



# Community Advisory Board for Nevada Test Site Programs

May 29, 2008

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Ms. Janet Appenzeller-Wing  
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**SUBJECT:** Comments and recommendations pertaining to the: *Draft Supplement Analysis for the Final Environmental Impact Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada, DOE/EIS-0243-SA-03, April 2008*

The Community Advisory Board for Nevada Test Site Programs (CAB) has been provided an opportunity to review the above-mentioned Draft Supplement Analysis. The report includes information on multiple programs and purposes at the Nevada Test Site. The CAB's mission is to provide stakeholder perspectives to the U.S. Department of Energy (DOE) Nevada Site Office in the areas relating to environmental management, environmental restoration, and environmental site cleanup.

The goal of an Environmental Impact Statement (EIS) is to consider viable alternatives and consequences before making a decision. With respect to the decisions made after the first EIS in 1996 and a later amendment in 2000 (Federal Register, 1996 and 2000), it is difficult to understand the combination of alternatives DOE used for its final decisions involving multiple projects in environmental management. It is also difficult to understand the current situation and alternatives being considered in this draft.

Given the above-mentioned statements, there are a number of areas within the document that the CAB would like to submit comments on. They are as follows:

1. At the beginning of the document, the page that identifies "Radiation Basics," may need revision. The report presents four basic types of ionizing radiation. The CAB recommends providing a good source for this, given that most sources only identify three basic types of ionizing radiation. (Neutrons are not ionizing radiation.)
2. In the summary and introduction, it should be made clear how the alternatives in the current draft are related or differ from the alternatives identified in the 1996 EIS.
3. While there are extensive tables in Chapter 4, the CAB recommends adding two simple tables up front with respect to environmental management activities:
  - The first table would summarize the alternatives identified in 1996 and the actual decision that combined the alternatives.
  - The second table would summarize current environmental management activities along with alternatives being examined for upcoming decisions.
4. Difficulty in distinguishing the alternatives makes it difficult to comment on the decision that no additional National Environmental Policy Act (NEPA) documentation is required.

5. In the appendix, the report includes input from the American Indian Writers Subgroup of the Consolidated Group of Tribes. The DOE may want to consider including other perspectives such as trade unions or professional groups given the potential economic vulnerability from any changes in activities to rural residents living around the Nevada Test Site.
6. On page 3-7, under "Area 5 Radioactive Waste Management Site," in the box for "*Greater confinement disposal waste*," perhaps reference should be made that a small amount of legacy waste remains buried in Area 5. The box can read: "*Transuranic waste has been disposed of in the past in the Area 5 RWMS. Closure of disposal units containing transuranic waste will occur in accordance with DOE, the EPA, and state requirements. No new waste will be disposed in the Greater Confinement Disposal Facility; its performance assessment has been completed.*"
7. Also on page 3-7, under the section for Facility Construction Activities, in the box for Transuranic Waste Certification, under remarks, the second sentence should be changed, to read: "*Within the Waste Examination Facility, modifications were made to the Visual Examination and Repackaging Building to support repackaging of mixed transuranic waste for off site shipment.*"
8. On page 3-9, bullet #3, the term "transloading" needs to be explained.
9. On page 3-21, and again on page 4-11, population statistics are included. If this is simply to update the original EIS, a statement should be added to this effect.
10. On page 3-31, the last sentence of the first paragraph states that: "*The analytical conclusion was that the Part 191 requirements could be met but a final DOE decision on the disposition of the inadvertently disposed waste is pending (DOE/NV 2006c).*" There should be a statement as to what DOE will do if the decision is that this waste is not properly disposed and must be moved.
11. On page 3-31, the fourth paragraph generally talks about tritiated water. If the "tritiated liquids" are in fact water, then change liquids to water. If there are other "tritiated liquids," they need to be defined.
12. On page 4-5, in Table 4-1 under "Air Quality," in the section entitled "Principal Radioactive Emissions," the phrase "From 1993 ASER" has displaced the curie numbers down one line. Line up the curies-per-year numbers with the corresponding radioisotopes.
13. On page 4-28, the last sentence of the second paragraph should reflect the legacy waste shipments planned for Idaho National Laboratory. Therefore, the sentence should read: "*All remaining legacy waste, including legacy waste drums and oversized boxes repacked to standard waste boxes, are included for off site shipment in 2009 to Idaho National Laboratory (INL) for final characterization prior to shipment to the Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico.*"

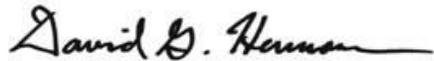
The following are editorial comments:

- 1) The acronyms list on page xi should include MEI, ASER, and SPEIS. Also, Tables 4-1 and 4-4 reference HAP, TSP, and HC, but these terms are not defined. Add them to the acronym list or define in the tables.
- 2) Use of land area units is not consistent. In some instances hectares (acres) are used, while other instances use square kilometers (square miles). For example, on page S-4, section S.3.2, land area is discussed primarily in hectares. However, on page 3-18, in section 3.2.1, first paragraph, the land area is described in square kilometers (square miles). The CAB recommends using square kilometers if possible.
- 3) On page S.3.2, a table to show land area before and after in all units may be helpful. Additionally, it may help to both tell the size of the increase and why and when it happened.
- 4) Within the third paragraph on page 3-5, the term "Lyner" is an acronym. The verbiage within the parentheses should read: (then called the Low Yield Nuclear Experiment and Research Facility [LYNER] Complex).

Ms. Janet Appenzeller-Wing  
U.S. Department of Energy, Nevada Site Office  
May 29, 2008  
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We appreciate the opportunity to review and comment on changes, revisions, and updates to the Draft Supplement Analysis for the Final Environmental Impact Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada, DOE/EIS-0243-SA-03, April 2008, and will continue working to help improve Environmental Management's efforts to communicate with the public.

Sincerely,

A handwritten signature in black ink that reads "David G. Hermann". The signature is written in a cursive style with a long horizontal flourish at the end.

David Hermann, Chair  
Community Advisory Board  
For Nevada Test Site Programs

cc: K. Snyder, NNSA/NSO DDFO  
C. Lockwood, NNSA/NSO  
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