



## ***Nevada Site Specific Advisory Board***

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### **Greater Than Class C (GTCC) Committee**

**Desert Research Institute  
755 E. Flamingo Road, Las Vegas, NV  
1:00 p.m. – April 25, 2011**

### **Meeting Summary**

Members Present: Kathleen Bienenstein, Robert Johnson, Michael Voegele

U.S. Dept. of Energy (DOE): Kelly Snyder (DDFO)

Facilitator: Denise Rupp, Navarro Research & Engineering, Inc.

Having reviewed the GTCC Draft Environmental Impact Statement (DEIS) and comments shared by the Chairman Voegele, the Committee discussed their initial comments. Although it was previously decided to address aspects specific to Nevada, the Committee determined the issues within the document made this impossible.

After discussion, the Committee agreed to focus on developing a recommendation outlining the issues in the report that require resolution before any decision regarding the proposal could be made.

Major issues include:

- Scoping hearings were held in 2007 at which time Yucca Mountain repository was a viable disposal option
- Current Nuclear Regulatory Commission (NRC) regulations do not allow for trench or vault burial as indicated in the DEIS
- Performance assessments are based on assumptions with no solution to the requirements of repository disposal under 10 Code of Federal Regulations (CFR) Part 61
- NRC licensing requirements for GTCC differ from the Resource Conservation Recovery Act standards used in permitting the Waste Isolation Pilot Plant (WIPP)
- There is little information on projected transportation impacts on local communities or the associated emergency preparedness and/or security needs
- Container criteria are not identified
- Document conclusions do not take into account the fact the NRC is currently considering international waste classifications
- Mitigation of human intrusion is not consistent with requirements for geologic disposal
- The EPA permit at WIPP may be jeopardized if the facility is licensed by the NRC
- Associated impacts under the purview of certain other agencies are not addressed in the document as these agencies will not be consulted until after site selection
- A preferred path forward should not be contingent on Congress changing laws on repositories
- Disposal of GTCC at WIPP would exceed the limits for RH capacity necessitating amendment of the WIPP Land Withdrawal Act and the WIPP EIS

- The performance assessments are not true indicators of the difference in performance among the sites since they are based on assumptions
- How a near surface cover could meet the expected performance required for GTCC should be presented rather than relying on assumptions in the performance assessment
- The argument that dilution decreases with distance requires more analysis in light of the fact contaminant flow has been shown not to disperse equally over distance
- The construction method for the trench disposal option includes the potential for fast travel pathways and more than nominal infiltration with the removal of the sheet piling

It was agreed a presentation should be made to the Full Board outlining the Committee's major concerns with the DEIS. The presentation will include an overview of the major points with a handout of more detailed information. The Chair will prepare the presentation based on the Committee's discussion and submit it to the NSSAB office for formatting and distribution. Since this is a technical subject that will require advance preparation for discussion at the Full Board meeting, the presentation and a link to the DEIS document will be provided to the Full Board prior to May 11.

The GTCC Committee meeting adjourned at 2:00 p.m.