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Volume 3

FINAL ENVIRONMENTAL IMPACT STATEMENT

on a

Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

Public Comments and Department of Energy Responses Part 3a – Individuals (Pages 2.7-1 through 2.7-530)

United States Department of Energy
Assistant Secretary for Environmental Management
Washington, DC 20585

Volume 3 is organized into three sections:

- Section 1 - Overview
- Section 2 - Written Comments and Responses
- Section 3 - Public Hearings

The Overview sets the tone for the document by summarizing the public comment process, by explaining how the receipt of written comments and the public hearing process were handled, and by summarizing the major issues raised by commentors and DOE's responses to these issues.

Section 2 of Volume 3, "Written Comments and Responses" contains all of the written comments received by DOE on the draft EIS. Upon receipt, these documents were assigned a sequential log number to be used in tracking during the comment response process. For presentation in Volume 3, these documents maintained their original log number, but were separated into the following seven distinct "affiliation" categories:

Section 2.1 - Federal Government
Section 2.2 - State Government
Section 2.3 - Local Government
Section 2.4 - Native American Groups
Section 2.5 - Non-Government Organizations
Section 2.6 - Foreign Entities
Section 2.7 - Individuals

Since these documents retained their original log number, the reader should note that while the documents in each respective section are in ascending order, their numbering therein is not sequential.

In order for a reader to find a specific document, a full "List of Commentors" has been included in each book (or part) of Volume 3, immediately following the "Table of Contents." This "List of Commentors" has been compiled alphabetically using either the commentors last name, the name of the submitting organization, or the name of a Federal, State, Tribal, or local government branch. City and State government bodies are listed under "City of" or "State of." Members of Congress are listed by the Senator's or Representative's name, with the government branch following.

To locate a document(s):

1. Find the "List of Commentors" and the name of the individual submitting the comment (or the name of the organization or agency if the comments were submitted on their behalf), and note the page number assigned to the first page of the comment document (i.e., a document from a Native American Group would be number 2.4-1, etc.).

2. Find the Volume 3 book (or part) that contains the section and page number for which you are looking and turn to the appropriate page to find a scanned copy of the document along with the responses to each of the comments delineated therein.

the written comments, the comments received during each of the 17 public hearings. Oral comments provided at these hearings have been summarized, rather than individually identified by each respective speaker. As such, there is not a list of speakers or identification of the commentors at the public hearings. A list of all registered attendees is provided immediately following the summary of each of the public hearings.

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Section 2.7
Individuals

COMMENTOR NO. 3: THOMAS, HENRY G.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Henry G. Thomas **Phone:** (803) 884-2885
Title and Organization: Hobcaw Yacht Club
Address: 614 East Hobcaw Drive
City: Mt. Pleasant **State** SC **Zip** 29464

*** COMMENTS ***

Attached is a copy of a 1979 Federal Court Order. Defendants include Sec'y of Army, Corps of Engineers, EPA, Dept. of Interior and the USA. One of the many conditions of this agreement deals with Air & Water Quality: Page 12, E. Pollution Control and Monitoring. The monitoring system was removed in 1985. For 15 years the defendants together with the SC State Ports Authority have operated in contempt of court. What reason does anyone have to suppose any assurance is sufficient? 3-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 3: THOMAS, HENRY G.

Response to Comment No. 3-1

DOE was not a party to the 1979 Federal Court Order which the commentor references, hence is not familiar with the issues, or the actions/inactions of the parties directly involved. For these reasons, DOE will make no comment on the specific issue raised.

However, on the issue of air and water quality as it pertains to the proposed policy of managing foreign research reactor spent nuclear fuel, DOE considers that there would be no significant adverse impacts to any of the ports that might be used to accept the material. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive material has ever been released from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality. In the unlikely event of a severe accident, the analysis performed for the EIS indicates that some radioactive material could be released from the cask and distributed into the environment. However, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the water and air quality in the port would be very small.

COMMENTOR NO. 4: JENSEN, M.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: M. Jensen Phone: 803 884 6283

Title and Organization:

Address: 236 Molasses Ln

City: Mt. Pleasant State SC Zip 29464

*** COMMENTS ***

Pg D-39 ¶ 6, 2nd line from bottom: I-526 does not entirely bypass the City of Charleston. 4-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 4: JENSEN, M.

Response to Comment No. 4-1

The text in Appendix D, Section D.2.1.1 of the EIS has been revised to indicate that I - 526 does not entirely bypass the City of Charleston.

COMMENTOR NO. 5: MCGAHEE, BERNY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Berny McGahee **Phone:** 706-860-2917
Title and Organization: concerned citizen
Address: 122 Lakeview Ct.
City: Augusta **State** Ga. **Zip** 30909

*** COMMENTS ***

It seems the best action is to process spent fuel at SRS by existing technologies on site known as chemical separation + vitrification. 5-1

Burning spent fuel with a ~~[illegible]~~ multi-Purpose reactor at SRS only makes common sense as a third technology on mission of SRS to deal with non-proliferation of nuclear weapons. 5-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 5: MCGAHEE, BERNY

Response to Comment No. 5-1

The commentor's preference for chemical separation of foreign research reactor spent nuclear fuel at the Savannah River Site is noted. This is Management Alternative 1, Implementation Alternative 6, and is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

Response to Comment No. 5-2

DOE is considering the use of a multi-purpose reactor as part of its decision on the Tritium Supply and Recycling EIS. DOE is also considering the use of a multi-purpose reactor as part of its decision on the Storage and Disposition of Weapons-Usable Fissile Materials EIS, dealing primarily with plutonium. This foreign research reactor spent nuclear fuel EIS will not lead to any decision on the use of a multi-purpose reactor.

COMMENTOR NO. 6: MCGAHEE, BERNY

Charles Head

May 9, 1995

As a concerned citizen, I fully support the processing of spent nuclear fuel at the Savannah River Site.

It is my understanding that SRS has built a recycling and glassification plant that is capable of safely processing these rods and other materials. The capability is here, so the volume of production should be increased so that the mission will be cost-effective. SRS should be permitted to process this country's spent fuel and do the same for other countries. By having some control over this, the chances of rogue countries and terrorists obtaining these materials for nefarious purposes such as making bombs would be greatly reduced. 6-1

In addition, as you know, DOE is considering using a multi-purpose reactor that will burn spent fuel rods, and make tritium and electricity. This should expedite the process of disposing of these dangerous materials. 6-2

The excellent safety record at SRS for over 40 years has earned it a nuclear-friendly relationship with the community, making it a most desirable location for future missions. This area has always welcomed and supported the projects at SRS, and continues to do so. 6-1 (Cont'd.)

Berny McGahee
122 Lakeview Dr.
Martinez, Ga. 30907
phone - 706-860-2917

RESPONSE TO COMMENT
COMMENTOR NO. 6: MCGAHEE, BERNY

Response to Comment No. 6-1

The commentor's support for using the Savannah River Site's facility for chemical separation of the foreign research reactor spent nuclear fuel is noted. Chemical separation at the Savannah River Site is part of Implementation Alternative 6 of Management Alternative 1 in the EIS. Section 2.2.2.6 of the EIS describes this alternative and Sections 2.4 and 2.6.5.2 describe the chemical separation facilities.

Response to Comment No. 6-2

A multi-purpose reactor, if it is built, would burn plutonium, not spent nuclear fuel from foreign research reactors. The decision to build a multi-purpose reactor is outside the scope of this EIS.

COMMENTOR NO. 9: PECK, DIANE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: DIANE PECK Phone: 409-762-6762

Title and Organization:

Address: 3121 AVENUE P.

City: GALVESTON State TEXAS Zip 77550

*** COMMENTS ***

I AM OPPOSED TO THE PROPOSED USE OF THE PORT OF GALVESTON FOR THE TRANSPORT OF SPENT NUCLEAR FUEL. 9-1

KEEP IT IN THE COUNTRIES THAT BOUGHT IT!! 9-2

DON'T SELL IT TO THEM (FOREIGN COUNTRIES OF WHICH 9-3

WE HAVE ENOUGH NUCLEAR WASTE TO DISPOSE IN THIS COUNTRY AT PRESENT. 9-4

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 9: PECK, DIANE

Response to Comment No. 9-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Galveston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Galveston, or to any port analyzed in the EIS, is low.

Response to Comment No. 9-2

The commentor's preference for overseas management of foreign research reactor spent nuclear fuel is noted. This is Management Alternative 2, which is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 9-3

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). Past and present nuclear weapons nonproliferation policies of the United States support peaceful applications of nuclear technology, such as research reactors for nations who agree not to develop nuclear weaponry. The use of LEU fuel is encouraged by the United States and since passage of the Energy Policy Act of 1992, no new export licenses for HEU have been issued by the United States.

Response to Comment No. 9-4

The commentor's opposition to the addition of spent nuclear fuel from foreign research reactors to the existing inventory of nuclear waste in the United States is noted. As discussed in Section 2.2.1.3 of the EIS, acceptance into the United States of the spent nuclear fuel from foreign research reactors would increase the existing inventory of spent nuclear fuel approximately one percent by mass and ten percent in volume.

COMMENTOR NO. 10: BRONDALILS, PHILIP

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Philip Brondalils **Phone:** (409) 765-7766

Title and Organization:

Address: 3115 Avenue P

City: Galveston **State** Tx **Zip** 77550

*** COMMENTS ***

I am against this in Galveston! 10-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 10: BRONDALILS, PHILIP

Response to Comment No. 10-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Galveston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Galveston, or to any port analyzed in the EIS, is low.

COMMENTOR NO. 11: WEBER, DENISE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: DENISE WEBER Phone: (409) 765-7766

Title and Organization:

Address: 3115 AVENUE P

City: GALVESTON ISLAND State TX Zip 77550

*** COMMENTS ***

I AM OPPOSED TO ANY NUCLEAR WASTE BEING BROUGHT THROUGH GALVESTON.

THIS "SALES PITCH" IS WORTH MORE TO "OUTSIDE" PEOPLE THAN IT IS WORTH TO "OUR" RISKS.

IF THE PEOPLE (THAT ARE TRYING TO "SELL" THIS) LIVED HERE ... THEN THEY WOULD NOT WANT IT HERE.

I agree with all of the mentioned Risks.

I AM AGAINST THIS BEING CRAMMED DOWN OUR THROATS! 11-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 11: WEBER, DENISE

Response to Comment No. 11-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Galveston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Galveston, or to any port analyzed in the EIS, is low.

