). DOE has determined that it was reasonable to analyze only these six sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository. Although some commenters stated that this range of disposal sites is too narrow, they did not offer specific locations for analysis. It would not be reasonable to analyze in detail an essentially unlimited number of additional non-DOE or nonfederal sites. Nevertheless, DOE also conducted a generic evaluation of commercial disposal facilities on nonfederal lands in the EIS to order to provide, to the extent possible, information regarding the potential long-term performance of other (nonfederal) locations for siting a GTCC waste land disposal facility.

L13-2 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

#### Concerned Citizens for Nuclear Safety Campaign Allen, Sabrina, Commenter ID No. L14



Lecejand

Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

Saluma Afflen

artiste alruna (a) hotmail . con

#### Concerned Citizens for Nuclear Safety Campaign Bliven, Rachel, Commenter ID No. L26

June 25 Way\_\_\_\_, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours truly,	
Name:	Rachel Bliven
Address:	DO A variencia Rd. carple Fe NIM 87505
Email:	suchel blivene gravil

# Concerned Citizens for Nuclear Safety Campaign Boyer, Jan, Commenter ID No. L40

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours truly,	can By	,
Name:	Jan Boyer	
Address:	815 Res Vista	
	SFe N.M 87581	
Email:		

### Concerned Citizens for Nuclear Safety Campaign Brenden, Robert, Commenter ID No. L88

May <u>27</u>, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Thank you fo	or your consideration of my comments,	, ' '
Yours truly,	Jack Sutn Dowl	Janlette
Name:	Thula Station Robert	· L Parlette
Address:	P.O. Box 144	(same)
	Embudo, N.M. 187531	**************************************
Email:	pinta seaton 460 gmail	com
	<b>t</b>	Curr over
	Mare	Signatures OVEN

# Concerned Citizens for Nuclear Safety Campaign Brenden, Robert, Commenter ID No. L88 (cont'd)

EMMY Koponen Englopmen PorBonsis 6 Dixon, 71. M. 87527

Maria Chilten Maria Chilten

KOBERT BRENDEN VILLE BONDEN
BOX 175
DVXON, NM 87527

Dec Finney
P.O. Box 321
DIXON, TIM 8 827
Dec January

Hallie Hayden PO # 542 Dyon, Ny 87527 (Hallie Hayden)

Kimberly M. Hayden Kimberly M. Hayden Po. Box 592 Dixon, NM 87527

# Concerned Citizens for Nuclear Safety Campaign Buono, Gail, Commenter ID No. L29

May 25, 2011



Cloverleaf Building, EM-43 1000 Independence Avc., S.W. Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name: GHL BROND

Address: LG COPPIN TS/.

Santa FE NM 8 1508

Email:

#### Concerned Citizens for Nuclear Safety Campaign Cate, Mary Ray, Commenter ID No. L23

May 24 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Yours truly,	
Name:	may lay Cate
Address:	16Th Cerry girds
	Santa Te NM 8780/
Email:	

#### Concerned Citizens for Nuclear Safety Campaign Chiltan, Maria, Commenter ID No. L10

June 25 May\_\_\_\_, 201

Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585



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Yours truly,	11 0001	
Name:	Maria Chiltan	
Address:	PO Box 512	
	Dita, Ny 87527	
Email:	maria clister a between a	٠.

#### Concerned Citizens for Nuclear Safety Campaign Conway, Patty, Commenter ID No. L25

May 24, 2011



Mr. Arnold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly,

Name:

tatty conwas

Address:

1205 Sandore AV

Email:

vay - patry @ ugnoo. ru

#### Concerned Citizens for Nuclear Safety Campaign Corliss, Roy, Commenter ID No. L11





Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Yours truly,	
Name:	Tay Corliss
Address:	1370 CENNO GORDO
Email:	ragconliss e gaHOO. LOM

## Concerned Citizens for Nuclear Safety Campaign Donahue, Lisa, Commenter ID No. L47

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y, 2011		rescrain
	210 D	 375 27

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,
Name: Lisa Denahue
Address: 1907 Second St.
Santa Fe, JM 87505

### Concerned Citizens for Nuclear Safety Campaign Dryden, Robert, Commenter ID No. L27

received

May 24, 2011

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

<u>I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 carries of commercial GTCC waste.</u> There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposal at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

& Alcalde M

nata fe NN 8)508

# Concerned Citizens for Nuclear Safety Campaign Duggan, Jaime, Commenter ID No. L33



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly.

Name:

Address:

Email:

J-1844

## <u>Concerned Citizens for Nuclear Safety Campaign</u> Fair, Linda, Commenter ID No. L206

JUN - 9 2011

May 3(, 2011

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585



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

Dear Mr. Edelman:

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Yours truly,			
Name:	Linda K. Fait	(Fair)	
Address:	PO BOL 156		
	El Prado NH	११८२९	
Email:			

### Concerned Citizens for Nuclear Safety Campaign Fairmont, Lorraine, Commenter ID No. L42

June May 12, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

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Yours truly,		
Name:	Lowaine H. Fairmont	
Address:	2115 Poplar Live	
	Boulder Co 80304	
Email:		

### Concerned Citizens for Nuclear Safety Campaign Finney, Dee, Commenter ID No. L88

May 27, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you to	r your consideration of my completity,
Yours truly,	Jack Sidn Band & Faultte
Name:	Phula Section Robert L Paulette
Address:	PO Box 144 (Same)
	Emplado, NM 87531
Email:	pinta seaton 460 g mail com
	More Signatures Over

### Concerned Citizens for Nuclear Safety Campaign Finney, Dee, Commenter ID No. L88 (cont'd)

EMMY Koponen Emy Kgomen ROBon 456
Dixon, 71. M. 87527

Maria Chiltan Maria Chiltan

ROBERT BRENDEN With Bondy BOX 175 DVXON, NM 87527

Dee Finney
Ro. Bg. 329
Dixon, n. m. 8827
Dixon, n. m. 8827

Hallie Hayden
PO # 542
Dyon, Ny 87527
(Hallie Hayden)

Kimberly M. Hayden Kimberly M. Hayden Po: Box 592 Dixon, NM 87527

# Concerned Citizens for Nuclear Safety Campaign Giles, Gail, Commenter ID No. L41

June 25, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

, -----

Email:

SAIL (Sices

elle Contesso

1@ sbcglobal, net

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Gregory, Michael, Commenter ID No. L36</u>





Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

ess: \_\_\_

Email:

J-1850

#### Concerned Citizens for Nuclear Safety Campaign Hayden, Hallie, Commenter ID No. L88

May <u>27</u> 2011



Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., 8.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly, Yeak Jeds Saw January

Name: Bula Section Robert L Parlette

Address: P.O Box 1444 (Same)

Email: Pinta section 460 g mail com

More Signatures OVES

#### Concerned Citizens for Nuclear Safety Campaign Hayden, Hallie, Commenter ID No. L88 (cont'd)

Emry Coponen Englogue
Bondes 6
Dixon, M. M. 87527

Maria Chitten Maria Chilten

Kobert Brensen Vated Boardyn BOX 175 DVXON, NM 87527

Dee Finney
Ro Box 329
DIXON, 71 M 8327
Dee James

Hallie Hayder PO# 592 Dyon, Ny 87527 (Hallie Hayden)

Kimberly M. Hayden Kimberly M. Hayden Po: Box 592 Dixon, NM 87527

# Concerned Citizens for Nuclear Safety Campaign Hayden, Kimberly, Commenter ID No. L88

May 27, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly, Jak Stater Daw Vandelle

Name: -laula Staten Robert L Parlette

Address: PO Box 1444 (same)

Email: Pinta scaton 460 gmail com

More Signatures OVER

# Concerned Citizens for Nuclear Safety Campaign Hayden, Kimberly, Commenter ID No. L88 (cont'd)

Emry Coponen Englopmen Bondes 6
Dixon, 71. M. 87527

Maria Chitten Maria Chilten

Robert Brenson With Sandy BOX 175 DVXON, NM 87527

Dee Finney
Ro. Box 327
Dixon, nm 81827
Dec Januar

Hallie Hayden
PO # 542
Dyon, Ny 87527
(Hallie Hayden)

Kimberly M. Hayden Vimberly M. Hayden Po Box 592 Dixon, NM 87527

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Hemprling, Joe, Commenter ID No. L16</u>

May June 25



Mr. Arnold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

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Yours truly,	,	
Name:	JOE Hempkhij	
Address:	1824 Kins rd	
	sata Re No	
Email:	Joseph - hempflin	DEMAIL COM

#### Concerned Citizens for Nuclear Safety Campaign Humason, Scott, Commenter ID No. L43

June 255, 2011



Mr. Arnold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly.

rours truty,

Address:

DO Rox 5494

dress: Y.O. DOX 5474

Email: HUMASON CO GMail Com

#### Concerned Citizens for Nuclear Safety Campaign Johnson, Jan, Commenter ID No. L38

Jan 25		
_May	201	l



Mr. Amold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours truly,		
Name:	Jon Hills Johnson	
Address:	PO BOX 31864	
	Souta Fe NM 87594	
Email:	hillsister 54@ qnail.com	

#### Concerned Citizens for Nuclear Safety Campaign Kennedy, Bridgette, Commenter ID No. L39

May 25, 2011



Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Name: Bridgette Frankely
Address: 2125 Pasao Print

300to Fe N/M 8750/

Email:

#### Concerned Citizens for Nuclear Safety Campaign Keppel, Roberta, Commenter ID No. L21

May 25 , 2011



Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Thank you for your consideration of my comments.

Yours truly, Name:

Address:

Email:

Santa Fe NH 87501 bokeppel 10 netzero, nel

J-1859

#### Concerned Citizens for Nuclear Safety Campaign Klukkort, Jim, Commenter ID No. L15





Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

Istrongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the indioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

En Khill Jin KLUKKON

3F, NM 87506

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# Concerned Citizens for Nuclear Safety Campaign Koffman, Arkee, Commenter ID No. L12





Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours truly,	1 10 10 00-	
Name:	drhee notman	
Address:	712 galisto id.	
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#### Concerned Citizens for Nuclear Safety Campaign Koponen, Emmy, Commenter ID No. L45

received

May 25, 2011

Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

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# Concerned Citizens for Nuclear Safety Campaign Kotowski, Sheri, Commenter ID No. E97

June 27, 2011

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly,

Sheri Kotowski PO Box 291 Dixon, New Mexico 87527

## Concerned Citizens for Nuclear Safety Campaign Krysl, Marilyn, Commenter ID No. L44

May 25, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Name:	MARIL	IN KR	45L			
Address:	2003	MESA	DR.	#4	Bldr	CO
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Email:						

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Lapalwe, Monica, Commenter ID No. L49</u>

May 25, 2011



Mr. Arnold M. Edelman, BIS Document Manager U.S. Department of Energy GTCC BIS Cloverteaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours truly,		_	_	Þ
Name:	Maira	LaPa	Duc_	
Address:	2751	Via Ca	Galler	1 del Say
	_ Savi	ta Fe	NM	87505
Email:		•		-

# Concerned Citizens for Nuclear Safety Campaign Lawless, Jessica, Commenter ID No. L32

Way 25, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Avc., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Name: Lossier (anderss

Address: Lylos Agua Feir St.

Santa Fe, Nin 87505

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Martin, Bruce, Commenter ID No. E40</u>

June 27, 2011

Mr. Arnold M. Edelman, HIS Document Manager U.S. Department of Energy GTCC EIB Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washingon, D.C. 20383

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

Dear Mr. Edelman:

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#### **Concerned Citizens for Nuclear Safety Campaign** Murphy, Pat, Commenter ID No. L48





Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly.

Address:

INT MURPHY

100 RID VISTA PLC

S FE, NM

SISTERSPIRIT 45 @ yeloo, com

# Concerned Citizens for Nuclear Safety Campaign Orozco, Martha, Commenter ID No. L20



May 25, 2011

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC ÉIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Name:

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Address:

1115 () Cake PD #19 Santa Fa Jun. 87507

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# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Paulette, Robert, Commenter ID No. L88</u>

May <u>27</u>, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Thank you to	or your consideration of my comments.
Yours truly,	Jak Sodn Dawit Wandette
Name:	Paula Staten Robert L Paulette
Address:	P.O. Biox 144 (Same)
	Finbulo, NM. 87531
Email:	pinta seaton 460 g mail com
	More Signatures Over=

# Concerned Citizens for Nuclear Safety Campaign Paulette, Robert, Commenter ID No. L88 (cont'd)

EMMY Koponen Engloymen PorBensisse
Dixm. 71. M. 87527

Maria Chilten Maria Chilten Diffan, NM Maria Chilten Konspor Brondon Mital Banden BOX 175 DVXON, NEM 87527

Dec Finney POBUL SEY DIXON, nm 8427 Dec Derree

Hallie Hayden PO # 592 Duron, Ny 87527 (Hallie Hayden)

Kimberly M. Hayden Kimberly M. Haydea Po Box 592 Dixon, NM 87527

# Concerned Citizens for Nuclear Safety Campaign Phillip, Sheridan, Commenter ID No. L28





Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours Intly,	01 ' 01'	
Name:	Sheridan Phellip	
Address:	3224 Casa Pinemada	
	Soutate NM 87507	
Email:		_

# Concerned Citizens for Nuclear Safety Campaign Quintana, Marlene, Commenter ID No. L57



June 20, 2011

Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ava., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

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# Concerned Citizens for Nuclear Safety Campaign Redondo, Petry, Commenter ID No. L31

June 25 May\_\_\_\_, 2011 terejvec

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Thank you for your consideration of my comments.

Yours truly,

Name:

o concept to

Address:

P.O. 1500 OC

Email:

TESUQUE, NM 87574 PERRYL REBONDO @ HOTMALL. COM

# Concerned Citizens for Nuclear Safety Campaign Robinson, Windell, Commenter ID No. L22

May 25, 2011



Mr. Arnold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

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Yours truly,	,	٠
Name:	Windell Bhoson	
Address:	526 1/3 AWareto, P.St	
	11BQ, NM 87108-3621	
Email:		All and the second second second

#### Concerned Citizens for Nuclear Safety Campaign Romero-Oak, Judy, Commenter ID No. L18





Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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Yours truly,

Name:

Addres

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1809 K. IX St.

