**Oak Ridge Reservation**
**Local Oversight Committee, Inc.**
136 S. Illinois Avenue, Suite 208
Oak Ridge, Tennessee 37830

# Fax Cover Sheet

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| **DATE:** | June 21, 2002 | **TIME:** | 3:10 PM |
| **TO:** | David Allen<br>DOE ORO | **PHONE:**<br>**FAX:** | 576-0411<br>576-0746 |
| **FROM:** | Susan L. Gawarecki<br>Executive Director, LOC | **PHONE:**<br>**FAX:** | (865) 483-1333<br>(865) 482-6572 |
| **RE:** | Transmittal of Letter with comments regarding DOE/EA-1393 | | |

**Number of pages including cover sheet: 4**

**Message**

Transmitted with this FAX is the document listed below:

> Letter to David Allen from Norman A. Mulvenon, Chair, LOC Citizens' Advisory Panel; Subject - Programmatic Environmental Assessment (PEA) for the U.S. Department of Energy, Oak Ridge Operations Implementation of a Comprehensive Management Program for the Storage, Transportation, and Disposition of Potentially Re-Usable Uranium Materials (DOE/EA-1393)

The original comment letter will also be sent to you in hard copy.

LOC INC
Oak Ridge Reservation
Local Oversight Committee

June 21, 2002

David R. Allen
U.S. Department of Energy
Oak Ridge Operations Office
SE-30-1
PO Box 2001
Oak Ridge, Tennessee 37831

*Subject: Programmatic Environmental Assessment (PEA) for the U.S. Department of Energy, Oak Ridge Operations Implementation of a Comprehensive Management Program for the Storage, Transportation, and Disposition of Potentially Re-Usable Uranium Materials (DOE/EA-1393)*

Dear Mr. Allen:

The Oak Ridge Reservation (ORR) Local Oversight Committee (LOC) Citizens' Advisory Panel (CAP) submits the following comments on the subject PEA. These comments should be attributed to the CAP only, as the LOC Board has not had the opportunity to address the issue.

The CAP reviewers find the document poorly written and the alternatives presented in an unclear and confusing manner, such that the average reader cannot make an intelligent evaluation. It appears that no quality assurance was performed on this document prior to release for public comment. At the very minimum, the subcontractor, Science Applications International Corporation, should have read their own material for content and used the appropriate annotated outline to guarantee that all text material was included and properly organized to allow proper evaluation. At the maximum, all involved parties as listed on page 6-1 should have properly reviewed and vetted this document. The CAP's primary recommendation is that DOE retract the document and have it internally reviewed, rewritten, corrected, amended, and then re-issued for public comment.

Comments that support revision and re-issuance of the PEA are listed below:

1. The PEA lacks an Executive Summary.
2. The preferred alternative—Portsmouth—is not stated until page 2-10. Even then, it is unclear whether this is the preferred alternative of all alternatives or only of the DOE sites under consideration. The PEA should present the compelling rationale for the preference. The reasons listed are not "unique" as most are applicable to the Y-12 National Security Complex also.
3. The various alternatives are not numbered or consistently named in such a way as to easily identify them for comparison. The various alternatives also appear in random order throughout the document causing additional confusion for the reader. An example of this is the final interim storage alternative listed in Table 2.2 "interim partially consolidate storage based on physical form" which is apparently the same as "Interim

Partially Consolidated Storage at Several DOE Sites" in Section 4.11.1 Comparison of Alternatives.

4. There are errors or unexplained inconsistencies between the final interim storage alternative listed in Table 2.2 "interim partially consolidate storage based on physical form" and the unnumbered, unnamed table in section 4.9 that shows the storage plan for materials based on physical form.

5. NU in the acronym list is defined as normal uranium. The definition used in Appendix A, page A-iv is natural uranium. The terms "natural uranium" and "normal uranium" are interchangeably and randomly used throughout the EA text and appendices. This is confusing to the reader and technically inaccurate, as "natural uranium" is the proper term.

6. The missions of the various sites for storage were not properly considered.

   - Portsmouth is no longer in use as a gaseous diffusion facility and its future role may be limited to being one of the two sites for a conversion plant for depleted uranium hexafluoride (Paducah being the other site).

   - The three sites at Oak Ridge are lumped together in Table 2.1 and Oak Ridge is the only designator listed in later tables. In reality, the three major DOE sites in Oak Ridge have separate missions and two of the sites are not suitable for the proposed storage mission. ETTP is a closure site, and DOE has stated an intention to transfer the site to other ownership by 2008. ETTP should not even be on the list of alternatives, in that there is no future DOE mission contemplated once the site is cleaned up and closed. ORNL is listed in Table 2.1, but then is not included in any of the analyses. As a national laboratory, it is a poor candidate for a storage site.

7. Information is scattered and difficult to find in the PEA. For example, on page 2-3 it is stated that the uranium trioxide at SRS is not considered within the scope of this PEA. We don't learn why (that these oxides are not part of the UMG inventory) until page 4-21.

8. The option of transportation by barge is not evaluated.

The PEA doesn't seem to focus on the most logical analysis of alternatives for interim storage. This would be the consolidation of uranium at sites with compatible enrichment forms or with potential future uses. Some examples:

1. Portsmouth and Paducah will both have facilities for conversion of depleted uranium hexafluoride to oxide or metallic forms. Either of these locations would be a logical choice for the national stockpile of DU.

2. Paducah has a continuing mission of gaseous diffusion enrichment of uranium for commercial nuclear fuel. It would be a logical location for the storage of LEU.

3. Y-12 has exceptional capabilities for handling and storing HEU, and could act as a repository for any of the forms, particularly those that are more reactive such as metallic uranium. Because proposals for future disposition of HEU include down-blending to a

lower enrichment, Y-12 might be a logical place to store compatible forms that could be used for this purpose at a later date.

The transportation analysis relies too heavily on computer modeling without actual analysis of the existing roads. Portsmouth is not accessible by interstate and for this reason would be a poor choice for storage of all forms/enrichments, making it a hub for a major shipping campaign involving sensitive cargos. It is more logical to minimize transportation on secondary roads and express a preference for sites close to interstate highways or other major bulk transportation options (rail or barge). In particular, if multiple shipments of a particular form or enrichment to a variety of end users are likely, the preferred storage location should weight access to good transportation routes more heavily.

With so much uncertainty about end states, one wonders why DOE has undertaken an assessment at this time. It also makes little sense that DOE's huge stock of depleted uranium hexafluoride in cylinders—soon to be converted to a more stable chemical form—is outside the scope of the PEA.

The LOC is a non-profit regional organization funded by the State of Tennessee and established to provide local government and citizen input into the environmental management, decision-making and operation of the DOE's Oak Ridge Reservation. The Board of Directors of the LOC is composed of elected and appointed officials from the City of Oak Ridge and the seven counties surrounding and downstream of the ORR, and the chair of the Citizens' Advisory Panel. The CAP is a stakeholder organization with up to 20 members with diverse backgrounds who represent the greater ORR region; the CAP supports Board interests by reviewing and providing recommendations on DOE decisions and policies.

The CAP appreciates the opportunity to comment on the PEA. We look forward to seeing a revised draft with a more user-friendly and logical analysis of alternatives.

Sincerely,

Norman A. Mulvenon

Norman A. Mulvenon
Chair, LOC Citizens' Advisory Panel

cc: LOC Document Register
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