COMMENTOR NO. 13: MUHICH, MARK

MARK MUHICH
2808 STRAND
GALVESTON, TX.
77550
409 762-6042

15 MAY, 1995

DEPARTMENT OF ENERGY
PUBLIC HEARING
NON-PROLIFERATION TREATY
FOREIGN RESEARCH REACTOR HIGHLY ENRICHED MATERIALS IMPORT PROJECT
[illegible] PORT OF GALVESTON
GALVESTON, TX. 77550

TO DATE, THE NUCLEAR ENERGY AND NUCLEAR WEAPONS INDUSTRIES HAVE FAILED TO ADDRESS THEIR RADIO ACTIVE WASTE PROBLEMS. NUCLEAR FACILITIES ARE TEMPORARILY STORING THESE RADIO-ACTIVE WASTES IN STRUCTURES AND AT LOCATIONS NOT ORIGINALLY DESIGNED FOR THIS PURPOSE. 13-1

THESE WASTES, WORLDWIDE, CONSTITUTE A SECURITY AND ENVIRONMENTAL THREAT. CLEARLY, A SYSTEMATIC POLICY TO PERMANENTLY REMOVE THESE HAZARDOUS MATERIALS FROM VULNERABLE SOCIETIES AND ECOLOGIES IS WELCOME.

MANAGERS OF THIS PROJECT, FROM THE LOCAL GALVESTON PORT OFIICIALS TO INTERNATIONAL DIRECTORS SHOULD DEMONSTRATE, AT THE OUTSET, THEIR AWARENESS OF THE RICHNESS OF THE GALVESTON BAY COMMUNITY.

GALVESTON BAY HAS BEEN DECLARED A NATIONAL ESTUARY. IT IS AFFORDED SPECIAL PROTECTIONS FROM DEGRADATION, POLLUTION, AND EXPLOITATION. GALVESTON BAY WAS SO DESIGNATED BECAUSE OF ITS INTERGAL ROLE IN THE VITALITY OF SO MANY SPECIES OF FLORA AND FAUNA, THE ECONOMIC LIFE OF THE REGION AND THE CULTURE OF THE CITIZENS WHO RESIDE HERE. 13-2

GALVESTON BAY IS THE NURSERY TO A VARIETY OF COMMERICIAL FISHES AND CRUSTACEANS.THE BAY IS THE SECOND MOST PRODUCTIVE ESTUARY IN THE UNITED STATES.

SPORT FISHING ALONE CONTRIBUTES OVER ONE BILLION DOLLARS TO THE STATE ECONOMY.

RESPONSE TO COMMENT
COMMENTOR NO. 13: MUHICH, MARK

Response to Comment No. 13-1

A national nuclear waste policy does not currently exist. Although such a policy would, no doubt, clarify and direct this country's efforts to address the nuclear waste issue, the question of managing foreign research reactor spent nuclear fuel that is addressed by this EIS cannot wait for a national nuclear waste policy to be developed. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). This issue cannot wait, especially since the amount of nuclear waste involved here is so small compared to that elsewhere in the public and private sectors.

Response to Comment No. 13-2

Although ports are generally not environmentally sensitive areas within the context of NEPA, Section 3.2.1.2 of the EIS has been modified to note that Galveston Bay has been named an "estuary of national significance." DOE also notes the commentor's statements related to the commercial fishing industry and migratory bird populations near the Port of Galveston. DOE considers that there would be no significant adverse impacts to any of the ports that might be used to accept foreign research reactor spent nuclear fuel. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive materials. To date, no radioactive material has ever been released from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality. In the unlikely event of a severe accident, the analysis performed for the EIS indicates that some radioactive material could be released from the casks and distributed into the environment. However, the analysis in section 4.2.3.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the water and air quality in the port, and on wildlife and marine life, would be very small.

COMMENTOR NO. 13: MUHICH, MARK (CONT'D.)

PROJECT MANAGERS SHOULD INFORM THEMSELVE OF THE UNIQUE POSITION GALVESTON ISLAND AND ENVIRONS SERVE TO THE VAST MIGRATORY BIRD POPULATION. MILLIONS AND MILLIONS OF BIRDS VISIT GALVESTON EACH SPRING EN ROUTE NORTH FROM CENTRAL AND SOUTH AMERICA. ANY DISPRUPTION TO THESE PRIMORDIAL RITES OF PASSAGE WOULD BE CATACLYSMIC.

THE NATIONAL RECORD FOR THE AUDUBON CHRISTMAS BIRD COUNT, APPROXIMATELY 230 SPECIES, WAS RECORDED IN FREEPORT,TX. SOME TWENTY FIVE MILES FROM THE PORT OF GALVESTON. GALVESTON ISLAND ITSELF CONTINUALLY RANKS IN THE TOP TWENTY REGIONS NATIONALY FOR NUMBER OF BIRD SPECIES SIGHTED IN A TWENTY-FOUR HOUR PERIOD. PROJECT MANAGERS MUST BE ZEALOUS IN PROTECTING THIS INTERNATIONAL BIO-TREASURE. 13-2 (Cont'd.)

SUGGESTIONS:

1. THE PORT OF GALVESTON SHOULD BE CONSIDERED AS A PORT OF ENTRY FOR IMPORT OF ENRICHED NUCLEAR WASTES FROM FOREIGN REACTORS. 13-3

2. NO PLANS, EITHER PRIMARY NOR CONTINGENT, FOR THE STORAGE OR LAY-OVER OF NUCLEAR WASTE CARGO SHOULD BE DEVELOPED AT THE PORT OF GALVESTON. 13-4

3. LOCAL GOVERNMENT OFFICIALS AND THE ENVIRONMENTAL COMMUNITY SHOULD BE CONSULTED THROUGHOUT THE DESIGN AND IMPLEMENTATION OF THE PROJECT. 13-5

4. PORT OF GALVESTON OFFICIALS SHOULD BE EMPOWERED TO HALT THE IMPORT OF NUCLEAR WASTE CARGO IF SUCH CARGO CANNOT BE TRANSPORTED FROM THE PORT FACILITY TO ITS FINAL DESTINATION WITHOUT DELAY. 13-6

THANK YOU FOR THE OPPORTUNITY TO EXPRESS MY CONCERNS ABOUT THE DEPARTMENT OF ENERGY IMPORT PLAN FOR THE PORT OF GALVESTON.

MARK MUHICH

Mark Muhich

RESPONSE TO COMMENT
COMMENTOR NO. 13: MUHICH, MARK (CONT'D.)

Response to Comment No. 13-3

The commentor's support for the inclusion of the Port of Galveston as a potential port of entry for foreign research reactor spent nuclear fuel is noted.

Response to Comment No. 13-4

No port would be used as a storage site for foreign research reactor spent nuclear fuel. Cargoes from foreign research reactors would remain in port only as long as necessary for completion of inspections, documentation, and loading for transportation to an interim management site - usually, under normal circumstances, less than 24 hours. Section 2.6.3.2.2 of the EIS describes port activities.

Response to Comment No. 13-5

DOE is required to inform the Governor of each State and any Tribal chair, or their designee, along a transportation route seven days prior to shipment of hazardous cargos, including radioactive materials. It would be the responsibility of the Governor to provide any further notification to State and local officials.

Emergency preparedness, security, and coordination of DOE with local emergency response authorities that would be involved with the acceptance and transportation of foreign research reactor spent nuclear fuel will be discussed in detail in the Transportation Plan, that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments.

Response to Comment No. 13-6

The Coast Guard Captain of the Port has the authority to prevent the unloading of a cargo if he or she believes that the port cannot safely receive that cargo. If port officials believe that the foreign research reactor spent nuclear fuel could not or would not be transported from the port facility within the 24 hours estimated by the calculations in the EIS, then the Captain of the Port should be contacted. The Captain of the Port could then consider delaying unloading of the foreign research reactor spent nuclear fuel.

COMMENTOR NO. 15: HANSEN, DICK

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Dick Hansen **Phone:**

Title and Organization: Scripps Consulting Group

Address: 528 Rimini Road

City: Del Mar **State** Ca. **Zip** 92014

**** COMMENTS ****

I agree that DOE should fulfill their responsibility to the foreign countries involved for receipt of foreign research reactor spent fuel. I further believe that a combination of research and reprocessing for stabilization, preferably for dry storage. The obstacles to reprocessing must be overcome. We need to take advantage of a great national resource.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 15: HANSEN, DICK

15-1

Response to Comment No. 15-1

The commentor's support for the proposed policy is noted. DOE and the Department of State consider that it is imperative that the United States maintain its leadership role in reducing the amount of HEU in global commerce.

15-2

Response to Comment No. 15-2

The commentor's support for the chemical separation of the foreign research reactor spent nuclear fuel, and dry storage of the resulting waste, is noted. Chemical separation in the United States is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

COMMENTOR NO. 18: QUINN, ROBERT

TO: DEPARTMENT OF ENERGY
FROM: ROBERT QUINN.
P.O. BOX 10177
SOUTHPORT, N.C. 28461
(910)457-5121

SUBJECT: MOVEMENT OF NUCLEAR WASTE FROM SUNNY PT. BY RAIL

The Department of Energy environmental study to determine the feasibility of shipping nuclear waste by rail through Sunny Point Army Ocean Terminal has missed some significant points.

The study, while claiming research slanted to the conservative side, has missed significant data. In Volume 1, para. 3.2.1.5 Military Ocean Terminal Sunny Point, NC, p. 3-23 it is stated that the terminal is serviced by well maintained roads, 98 miles of a U.S. Army rail line connecting to CSX and that the 1990 population within 10 miles was 7995. It further states on p. 3-25 that ENVIRONMENTAL CONDITIONS are the same as the Port of Wilmington. 18-1

The Brunswick County Land Use Plan states, "it is anticipated that the following roads would be experiencing capacity related problems during the period 1988-2005". This includes the Hwy 133/87 areas of Sunny Point. The Land Use Plan further documents that correction of this problem is not in the state plan.

The county planning document shows a seasonal population of approximately 60,000 within 10 miles. The season runs for an extended period.

Sunny Point and its associated rail facilities run through the middle of an intense "lime sink community".

The study has failed to grasp the impact of the actions of the U.S. Army in granting consent agreements to a mining operation without knowing the hazards associated with the activity. This impact relates to the area in general and the rail line upon which Department of Energy nuclear waste will be shipped specifically. 18-2

What is most disconcerting to the citizens in the Brunswick County area is the fact that numerous studies by FEDERAL AGENCIES document these dangers in detail, yet it is not discussed and not addressed in the study. 18-3

RESPONSE TO COMMENT
COMMENTOR NO. 18: QUINN, ROBERT

Response to Comment No. 18-1

The U.S. Army rail line mentioned by the commentor was used by DOE for the urgent-relief acceptance of foreign research reactor spent nuclear fuel discussed in Section 1.5 of the EIS. Tourist or seasonal populations were not considered in the population figures used for the "human population" port selection criterion (Criterion 5), only resident populations as indicated by the 1990 census. As shown in Appendix D, Section D.1.9.5 of the EIS, the seasonal population figure of 60,000 within 10-miles of MOTSU given by the commentor is still lower than the other 9 ports described in Section 3 of the EIS.