Email:

judy rock o yahoo. con

#### Concerned Citizens for Nuclear Safety Campaign Ruark, Ramona, Commenter ID No. L24



May 24 2011

Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

Istrangly appase consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the midianctivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Yours truly,	0 0 1
Name:	Ramona Kuark
Address:	Po Box 32894
	Souto FE NM 87594
Email:	

# Concerned Citizens for Nuclear Safety Campaign Scarbrough, Jarrod, Commenter ID No. L19

May 25 , 2011



Mr. Amold M. Edelman, BIS Document Manager U.S. Department of Energy GTCC BIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

<u>I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste.</u> There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circunvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly,

Name:	Jarred Scarbrough
Address:	35 Apache Plume Rd.
	Los Lunas, NM 8703/
Email:	jaremeister P & mail. com

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Seaton, Paula, Commenter ID No. L88</u>

May <u>27</u>, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

<u>I strangly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste.</u> There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Thank you for your consideration of my comments.

Yours truly, Male States Solvent I Paulette

Name: Java States Robert I Paulette

Address: P.O Box 144 (Same)

Email: pinta seaton 460 g mail com

More Signatures OVES

# Concerned Citizens for Nuclear Safety Campaign Seaton, Paula, Commenter ID No. L88 (cont'd)

EMMY Koponen Englopen Box 656 Dixon, 71. M. 87527

Maria Chitten Maria Chilten

"Kowers Brenson Water Boardyn BOX 175 DVXON, NM 87527

Dec Finney
P.O. Box 327
DIXON, MM 8327
Dec James

Hallie Hayden

PO # 542

Duyon, Ny 87527

(Hallie Hayden)

Kimberly M. Hayden Kimberly M. Hayden Po. Box 592 Dixon, NM 87527

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Sinha, Barbara, Commenter ID No. L9</u>

June 25, 2011



Mr. Arnold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

<u>I strangly appase consideration of any site in New Mexico for the disposal of any of the 160,000.000 curies of commercial GTCC waste.</u> There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from aranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

I believe that you should stop this flawed process and not issue a final environmental impact statement (EIS). The new EIS should not consider any sites in New Mexico as reasonable alternatives and instead should examine alternative commercial sites. The new EIS also should consider Hardened On-Site Storage as a long-term storage option until there are suitable disposal sites.

Yours truly,					
Name:	Barba	ara Sj	nha		
Address:				Abuelos	
	Santa	c Fe	NM	87508	
Email:					

# Concerned Citizens for Nuclear Safety Campaign Stangarone, Richard, Commenter ID No. L35





Mr. Amold M. Edelman, ElS Document Manager U.S. Department of Energy GTCC ElS Cloverleaf Building, EM-43 1000 Independence Avc., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

Istrongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

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Yours truly,	
Name:	Richard Stongarone
Address:	107 Poseo Del Pinon
	Santa Fe, NM 87508
Email:	

#### <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Suellentrop, Ann, Commenter ID No. L46</u>





Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

<u>Istrongly appase consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste.</u> There are not suitable sites in New Mexico for disposal of this waste. Not is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste,

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Yours truly,	
Name:	Ann Suellentrap
Address:	1865 s. Pyle
_	KCKS 106103
Email:	ann swellen egmail. com

# Concerned Citizens for Nuclear Safety Campaign Unknown, Unknown, Commenter ID No. L30

May 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

<u>I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste</u>. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Thank you for your consideration of my comments.

Yours truly,

Name:

Address:

Email:

# Concerned Citizens for Nuclear Safety Campaign Unknown, Unknown, Commenter ID No. L321

-May\_\_\_\_, 2011

Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585



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

Dear Mr. Edelman:

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Yours truly,	
Name:	Took Calm
Address:	116 Bob St.
á	Sanh Fe, O.M. 87501
Email:	•

# Concerned Citizens for Nuclear Safety Campaign Unknown, Ed, Commenter ID No. L17

May June 22

Mr. Arnold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585



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

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

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Yours truly,		
Name:		
Address:	305 CACIE LEON MW	_
	ABU. UM 87114	
Email:		

# <u>Concerned Citizens for Nuclear Safety Campaign</u> <u>Wilson, Marguerite, Commenter ID No. L37</u>

June 15 May\_\_\_\_, 2011



Mr. Amold M. Edelman, EIS Document Manager U.S. Department of Energy GTCC EIS Cloverleaf Building, EM-43 1000 Independence Ave., S.W. Washington, D.C. 20585

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

Dear Mr. Edelman:

I strongly oppose consideration of any site in New Mexico for the disposal of any of the 160,000,000 curies of commercial GTCC waste. There are not suitable sites in New Mexico for disposal of this waste. Nor is there any need for New Mexico sites to be considered because the wastes should be stored and disposed at sites at or near the commercial reactors that produce approximately 98 percent of the radioactivity in GTCC waste.

The people of New Mexico were promised on numerous occasions that the Waste Isolation Pilot Plant (WIPP) would be for defense, not commercial, waste. The WIPP Land Withdrawal Act prohibits any commercial waste at WIPP. Any site at or near WIPP also is inappropriate because it would be an attempt to circumvent that prohibition. Los Alamos National Laboratory (LANL) has thousands of cubic meters of waste that must be cleaned up, and it is totally inappropriate to bring any commercial waste to LANL for disposal. New Mexico also has millions of tons of waste from uranium mining and milling. Thus, New Mexicans are already burdened with more than our share of the nation's nuclear waste.

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Thank you for your consideration of my comments.

Yours truly,

Name: Marquerite Wilson

Address: 9 Fido Lane

Email: Marquerile & cybornesq. com

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1

# J.3.5 Snake River Alliance Campaign Form Letters

Table J.3-5 tabulates all individuals who submitted comments via the Snake River Alliance Campaign form letter along with the comment document identifiers assigned to each. There were two versions of the form letter, identified as version "a" and version "b". One representative of each version of the letter (Allen, John, Comment Document ID No. L176 for version a; Aiegel, Jennifer, Comment Document ID No. L130 for version b) was used to identify the comments. The comments are identified in brackets on the left side of the page, and the corresponding response is shown on the right side of the same page. All other comment letters resemble the representative version "a" or "b" letter. The representative letters, comments identified in the letters, responses, and all other comment documents received for this campaign are presented here in Section J.3.5 on pages J-1892 through J-1953, as indicated in the table.

14

TABLE J.3-5 Individuals Who Submitted Letters via the **Snake River Alliance Campaign Form Letters** 

			_
	Version	Comment	Starting
Last Name, First Name	of Letter	Document ID No.	Page No.
Adams, Miranda	a	L123	J-1892
Aiegel, Jennifer*	b	L130	J-1893
Allen, John*	a	L176	J-1892
Ames, Peggy	a	L103	J-1894
Anderson, Vivian	a	L119	J-1893
Avitua, Camille	a	L177	J-1894
Baltes, Julie	a	L165	J-1895
Baltes, Mark	a	L181	J-1895
Barker, Ken	ъ	L112	J-1896
Bogle, Andrea	Ъ	L192	J-1896
Bolin, Celeste	a	L142	J-1897
Bracht, Edward	a	L114	J-1897
Briggs, E.	a	L139	J-1898
Bryan, Clifford	a	L169	J-1898
Carroll, Susan	a	L111	J-1899
Carter, Richard	a	L122	J-1899
Childers, Dee	a	L196	J-1900
Collins, Bill	a	L146	J-1900
Coney, David	a	L199	J-1901
Costello, Jenne	a	L175	J-1901
Crisp, Travis	a	L148	J-1902
Crisp, Travis	a	L163	J-1902
Crowley, Stephen	a	L200	J-1903
Dadalay, John	a	L137	J-1903
Daley, Katherine	a	L64	J-1904
Davis, Bill	a	L174	J-1904
Davis, Michelle	a	L113	J-1905
Donnelly, Jack	b	L190	J-1905
Emerson, Gen	a	L121	J-1906
Emerson, Steve	a	L197	J-1906
Enno, Christina	a	L183	J-1907

TABLE J.3-5 (Cont.)

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.
Evans, Scott	a	L154	J-1907
Everett, Victoria	ь	L188	J-1908
Farmers, Scott and Linda	a	L107	J-1908
Forrest, Robert	a	L71	J-1909
Franklin, James	a	L157	J-1909
Franklin, Joanne	a	L193	J-1910
Greco, Nancy	a	L135	J-1910
Greenwell, Neesa	a	L178	J-1911
Greer, Dalyn	a	L168	J-1911
Haga, Keith	a	L138	J-1912
Haga, Martha	a	L149	J-1912
Hall, Roy	b	L108	J-1913
Heoethriizzer, Wietebe	a	L109	J-1913
Hesp, Joan	a	L117	J-1914
Hillam, Devin	a	L102	J-1915
Hueftle, Keene		L102 L167	J-1915
	a		
Hyatt, Larry	a	L126	J-1916
Jacob, Margaret	a	L172	J-1916
Jenks, Vyonne	a	L65	J-1917
Jolly, Linda	a	L134	J-1917
Jones, Diane	a	L195	J-1918
Jones, Kenneth	a	L69	J-1918
Jull, Paula	a	L155	J-1919
Keener, Edwin	Ъ	L129	J-1920
Keener, Martha	a	L201	J-1919
Kelly, Tim	a	L156	J-1920
Kirkpatrick, Unknown	ь	L133	J-1921
Landry, Louis	a	L144	J-1921
Leffel, Craig	a	L164	J-1922
Lovell, Brenda	a	L116	J-1922
Maack, Share	a	L110	J-1923
Marshall, Judy	Ъ	L66	J-1923
Masak, Regina	Ъ	L72	J-1924
Maschaer, Kate	a	L101	J-1925
Matthew, Ellen	a	L205	J-1924
McFadden, Marques	a	L203	J-1926
Miller, Ken	a	L147	J-1926
Miller, Samuel	a	L182	J-1927
Miller, Virginia	b	L141	J-1927
P., Ann	a	L106	J-1925
Paquette, Holly	b	. L140	J-1928
Parker, George	a	L67	J-1928
Patterson, Kathy	a	L62	J-1929
Patterson, William	a	L73	J-1929
Pollard, Leslie	a b	L186	J-1930
Pollard, Stan		L160 L162	J-1930 J-1930
Proksa, Margo and Dennis	a	L170	J-1930 J-1931
	a b	L170 L151	
Proksa, Sanni Puckett, Bob	b a	L131 L179	J-1931 J-1932

TABLE J.3-5 (Cont.)

Last Name, First Name	Version of Letter	Comment Document ID No.	Starting Page No.	
Last Name, 1 list Name	OI Letter	Document 15 110.	Tage 110.	
Puckett, Su	a	L166	J-1932	
Puopolo, Mia	a	L158	J-1933	
Pursley, Ben	a	L136	J-1933	
Reid, Heidi	a	L127	J-1934	
Reneay, Nava	a	L105	J-1934	
Reynolds, Anne	a	L160	J-1935	
Ritter, Stephen	b	L153	J-1935	
Robinson, Pat	a	L145	J-1936	
Rodie, Jan	b	L70	J-1937	
Rule, Andrea	a	L191	J-1936	
Rush, Irene	a	L132	J-1937	
Russell, Brennan	a	L115	J-1938	
Rydakh, Amanda	b b	L60	J-1938	
Schmidt, Eliza	a	L198	J-1939	
Scott, Gale Dawn	a	L74	J-1939	
Scott, Linda	a	L173	J-1939 J-1940	
Seward, Michelle	b	L68	J-1940 J-1941	
Seward, Peggy	a	L75	J-1940	
Seymour, Jan	b	L61	J-1941	
Shipley, Andrea	a	L143	J-1942	
Smith, E.	a	L189	J-1942 J-1942	
Smith, Gary	a	L171	J-1943	
Stewart, Mark	a	L131	J-1943	
Swain, Merle	b	L151	J-1944	
	b	L139	J-1944 J-1945	
Swinford, Joseph Tate, Karen		L128	J-1943 J-1944	
· · · · · · · · · · · · · · · · · · ·	a	L128 L185	J-1944 J-1945	
Thompson, Pennee	b		J-1945 J-1946	
Tyson, Andy	a	L118		
Unknown, John	a b	L152 L120	J-1946	
Unknown, Ray	b	L63	J-1947	
Von, Lori Wallace, Eric		L125	J-1947 <b>J-</b> 1948	
Wattens, Ron	a b	L123 L180	J-1948 J-1949	
•				
Weatherner T	a	L124	J-1948	
Weatherman, T.	a	L194	J-1949	
Weber, John	. a	L202	J-1950	
Webs, Lori	a	L104	J-1950	
Weeq, Susan	b	L76	J-1951	
Weston, Andrew	a	L204	J-1951	
White, Crystal	a	L150	J-1952	
Yeatts, Carole	a	L161	J-1953	
Yoshida, Takayaki	a	L184	J-1952	

<sup>\*</sup> Allen, John (Comment Document ID No. L176) is representative letter version a; Aiegel, Jennifer (Comment Document ID No. L130) is representative letter version b.

January 2016

# Snake River Alliance Campaign Adams, Miranda, Commenter ID No. L123 Allen, John, Commenter ID No. L176 (Representative Letter version a)

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOR is considering how to dispose of 160 million curies of Greater -than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites considered in this draft EIS all belong to the federal government, and the DOE's study does not even try to prove they are best for GTCC disposal based on objective criteria. Of all the arid sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through contaminated groundwater. That is not acceptable. The DOE should write a new draft BIS that includes hardened -on-site-storage at commercial reactor sites.

ia vocament manaket Re; Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is not acceptable. The DOE should write a new draft EIS that includes con consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Miranda Adams mirandaadamsahotmail.com

Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

Final siting of a disposal facility for GTCC LLRW and GTCC-like wastes would involve further NEPA review as appropriate and be in accordance with applicable laws and regulations and would include local stakeholder and tribal government involvement.

