INEEL Oversight
Idaho's eyes on the INEEL

Dirk Kempthorne, Governor
Kathleen E. Trever, Coordinator

900 North Skyline, Suite C • Idaho Falls, Idaho 834
1410 North Hilton • Boise, Idaho 83706

June 21, 2002

David Allen
U.S. Department of Energy, SE-30-1,
P.O. Box 2001
Oak Ridge, TN 37831

Re: Draft Programmatic Environmental Assessment (PEA) *Implementation of a Comprehensive Management Program for the Storage, Transportation, and Disposition of Potentially Reusable Uranium Materials* (DOE/EA-1393)

Dear Mr. Allen:

In stating a need for this EA, DOE emphasizes increasing budget pressures, good stewardship of resources, and ensuring maximum cost-effectiveness. DOE does not, however, provide a clear explanation of how its alternatives for moving materials around before deciding on their disposition addresses these goals. This explanation is essential to supporting a sound policy decision.

Although DOE may be able to "bound" impacts based on hypothetical disposition paths, the geographical locations for disposition of the various physical forms could form a discriminator among alternatives that require transport, facility upgrade or construction. If, for example, there may be future activities using materials at their current or nearby location, it probably does not make sense to "consolidate" them elsewhere.

To support a sound decision, DOE should also provide information as to whether other activities at the storage facilities in question would still require similar monitoring or upkeep regardless of whether the reusable uranium materials remain. To enable fair evaluation of the alternative for consolidation by physical form versus solely geographical approaches, DOE should also provide information as to how physical form can relate to ultimate disposition, as well as identifying any differences in interim storage needs.

The document's simplified assumptions prevent much quantitative analysis, but do allow some qualitative comparisons.

The fundamental, outstanding question left by the EA, however, is to what extent the alternatives can achieve DOE's stated purpose of achieving management efficiencies.

Sincerely,

Kathleen E. Trever

Kathleen E. Trever
Coordinator-Manager

cc: Roger Twitchell, DOE-Idaho NEPA Coordinator

*an Idaho state program that independently monitors activities at the INEEL on behalf of the citizens of Idaho*

IF: (208) 528-2600 Boise: (208) 373-0498
IF: (208) 528-2605 Boise: (208) 373-0429
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