The environmental conditions mentioned by the commentor relate to the Cape Fear River and surrounding area, and is an accurate description of the affected environment for both MOTSU and the Port of Wilmington, NC.

In regard to Routes 133/87 "experiencing capacity related problems" during the period 1988-2005, DOE considers that if the foreign research reactor spent nuclear fuel is accepted into the United States through MOTSU, the contribution to traffic from this effort would be negligible. The maximum number of casks that might be accepted under this proposed action is approximately 721 (736 if targets were included). Even if all of them were to be accepted through MOTSU, this amounts to an average of one shipment per week over the proposed 13 year acceptance period under the basic implementation of Management Alternative 1 (less if a hybrid alternative under Management Alternative 3 were adopted).

DOE estimates that the transportation of foreign research reactor spent nuclear fuel would have about the same impact on the structural integrity of local roadways and bridges as the commercial transportation of gravel and cement. As discussed in Table B-14 in Appendix B of the EIS, transportation casks for foreign research reactor spent nuclear fuel weigh between 10.9 and 25.5 metric tons. Including the truck (an 18-wheeler), the total weight would be approximately 24 to 38 metric tons. For comparison, commercial ten-wheel sand and gravel trucks usually weigh almost 30 metric tons when fully loaded. Newer sand and gravel trucks which have an additional axle can weigh as much as 34 metric tons.

Since the number of trucks would be limited and their weight would be within the legal limits, the added burden to the State highways would be minimal.

Response to Comment No. 18-2

The EIS does not specifically address the possibility of a train carrying a cask of foreign research reactor spent nuclear fuel falling into a sinkhole. The EIS does, however, address a broad range of accidents involving dropped casks. This broad range of accidents covers some that are more severe than the falling into a sinkhole scenario. Section 4.2.3 of the EIS describes environmental effects for the most severe accidents which might reasonably occur.

COMMENTOR NO. 18: QUINN, ROBERT (CONT'D.)

The packet submitted to you contains the following:

1. U.S. Army Corps of Engineers LETTER OF CONSENT for Martin Marietta Aggregates Company to operate a limestone mine in the safety buffer area of the Sunny Point Terminal, dated 3 May 1993.

2. STUDY OF SINKHOLES: THEIR GEOLOGY,ENGINEERING AND ENVIRONMENTAL IMPACT, by the Florida Sinkhole Research Institute and the North Carolina Department of Transportation.
(Documents that the majority of sinkholes in North Carolina are in the Southeastern part of the state and the Brunswick County area of the Sunny Point terminal and Railroad)

3. RECONNAISSANCE GEOLOGIC AND GEOPHYSICAL INVESTIGATION OF POTENTIAL SINKHOLE COLLAPSE OF SUNNY POINT ACCESS RAILROAD AT BOILING SPRINGS LAKE, NORTH CAROLINA, dated October 1984, by TECHNO INC. for the U.S. Army.
(Documents the severe magnitude of the occurrence of sinkholes in this area. 27 PRIMARY ANOMALIES and 13 SECONDARY ANOMALIES)

4. RAILROAD LAND BRIDGE MILITARY OCEAN TERMINAL SUNNY POINT,CONCEPT DESIGN REPORT, dated February 1985, by U. S. Army Corps of Engineers.
(Documents that active sinkholes have occurred immediately east of the rail line...attributed to increased flow rates imposed on the lime stone aquifer)

5. U.S. GEOLOGICAL SURVEY CIRCULAR 968, dated 1987.
Documents:
A. Costly loss to roads and railroads from man induced sinkholes. p. 1
B. Man induced sinkholes are the sole source of the worst forms of sinkholes. p. 13
C. The de-watering activities of pumping bring on man induced sinkholes. p. 14
D. Maps Brunswick County, Sunny Point location as area of numerous man induced sinkholes. p. 15
E. Decline in aquifer pressure brings on sinkholes. pp. 16-20
F. Recognizes the primary cause of man induced sinkholes as DE-WATERING CONDUCTED BY MINING ACTIVITIES. p. 38
G. States that mining activities should be KEPT away from populated or HAZARD AREAS. p. 38.

6. Letter from, U.S. DEPARTMENT OF INTERIOR, GEOLOGICAL SURVEY DIVISION to Congressman Charlie Rose, dated February 1994.
(Evaluating the mining proposal and stating that de-watering in this area will cause sinkhole development)

RESPONSE TO COMMENT
COMMENTOR NO. 18: QUINN, ROBERT (CONT'D.)

Response to Comment No. 18-3

A discussion of sinkholes in the Sunny Point area has been added to Section 3.2.1.5 of the EIS in response to public comments. MOTSU has been identified as an area with significant sinkhole activity (Kock, 1984). Sinkholes can occur naturally or as a result of human activity. Occurrences of sinkholes are closely tied to the drainage pattern in areas whose geologic formations provide a collapse mechanism. Human activities which modify the natural drainage pattern in such an area can increase the rate of sinkhole formation. Sinkholes pose a potential hazard to truck and rail traffic in the Sunny Point area. Due to the robust nature of the casks which are used to transport spent nuclear fuel from foreign research reactors, sinkholes are not expected to cause a radiological accident (Appendix B of the EIS presents a description of the casks).

COMMENTOR NO. 18: QUINN, ROBERT (CONT'D.)

7. CAROLINA POWER AND LIGHT COMPANY LETTER OF OBJECTION TO MARTIN MARIETTA MINE PROPOSAL, dated December 1993.
(Documenting "SUBSTANTIAL PHYSICAL HAZARD " to the nuclear power plant) p. 1
(Sinkhole damage to the transmission and railroad line) p. 3

8. Letter from, DEPARTMENT OF THE ARMY, SUNNY POINT COMMANDER, OUTLINING MODIFICATIONS REQUIRED TO PREVENT DAMAGE TO THE BASE, dated November 1993.
(Outlining modifications required to prevent damage to the base facilities from sinkholes and potential of secondary explosions on the base from underground blasting)

9. Raleigh News and Observer article, SHIPPING NUCLEAR WASTE BY RAIL HAS RISKS, dated May 1994.
(Documents state record count of 89 accident in 10 years along North Carolina tracks that will haul your waste material)

10. Wilmington Morning Star article, SINKHOLES OPEN IN BRUNSWICK, dated Spring 1994.
(Documents sudden sinkhole within 50 yards of the Sunny Pt. railroad)

To summarize :

In May of 1993, without knowing or asking what the proposed mining operation would entail, the Corps of Engineers at SAVANNAH granted a consent agreement for mining operations within the government buffer area.

In November of 1993, public hearings documented a danger to the health safety and welfare of the public caused by sinkhole development as a result of pumping 10 to 12 million gallons of water a day from the underlaying Castle Hayne Aquifer. The Army failed to identify the dangers in the mining proposal. 18-4

Research data over a 10-year period by FIVE FEDERAL AGENCIES verifies that these dangers were ignored in the decision process to grant the consent agreement.

As long as this consent agreement is in effect, the potential for dangers to the PUBLIC HEALTH, SAFETY and WELFARE will continue. If you are to move nuclear waste in this area on a rail line that has documented failure from sinkholes, you would be negligent in failing to consider the safety of hundreds of thousands of people in this area.

Since this is an issue created by the action of a federal agency, I recommend that you take appropriate action to have this time expired consent agreement voided and insure no others are issued. 18-5

RESPONSE TO COMMENT
COMMENTOR NO. 18: QUINN, ROBERT (CONT'D.)

Response to Comment No. 18-4

DOE understands the potential impact that would be associated with the development of sinkholes along the rail track in the area of Sunny Point, N.C. DOE, however, would like to point out that the transportation casks that would be used to transport the foreign research reactor spent nuclear fuel are designed and certified to survive drops of 30 feet onto an unyielding surface. Sinkholes are rarely 30 feet deep and they have soft soil bottoms. A cask carrying foreign research reactor spent nuclear fuel would survive a fall into a sinkhole without releasing any of its radioactive contents. The standards for spent nuclear fuel transportation casks have been summarized in Figure B-7 of Appendix B of the EIS.

Response to Comment No. 18-5

DOE has reviewed the issue of sinkhole development in and around the Sunny Point Terminal and railroad. As explained in the response to comment 18-4 above, a sinkhole is not likely to appear at the time a foreign research reactor spent nuclear fuel transportation cask would be passing over on the rail line. The risk of releasing radioactive material from a spent nuclear fuel transportation cask as the result of a sinkhole event is low. Transportation casks are designed to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a sinkhole event, even if it damaged the rail cars, would not be expected to compromise the spent nuclear fuel transportation cask. The existence of any consent agreement between the Corps of Engineers and mining interests is outside the scope of this EIS.

COMMENTOR NO. 19: BROWN, PAULA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Paula Brown **Phone:** 910-259-4994

Title and Organization: Citizen

Address: PO Box 1242

City: Burgaw **State** NC **Zip** 28425

*** COMMENTS ***

Provide need to know on shipment date and location to State Officials ONLY. – Shipments become media circus and inflame public opinion. 19-1

Most local citizens believe in the ability of local and State officials to protect themselves and property. Most citizens believe, as well, that if it is in the best interest of the US, local sacrifice is worth while. 19-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 19: BROWN, PAULA

Response to Comment No. 19-1

DOE is required to inform the Governor of each State and any Tribal chair, or their designee, along a transportation route at least seven days in advance of each shipment of hazardous cargos, including radioactive materials. It would be the responsibility of the Governor to provide any further notification to State and local officials.

Response to Comment No. 19-2

The commentor's position that local and State officials are capable of responding to an emergency involving spent nuclear fuel from foreign research reactors is noted. Emergency management and response are discussed in Section 2.7 and Appendix H, which was added to the final EIS in response to public comments. As demonstrated by the analysis in Section 4 of the EIS, the risks associated with implementation of the proposed action to health or the environment would be low.

COMMENTOR NO. 20: PENNOCK, JOYCE E.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Joyce E. Pennock **Phone:** 910-457-6050

Title and Organization:

Address: 4819 Oakview Dr.

City: Southport **State** N.C. **Zip** 28461

*** COMMENTS ***

I do not have any problems bringing back what we sold & said we would take back. My only concern is that we are still ~~selling~~ selling overseas. 20-1

I feel that we should bring back what we have sold & has been used (spent), but we should not sell anymore. Thank you.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 20: PENNOCK, JOYCE E.