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

L176-

L176-2

# Snake River Alliance Campaign Aiegel, Jennifer, Commenter ID No. L130 (Representative Letter version b) Anderson, Vivian, Commenter ID No. L119

OD: LOCUMENT MERRICO Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes WIPP in New Mexico. But WIPP was opened with a promise to the people of New Mexico that it would be used solely for waste; from nuclear weapons production. Commercial waste is specifically prohibited The federal government can't now tell New Mexicans:"You took the nose, now take the camel."To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced and does not consider legally barred disposal.

L1301

L13012

Jennifer Alugal 3002 W. Tatt St. Boise, ID, 83703

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft BIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardencel on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at re-

VIVIAN ANDERSON 22655 EEL LN MIDDLETON, IDAHO

L130-1 DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and that legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states; "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement, Either party to this Agreement may request a review of the terms and conditions."

> DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

L130-2 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

# Snake River Alliance Campaign Ames, Peggy, Commenter ID No. L103 Avitua, Camille, Commenter ID No. L177

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal...

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- Person De Ames
- Person De - Person No 53207 1110

To: Document Manager Re: Druft EIS on Greater-than-Class-C radioactive waste disposal

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From: Camille Aviture
713 Typee Ave
Am ortrain Falls, TD83211

## Snake River Alliance Campaign Baltes, Julie, Commenter ID No. L165 Baltes, Mark, Commenter ID No. L181

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hard-ened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years.

From: MARK BALTES
10 BALL 7903
1804E 18 83707

To: Ducument Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Bacie, It. 83767

#### <u>Snake River Alliance Campaign</u> <u>Barker, Ken, Commenter ID No. L112</u> <u>Bogle, Andrea, Commenter ID No. L192</u>

10: Locument manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes WIPP in New Mexico. But WIPP was opened with a promise to the people of New Mexico that it would be used solely for waste from nuclear weapons production. Commercial waste is specifically prohibited. The federal government can't now tell New Mexicans." You took the nose, now take the camel. "To do so would show every other community asked to host a permanent repository in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced and does not consider legally barred disposal.

From: Kun Boder 7249 N PIERC PIN BIS 10 83714

To: Donument Manager
Re: Draft HIS on Greater-than-Class-C radioactive waste disposal

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Fram:

Andrea Bogle 2312 W. Kingskin Dr. Boire, 18 83704

# Snake River Alliance Campaign Bolin, Celeste, Commenter ID No. L142 Bracht, Edward, Commenter ID No. L114

10: Locument manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking only at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already scriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft 25 that includes consideration of hardened on-site storage of GTEC waste at the commercial reactor sites where it is produced.

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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Edward BRACUT MD From: 642 E. PENLEY LVANIN ST BOISE 10 83706

# Snake River Alliance Campaign Briggs, E., Commenter ID No. L139 Bryan, Clifford, Commenter ID No. L169

10: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites, the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is not acceptable. The DOE should write a new draft EIS that includes con consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

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E. Manley Brand M.P.

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From: Bosse, ID 87703

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From Clifford Brigar
Box 4176
Pocatella, 70 63208

# Snake River Alliance Campaign Carroll, Susan, Commenter ID No. L111 Carter, Richard, Commenter ID No. L122

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Susan Carroll, 200 N. 320 ST #301 BOSSE ID 83707

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Richard Carter 2343 S. Ridge Point Way Boise, Edaho 83712

#### Snake River Alliance Campaign Childers, Dee, Commenter ID No. L196 Collins, Bill, Commenter ID No. L146

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking only at DOE sites in New Mexico, Washington; Nevada, South Carolina and Idaho. These sites are already scriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From:

DEE Childers In le 71 Manuex In Eagle ID 836/6 One Chulder

To: Documer Manager Re: Draft EIS on Greater-than-Class-C radjoactive waste disposal

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From RIP Milino

#### Snake River Alliance Campaign Coney, David, Commenter ID No. L199 Costello, Jenne, Commenter ID No. L175

10: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: David C. Coney. 4073/ Darren Street. Boise, ID. 83706

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOB is considering how to dispose of 160 million curies of Greater -than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOB's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOB should write a new draft EIS that includes hardened-on-site-storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

Prom: 2016 Cosk//8 984 W. (Own St-2004 10, 10 80004

#### Snake River Alliance Campaign Crisp, Travis, Commenter ID No. L148 Crisp, Travis, Commenter ID No. L163

10: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Travis Crist Baise ID 601 N. 1444 St. 92784 83702

10: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Travis Crisp 4285 Bristel St. Boise ID, 83704

#### Snake River Alliance Campaign Crowley, Stephen, Commenter ID No. L200 Dadalay, John, Commenter ID No. L137

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking only at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Stephen CROWLEY
408 E. 51 St ST
Garden City, 15, 837-14

To: Document Manager
Re: Draft BIS on Greater-than-Class-C radioactive waste disposal

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From: John Dadakar Jor.

### <u>Snake River Alliance Campaign</u> <u>Daley, Katherine, Commenter ID No. L64</u> Davis, Bill, Commenter ID No. L174

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The DOE is considering how to dispose of 160 million curies of Greater—than-Class-C (CTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources, But the six sites specifically considered in this drift BIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site-storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:

1135 E BONNOUNDE

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From:

910 No Huges Post of the TO 83201

### Snake River Alliance Campaign Davis, Michelle, Commenter ID No. L113 Donnelly, Jack, Commenter ID No. L190

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from commercial sources, current or projected. But the DOE is looking only at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are afready seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Michelle Davis
1916 W. Stale St.
Boise ID 83702

10: Decument Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal.

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From:

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#### Snake River Alliance Campaign Emerson, Gen, Commenter ID No. L121 Emerson, Steve, Commenter ID No. L197

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: 1975 WILMINGTON Dr. BOISE, 10 83704

Rc: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: 1975 N. Wilmington elm TBasse, ID 83704

# Snake River Alliance Campaign Enno, Christina, Commenter ID No. L183 Evans, Scott, Commenter ID No. L154

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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Christina Mno
Boka hinghorn Dio B
Poratchis 12 8320

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From

SCOTT EVANS

8912 W. BARTON RO.

POCATELLO , ID. 83204 -7101

### Snake River Alliance Campaign Everett, Victoria, Commenter ID No. L188 Farmers, Scott and Linda, Commenter ID No. L107

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Victoria Exerct
408 E 572 488
Garelia City Col.

10: Document Manager

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#### Snake River Alliance Campaign Forrest, Robert, Commenter ID No. L71 Franklin, James, Commenter ID No. L157

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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10: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at re-actor sites for 100 years.

From: JAMES E. FRANKLIN 2720 N. TURNBERRY M MERIDIAN, ID. 83646

# Snake River Alliance Campaign Franklin, Joanne, Commenter ID No. L193 Greco, Nancy, Commenter ID No. L135

10. Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: 2720N. Turnberry way
Meridian, Id. 83 446

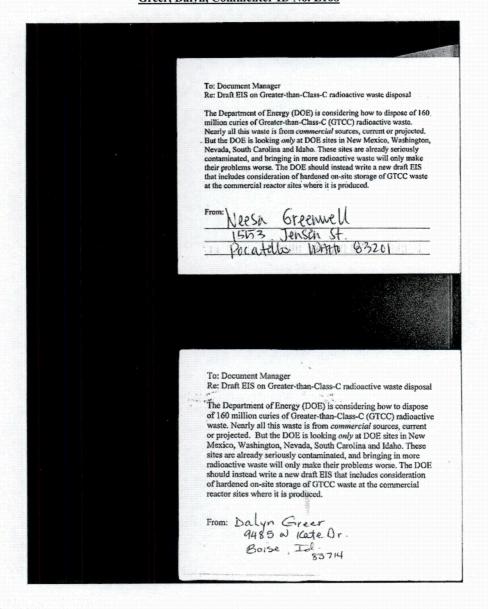
To: Document Manager
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From:

NANCY GRECO

# Snake River Alliance Campaign Greenwell, Neesa, Commenter ID No. L178 Greer, Dalyn, Commenter ID No. L168



#### Snake River Alliance Campaign Haga, Keith, Commenter ID No. L138 Haga, Martha, Commenter ID No. L149

10: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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Keith Haga 12614 N. Schicks From: Ore Key Boise, 7D. 83714

To: Document Manager

- Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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A From: Martha Haga

#### Snake River Alliance Campaign Hall, Roy, Commenter ID No. L108 Heoethriizzer, Wietebe, Commenter ID No. L109

10: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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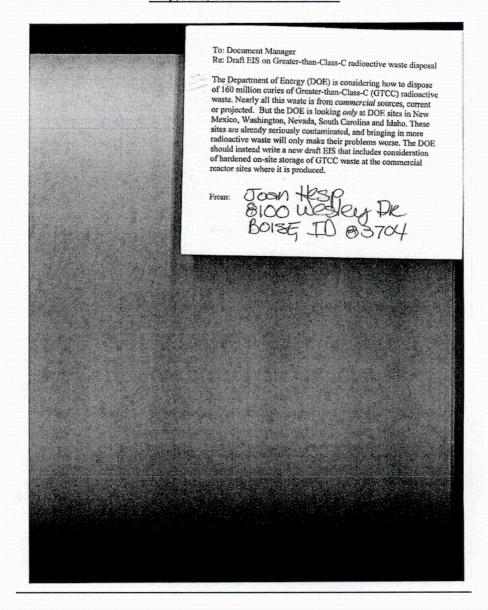
Roy HII 75 13 Was by Dr. Boise ID 83704

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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Wielebe Heolthing

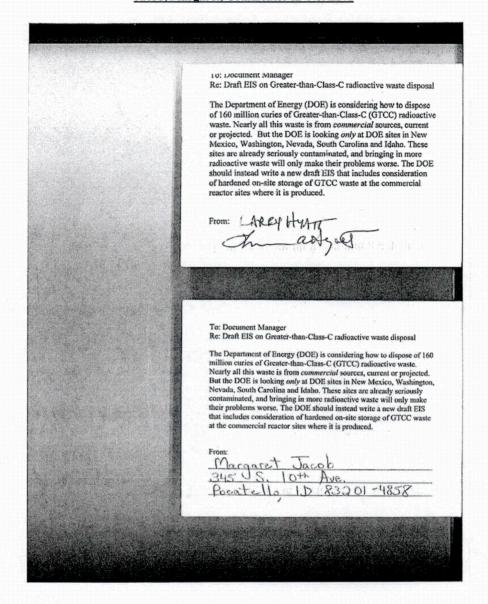
#### Snake River Alliance Campaign Hesp, Joan, Commenter ID No. L117



#### Snake River Alliance Campaign Hillam, Devin, Commenter ID No. L102 Hueftle, Keene, Commenter ID No. L167

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	To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal	
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And the Secretary of the Land	From:	
	Devin Hillam	
	Rectallo, TD 83201	
	To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal	
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	Pill 83201	

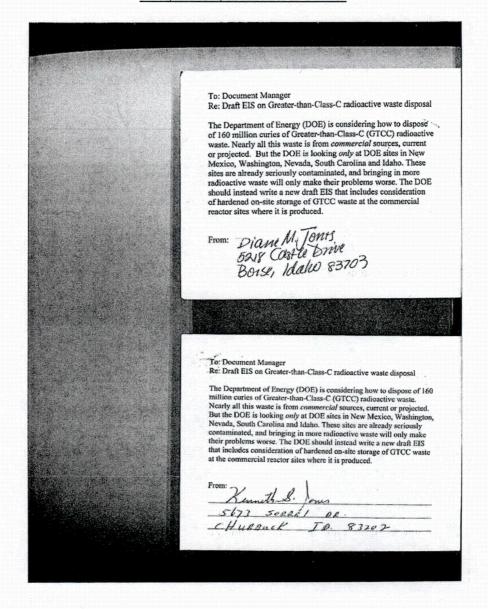
# Snake River Alliance Campaign Hyatt, Larry, Commenter ID No. L126 Jacob, Margaret, Commenter ID No. L172



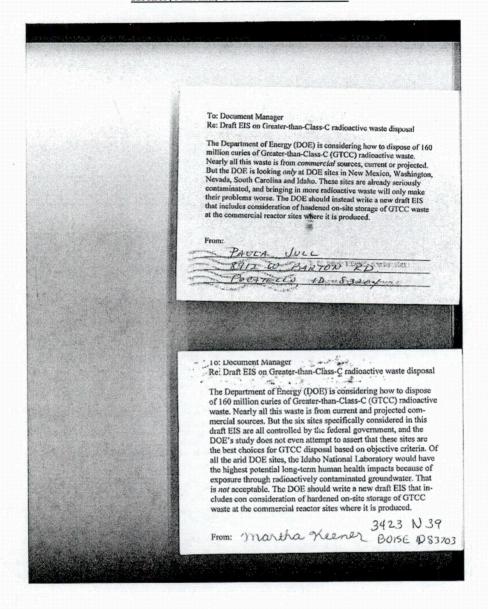
# Snake River Alliance Campaign Jenks, Vyonne, Commenter ID No. L65 Jolly, Linda, Commenter ID No. L134

To: Document Manager
Re: Draft EIS on Greater-than-Class-C radioactive waste disposal
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From;
132 Oakland Aug
Docatello, Daho
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From: Linda Tolly 3415 Mt. Veres Dr. Borse 10,83706

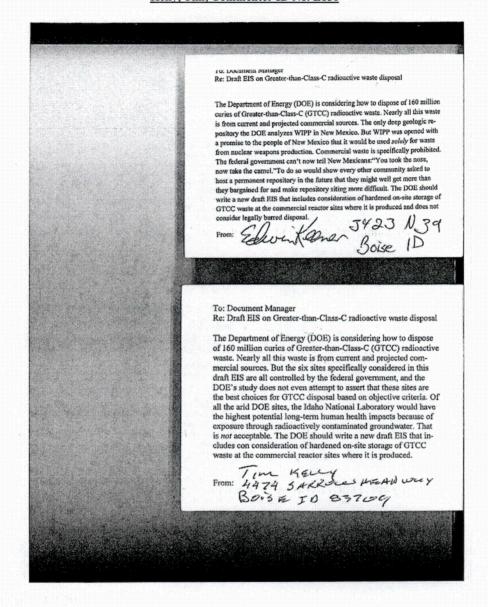
#### Snake River Alliance Campaign Jones, Diane, Commenter ID No. L195 Jones, Kenneth, Commenter ID No. L69