Response to Comment No. 20-1

The Energy Policy Act of 1992 prohibits the United States from selling HEU to foreign nations except in narrowly defined circumstances. No new export licenses for HEU have been issued by the United States since passage of this Act. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

COMMENTOR NO. 21: GREENEBAUM, HOWARD

May 23, 1995

The citizens of North Carolina and South Carolina are being put at grave risk by the proposed shipping of 10's of 1,000's of spent nuclear rods through NC to be stored in SC. *21-1*

First point of fact is the vulnerability of these two areas to hurricanes. A ship at sea carrying this deadly cargo up the Cape Fear River could become a mass disaster if it were caught in one of the frequent hurricanes visiting these areas. The Dept. of Energy is considering a long term program of these deadly visits by ships, and their proposed route is extremely perilous. *21-2*

Second point of fact is that this area is subject to earthquakes. The worse earthquake in US history occurred in 1886 in Charleston, SC. Recently both SC and the area that you are sitting in has experienced several earthquake tremors. On Feb. 20, 1995 I personally made presentations to both the Brunswich and New Hanover County Boards of Commissioners urging them to buy a seismograph. On April 18, 1995 the New Hanover County Board of Commissioners voted 4-1 to consider purchasing a seismograph. We are indeed taking seriously the possibility of an earthquake in this very area that you are proposing to send numerous ships loaded with dangerous cargoes. *21-3*

American taxpayers should be alerted that at least 94 more nuclear reactor plants will be operating around the world in the next 15 years. These numbers came from the Dept. of Energy's own survey. How many of these plants have deals with the US Government to dump their waste in our country ? *21-4*

And American taxpayers should be made aware of the huge costs for nuclear waste clean up that these ill conceived deals will ultimately cost all of us. Taking the Dept. of Energy's own figures for cost clean up of our nuclear weapons plants, the estimate for a partial *21-5*

RESPONSE TO COMMENT
COMMENTOR NO. 21: GREENEBAUM, HOWARD

Response to Comment No. 21-1

The commentor's concerns related to potential transport of foreign research reactor spent nuclear fuel through North Carolina are noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to MOTSU, or to any of the ports analyzed in the EIS, is low. Section 4.2.4 of the EIS demonstrates that the risk associated with interim storage of the spent nuclear fuel at any of the potential management sites is also low.

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive material has been released from a spent nuclear fuel transportation cask, even as the result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

Response to Comment No. 21-2

Any ship that would be used to transport foreign research reactor spent nuclear fuel would be equipped with long range communication equipment and would remain in contact with weather advisory services. Therefore, the ship would be aware of the existence of a hurricane or other dangerous storm with sufficient advance notice in order to avoid being in the Cape Fear River specifically, or any port or other restricted waterway when such a storm hit. Since docking the ship and unloading of the foreign research reactor spent nuclear fuel would be accomplished quickly, typically well within a day, the foreign research reactor spent nuclear fuel would not be caught in restricted spaces due to an extended port stay. Even if the ship were to experience a collision or sink as the result of a severe storm or other cause, the analysis in the EIS indicates that the risk to people nearby is low, very much shy of a "mass disaster." Appendix D, Section D.5 presents details on the calculation of consequences and risk associated with accidents in port and their approaches.

Response to Comment No. 21-3

Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

COMMENTOR NO. 21: GREENEBAUM, HOWARD (CONT'D.)

clean up is $ 230 billion ! If the clean up for these polluted facilities is done completely, the cost will double to one half a trillion dollars ! The cost for a partial clean up in Aiken, SC is estimated at $ 48.2 billion ! **21-5 (Cont'd.)**

American and foreign contractors made a profit building nuclear power plants. Private power companies are making a profit operating nuclear power plants. Why should American tax payers be stuck with huge bills paying for the transportation, storeage, and inevitable clean ups that will cost hundreds of billions of dollars ? **21-6**

American taxpayers should not be asked to subsidize other nations' energy needs. Each nation should be responsible for their own nuclear waste. If they can't provide the security, then they should not build nuclear power plants. It's bad enough that Americans are expected to fight other nations' battles for them. It's too much to ask us to collect their dangerous garbage for them. American tax payers should protest this program of the Dept. of Energy. If it is not stopped, look out for the clean up bill. It will be enormous. **21-7**

I am handing you some papers written by UNC professors about earthquake activity and faults in this area. I hope you will read them and cancel this program. **21-3 (Cont'd.)**

Howard Greenebaum 841 Settlers Lane Kure Beach, NC 28449
(910) 458-0543

RESPONSE TO COMMENT
COMMENTOR NO. 21: GREENEBAUM, HOWARD (CONT'D.)

Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at MOTSU to fail, is not expected to compromise the transportation cask. Further, the analyses of impacts associated with accidents involving foreign research reactor spent nuclear fuel presented in Section 4.2.2.3 demonstrates that the use of any of the selected ports would not pose any significant risk to the port personnel or the population near the ports.

Response to Comment No. 21-4

The proposed policy is limited to foreign research reactor spent nuclear fuel containing uranium enriched in the United States (Section 2.1 of the EIS). Consideration for acceptance of spent nuclear fuel from any other source is outside the scope of this EIS.

Response to Comment No. 21-5

Costs associated with cleanup of nuclear weapons plants are outside the scope of this EIS.

Response to Comment No. 21-6

The receipt of spent nuclear fuel from power reactors is outside the scope of this EIS. With respect to the foreign research reactor spent nuclear fuel at issue, financing alternatives under consideration range from full subsidization of all participating nations to charging all nations the full cost for receipt, shipment, handling and management of their spent nuclear fuel (Section 2.2.2.3 of the EIS).

Response to Comment No. 21-7

See response to comment 21-6, above.

COMMENTOR NO. 24: MICALLEF, PAUL

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: PAUL MICALLEF **Phone:** 510 932-1766

Title and Organization:

Address: 431 LA VISTA RD.

City: WALNUT CREEK **State** CA **Zip** 94598

*** COMMENTS ***

I am joined with my wife in absolutely opposing the importation, transportation, and storage of nuclear waste in and through Concord, Calif. 24-1

We do not approve of the United States taking the burden of storing fuel for 28 foreign countries. 24-2

In terms of government agency responsibility I have no trust in your ability to perform the necessary tasks to dispose of this toxic waste with safety. The history of toxic waste storage is a fiasco in this country. 24-3

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 24: MICALLEF, PAUL

Response to Comment No. 24-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 24-2

The commentor's opposition to the management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5 and 4.4 of the EIS describe other alternatives under consideration for implementation of the proposed policy.

Response to Comment No. 24-3

The commentor's concern regarding the government's ability to perform the tasks necessary to dispose of the foreign research reactor spent nuclear fuel is noted. As discussed in Section 4 of the EIS, foreign and domestic spent nuclear fuel have been transported in the United States for over four decades without a single radiological incident. As discussed in Section 4 and Appendix F of the EIS, foreign research reactor spent nuclear fuel could be safely stored at one or more of the candidate management sites pending ultimate disposition.

COMMENTOR NO. 25: CHASE, BARBARA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: BARBARA CHASE Phone: 510-932-2848

Title and Organization:

Address: 435 SUMMIT RD

City: WALNUT CREEK State CA Zip 94598

*** COMMENTS ***

THIS PROPOSAL SHOULD NOT PROCEED UNTIL ITS FEASIBILITY CAN BE RE-EXAMINED. — 25-1

- THE CONCORD WEAPONS DEPOT - IS SURROUNDED BY DENSE POPULATIONS OF PEOPLE, OIL REFINERIES AND ASSORTED DANGEROUS MANUFACTING AGENCIES SITTING ON AN EARTH QUAKE FAULT. TO ADD A NUCLEAR SWORD TO THE MIX, WITH OUT SUFFICIENT THOUGHT, IS UNTHINKABLE. 25-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

SLOW DOWN — MORE MEETINGS - NO DECISON, YET

RESPONSE TO COMMENT
COMMENTOR NO. 25: CHASE, BARBARA

Response to Comment No. 25-1

The commentor's concern regarding the feasibility of the proposed action is noted. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of LEU spent nuclear fuel. The analysis of impacts presented in Sections 4.2.2 and 4.5 of the EIS demonstrate that the risks associated with accepting and managing foreign research reactor spent nuclear fuel in the United States are low. The analyses presented in the EIS, and the historical success of United States acceptance and management of foreign research reactor spent nuclear fuel, demonstrate the feasibility of the proposed policy.

Response to Comment No. 25-2

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas (Appendix D, Section D.1.9.5 of the EIS). Additionally, all populations within a fifty mile radius of the Concord NWS were considered when analyzing the potential impact of a range of hypothetical port accidents. The risks were found to be low (Appendix D, Section D.5 of the EIS).

The passage from San Francisco Bay to Concord NWS does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2). The port selection criteria do not consider the existence of land-based facilities such as refineries because they have no direct impact on the risk associated with the shipment of foreign research reactor spent nuclear fuel. The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation cask.

COMMENTOR NO. 26: LUCAS, STAN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: STAN LUCAS **Phone:** 825-7257

Title and Organization:

Address: 4057 LUCAS LN

City: CONCORD **State** CA **Zip** 94521

*** COMMENTS ***

Do not think it right to put the waste plant here in Concord it should have been put up for a vote 26-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 26: LUCAS, STAN

Response to Comment No. 26-1

If accepted into the United States, the foreign research reactor spent nuclear fuel would be stored at one or more of the five candidate management sites discussed in Section 2.6.5 of the EIS. No "waste plant" would be sited in the Concord, California area.

COMMENTOR NO. 27: SMITH, SUSAN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Susan Smith **Phone:**

Title and Organization: individual

Address: 837 Ruth Dr

City: Pleasant Hill **State** CA **Zip** 94523

*** COMMENTS ***

I oppose your plan to ship spent nuclear fuel through our community. Plutonium is one of the most dangerous substances known to humankind & has no place in a populated community. There is no 100% safe way to contain it. I have a 2 year old child, live nearby the weapons station & feel your plan is immoral & extremely dangerous to our lives & health. 27-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 27: SMITH, SUSAN

Response to Comment No. 27-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. Health and safety were primary considerations during the evaluation of environmental effects for the proposed action and its management alternatives. Conservative estimates of radiological and non-radiological impacts show that risks to the population and workers are low (Sections 4.2.2 and 4.5 of the EIS).

COMMENTOR NO. 28: ACE, CAROL A.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Carol A. Ace **Phone:** 676-6183
Title and Organization: Citizen of Concord
Address: 4596 Adams Dr
City: Concord **State** Ca **Zip** 94521

*** COMMENTS ***

I am a Citizen of Concord & live in Bishop Estates a growing development that leads up to Naval Weapons Station.

I am concerned that Naval Weapons Station may be considered to deposit further nuclear waste. There must be an area that is away from civilization that is better & available to deposit this waste. 28-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 28: ACE, CAROL A.