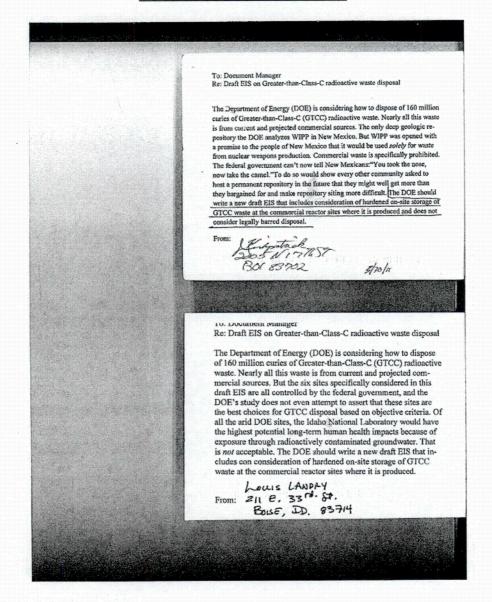
# Snake River Alliance Campaign Jull, Paula, Commenter ID No. L155 Keener, Martha, Commenter ID No. L201



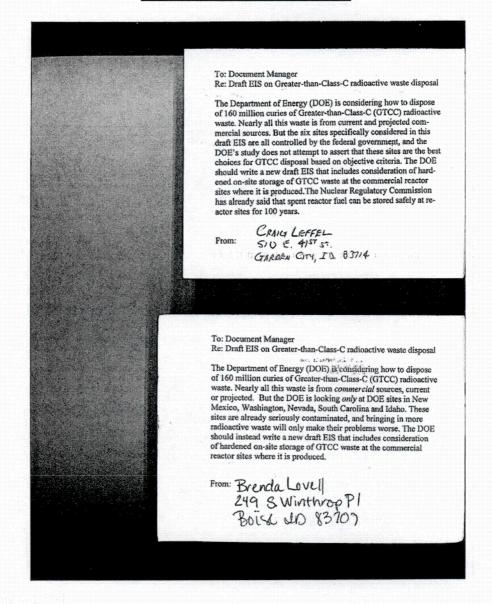
#### Snake River Alliance Campaign Keener, Edwin, Commenter ID No. L129 Kelly, Tim, Commenter ID No. L156



# Snake River Alliance Campaign Kirkpatrick, Unknown, Commenter ID No. L133 Landry, Louis, Commenter ID No. L144



#### Snake River Alliance Campaign Leffel, Craig, Commenter ID No. L164 Lovell, Brenda, Commenter ID No. L116



#### **Snake River Alliance Campaign** Maack, Share, Commenter ID No. L110 Marshall, Judy, Commenter ID No. L66

10: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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Share Maark
From: 1201 N. 7 to St. Boise 93702

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: Dudy Menatrall 1783 S. Clif Hugge Daken , FD 53245

#### Snake River Alliance Campaign Masak, Regina, Commenter ID No. L72 Matthew, Ellen, Commenter ID No. L205

To: Document Manager
Re: Draft ElS on Greater-than-Class-C radioactive waste disposal

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From: Keyina 1 1350 K 2156 S. Sh. 70021616, 1D 83201

10. Document wantager

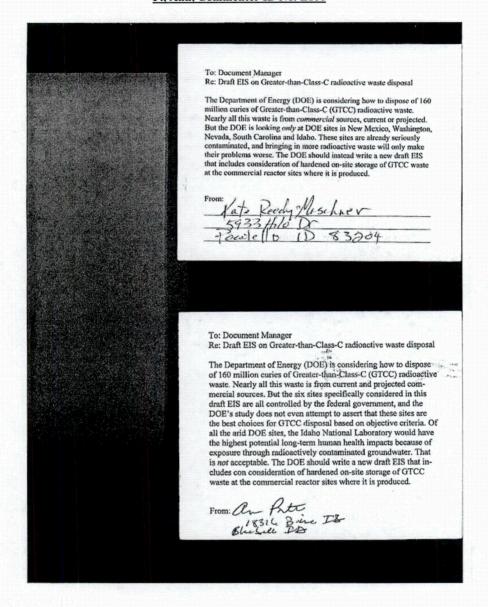
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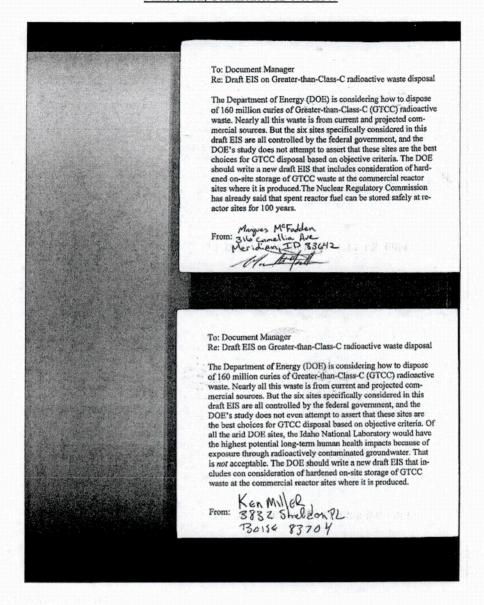
From:

Eilen Matthew 1419 S. Colorado Que. Bose, 1D 83706

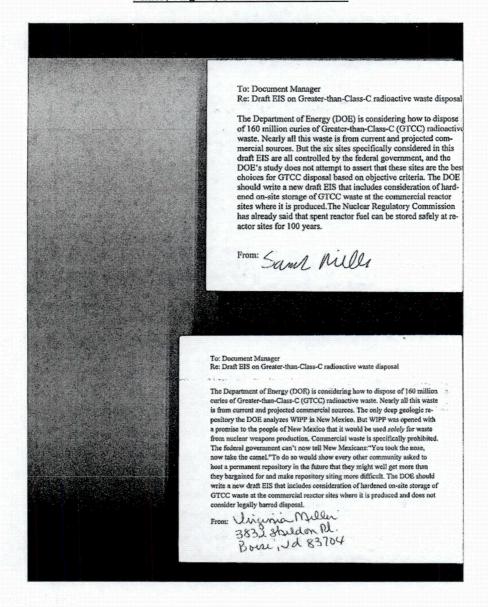
# Snake River Alliance Campaign Maschaer, Kate, Commenter ID No. L101 P., Ann, Commenter ID No. L106



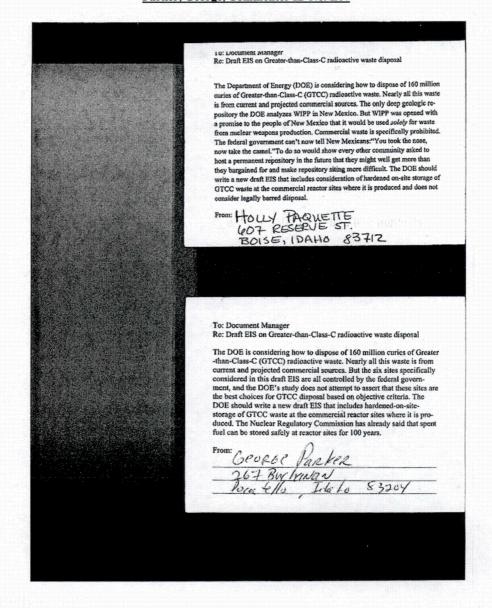
### Snake River Alliance Campaign McFadden, Marques, Commenter ID No. L203 Miller, Ken, Commenter ID No. L147



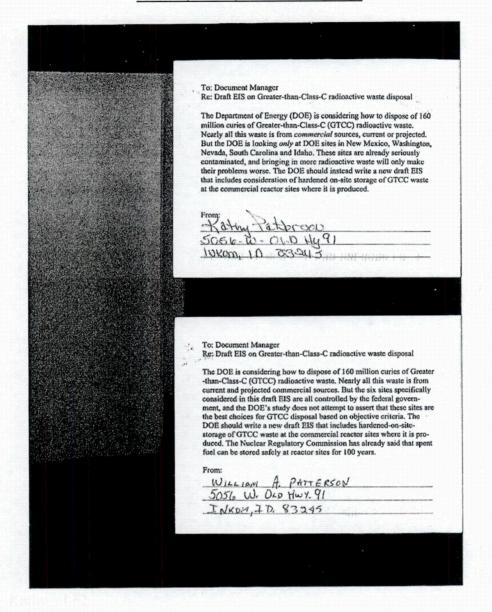
#### Snake River Alliance Campaign Miller, Samuel, Commenter ID No. L182 Miller, Virginia, Commenter ID No. L141



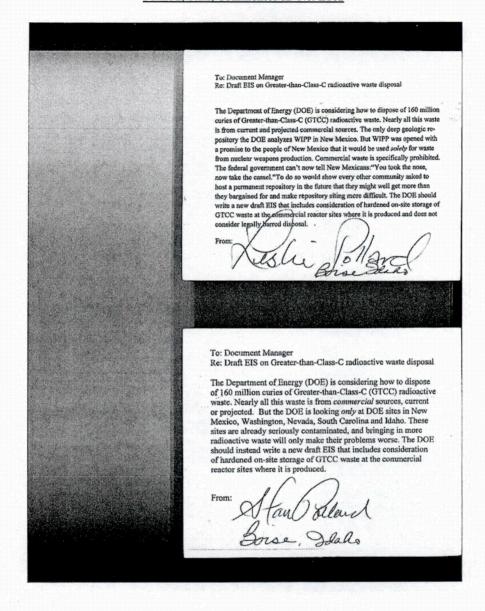
#### Snake River Alliance Campaign Paquette, Holly, Commenter ID No. L140 Parker, George, Commenter ID No. L67



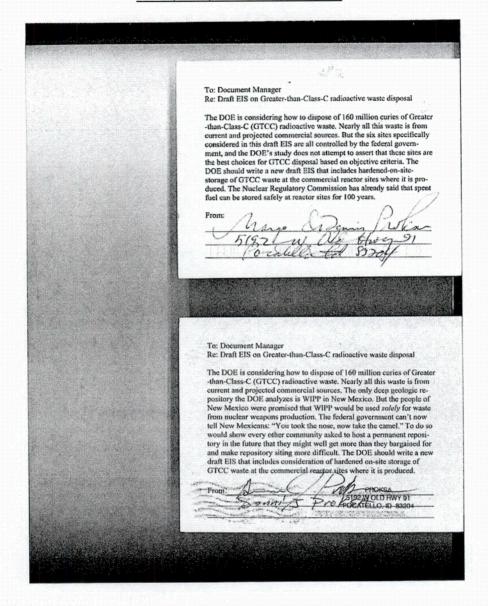
# Snake River Alliance Campaign Patterson, Kathy, Commenter ID No. L62 Patterson, William, Commenter ID No. L73



# Snake River Alliance Campaign Pollard, Leslie, Commenter ID No. L186 Pollard, Stan, Commenter ID No. L162



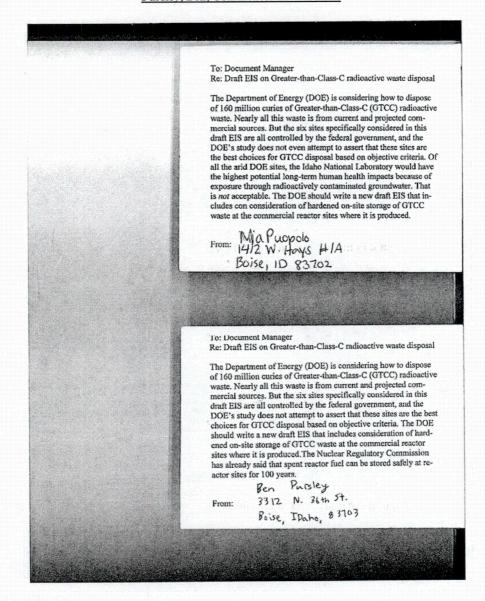
# Snake River Alliance Campaign Proksa, Margo and Dennis, Commenter ID No. L170 Proksa, Sanni, Commenter ID No. L151



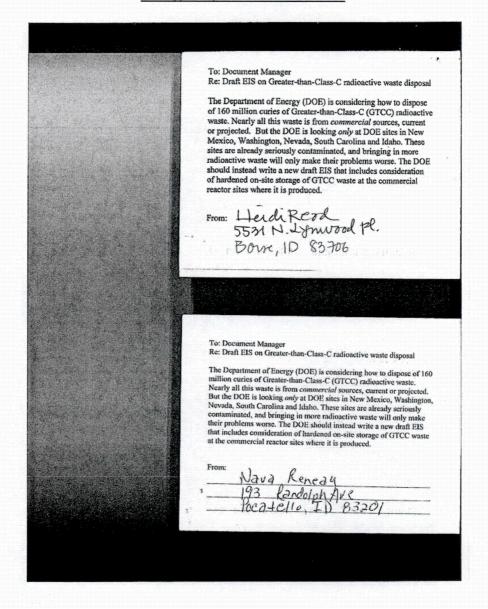
#### Snake River Alliance Campaign Puckett, Bob, Commenter ID No. L179 Puckett, Su, Commenter ID No. L166

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal
The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste.  Nearly all this waste is from commercial sources, current or projected. But the DOE is looking only at DOE sites in New Mexico, Washington, Nevada, South Carolina and Idaho. These sites are already seriously contaminated, and bringing in more radioactive waste will only make their problems worse. The DOE should instead write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.
From:
5025 Mohawik Formello 1d 53304
Pocadello 1d 53004
To: Document Manager
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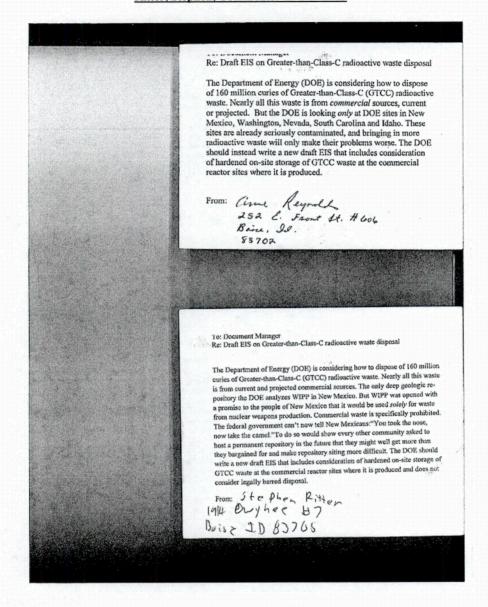
#### Snake River Alliance Campaign Puopolo, Mia, Commenter ID No. L158 Pursley, Ben, Commenter ID No. L136



#### Snake River Alliance Campaign Reid, Heidi, Commenter ID No. L127 Reneay, Nava, Commenter ID No. L105



### Snake River Alliance Campaign Revnolds, Anne, Commenter ID No. L160 Ritter, Stephen, Commenter ID No. L153



### **Snake River Alliance Campaign** Robinson, Pat, Commenter ID No. L145 Rule, Andrea, Commenter ID No. L191

To: Document Manager

Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: From: From: From: From: Jay 2454

Ketchum, 15 3340

### Snake River Alliance Campaign Rodie, Jan, Commenter ID No. L70 Rush, Irene, Commenter ID No. L132

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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From: DAIV Rache 3528 Macatello Do 83201

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From: 107 N. 8th St. Boise 83702

### Snake River Alliance Campaign Russell, Brennan, Commenter ID No. L115 Rydakh, Amanda, Commenter ID No. L60

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent reactor fuel can be stored safely at reactor sites for 100 years. Brennan Russell 1412 W Hoys of APIA To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal The DOE is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. The only deep geologic repository the DOE analyzes is WIPP in New Mexico. But the people of New Mexico were promised that WIPP would be used solely for waste from nuclear weapons production. The federal government can't now tell New Mexicans: "You took the nose, now take the camel." To do so would show every other community asked to host a permanent reposi-tory in the future that they might well get more than they bargained for and make repository siting more difficult. The DOE should write a new draft EIS that includes consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced. From: Amarida Ridalih 873 Linda Albe Pocatello ID 83201

### Snake River Alliance Campaign Schmidt, Eliza, Commenter ID No. L198 Scott, Gale Dawn, Commenter ID No. L74

	To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal
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### Snake River Alliance Campaign Scott, Linda, Commenter ID No. L173 Seward, Peggy, Commenter ID No. L75

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

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Suida Scott

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

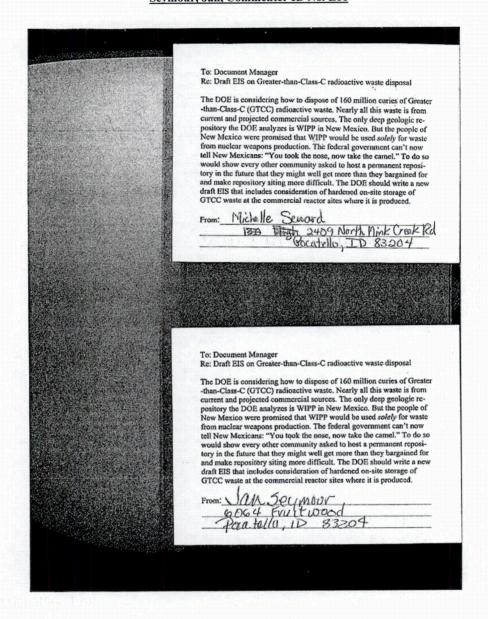
The DOE is considering how to dispose of 160 million curies of Greater -than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. The DOE should write a new draft EIS that includes hardened-on-site-storage of GTCC waste at the commercial reactor sites where it is produced. The Nuclear Regulatory Commission has already said that spent fuel can be stored safely at reactor sites for 100 years.

From:

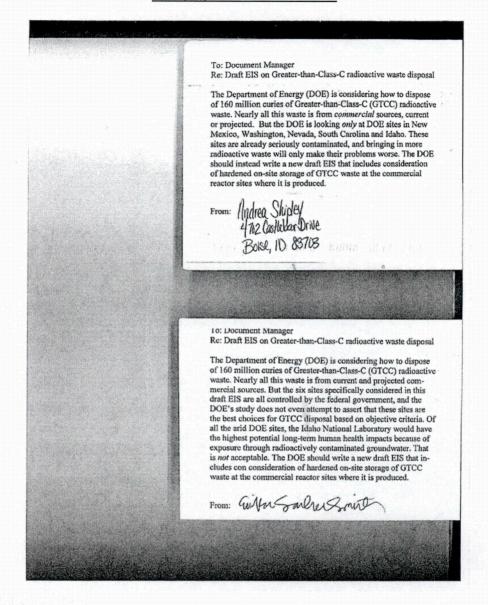
Reggy Seward 130 High Street Mil-Ford, NH

H 03055

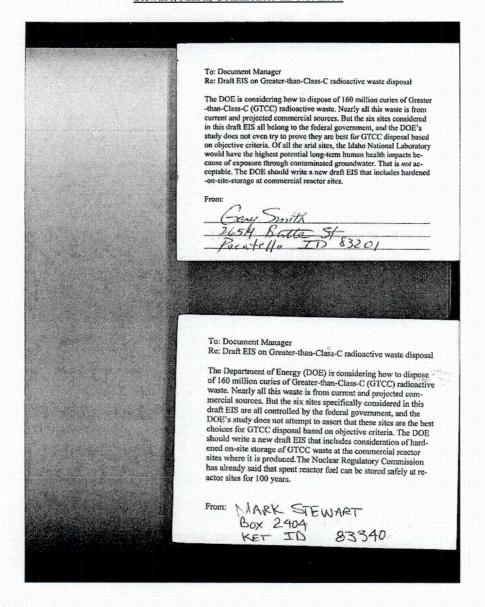
# Seward, Michelle, Commenter ID No. L68 Seymour, Jan, Commenter ID No. L61



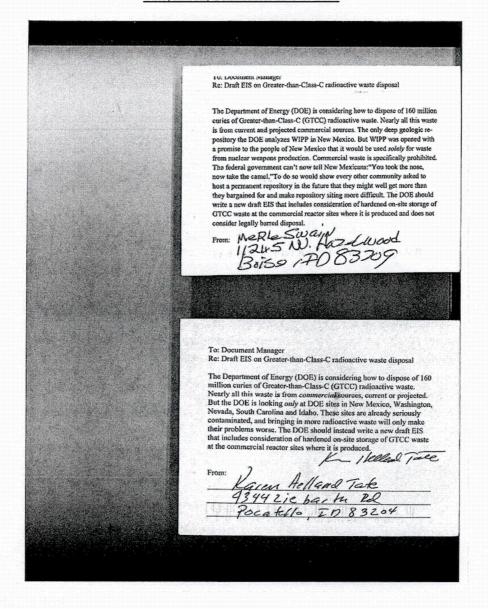
# Snake River Alliance Campaign Shipley, Andrea, Commenter ID No. L143 Smith, E., Commenter ID No. L189



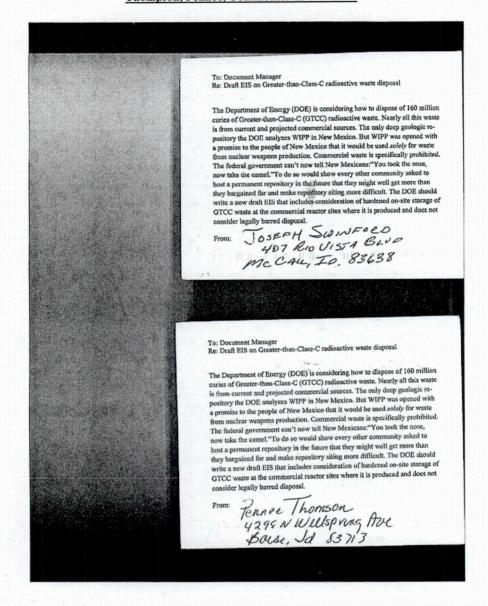
### Snake River Alliance Campaign Smith, Gary, Commenter ID No. L171 Stewart, Mark, Commenter ID No. L131



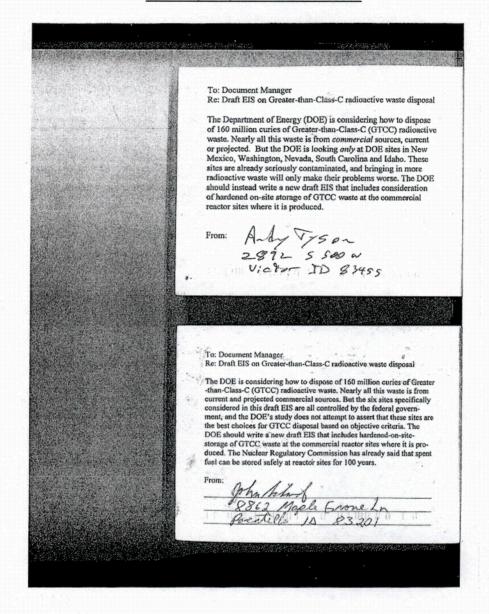
### Snake River Alliance Campaign Swain, Merle, Commenter ID No. L159 Tate, Karen, Commenter ID No. L128



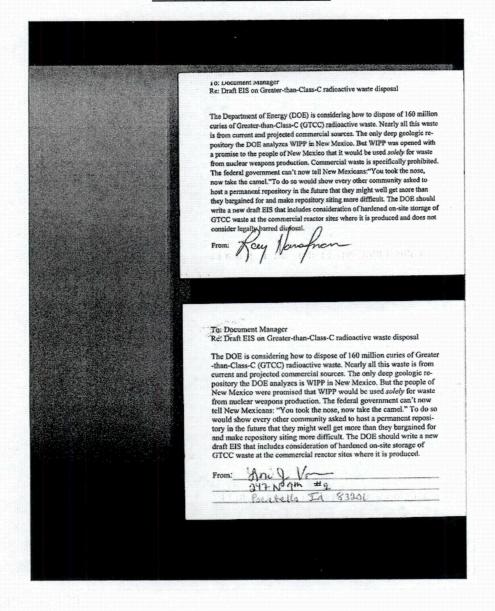
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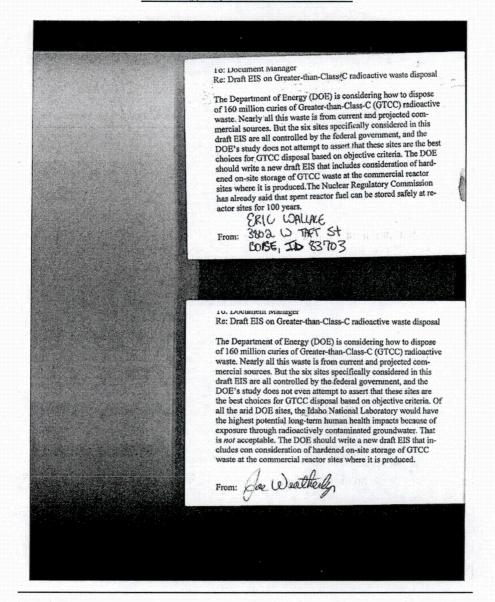
### Snake River Alliance Campaign Tyson, Andy, Commenter ID No. L118 Unknown, John, Commenter ID No. L152



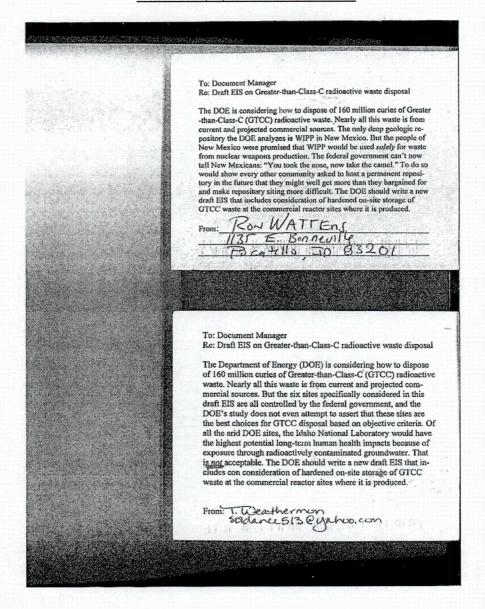
# Snake River Alliance Campaign Unknown, Ray, Commenter ID No. L120 Von, Lori, Commenter ID No. L63



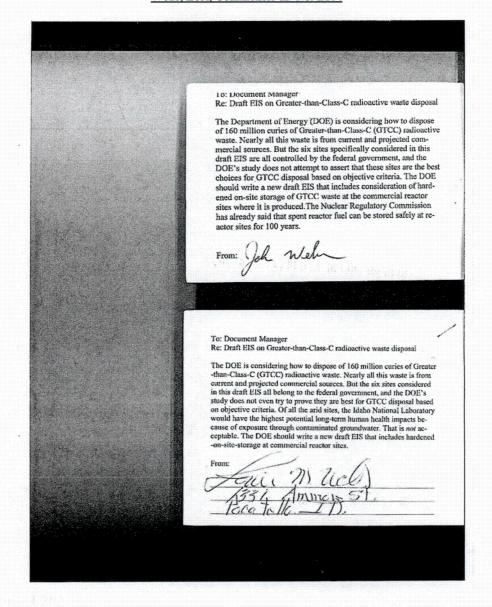
### Snake River Alliance Campaign Wallace, Eric, Commenter ID No. L125 Weatherly, Joe, Commenter ID No. L124