Response to Comment No. 28-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternatives 1 or 3), there would be no storage of this material at Concord NWS, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

COMMENTOR NO. 29: NAVMANN, MICHAEL

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: MICHAEL NAVMANN Phone: 510 279-6277

Title and Organization:

Address: PO BOX 27294

City: Concord State CA Zip 94527

*** COMMENTS ***

I AM NOT CONFIDENT THAT THE US GOVERNMENT CAN GUARANTEE RESIDENTS OF CONCORD THAT THIS IDEA IS 100% SAFE. I KNOW ABOUT VARIOUS OTHER PROJECTS THAT WERE FATAL DUE TO HUMAN ERROR AND/OR OTHER PROBLEMS. THE SPACE SHUTTLE, PORT CHICAGO, FRIENDLY FIRE, WACO, OKLAHOMA, ETC. CALIFORNIA HAS NUMEROUS NATURAL (EARTHQUAKES, CIVIL UNREST, FIRES) AND MAN INDUCED CRIME - TERRORISM. 29-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 29: NAVMANN, MICHAEL

Response to Comment No. 29-1

Every activity carries some risk. Radiological and non-radiological risks analyzed in Section 4 of the EIS indicate that there would be no significant impact to either human health or the environment as a result of the proposed action and its management alternatives. Nuclear weapons proliferation also carries risks, and the purpose of the proposed action is to reduce those risks through a cooperative foreign policy.

COMMENTOR NO. 30: WILLIAMS, LES

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Les Williams Phone:

Title and Organization:

Address: 1391 Monument Blvd #13

City: Concord State Ca Zip 94520

*** COMMENTS ***

Stop All Nuclear Development!
No Storage in Concord
No transporting

30-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 30: WILLIAMS, LES

Response to Comment No. 30-1

The commentor's opposition to nuclear development, as well as to transport of foreign research reactor spent nuclear fuel through Concord NWS or to storage at Concord NWS, is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to Concord NWS, or to any port analyzed in the EIS is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternatives 1 or 3), there would be no storage of this material at Concord NWS, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

COMMENTOR NO. 31: ALIYY-WMS, TRUMILLA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: TRUMILLA ALIYY-WMS **Phone:** —
Title and Organization: VICE PRESIDENT MONUMENT OAKS
Address: 1391 MONUMENT BLVD. #13
City: CONCORD **State** CA **Zip** 94520

*** COMMENTS ***

DON'T WANT THAT NUCLEAR TRANSPORTATION COMING THROUGH CONCORD. 31-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 31: ALIYY-WMS, TRUMILLA

Response to Comment 31-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 33: JAMERSON, JANET

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Janet Jamerson **Phone:** 676-8521

Title and Organization: Social Science 111 - Bob Manamberg

Address: 154 The Trees Dr

City: Concord **State** CA **Zip** 94518

*** COMMENTS ***

Yes, I think Concord Naval Weapon Station may be able to handle the arms they have right now but I think they aren't able to handle the foreign research reactor spent Nuclear Fuel that they are trying to ship in, without failure of some sort to our city. 33-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 33: JAMERSON, JANET

Response to Comment 33-1

As the port selection process described in Appendix D, Section D.1 of the EIS explains in detail, Concord NWS and the other nine ports all meet the criteria and hence are considered to be able to safely handle the foreign research reactor spent nuclear fuel. The experience criterion used in the port selection process (Appendix D, Section D.1.9.1 of the EIS) evaluates the port's experience in handling containerized cargo, such as would be the case for any spent nuclear fuel shipments. Although the foreign research reactor spent nuclear fuel is radioactive material, the dose rates from the casks used to transport it would be low, so no special handling is required.

COMMENTOR NO. 34: ELLYSON, MARY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Mary Ellyson **Phone:**

Title and Organization:

Address: 1086 Orchard Ave

City: Vallejo **State** CA **Zip** 94591

*** COMMENTS ***

While at the EIS meeting, a statement by the DOE ~~rep~~ represented really caught my attention. The question of terrorist activity during the transportation was brought up. The response was ~~th~~ terrorist would not be interested in the spent rods. If we are not concerned with terrorist activity during transportation, why is it necessary to move the spent rods back to the U.S. if terrorist aren't interested in them? 34-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 34: ELLYSON, MARY

Response to Comment No. 34-1

The HEU in spent nuclear fuel from foreign research reactors could be used to manufacture nuclear weapons. However, to do so would require a sophisticated chemical processing plant to separate the HEU from the spent nuclear fuel and purify it to remove the fission products and structural materials in the spent nuclear fuel, and time and money to perform the preceding activities. These steps could be taken by a foreign nation that is supportive of terrorist activities or wishes to acquire nuclear weapons itself. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

However, it would not be possible to remove the HEU from spent nuclear fuel and convert it into a nuclear weapon during the transport of spent nuclear fuel. In fact, the physical size and bulk of the transportation casks used to contain the spent nuclear fuel during transport (Section 2.6.2 and Appendix B of the EIS) and the security measures implemented during transport (Section 5.4.2 and Appendix H of the EIS) make it a poor target for terrorist activity.

COMMENTOR NO. 39: BROWN, RACHEL

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Rachel Brown **Phone:** (206)324-3809

Title and Organization: Citizen

Address: 602 E. Howell St.

City: Seattle, **State** WA **Zip** 98122

**** COMMENTS ****

I do not approve of my tax dollars to bring in high-level nuclear waste and pollute this country any more.

This is LUDICRUS!

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 39: BROWN, RACHEL

39-1

Response to Comment No. 39-1

The commentor's opposition to acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

COMMENTOR NO. 39: BROWN, RACHEL (CONT'D.)

May, 24, 95

To whom it may concern:

I would like to start off by saying that I am dissapointed that my comments could not be taken verbatim at this hearing. I strongly dissagree with and oppose the proposal of these Spent fuel Shipments. 39-1 (Cont'd.)

First, the risk of accidents is a major problem. If this waste is to come into the states for a period of ten years or longer, where is it all going to go? We are already having problems with the waste stored in the United States now. If we take in this waste we are just making are problems worse. 39-2

EVERYONE SHOULD KEEP THEIR OWN WASTE!!!

Thank You

Rachel Brown

Rachel Brown
602 E. Howell St.
Seattle, WA., 98122

RESPONSE TO COMMENT
COMMENTOR NO. 39: BROWN, RACHEL (CONT'D.)

Response to Comment No. 39-2

Section 4 of the EIS evaluates the impacts of accident conditions that could result from the acceptance and management of foreign research reactor spent nuclear fuel in the United States. Accident conditions were considered for marine transportation, activities at ports of entry, ground transportation and at DOE management sites (Sections 4.2.1, 4.2.2, 4.2.3, and 4.2.4, respectively). The analyses determined that the risks to the environment and the health and safety of the workers and the public due to potential accidents were low.

For planning purposes, DOE has determined that its spent nuclear fuel, including foreign research reactor spent nuclear fuel, that is not otherwise dispositioned (e.g., chemically separated, with the high-level waste being converted into a vitrified glass for repository disposal), is authorized for disposal in a geologic repository. However, since the repository characterization program is in its early stages, the waste acceptance criteria for deposit of DOE's spent nuclear fuel have not been developed. Thus, a determination cannot be made at this time as to the requirements that must be met to allow placement of the foreign research reactor spent nuclear fuel in the repository. As a result, the analysis in the EIS for the time period beyond 40 years is qualitative rather than quantitative. The impacts due to ultimate disposition are discussed qualitatively in Section 4.2.7 of the EIS.

COMMENTOR NO. 40: ZEPEDA, BARBARA

5-24-95

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: BARBARA ZEPEDA **Phone:** 324-8571
Title and Organization: WA DEMOCRATIC COUNCIL, BOARD MEMBER
Address: 1937-25 E
City: SEATTLE **State** WA **Zip** 98112

*** COMMENTS ***

THE US POSITION ON NONPROLIFERATION WAS CLEARLY CRITIZED BY THE NZ PM IN MARCH 1995. IT WAS IGNORED BY THE USA PRESS & MEDIA. IT WAS TO PRESERVE THE RIGHT TO MAKE MORE NUKES - EVEN THOUGH WE CAN'T DEAL WITH THE "FALLOUT" OF WHAT WE HAVE. MORE WEAPONS PRODUCTION/TRADE TAKE PLACE BECAUSE THE US HAS REFUSED TO END NUKE PRODUCTION AS REQUESTED BY ART 6 AND THE MAJORITY OF CIVILIZED NATIONS. THE US IS THE FIG LEAF FOR NUCLEAR TERRORISTS COVERT AND OVERT, AS LONG AS IT REFUSES TO ADOPT UN CONVENTIONS ON NUCLEAR & WEAPONS CONTROL THE US GOVERMENT HAS REFUSED TO ADOPT A CODE OF CONDUCT CONVENTION ON CONVENTIONAL WEAPONS WHILE IT IS RESPONSIBLE FOR 1/2 THE WORLD'S WEAPONS TRADE. 30B - 500B? WHAT IS IT? WHO PROFITS? WHO PAYS

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

1T per year Σ World arm Budgets

40-1

RESPONSE TO COMMENT
COMMENTOR NO. 40: ZEPEDA, BARBARA

Response to Comment No. 40-1

Foreign research reactors are not used in the production of nuclear weapons. Section 1.1 of the EIS describes the research, medical, commercial, and educational applications for which foreign research reactors are utilized. The proposed action seeks to reduce international commerce in HEU and thereby reduce the threat of nuclear terrorism (Section 1.2 of the EIS).

COMMENTOR NO. 41: MACARTHUR-PANGBORN, SALLY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Sally MacArthur-Pangborn Phone: 206 323-5980

Title and Organization: Retired teacher

Address: 221-35th Ave E

City: Seattle State Wn Zip 98112-4921

*** COMMENTS ***

It would have made us all feel better and more trusting of the nuclear establishment if you had not decided to change your practice of typing people's remarks. In the recent past when Ecology and Environment ~~of the state~~ were present we were allowed to speak hoping the message would get to the right people to make a difference. Our opinion of the establishment (nuclear) has been shaped by just such action — a pretense of listening but failing to paraphrase remarks. In order to preserve our Democracy and restore trust in our govt you and all of us must work for an open Govt. I don't advocate armed rebellion, I believe in the democratic process; I believe it works if people are properly informed. What creates loonies is having people in authority who deceive and manipulate. The loonies get so frustrated they think they can correct by destroying.

41-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 41: MACARTHUR-PANGBORN, SALLY

Response to Comment No. 41-1

The format adopted by DOE for the public hearings held on the draft EIS is fully in compliance with the requirements of NEPA implementing regulations and DOE's requirements for conducting such hearings. This public hearing format provides opportunity for increased interaction between DOE and the public, thus serving to facilitate communication. In the large majority of cases, this public hearing format has been well received by the public. During the hearings, the facilitator recorded the major comment themes on flip charts where the audience could see what was being recorded. In addition, notetakers in the audience were recording additional information to supplement the points captured by the facilitator. Nevertheless, for those people who wished to submit their comments as individuals, or who wished to ensure that their comments were received exactly as they stated them, DOE also encouraged and welcomed the submittal of written comments, either on forms distributed during the public hearings, or in any other written form the public chose to use. Considering all of the redundant mechanisms that were provided to allow comments to be submitted, DOE considers that tapes of the hearing themselves were not necessary.