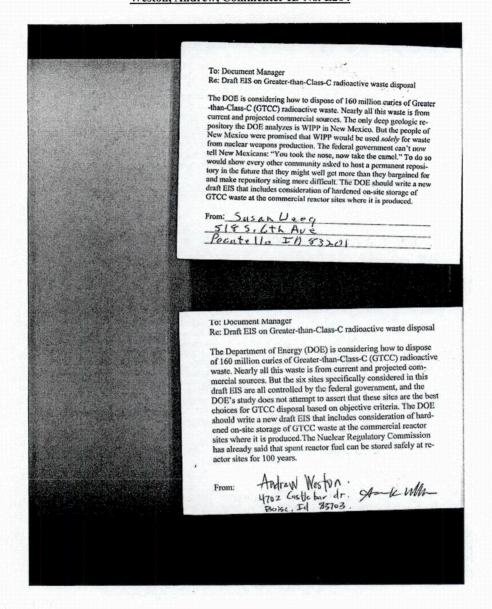
### Snake River Alliance Campaign Wattens, Ron, Commenter ID No. L180 Weatherman, T., Commenter ID No. L194



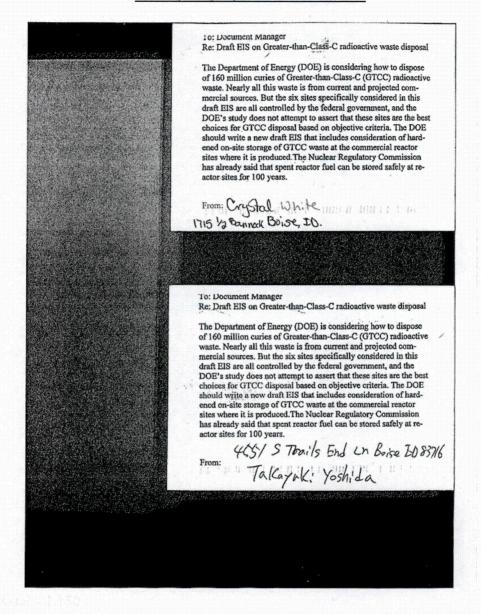
### Snake River Alliance Campaign Weber, John, Commenter ID No. L202 Webs, Lori, Commenter ID No. L104



### Snake River Alliance Campaign Weeq, Susan, Commenter ID No. L76 Weston, Andrew, Commenter ID No. L204



### Snake River Alliance Campaign White, Crystal, Commenter ID No. L150 Yoshida, Takayaki, Commenter ID No. L184



### Snake River Alliance Campaign Yeatts, Carole, Commenter ID No. L161

To: Document Manager Re: Draft EIS on Greater-than-Class-C radioactive waste disposal

The Department of Energy (DOE) is considering how to dispose of 160 million curies of Greater-than-Class-C (GTCC) radioactive waste. Nearly all this waste is from current and projected commercial sources. But the six sites specifically considered in this draft EIS are all controlled by the federal government, and the DOE's study does not even attempt to assert that these sites are the best choices for GTCC disposal based on objective criteria. Of all the arid DOE sites the Idaho National Laboratory would have the highest potential long-term human health impacts because of exposure through radioactively contaminated groundwater. That is not acceptable. The DOE should write a new draft EIS that includes con consideration of hardened on-site storage of GTCC waste at the commercial reactor sites where it is produced.

From: Carole C. Yealts
1674 W. Hril Rd #10 Boise, ID
83702

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### J.3.6 Nuclear Watch Campaign Form Letters

Table J.3-6 tabulates all individuals who submitted comments via the Nuclear Watch Campaign form letter along with the comment document identifiers assigned to each. There were three versions of the form letter, identified as version "a", version "b", and version "c". One representative of each version of the letter (Anderson, Mary Lou, Comment Document ID No. E65 for version a; Mills, Lorene, Comment Document ID No. E56 for version b; and Gordon, Susan, Comment Document ID No. E95 for version c) was used to identify the comments. The comments are identified in brackets on the left side of the page, and the corresponding responses are shown on the right side of the page. All other comment letters resemble the representative version "a", "b", or "c" letter. The representative letters, comments identified in the letters, responses, and all other comment documents received for this campaign are presented here in Section J.3.6 on pages J-1957 through J-2073, as indicated in the table.

TABLE J.3-6 Individuals Who Submitted Comments via the Nuclear Watch Campaign Form Letters

	Version of	Comment	Starting
Last Name, First Name	Letter	Document ID No.	Page No.
Anderson, Mary Lou*	a	E65	J-1957
Baley, Patricia McRae	b	E75	J-1965
Brown, John	a	E17	J-1968
Busch, Dorothy	a	E30	J-1970
Cardwell, Stephanie	a	E18	J-1972
Childers, Dee	a	E25	J-1974
Cole, Corrine	a	E13	J-1976
Colip, Carol	a	E16	J-1978
Crawford, Teresa	a	E91	J-1980
Cronin, Thomas	a	E88	J-1982
Drucker, Linda	a	E98	J-1984
Fanning, Don	a	E86	J-1986
Ford, Peter	a	E78	J-1988
Gordon, Susan*	c	E95	J-1963
Haber, Ruth	a	E79	J-1990
Hall, Frederica	Ъ	E38	J-1992
Halsey-Hoover, Sharon	a	E99	J-1995
Hartsough, David	a	E24	J-1997
Hoffman, Jim	a	E44	J-1999
Intino, Mario	a	E87	J-2001
Jones, Barbara	a	E62	J-2003
Jones, Jeremiah	a	E42	J-2005
Knutsen, Reinard	a	E81	J-2007
Kovac, Scott	c	E101	J-2009
Lai, R	a	E83	J-2011
Larson, David	a	E22	J-2013
Levee, Penny	a	E104	J-2015
Levine, Julie	a	E49	J-2017
Louis, Cynthia	Ъ	E19	J-2019

TABLE J.3-6 (Cont.)

	Version of	Comment	Starting
Last Name, First Name	Letter	Document ID No.	Page No.
Lynn, Michele	a	E63	J-2022
Mills, Lorene*	b	E56	J-1960
Model, Betsy	ь	E6	J-2024
Moon, Otter C.	a	E74	J-2027
Mullin, Charles	a	E14	J-2029
Pringle, Mark	a	E66	J-2031
Rankin, Douglass	Ъ	E31	J-2033
Rice, Megan	a	E64	J-2036
Riegle, Rosalie	a	E82	J-2038
Rockefeller, Terry Kay	a	E89	J-2040
Schmidt, Laurel Lambert	a	E55	J-2042
Shiroky, Cynthia	a	E20	J-2044
Simon, Madeline	a	E57	J-2046
Sorgen, Phoebe	a	E77	J-2048
Tatro-Medlin, April	a	E37	J-2050
Thawley, Bob	a	E8	J-2052
Thomas, Ellen	a	E36	J-2054
Turk, Lawrence	a	E9	J-2056
Ventura, Maxina	a	E5	J-2058
Wale, Lisa	b	E52	J-2061
Welsh, Anne	a	E85	J-2064
Welsh, Myron	a	E67	J-2066
Yoshida, Takayuki	a	E39	J-2068
Young, Lisa	a	E54	J-2070
Ziglar, Randy	a	E80	J-2072

<sup>\*</sup> Anderson, Mary Lou (Comment Document ID No. E65) is representative letter version a; Mills, Lorene (Comment Document ID No. E56) is representative letter version b; and Gordon, Susan (Comment Document ID No. E95) is representative letter version c.

### Nuclear Watch Campaign, Commenter Anderson, Mary Lou, ID No. E65 (Representative Letter version a)

From:

mlavegas@yahoo.com

Sent: To: Wednesday, June 08, 2011 1:23 PM

gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

High

#### Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a pertuanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

E65-1

E65-2

E65-3

E65-4

E65-5

E65-4

Part of that future solution, of course, should be drastically minimizing or climinating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years, GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the DEIS appears biased.

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

E65-1 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

E65-2 Stopping the generation of nuclear waste or promoting alternative energy sources is outside the scope of the GTCC EIS, the scope of which is to evaluate disposal alternatives to enable the selection of a safe alternative or alternatives for the disposal of GTCC LLRW and GTCC-like wastes.

E65-3 The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS. DOE did not evaluate developing a repository exclusively for disposal of GTCC LLRW and GTCC-like wastes because DOE determined that such an alternative is unreasonable due to the time and cost associated with siting another deep geologic repository and the relatively small volume of GTCC LLRW and GTCC-like waste identified in the GTCC EIS. DOE believes that the results presented in this EIS for the WIPP geologic repository alternative are indicative of the high degree of waste isolation that would be provided by the use of this disposal method.

DOE recognizes that the use of WIPP for disposal of GTCC waste would require federal legislation to modify the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240). In addition, it may be necessary to revise the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, the WIPP compliance certification with the EPA, and the WIPP Hazardous Waste Facility Permit.

The No Action Alternative is evaluated in Chapter 3 of the EIS, and under this alternative, current practices for storing GTCC LLRW and GTCC-like waste would continue. These practices are described in Sections 3.2 (GTCC LLRW) and 3.3 (GTCC-like wastes) in the Final EIS. It was necessary to make a number of simplifying assumptions to address the long-term impacts of this alternative, and these are described in Section 3.5. As part of this assessment, it was assumed that these wastes would remain in long-term storage indefinitely, and that no maintenance of either the storage facility or waste packages would occur after 100 years. These results indicate that very high radiation doses and cancer risks could occur under this alternative in the long term.

The No Action Alternative is evaluated in sufficient detail in the EIS as required by NEPA. Comparatively high potential radiation doses and cancer risks could occur should this alternative be selected. While a more detailed analysis could reduce the uncertainties associated with estimating these doses and risks, the conclusion of comparatively high impacts would not change for this alternative.

1

### Nuclear Watch Campaign Anderson, Mary Lou, Commenter ID No. E65 (cont'd) (Representative Letter version a)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Painte and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

E65-5 (Cont.) E65-5

E65-6

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]cither NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

E65-6

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

E65-7

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

E65-8

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Finally, suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Mary Lou Anderson 4584 CASA MIA CIR I.AS VEGAS, NV 89121-5407 7025727249 The No Action Alternative is evaluated in the EIS to provide a baseline for comparison with the action alternatives. This evaluation confirmed the risks posed by these wastes and the need to develop appropriate disposal capability. The potential radiation doses for the No Action Alternative covered a time period of 10,000 years in a manner comparable to that done for the action alternatives. Relatively high impacts could occur shortly after the 100-year institutional control period under this alternative.

DOE initiated consultation and communication with the 14 participating American Indian tribes that have cultural or historical ties to the DOE sites analyzed in the EIS. These interactions are summarized in Section 1.8 of the EIS, and they included several meetings, workshops, and the development of tribal narratives that were included in the EIS. In addition to including tribal narratives related to the four sites in the EIS, DOE inquired about tribal interest with regard to the WIPP/WIPP Vicinity and SRS. No tribes came forward in response to the inquiries regarding these two locations. It was not necessary to consult with American Indian tribes with regard to the generic regional locations, since the specific locations of the potential disposal facilities (and the affected tribes) were not known.

The Low-Level Radioactive Waste Policy Amendments Act (LLRWPAA, P.L. 99-240) assigns DOE responsibility for the disposal of GTCC LLRW generated by NRC and Agreement State licensees. The LLRWPAA (P.L. 99-240) does not limit DOE to using only non-DOE facilities or sites for GTCC LLRW disposal.

The LLRWPAA (P.L. 99-240) specifies that GTCC LLRW is to be disposed of in an NRC-licensed facility that has been determined to be adequate to protect public health and safety. There are currently no NRC-licensed facilities that are authorized to dispose of GTCC LLRW. Unless specifically provided by law, the NRC does not have authority to license and regulate facilities operated by or on behalf of DOE. While DOE does not believe the LLRWPAA (P.L. 99-240) requires DOE to only consider commercial disposal alternatives, DOE does recognize that legislation may be needed to clarify whether a GTCC LLRW disposal facility owned or operated by or on behalf of DOE must be licensed by the NRC, and if so, to authorize the NRC to license such a facility.

DOE/NNSA analyzed various radioactive waste shipping routes through and around metropolitan Las Vegas, Nevada, in the Draft NNSS SWEIS. DOE/NNSA continued discussions with the State of Nevada on routing options throughout the preparation of the Final NNSS SWEIS. After taking into consideration the comments and concerns expressed by State, county, and local government officials and the public in general during the review and comment period for the Draft NNSS SWEIS, DOE/NNSA decided to maintain the current highway routing restrictions for shipments of low-level radioactive waste (LLW) and mixed-low level radioactive waste (MLLW), as described in the Waste Acceptance Criteria (WAC) for the site. DOE/NNSA explained this decision in the Final NNSS SWEIS. The unchanged WAC restrictions are to avoid (1) crossing the Colorado River near Hoover Dam and (2) the greater metropolitan Las Vegas interstate system. DOE/NNSA is not considering, nor is it making, changes to the NNSS WAC with regard to routing.

The scope of this EIS is adequate to inform decision making for the disposal of GTCC LLRW and GTCC-like waste. Sufficient information is available to support the current decision-making process to identify (an) appropriate site(s) and method(s) to dispose of the limited amount of GTCC wastes identified in the EIS.

DOE believes that this EIS process is not premature and is in compliance with NEPA. On the basis of an assumed starting date of 2019 for disposal operations, more than half (about 6,700  $\rm m^3$  [240,000  $\rm ft^3$ ] of the total GTCC waste inventory of 12,000  $\rm m^3$  [420,000  $\rm ft^3$ ]) is projected to be available for disposal between 2019 and 2030. An additional 2,000  $\rm m^3$  (71,000  $\rm ft^3$ ) would become available for disposal between 2031 and 2035. This information is

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# Nuclear Watch Campaign Anderson, Mary Lou, Commenter ID No. E65 (cont'd) (Representative Letter version a)

presented in Figure 3.4.2-1. DOE believes this EIS is timely, especially given the length of time necessary to select, design, and build a GTCC waste disposal facility.

DOE developed this EIS to support a decision on selecting a disposal facility or facilities for GTCC LLRW and GTCC-like waste, to address legislative requirements, to address national security concerns (especially for scaled sources), and to protect public health and safety. The purpose and need for the proposed action, as discussed above, is stated in the EIS (Section 1.1). The scope of the EIS is focused on addressing the need for developing a disposal capability for the identified inventory of GTCC LLRW and GTCC-like waste. DOE plans a tiered decision-making process in which DOE would conduct further site-specific NEPA reviews before implementing an alternative ultimately selected on the basis of this EIS.

# Ianuary 2016

### Nuclear Watch Campaign Mills, Lorene, Commenter ID No. E56 (Representative Letter version b)

From

Lorene Mills <LCarpMills@aol.com>

Sent;

Monday, June 27, 2011 11:05 PM

To: Cc: Arnold Edelman

Subject:

Greater than Class C Comments

June 27, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000

Independence Avenue, SW., Washington, DC 20585

Please do not send all that waste to WIPP. Wipp is only for Low Level waste! Thank you.

#### General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
- o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCC-like" waste and other wastes for which long-term storage and disposal is not determined.

E56-1

E56-2

- Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
- Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that
  addresses major federal actions that could significantly affect the quality of the human environment. This is particularly
  important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.

- E56-1 DOE's ROD 78 FR 75913 dated December 13, 2013, stated that DOE has deferred a decision on importing waste from other DOE sites (with limited exceptions as described in the Settlement Agreement with Ecology) for disposal at Hanford at least until WTP is operational. For information on DOE's preferred alternative see GTCC EIS Chapter 2.
- E56-2 The EIS considered the range of reasonable alternatives for the disposal of the GTCC waste inventory identified in the EIS. The Secretary of Energy determined that a permanent repository for high-level waste and spent nuclear fuel at Yucca Mountain, Nevada, is not a workable option and will not be developed. Therefore, DOE concluded that co-disposal at a Yucca Mountain repository is not a reasonable alternative and has eliminated it from evaluation in this EIS, as described in Section 2.6 of the EIS.

DOE did not evaluate developing a geologic repository exclusively for disposal of GTCC LLRW and GTCC-like wastes because DOE determined that such an alternative is unreasonable due to the time and cost associated with siting another deep geologic repository and the relatively small volume of GTCC LLRW and GTCC-like waste identified in the GTCC EIS. DOE believes that the results presented in this EIS for the WIPP geologic repository alternative are indicative of the high degree of waste isolation that would be provided by the use of this disposal method.

DOE recognizes that the use of WIPP for disposal of GTCC waste would require federal legislation to modify the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240). In addition, it may be necessary to revise the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, the WIPP compliance certification with the EPA, and the WIPP Hazardous Waste Facility Permit.

### Nuclear Watch Campaign Mills, Lorene, Commenter ID No. E56 (cont'd) (Representative Letter version b)

- Prior to issuance of the GTCC EIS, DOE has falled to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.
- In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of GTCC waste.

#### WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC. By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- Safely operate WIPP to meet the "start clean, stay clean" standard
- Meet commitments to clean up about 20 DOE nuclear weapons sites
- Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

#### Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class
- Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

E56-3

E56-4

E56-2

E56-3

E56-4

E56-5

E56-5

(Cont.)

DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement, Either party to this Agreement may request a review of the terms and conditions,"

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant, Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

Consistent with NEPA implementing regulations in Parts 1500-1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500-1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

### Nuclear Watch Campaign Mills, Lorene, Commenter ID No. E56 (cont'd) (Representative Letter version b)

o The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.

o To reverse this policy and add new waste will severely jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.

• Heed the American Indian Text

o Pueblo people believe that plant roots will eventually penetrate the GTCC facility.

There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural

Lorene Mills 87502

significance and use.

Text prepared by potentially affected American Indian tribes is included in this EIS. DOE considered this text for Hanford, INL, LANL, and NNSS; however, DOE also needed to ensure consistency in the EIS analyses between the various sites, so that an even comparison could be made between alternatives as required by NEPA. Because of this, it was not possible to fully utilize all of the information provided by the tribal governments in order to perform specific analyses associated with exposure events unique to a given American Indian tribe (such as greater intakes of fish, game, and plants; the use of sweat lodges; and the use of natural pigment paints for traditional ceremonies). Once a decision is made on a specific site location and method, site-specific NEPA reviews would be conducted as needed, including appropriate analysis of exposure events unique to the impacted local American Indian tribes.

However, the information provided in these narratives was considered in the identification of the preferred alternative presented in this EIS. The information provided in the narratives for Hanford, INL, LANL, and NNSS was very useful, and DOE appreciates the time and effort expended by the various tribes in supporting this EIS process.

### Nuclear Watch Campaign Gordon, Susan, Commenter ID No. E95 (Representative Letter version c)

From:

Susan Gordon <sgordon@ananuclear.org>

Lelui b

Sent:

Friday, June 10, 2011 11:38 AM Arnold Edelman

To:

Susan Gordon

Subject:

Greater than Class C Comments

June 10, 2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000

Independence Avenue, SW., Washington, DC 20585

#### **General Recommendations**

- Hardened On-site Storage (HOSS) must be considered as an alternative.
- o GTCC waste and irradiated spent fuel would remain on-site at commercial nuclear power plants in long-term storage so that they can be monitored and are protected in hardened storage facilities from aircraft crashes or terrorist attacks. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS.
- The DOE rejection of the HOSS alternative is unacceptable because GTCC LLW at present and for decades in the
  future will be in on-site storage, so the actual status is not outside the scope of alternatives that should be considered
  for an EIS.
- The DEIS rejected the HOSS alternative that many people from around the country advocated at DOE's GTCC scoping meetings in 2007.
- HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.
   Part of that future solution, of course, should be drastically minimizing the generation of those wastes.
- O DOE's reason for rejecting HOSS is that it is "not a permanent disposal facility." Yet, most of the GTCC waste will not be generated for many decades.
- At Jeast 85 percent of existing reactors and any new ones are expected to operate beyond 2030, which means
   GTCC waste disposal could not begin for years after that.
- Decisions now about disposal sites and technologies are premature. There is time to learn from experience.
- DOE must create a regulatory definition of HOSS.

The use of HOSS and other approaches for long-term storage of GTCC LLRW and GTCC-like wastes are outside the scope of this EIS because they do not meet the purpose and need for agency action. Consistent with Congressional direction in Section 631 of the Energy Policy Act of 2005 (P.L. 109-58), DOE plans to complete an EIS and a ROD for a permanent disposal facility for this waste, not for long-term storage options. The GTCC EIS evaluates the range of reasonable disposal alternatives and, as also required under NEPA, a No Action Alternative. Under the No Action Alternative, current practices for storing GTCC LLRW and GTCC-like wastes would continue in accordance with current requirements.

The development of a regulatory framework for the use of HOSS at commercial nuclear power plants is outside the scope of the GTCC EIS. DOE does not have authority to regulate the storage of radioactive wastes at commercial facilities, including nuclear power plants. Under the Atomic Energy Act of 1954 as amended (AEA) (see United States Code: 42 USC § 2011), NRC is responsible for regulating storage of such wastes. Radioactive waste storage requirements can be found in 10 CFR Part 30 (Rule of General Applicability to Domestic Licensing of Byproduct Material), 10 CFR Part 70 (Domestic Licensing of Special Nuclear Material), and 10 CFR Part 72 (Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste). In addition, NRC has provided guidance for the storage of LLRW in SECY-94-198, Review of Existing Guidance Concerning the Extended Storage of Low-Level Radioactive Waste, which was issued on August 1, 1994.

E95-1

E95-1

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### Nuclear Watch Campaign Gordon, Susan, Commenter ID No. E95 (cont'd) (Representative Letter version c)

DOE must create a regulatory framework for HOSS. E95-1 (Cont.) HOSS is not a "no action" alternative. Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War. WIPP Recommendations The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal. DOE is considering WIPP for GTCC disposal only because WIPP is currently the only hole in the ground. DOE must expand its horizons. Section 1.4.3 of the EIS states, "For deep geologic disposal, WIPP in New Mexico was included for evaluation in E95-3 this EIS because of its characteristics as a geologic repository." The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC, By law, WIPP's mission is limited to 175,564 cubic meters of transuranic waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste. Los Alamos Recommendations

Susan Gordon 903 W Alameda St #740 Santa Fe, NM 87501 505-555-5555 DOE is performing environmental restoration activities at the Hanford Site, INL, LANL, NNSS, and SRS. The ongoing cleanup efforts at these sites will continue. A GTCC waste disposal facility would be located in an area removed from ongoing cleanup activities, so disposal of the GTCC wastes would not affect ongoing cleanup activities at these sites.

E95-3

E95-4

DOE acknowledges that only defense-generated TRU waste is currently authorized for disposal at the WIPP geologic repository under the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and legislation would be required to allow disposal of waste other than TRU waste generated by atomic energy defense activities at WIPP and/or for siting a new facility within the land withdrawal area. However, NEPA does not limit an EIS to proposing and evaluating alternatives that are currently authorized. The Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant recognizes that the mission of WIPP may change and provides provisions to modify the agreement. For example, the Agreement states: "The parties to this Agreement recognize that future developments including changes to applicable laws (e.g., Public Law [P.L.] 96-164) may make it desirable or necessary for one or both parties to seek to modify this Agreement. Either party to this Agreement may request a review of the terms and conditions."

DOE acknowledges the TRU waste disposal limitations for WIPP specified in the WIPP LWA as amended (P.L. 102-579 as amended by P.L. 240) and in the Agreement for Consultation and Cooperation between Department of Energy and the State of New Mexico for the Waste Isolation Pilot Plant. Information on these limitations is provided in this EIS (see Section 4.1.1) and was considered in developing the preferred alternative. Based on the GTCC EIS evaluation, disposal of GTCC LLRW and GTCC-like wastes at WIPP would result in minimal environmental impacts for all resource areas evaluated, including human health and transportation. Both the annual dose and the latent cancer fatality (LCF) risk would be zero because there would be no releases to the accessible environment and therefore no radiation doses and LCFs during the first 10,000 years following closure of the WIPP repository. In addition to legislative changes, DOE recognizes that the use of WIPP for the disposal of GTCC LLRW and GTCC-like wastes would require and site-specific NEPA reviews, including further characterization of the waste (e.g., radionuclide inventory and heat loads), as well as the proposed packaging for disposal.

E95-4 Consistent with NEPA implementing regulations in Parts 1500–1508 of Title 40 of the Code of Federal Regulations (40 CFR Parts 1500–1508), DOE analyzed a range of disposal methods (i.e., geologic repository, near-surface trench, intermediate-depth borehole, and above-grade vault) and federally owned sites (i.e., Hanford Site, INL, LANL, NNSS, SRS, WIPP, and the WIPP Vicinity) as well as generic commercial locations. DOE determined that it was reasonable to analyze the federal sites because they currently have operating radioactive waste disposal facilities, except for the WIPP Vicinity, which is near an operating geologic repository.

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The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.

radioactive waste that is dangerous for tens of thousands of years.

The location of LANL in a seismic fault zone between a rift valley and a dormant volcano is not the place for

### Nuclear Watch Campaign Baley, Patricia McRae, Commenter ID No. E75

Sent:

Patricia McRae Baley <patricia.mcrae@unlv.edu> Friday, June 24, 2011 2:57 PM

Arnold Edelman

To:

Patricia McRae Baley

Cc: Subject:

Greater than Class C Comments

#### 6/24/11

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000

Independence Avenue, SW., Washington, DC 20585

#### **General Recommendations**

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 100's of billions of dollars and decades worth of cleanup from the Cold War.
- DOE should develop a national waste management strategy to address these waste types.
- o "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCCwaste and other wastes for which long-term storage and disposal is not determined.
- Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
- o Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second
  repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that
- Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.

### Nuclear Watch Campaign Baley, Patricia McRae, Commenter ID No. E75 (cont'd)

- o Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.
- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obarna administration, and appropriately has been dropped from consideration in the GTCC EIS.
- The Jegal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS
  facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of
  GTCC waster.

#### WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit
  commercial waste, including GTCC, By law, WIPP's mission is limited to 175,564 cubic meters of transurant waste from
  nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity
  than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- Safely operate WIPP to meet the "start clean, stay clean" standard
- Meet commitments to clean up about 20 DOE nuclear weapons sites
- Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

#### Los Alamos Recommendations

- . The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- o Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.

### <u>Nuclear Watch Campaign</u> Baley, Patricia McRae, Commenter ID No. E75 (cont'd)

- o The residents of Northern New Mexico expect no less from DDE and LANL than completion of the legacy waste remediation on schedule.
- o To reverse this policy and add new waste will severely Jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- o There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Patricia McRae Baley Las Vegas, NV 89121

### Nuclear Watch Campaign Brown, John, Commenter ID No. E17

Sent:

compostjohn2@yahoo.com Friday, June 24, 2011 4:02 PM

atcceis@anl.gov

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

#### Document Manager Amold Edelman.

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of freater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial on-site storage (ROSs) in which Orec waste and intended spent ther would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOF's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "longterm storage option." But the DEIS also does not include consideration of any geologic disposal facility, excep the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

Table S-4 in the DEIS Summary purports to compare "Estimated Potential Maximum Human Health Long-Term Impacts" for the five alternatives being considered. The DEIS also purports not to recommend one alternative over the others. This chart and its related graph make "No Action" and "Vault Method" appear much more toxic than the other options. The problem stems from the inability to extrapolate impacts from future actions that will need to be discussed and taken, reducing long-term toxicity. "No action" alternative doesn't mean no action ever, just none of the ones being reviewed. As it exists currently, the DOE's presentation of the

The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

### Nuclear Watch Campaign Brown, John, Commenter ID No. E17 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

John Brown 932 E Edgeware Rd Los Angeles, CA 90026-5781

### Nuclear Watch Campaign Busch, Dorothy, Commenter ID No. E30

From: Sent: dorothybusch@aol.com

Sent:

Thursday, June 23, 2011 6:06 PM

To:

gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

Hình

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both largo issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Kceping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "long-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

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The entire NNSS proposed location is located within the Western Shoshone Nation established by the Treaty of Ruby Valley in 1863. According to the DEIS, consultation with the Tribal nations near the NNSS has been

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## Nuclear Watch Campaign Busch, Dorothy, Commenter ID No. E30 (cont'd)

conducted through the "Consolidated Group of Tribes and Organizations (CGTO)", which includes "representatives" from 16 Paiute and Shoshone Tribes. While the CGTO sounds inclusive, it is not clear that its members actually have standing to speak for their tribes. It's strongly recommended that the DOE officially engage the indigenous peoples whose land will be directly affected by the proposed disposal sites, prior to the conclusion of the timeline for response to the draft EIS.