COMMENTOR NO. 42: NETRO, JENNIFER

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Jennifer Netro **Phone:** (206) 623 2295

Title and Organization:

Address: 1922 9th ave #203

City: seattle **State** WA **Zip** 98101

*** COMMENTS ***

The risk to the public from importing, transporting, and storing the spent nuclear fuel rods is much greater than any risk from countries who currently have the rods. Until we have safe ways to transport and store this material, as well as deal with the waste we have made ourselves, we should not consider bringing it into the United States from other countries. 42-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 42: NETRO, JENNIFER

Response to Comment No. 42-1

Public risks due to the alternatives were evaluated and found to be low. Section 4 of the EIS describes estimated risks and environmental effects. Nevertheless, the commentor's opposition to acceptance of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

COMMENTOR NO. 43: ROGERSON, PETE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Pete Rogerson Phone: 285 2344 (206)

Title and Organization: Citizen

Address: 2116 10th Ave W.

City: Seattle State WA Zip 98119

*** COMMENTS ***

If shipments have to be taken, the following suggestions are offered: 43-1
Shipments should be taken that only HIGH Security ports. More shielding around casks is needed: smaller 43-2
amounts in larger casks? Only the finest ships, trains, trucks, etc. Should be used. Not just general transport services with a little added precautions. That's not secure 43-3
enough. Do not mark the shipments well. That's a target for people who want to steal or peirce a container. Nuclear proliferation is very important and in general I support the idea of this program. I feel most of the people at the meeting here at Sea-Tac Radisson are very anti-nuclear waste, 43-4
at the expense of good foreign policy and effective long-term world administration.

We must STOP the generation of waste, here and all over the world. Storage or disposal solutions are 43-5
inadequate and will remain so.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

The Public notice in the paper that announced this meeting described it as "informal discussion". Most of the people thought they would be testifying before congress! I had no such expectation, as none was suggested by the notice. I feel that issue was blown way out of proportion.

RESPONSE TO COMMENT
COMMENTOR NO. 43: ROGERSON, PETE

Response to Comment No. 43-1

Section 2.8 of the EIS addresses the security measures that would be taken to ensure that there would be no unacceptable risks of terrorism or theft of materials. DOE considers that the foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. The security provisions are summarized in the new Appendix H that has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify details of the transportation process, including security provisions in port and during transit.

Response to Comment No. 43-2

The commentor's suggestion regarding the use of extra shielding, the number of spent nuclear fuel elements, and the size of the transportation casks are noted. All spent nuclear fuel transportation casks are built with sufficient shielding materials (Appendix B, Section B.2 of the EIS) to protect the workers and public from the radiation emanating from spent nuclear fuel that would be carried in the casks. The allowed radiation levels on a transportation cask are regulated by 10 CFR Part 71.41. No cask would be shipped if its radiation level exceeded the allowed limit. Historically, the transportation cask radiation levels were much less (one to two orders of magnitudes) than the limits allowed by the regulation. Any additional shielding other than that provided by the cask and the ISO container would be unnecessary. The amount of spent nuclear fuel in a transportation cask is a small percentage of the cask's total weight. Each cask can only accommodate a limited number of spent nuclear fuel elements. Carrying a smaller number of spent nuclear fuel elements per cask than that allowed by the cask's certificate would increase the number of shipments, and add to the overall shipping costs.

Response to Comment No. 43-3

The incident-free and accident risk calculations in the EIS cover both general transport means and dedicated carriers. The commentor's preference for dedicated carriers is noted.

DOE disagrees, however, with the commentor's preference for not marking the shipments well. Failure to mark the shipments would increase the risk to marine transport workers, port workers, ground transport workers, emergency responders, and the general public while providing only a marginal increase in security.

COMMENTOR NO. 43: ROGERSON, PETE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 43: ROGERSON, PETE (CONT'D.)

Response to Comment No. 43-4

The support given by the commentor to the proposed policy is noted. The United States is eager to eliminate HEU from civilian commerce worldwide and to safely manage all U.S.-origin HEU.

Response to Comment No. 43-5

The commentor's opinion about generally inadequate nuclear storage and disposal solutions is noted. The analysis in Section 4.2.4 of the EIS demonstrates that the risk associated with interim storage of foreign research reactor spent nuclear fuel at the DOE management sites would be low.

The impacts of ultimate disposition of spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1. of the EIS). As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

COMMENTOR NO. 44: DEROY, TIFFANY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Tiffany Deroy **Phone:** 206-783-3922

Title and Organization: —

Address: 6000 Greenwood Ave N

City: Seattle **State** WA **Zip** 98103

*** COMMENTS ***

I feel that the DOE has no real interest in what citizens of Tacoma & Seattle really feel about this issue. The "paraphrasing" of citizen comments during the hearing is something I find highly objectionable – comments should be recorded word for word. 44-1

The idea that the U.S. is encouraging non-proliferation is ridiculous as is the idea that this issue concerns nonproliferation. Also, the DOE must recognize that the public has very valid reasons for mistrusting them. There has been a break of trust in the past & the DOE needs to earn that trust back, if possible. Please do not treat skeptics as paranoids who mistrust w/o no reason. We do not believe your assurances of our safety. There is a risk and it may well be more than you are willing to admit. 44-2 44-3

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 44: DEROY, TIFFANY

Response to Comment No. 44-1

The format adopted by DOE for the public hearings held on the draft EIS is fully in compliance with the requirements of NEPA implementing regulations and DOE's requirements for conducting such hearings. This public hearing format provides opportunity for increased interaction between DOE and the public, thus serving to facilitate communication. In the large majority of cases, this public hearing format has been well received by the public. During the hearings, the facilitator recorded the major comment themes on flip charts where the audience could see what was being recorded. In addition, notetakers in the audience were recording additional information to supplement the points captured by the facilitator. Nevertheless, for those people who wished to submit their comments as individuals, or who wished to ensure that their comments were received exactly as they stated them, DOE also encouraged and welcomed the submittal of written comments, either on forms distributed during the public hearings, or in any other written form the public chose to use. Considering all of the redundant mechanisms that were provided to allow comments to be submitted, DOE considers that tapes of the hearing themselves were not necessary.

Response to Comment No. 44-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). As discussed in Section 4 of the EIS, none of the management alternatives poses significant benefits or risks to human health or the environment.

Response to Comment No. 44-3

Assumptions used in calculations of radiological risks are described in Section 4 of the EIS. As discussed in Section 4.10 of the EIS, there are risks associated with the proposed action or any other action. Because of the conservative assumptions used in the analyses, actual risks associated with the proposed action would be expected to be lower than the conservative estimates shown in Section 4 of the EIS.

COMMENTOR NO. 47: BERGER, DAVE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Dave Berger Phone: 503-977-4878

Title and Organization: Portland Community College

Address: 12000 SW 49th

City: Portland State OR Zip 97219

*** COMMENTS ***

It seems like trying to limit weapons expansion & terrorism is a good idea. But, how can we continue to: (1) sell arms at an astronomical rate to foreign dictators, & then fight wars with them (2) allow multinationals to continue to build reactors all over the globe & (3) allow multinationals to dump pesticides & hazardous materials in foreign countries & then turn around and worry about proliferation. We have no logical broad based policy to protect humanity other than fattening profits for huge corporations 47-1

To Mail in Comments, Address Correspondence to:

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Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 47: BERGER, DAVE

Response to Comment 47-1

Foreign research reactors are used for research, medical, commercial, and educational applications (Section 1.1 of the EIS) not for the manufacture of conventional or nuclear weapons. An objective of the proposed policy is to encourage the use of LEU in foreign research reactors (Section 1.2 of the EIS). Because of the peaceful applications and benefits which result from operation of research reactors, foreign nations are not likely to cease operation and construction of such reactors. In addition, the U.S. accrues significant benefits from the operation of foreign research reactors - including Moly-99 and other medical isotopes.

The nonproliferation of nuclear weapons is a vital policy goal of the United States (Section 1.1 of the EIS). Although the treatment of hazardous materials in foreign nations is an important environmental concern, it is outside of the scope of this EIS .

COMMENTOR NO. 48: BERGER, DAVE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Dave Berger Phone: 977-4878

Title and Organization: Instructor/Engineering Portland Community College

Address: 2000 SW 49th Ave. ~~Portland, OR~~

City: Portland State OR Zip 97219

*** COMMENTS ***

The risks and costs to health and potential damage to the ecosystem can simply not be offset by the economic gain & strategic gain of storing such materials in the U.S. 48-1

Oregon is not a state that benefits from military activities or major chemical industries - it should not become such a state - nor should it bare such burdens -

Why shouldn't these materials be handled closer to the site of their creation. 48-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 48: BERGER, DAVE

Response to Comment No. 48-1

Radiological and non-radiological environmental risks resulting from the management alternatives were evaluated under conservative assumptions and found to be low (Section 4 of the EIS). Although adoption of Management Alternative 1 or 3 to the proposed action would not result in any economic gain for the United States, it would promote reduction in international commerce in HEU, and thereby reduce the threat of nuclear weapons proliferation.

Response to Comment No. 48-2

The commentor's preference for storing the foreign research reactor spent nuclear fuel closer to the site of its creation, is noted. At the present time, many foreign research reactor operators have no means for disposition of their spent nuclear fuel (Section 1.1 of the EIS). The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

COMMENTOR NO. 49: KLAUSMAN, STEVE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Steve Klausman **Phone:** 665-3494
Title and Organization: P.H.C
Address: 1461 NE Paropa Ct
City: Gresham **State** OR **Zip** 97030

*** COMMENTS ***

I'm definately against nuclear waste coming to U.S. It causes too much radiation. My boss Sharon says that we can't handle nuclear waste. 49-1

Thanks

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 49: KLAUSMAN, STEVE

Response to Comment 49-1

The commentor's opposition to acceptance of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

Safe handling of radioactive material is an important concern. Because spent nuclear fuel from foreign research reactors is radioactive, it is transported in casks which shield the surroundings from harmful levels of radioactivity. In addition, the spent nuclear fuel transportation casks are constructed to withstand severe stress, such as accidents and immersion in water, without releasing their contents. Section 2.6.2 of the EIS describes the casks which would be used to transport spent nuclear fuel from foreign research reactors. Facilities for safely managing spent nuclear fuel are described in Section 2.6.5 of the EIS.

COMMENTOR NO. 50: GROVER, MIKE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Mike Grover **Phone:** 233-1139

Title and Organization:

Address: 2548 SE Ankeny

City: Portland **State** OR **Zip** 97214.