I also want to underscore a point made by Joseph Strolin, Acting Executive Director, State of Nevada Agency for Nuclear Projects: "The draft EIS fails to recognize that any facility chosen for disposal of GTCC waste must be licensed and regulated by the U.S. Nuclear Regulatory Commission....[N]either NNSS nor any of the specific locations identified for potential GTCC waste disposal has a NRC licensed disposal facility."

There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

Finally, this EIS process is premature, since the vast majority of the waste will not exist for at least 20 years, and the Blue Ribbon Commission will not have presented its recommendation on the disposal of high level nuclear waste and GTCC waste.

Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Dorothy Busch POB 16567 Missoula, MT 59808-6567

### **Nuclear Watch Campaign** Cardwell, Stephanie, Commenter ID No. E18

From: Sent:

cstcardwelt@botmail.com

Thursday, June 16, 2011 5:20 PM

Subject

gtcceis@anl.gpv Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

Document Manager Arnold Edelman.

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS, HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

Part of that future solution, of course, should be drastically minimizing or eliminating the generation of those wastes. DOE's stated reason for rejecting HOSS is that it is not a "permanent disposal facility" but just a "longwastes DOB's stated reason for rejecting 1705s is that it is not a permanent asposal activity out year to super-term storage option." But the DEIS also does not include consideration of any geologic disposal facility, except the WIPP site in New Mexico, even though for almost 30 years federal law (Nuclear Waste Policy Act of 1982) has required development of one or more other repositories. The Nuclear Regulatory Commission has determined that spent nuclear fuel can stay at commercial reactors for up to 100 years. GTCC could also remain at those sites for at least that time period. The DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS which includes HOSS facilities as the best solution for GTCC wastes for decades to come, and for new geologic disposal site(s) to dispose of GTCC waste.

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## <u>Nuclear Watch Campaign</u> Cardwell, Stephanie, Commenter ID No. E18 (cont'd)

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Stephanic Cardwell 4621 Merced St Des moines, IA 50310-2910

## Nuclear Watch Campaign Childers, Dee, Commenter ID No. E25

From: Sent: deechilders@msn.com

To:

Tuesday, June 28, 2011 11:32 AM

gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

High

Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any commonts are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with.

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

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## Nuclear Watch Campaign Childers, Dee, Commenter ID No. E25 (cont'd)

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There is the problem of transportation of the waste to Nevada, since there is no rail to the site, and routing would need to go through Las Vegas if the NNSS is chosen as the site.

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Dee Childers 671 N Harvey Ln Eagle, ID 83616 2088304455

# Nuclear Watch Campaign Cole, Corrine, Commenter ID No. E13

From: Sent: caronkoreen@gmail.com Friday, June 17, 2011 11:13 AM

otcceis@anl.gov

To: Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance

High

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Sincerely,

Corrine Cole P.O. Box 476 Markleeville, CA 96120-0476

## Nuclear Watch Campaign Colip, Carol, Commenter ID No. E16

From: Sent: colipso@charter.net

Sent:

Tuesday, June 21, 2011 6:08 PM gtcceis@anl.gov

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Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

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Sincerely,

Carol Colip 255 Drumm Lane Fallon, NV 89406-7131

### Nuclear Watch Campaign Crawford, Teresa, Commenter ID-No. E91

From:

tailspinterry@hotmail.com

Thursday, June 16, 2011 6:36 PM

gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

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Sincerely,

Teresa Crawford 476 Hidden Garden Place Henderson, NV 89012

J-1981

## Nuclear Watch Campaign Cronin, Thomas, Commenter ID No. E88

From: Sent:

tompainecronin@comcast.net

Friday, June 17, 2011 12:13 PM

Subject

gtcceis@anl.gov Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

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Sincerely,

Thomas Cronin 100 Rochelle Ave. Phila., PA 19128 215-482-5531

## <u>Nuclear Watch Campaign</u> <u>Drucker, Linda, Commenter ID No. E98</u>

From: Sent: shantilin@cox.net

To:

Thursday, June 23, 2011 5:03 PM gtcceis@anl.gov

gtcc

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOF/EIS-0375-D)

Importance:

High

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Sincerely,

Linda Drucker 2832 Summer Lake Dr. Las Vegas, NV 89128-7706

# Nuclear Watch Campaign Fanning, Don, Commenter ID No. E86

From: Sent: uncledon@well.com

Thursday, June 23, 2011 8:05 PM gtcceis@anl.gov

To: Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

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Please re-group and begin conducting a thorough assessment of the most urgent matters at hand. Suspend the current EIS study review, until such time that the most prevailing matters of short and intermediate storage are adequately addressed.

Sincerely,

Don Fanning PO Box 128 Flagstaff, AZ 86002-0128

## **Nuclear Watch Campaign** Ford, Peter, Commenter ID No. E78

From: Sent:

quartermanjack@gmail.com Monday, June 27, 2011 3:17 PM

gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

### Document Manager Arnold Edelman,

Please consider the following points concerning the Draft Environmental Impact Statement for the Disposal of Greater-Than-Class C (GTCC) Low-Level Radioactive Waste and GTCC-Like Waste (DOE/EIS-0375-D). I hope that if any comments are considered outside the scope of the EIS, they will still be taken into account. The public has repeatedly raised some issues that have been excluded from the DEIS. They need to be spoken to, for the record, in the hopes that enough such comments will point to a flaw in the process that can't be ignored, leading to a suspension of this effort until these additional and broader points are dealt with

There are both large issues and some specific options not included in the DEIS. I therefore must recommend the "No Action" alternative. The DEIS specifically excludes the option that I and many others advocated for at DOE's GTCC scoping meetings in 2007 and at current public meetings about the DEIS. That alternative is "Hardened On-Site Storage" (HOSS) in which GTCC waste and irradiated spent fuel would remain at commercial nuclear power plants in long-term storage so that they can be monitored and are protected from aircraft crashes or terrorist attacks, eliminating both the threats of transport and disposal. Keeping the waste in HOSS would reduce the risk of accidents or a terrorist attack during transport. While HOSS is not a permanent solution, it would be more protective of human health and the environment than any of DOE's current dumping practices and the alternatives presented in the DEIS. HOSS would be a safe way of storing wastes until a scientifically sound, publicly acceptable solution is found.

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## Nuclear Watch Campaign Ford, Peter, Commenter ID No. E78 (cont'd)

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Sincerely,

Peter Ford 2021 Burma Road Baker, NV 89311-0140 775-234-8808

### Nuclear Watch Campaign Haber, Ruth, Commenter ID No. E79

From Sent: r.haber@sbcglobal.net

To:

Friday, June 24, 2011 3:36 PM gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance

#### Document Manager Arnold Edelman.

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## <u>Nuclear Watch Campaign</u> <u>Haber, Ruth, Commenter ID No. E79 (cont'd)</u>

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Sincerely,

Ruth Haber 3040 Flora Court Pleasanton, CA 94588-7706

## **Nuclear Watch Campaign** Hall, Frederica, Commenter ID No. E38

Sent:

Frederica Hall <rik3@mindspring.com> Saturday, June 25, 2011 2:59 PM

To:

Arnold Edelman Frederica Hall

Subject:

Greater than Class C Comments

#### 06/25/2011

Arnold Edelman, Document Manager, DOE GTCC EIS, Cloverleaf Bld., EM-43, 1000

Independence Avenue, SW., Washington, DC 2058S

#### General Recommendations

- Do not send GTCC to DOE sites. Nation-wide, DOE sites are still facing 180's of billions of dollars and decades
- DOE should develop a national waste management strategy to address these waste types.
- "GTCC-like" waste is not subject to the NRC requirements for geologic disposal. DOE should issue a supplement to its 1997 Final Waste Management Environmental Impact Statement to look at the reasonable alternatives for "GTCClike" waste and other wastes for which long-term storage and disposal is not determined.
- Such a strategy is needed to integrate the management of these wastes as opposed to the apparent piecemeal approach that is currently being used by the Department.
- Such a strategy, moreover, should be assessed through a programmatic and site-specific NEPA process that addresses major federal actions that could significantly affect the quality of the human environment. This is particularly important when considering the disposal of long-lived radioactive wastes, which are not suitable for shallow land burial.
- Current regulations say that GTCC wastes should be disposed in a geologic repository. Examine a second repository. The legal requirement for another repository exists, yet the alternative of putting the GTCC waste into that
- Rather than an alternative repository, the EIS proposes using near-surface trenches; bore holes, or vaults to dispose of GTCC waste at DOE facilities. All those sites have large amounts of nuclear weapons waste, which will take billions of dollars and decades to clean up, and should not be considered for GTCC waste.
- Prior to issuance of the GTCC EIS, DOE has failed to comply with the requirement of the Nuclear Waste Policy Act of 1982, 42 U.S.C. §10101 et seq., for development of one or more other deep geologic repositories. The Yucca Mountain site has failed as a deep geologic repository and Congress has not authorized a second site to be located.

## <u>Nuclear Watch Campaign</u> <u>Hall, Frederica, Commenter ID No. E38 (cont'd)</u>

- o In addition to ignoring regulatory requirements and public comment, the GTCC EIS also disregards the Nuclear Waste Policy Act, which requires DOE to site and operate at least one geologic repository other than WIPP. Since 1987, the only place considered is Yucca Mountain, Nev. That flawed site, always strongly opposed by Nevadans, has been terminated by the Obama administration, and appropriately has been dropped from consideration in the GTCC EIS.
- The legal requirement for another repository still exists, yet the alternative of putting the GTCC waste into that repository is not even mentioned.
- DOE should not proceed with a final GTCC EIS, but instead should develop a new DEIS that includes HOSS
  facilities as the best solution for GTCC wastes for decades to come and for new geologic disposal site(s) to dispose of
  GTCC waste.

### WIPP Recommendations

- The Waste Isolation Pilot Project (WIPP) must not be considered for GTCC waste disposal.
- The only repository alternative considered is WIPP, even though federal and New Mexico laws clearly prohibit commercial waste, including GTCC, By Jaw, WIPP's mission is limited to 175,564 cubic meters of transurante waste from nuclear weapons. That's less than 5,000,000 curies of radioactivity. GTCC waste would be 30 times more radioactivity than planned for WIPP and would eliminate the ban on commercial waste.
- Finish the original mission at WIPP.
- Safely operate WIPP to meet the "start clean, stay clean" standard
- Meet commitments to clean up about 20 DOE nuclear weapons sites
- o Safely close, decontaminate, and decommission the WIPP site, beginning in about 2030 or earlier.

#### Los Alamos Recommendations

- The Los Alamos National Laboratory (LANL) must not be considered for GTCC waste.
- LANL must focus on existing Consent Order cleanup and not bring any more waste, including Greater-than-Class C (GTCC), to the Lab.
- Technical Area 54 (TA-54) is the specific location at LANL that the EIS proposes borehole, trench or vault. This very location is the subject of extensive remediation in Material Disposal Areas (MDAs) G, L and H and is scheduled for completion in 2015 under an agreement with the New Mexico Environment Department.
- o This legally binding agreement requires DOE and LANL to investigate and clean up decades worth of contamination across the lab's 40-square-mile property. Signed in 2005, the Consent Order lays out cleanup milestones and requires the federal government to pay fines if LANL fails to meet them.
- The residents of Northern New Mexico expect no less from DOE and LANL than completion of the legacy waste remediation on schedule.

## <u>Nuclear Watch Campaign</u> <u>Hall, Frederica, Commenter ID No. E38 (cont'd)</u>

- o To reverse this policy and add new waste will severely Jeopardize LANL relations with its neighbors both near and far and negate much of the progress accomplished.
- Heed the American Indian Text
- Pueblo people believe that plant roots will eventually penetrate the GTCC facility.
- There is a need for a cultural mineral assessment and study to identify the existence of minerals of cultural significance and use.

Lastly Do not continue development of new nuclear waste

Stop all new development of Nuclear power.

Frederica Hall Flagstaff AZ 86002

## **Nuclear Watch Campaign** Halsey-Hoover, Sharon, Commenter ID No. E99

From:

shalseyhoover@amail.com

Saturday, June 25, 2011 6:13 PM

Subject:

gtcceis@anl.gov
Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

Document Manager Arnold Edelman.

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## <u>Nuclear Watch Campaign</u> Halsey-Hoover, Sharon, Commenter ID No. E99 (cont'd)

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Sincerely,

Sharon Halsey-Hoover 2209 Via Marioposa E Laguna Woods, CA 92637

2

## Nuclear Watch Campaign Hartsough, David, Commenter ID No. E24

From: Sent: davidhartsough@igc.org Friday, June 24, 2011 4:12 PM

To: Subject: gicceis@ani.gov Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importance:

High

### Document Manager Arnold Edelman,

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Sincerely,

David Hartsough 721 Shrader St. San Francisco, CA 94117-2721

## <u>Nuclear Watch Campaign</u> Hoffman, Jim, Commenter ID No. E44

From: Sent: jimofmhoffman@yahoo.com Saturday, June 11, 2011 8:37 PM

gtcceis@anl.gov

Subject:

Comments Re: GTCC LLRW Waste DEIS (DOE/EIS-0375-D)

Importances

High

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Sincerely,

Fr. Jim Hoffman OFM 110 W. Madison St. Chicago, IL 60602-4102