**** COMMENTS ****

We need to stop producing the Poison (commodity whatever you want to call it. This is a blatant disregard for life in the present and generations to come. NPT, CTB mean little to an inactive govt. IS THE MONEY WORTH IT. NO. — 50-1

Evaluate cleanup of Maxey Flats, Beatty, Hanford, Savannah Rocky Flats.... — 50-2

Creation of Nuke Stuff = Destruction of Biology. Live FREE OR DIE & Nothing is for free — 50-1 (Cont'd.)

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Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

This could have been by the size using the back. CHIORINE

RESPONSE TO COMMENT
COMMENTOR NO. 50: GROVER, MIKE

Response to Comment No. 50-1

The commentor's position on these matters is noted. The EIS has discussed in detail the potential impacts associated with implementation of the proposed action and any of its management alternatives. As discussed in Section 4 of the EIS, the risks associated with implementation of the proposed action to human health or the environment would be low.

Response to Comment No. 50-2

Waste management activities at facilities such as Maxey Flats, Beatty, Hanford, Savannah River, and Rocky Flats are outside the scope of this EIS (Section 1.3 of the EIS).

COMMENTOR NO. 51: ROBINSON, BOB

DEPARTMENT OF ENERGY HEARING ON TRANSPORT OF NUCLEAR WASTE

MAY 25, 1995

The Pacific Northwest, and Oregon in particular has been proposed as the transfer site of extremely hazardous nuclear waste from other countries who are considered irresponsible and are prone to the proliferation and construction of atomic weapons if left to dispose of these waste materials on their own.

To compound this factious scheme, attempts are being made to transport these perilous and unstable materials through the Port of Portland and to continue on by land transport to a storage area. This is *totally unacceptable.* We will continue the struggle to protect our citizens and environment from irresponsible and unnecessary transport of volatile and unstable nuclear wastes. 51-1

The organizations I belong to have *consistently opposed* any transfer or storage of nuclear wastes and material in or through Oregon and the Pacific Northwest. People come from all over the world to see and enjoy the beauty and splendor of Oregon. We *must* continue to protect this way of life. It would be nonsensical and vacuous for the Department of Energy to give this ludicrous idea any further consideration.

If the Department of Energy is truly dedicated to a fair and impartial determination of this matter, a basic common sense analysis of the issue would automatically rule out Oregon as a deposit site for Nuclear Wastes. The storage of Nuclear Wastes adjacent to the Columbia River and the irreplaceable Columbia River George is ludicrous on its face. Your assumption that *"there is already nuclear waste at Hanford so thats where we'll dump it"* flies in the face of sagacity. Just because one has a headache doesn't mean you cut your head off to solve the problem. 51-2

I would propose another more reasonable and equitable alternative. Stop the importing of Nuclear Wastes. Spend the money allocated for Nuclear Waste transfers on guaranteed, safe, reasonable storage facilities research. Looking for scapegoats to dump on is neither productive nor rational. 51-3

Whatever time it takes, take it. This is the answer to resolve this unwanted and unnecessary controversy.

Sincerely,

Bob Robinson

BOB ROBINSON
2226 S.E. 35th Place
Portland, Oregon 97214
503-235-5498

RESPONSE TO COMMENT
COMMENTOR NO. 51: ROBINSON, BOB

Response to Comment No. 51-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Portland is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Portland, or to any of the ports analyzed in the EIS, is low.

DOE would like to point out that the foreign research reactor spent nuclear fuel is neither volatile nor unstable. The spent nuclear fuel that the proposed policy deals with is a metal which contains enriched uranium clad with either aluminum or stainless steel. This type of fuel is very stable. Section 2.6.1 of the EIS presents a detailed description of the foreign research reactor spent nuclear fuel.

Response to Comment No. 51-2

The commentor's opposition to the proposed action, including storage in the States of Washington and Oregon is noted. As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site. The State of Oregon was not considered for storage of spent nuclear fuel.

Response to Comment No. 51-3

Under the No Action Alternative, as described in Section 2.5 of the EIS, the United States would not manage spent nuclear fuel from foreign research reactors, nor provide assistance or incentives for overseas management of such spent nuclear fuel. Based on the undesirable impact this alternative would have on U.S. nuclear weapons nonproliferation policy, the No Action Alternative would not be considered the most viable option for managing foreign research reactor spent nuclear fuel.

COMMENTOR NO. 53: SIMMS, LYNN

May 25, 1995

Comment upon Draft EIS on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

Thank you for the opportunity to comment.

I suppose the USDOE is seeking re-comment and discussion duplicating the extensive hearings held over a year ago on the issue. Therefore, I would like you to review my previous testimony and re-enter it along with this passage as my comment, highlighting the positions that in real reality, there is no such program as "atoms for peace", because all nuclear production results in a legacy that ravages the earth and imperils the future. 53-1 53-2

Other countries must begin to manage the nuclear products they use, if they choose to participate in such an enterprise. We should supply them with monies and best current technologies to isolate the waste instead of incurring the risks of transport and further polluting our homeland. 53-3

The program is based upon a number of fallicies. A Nonproliferation Policy. This policy remains flawed. The military wants to keep nuclear bombs, as is plainly evident in the current budget requests for funding for a tritium reactor for the purpose of triggering and enhancing the destructive power of nuclear weapons ... even while we already have a 20 year supply. We can not bring ourselves yet to classify this deadly gold as a waste and are persistent in euphimistically coining phrases such as "special nuclear materials"

This country is in deep denial over the fact that the military industrial complex wants distinct advantage in the global sales of nuclear power plants and to have some position of control in the supply of nuclear fuels. Technology has not rescued us yet from our human folly or from the human failures that promote the use of nuclear bombs to accomplish our agendas. 53-4

This evolving grim scenario is one of the diastrous possibilities, described by President Eisenhower's warning concerning the assumption of power by the military industrial complex..the sacrificing of our own homeland, our economy and our people for the sake of military power and the profits of the profits of the nuclear industry.

Now we are all caught in a very sticky web. We could have an extended open house discussion until doomsday and none of us will change a word of our original testimonies or change our minds.

RESPONSE TO COMMENT
COMMENTOR NO. 53: SIMMS, LYNN

Response to Comment No. 53-1

The commentor references previous testimony given during the scoping process in November/December 1993. The testimony given during scoping meetings was solicited in order to help DOE determine the scope of the EIS and was responded to in the development of the Implementation Plan on the proposed policy on spent nuclear fuel (DOE/EIS-0218, October 1994). However, the public hearings on the proposed policy were conducted to solicit comments on a different and later document — the draft EIS. The draft EIS contains different information than contained in the Implementation Plan, so the comments made at scoping meetings were not considered in the preparation of the final EIS. Only comments made during the public hearings on the draft EIS, and those submitted to DOE in written form during the public comment period, were considered.

Response to Comment No. 53-2

The "Atoms for Peace" program was an innovative and valid initiative that was intended to promote peaceful nuclear cooperation by providing peaceful nuclear technology in exchange for a promise by recipient foreign nations that they would not pursue nuclear weapons development. An important component of the program was to encourage research reactor technology. Research reactors are important to medical, agricultural, and industrial sectors and also are helpful in scientific research (Section 1.1 of the EIS).

Response to Comment No. 53-3

This comment describes and advocates a path that is very similar to Management Alternative 2 in this EIS. DOE notes the commentor's preference for Management Alternative 2, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 53-4

As discussed in Section 1.2 of the EIS, the intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy by seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. Research reactors are not used to construct nuclear weapons. Section 1.1 of the EIS describes the reasearch, medical, industrial, and agricultural applications for foreign research reactors.

Weapons procurement and maintenance policies of the United States are outside the scope of this EIS. Research reactors are not used to generate commercial power and play no role in the construction of nuclear power plants or in economic impacts resulting from the sale of nuclear power plants.

COMMENTOR NO. 53: SIMMS, LYNN (CONT'D.)

Every single technically correct decision may be made as you implement these projects. But you are none the less, still on the wrong path. And it should be obvious, even to you, that the military industrial complex has no room for second opinions and that if it has its way, even the Department of Energy will be eliminated and the military budgets will increase and the clean up funds and regulations will be lessened. 53-5

Listen to us and take out your erasers and wipe out the Port of Portland from your list of targeted ports. Because the people of Portland never will participate in, aide, condone, or approve of this continuing nuclear madness. 53-6

RESPONSE TO COMMENT
COMMENTOR NO. 53: SIMMS, LYNN (CONT'D.)

Response to Comment No. 53-5

The commentor's opinions related to the military industrial complex and the future of DOE are outside the scope of the EIS.

Response to Comment No. 53-6

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Portland is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Portland, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 54: TATE, MONTIE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Montie Tate **Phone:** No Phone
Title and Organization: American Citizen
Address: P.O. Box 4063
City: Portland **State** OR **Zip** 97208

*** COMMENTS ***

I am AGainst the Importation of Spent Nucalar Fuel into my Home land, I Am Against this process that does not Record Electronically mine and others statements. The Democratic Process you used to decide this did not include me – So your Process was not Democate – 54-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 54: TATE, MONTIE

Response to Comment No. 54-1

The commentor's opposition to acceptance of spent nuclear fuel from foreign research reactors into the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

The format adopted by DOE for the public hearings held on the draft EIS is fully in compliance with the requirements of NEPA implementing regulations and DOE's requirements for conducting such hearings. This public hearing format provides opportunity for increased interaction between DOE and the public, thus serving to facilitate communication. In the large majority of cases, this public hearing format has been well received by the public. During the hearings, the facilitator recorded the major comment themes on flip charts where the audience could see what was being recorded. In addition, notetakers in the audience were recording additional information to supplement the points captured by the facilitator. Nevertheless, for those people who wished to submit their comments as individuals, or who wished to ensure that their comments were received exactly as they stated them, DOE also encouraged and welcomed the submittal of written comments, either on forms distributed during the public hearings, or in any other written form the public chose to use. Considering all of the redundant mechanisms that were provided to allow comments to be submitted, DOE considers that tapes of the hearing themselves were not necessary.

COMMENTOR NO. 55: FERGUSON, KEN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: KEN FERGUSON Phone: (503) 497-9131
Title and Organization: GREENPEACE (503) 233-1139
Address: 2021 SW 6TH
City: PORTLAND State OR Zip 97201

*** COMMENTS ***

FOR THE RECORD
CORRECTION FOR THE DRAFT EIS SNF PROGRAM HEARING AUGUST 8TH(?) 1994 VOLUME 3, COMMENT RESPONSE DOCUMENT READS ~~[illegible]~~ THAT I STATED HANFORD WOULD BE A GOOD LOCATION TO CENTRALIZE SNF REPROCESS IT AND SUPPORT PROPER DISTRIBUTION OF REACTOR FUEL. MY ACTUAL COMMENT WAS TO EXPRESS ~~BE~~ MY OPPOSITION TO REPROCESS THIS FUEL FOR THIS OR ANY OTHER USE

55-1

OVER

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 55: FERGUSON, KEN

Response to Comment No. 55-1

The commentor's opposition to acceptance of spent nuclear fuel from foreign research reactors is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration. The commentor's claim that Volume 3 of the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement misquotes the commentor is also noted.

COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

① 5/25/95

– NO ACTION –

THERE IS NOW KNOWN 100% SAFE METHOD OR TECHNOLOGY TO TRANSPORT OR STORE NUCLEAR MATERIALS. UNTIL THIS DEADLY WASTE STREAM CEASES NO DEBATE ON MANAGEMENT OF THESE MATERIALS WILL BE ENTERED BY MYSELF OR GREENPEACE. WE ARE IN COMPLETE OPPOSITION TO NUCLEAR WEAPONS, NUCLEAR ENERGY AND TRANSPORT OF ANY OF THESE MATERIALS. THIS NATION IS CURRENTLY GRAPPLING WITH THE FISCAL & ENVIRONMENTAL NIGHTMARE OF MANAGING EXISTING WASTES. RESTORATION COSTS FOR HANFORD AND INEL MAY EXCEED 6.6 BILLION DOLLARS. IN LIGHT OF CURRENT BUDGET CUTS IN THE DOE THE WISDOM OF ACCEPTING OVERSEAS WASTES TO MANAGE IN ADDITION TO EXISTING WASTES SEEMS MISGUIDED.

55-2

55-3

RESPONSE TO COMMENT
COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

Response to Comment No. 55-2

As discussed in Section 4.10 of the EIS, every activity carries some risk. However, as described throughout Section 4 of the EIS, implementation of the proposed action would pose no significant benefits or risks to human health or the environment.

The commentor's opposition to nuclear weapons, nuclear energy, and the transport of nuclear materials is noted. Foreign research reactors are not used in the construction of nuclear weapons or for generation of commercial power. Section 1.1 of the EIS describes the research, medical, industrial, and agricultural applications for research reactors. Radiological and non-radiological risks that would result from transportation of spent nuclear fuel from foreign research reactors were found to be low (Section 4 of the EIS).

As discussed in Section 4.2.4 of the EIS, foreign research reactor spent nuclear fuel could be safely managed at one or more of the candidate management sites pending ultimate disposition. Section 2.6.5 describes storage technologies that would be used for interim management of foreign research reactor spent nuclear fuel.

United States abandonment of this program and, in fact, all civilian nuclear programs, would do nothing to eliminate nuclear research reactor or commercial nuclear power from the rest of the world. With respect to foreign research reactors, exactly the opposite is true. Adoption of the No Action Alternative would lead to a resumption of civilian commerce in HEU.

Response to Comment No. 55-3

Clean-up and restoration efforts at the Hanford Site and Idaho National Engineering Laboratory are outside the scope of this EIS (Section 1.3 of the EIS). The cost for the foreign research reactor spent nuclear fuel program, as disclosed to the public in Section 4.9 of the EIS, is estimated at roughly $1 billion to $1.5 billion. Additional costs could be incurred depending on factors outside the control of this program, such as the requirements for disposing of nuclear material at the high-level nuclear waste repository. The program costs are therefore less than one percent of the estimated costs to cleanup the DOE nuclear facilities.

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operations that would pay all of the costs of the program to full subsidization of the program by DOE. One of these options would be for developed countries (which represent about 87 percent of the spent nuclear fuel total mass and about 78 percent of the spent nuclear fuel elements) to be charged a competitive fee and the costs for developing countries to be subsidized by the United States for the acceptance and management of their spent nuclear fuel.

COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

(2)

Marriott
HOTELS · RESORTS · SUITES

DOE HAS YET TO DECIDE FINAL DISPOSITION OF THESE FUEL RODS, AND THIS DECISION IS FOR AN INTERIM PERIOD OF 40 YEARS. AT THE CURRENT RATE OF GENERATION OF SPENT NUCLEAR FUEL WE WILL BE ATTEMPTING TO MANAGE OVER TWICE AS MANY WASTES AT THAT TIME.

CURRENTLY THE UNITED STATES IS UNDER MORATORIUM FOR REPROCESSING OF THESE MATERIALS BUT THE DOE DOES INCLUDE REPROCESSING IN ITS ALTERNATIVES. IT SEEMS THAT WITH THE AMOUNT OF SNF

For reservations call toll free 800-228-9290

55-4

55-5

RESPONSE TO COMMENT
COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

Response to Comment No. 55-4

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation.

The amount of spent nuclear fuel involved in this EIS is presented in Section 2.2.1.3. It is equal to less than one percent of the total mass of heavy metal that DOE currently manages, and approximately ten percent of the volume.

Response to Comment No. 55-5

Chemical separation is being considered as Implementation Alternative 6 to Management Alternative 1 and as part of Management Alternative 3 in this EIS. DOE takes note of the commentor's opposition to the chemical separation alternatives, which are discussed in Section 2.2.2.6, 2.4, 4.36 and 4.5 of the EIS.

(7) PROPOSED STORED, THAT THE INTENTION IS TO REPROCESS SPENT RODS INTO USABLE FUEL WITHIN COULD THEN BE REDISTRIBUTED TO EXISTING REACTORS.

REPROCESSING IS NOT ACCEPTABLE. WHILE NOT ONLY BEING A VERY DANGEROUS PROCESS (EX. TOMSK-7 A FORMER SOVIET UNION REPROCESSING FACILITY WHERE A RADIOACTIVE EXPLOSION OCCURRED DURING CHEMICAL SEPERATION IN 1992) IT ALSO CREATES A BY-PRODUCT OF HIGH-LEVEL HAVIO TRANSURANIC WASTES WHICH MUST THEN BE VITRIFIED TO MAKE LONG TERM STORAGE POSSIBLE

55-5 (Cont'd.)

COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

(4)

Marriott
HOTELS · RESORTS · SUITES

MAY I REMIND YOU
THAT THESE WASTES ARE
EXTREMELY TOXIC FOR HUNDREDS
~~YEARS~~ OF THOUSAND OF
YEARS AND IT SEEMS
APPARENT THAT THE
VITRIFICATION FACILITY IN
EXISTENCE AT THE SAVANNAH
RIVER SITE ~~[illegible]~~ (WHICH I MAY
ADD IS NOT FUNCTIONING
~~PROPERLY~~ IN ACCORDANCE
WITH DESIGN THEORY) AND
THE PLUTONIUM & URANIUM
EXTRACTION FACILITY (PUREX)
LOCATED AT HANFORD ~~RESERVATION~~
CLEARLY ILLUMINATES THE DOE'S
PREFERRED FINAL DISPOSITION
OF THESE FUELS.

For reservations call toll free 800-228-9290

55-5
(Cont'd.)

RESPONSE TO COMMENT
COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

(5) IN CONCLUSION I WOULD LIKE TO ~~[illegible]~~ NOTE THE ~~[illegible]~~ VIABILITY OF CLEAN ENERGY SOURCES THAT ~~[illegible]~~ WITH AN EMPHASIS ON CONSERVATION AND EFFICIENCY ~~[illegible]~~ CAN PROVIDE ~~[illegible]~~ WITH CLEAN WASTE ~~FREE~~ ENERGY SOURCES AS LONG AS THE SUN SHINES AND THE WIND BLOWS. THE MORE PUBLIC DOLLARS THAT ARE DUMPED INTO EIS'S (OVER 100 MILLION DOLLARS) MANAGEMENT OF THESE WASTES AND FUTURE GENERATION OF WASTES ONLY LEAVES A LARGER LEGACY FOR FUTURE GENERATIONS AND ~~[illegible]~~ PLUGS CLEAN ENERGY ALTERNATIVES FROM BEING DEVELOPED.

55-6

Response to Comment No. 55-6

Consideration of alternative energy sources is outside the scope of this EIS. However, it is important to note that as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources, such as solar and wind.

COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

(2)

Marriott
HOTELS · RESORTS · SUITES

WE CANNOT ~~[illegible]~~ ALLOW THESE WASTES TO ~~FOR~~ BE MOVED FROM THE GENERATION SITE. THESE ~~[illegible]~~ FACILITIES MUST REMAIN ACCOUNTABLE AND ~~[illegible]~~ CANNOT BE CLEARED UNTIL THIS WASTE STREAM ~~[illegible]~~ CEASES. NOT JUST THIS PORT OF NOT ANY ~~OTHER~~ PORT.

55-7

For reservations call toll free 800-228-9290

RESPONSE TO COMMENT
COMMENTOR NO. 55: FERGUSON, KEN (CONT'D.)

Response to Comment No. 55-7

Many foreign research reactor operators will soon run out of storage space or face safety or regulatory issues due to the presence of spent nuclear fuel at their facility (Section 1.1 of the EIS). The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

COMMENTOR NO. 61: SCHMALZ, BRUCE L.

Bruce L. Schmalz

6445 Sidehill Lane
[redacted]
Idaho Falls, Idaho 83401

Phone (208) 522-7176

April 20, 1995

United States Department of Energy
Office of Environmental Management
1000 Independence Avenue SW
Washington, D.C. 20585-0001

Attention: Mr. Charles Head

Re: "Draft Enfironmental Impact Statement, DOE/EIS 0218D
---Nonproliferation Policy --- Spent Nuclear Fuel"

Dear Sir:

Reported black market movement of plutonium out of Russia, construction of reactors in Iran by Russia and China, and nuclear efforts in North Korea and Iraq would seem to compromise or mute U.S. efforts to limit proliferation of weapons 61-1

If political matters can be construed as a part of the environment, they should be considered in an EIS. Authorities in the states in which the five proposed storage sites are to be located seem unwilling to allow fuel or waste to be stored indefinitely. 61-2

Ultimate disposal of fuel or waste is left to future decisions in all of the Alternatives. This problem has been studied for decades, with no predictable solution. The matter should be pursued vigorously, and until solutions and decisions are reached, no importation of fuel should be considered or allowed. 61-3

For these reasons the No Action Alternative seems to be the only rational or logical outcome; continued reliance on HEU notwithstanding. 61-4

Respectfully,

Bruce L. Schmalz
AEC Retired

RESPONSE TO COMMENT
COMMENTOR NO. 61: SCHMALZ, BRUCE L.

Response to Comment No. 61-1

Black market trade in fissile materials does pose a threat to nuclear weapons nonproliferation. Construction of nuclear reactors fueled by HEU are also undesirable from that viewpoint. Efforts by some nations to develop a nuclear weapons capability are an incentive to reduce the amount of weapons grade fissile material available. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

Response to Comment No. 61-2

Under NEPA, political matters are not part of the environmental impacts analyzed in this EIS.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory.

Response to Comment No. 61-3

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1. of the EIS). As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

DOE and the Department of State consider it is reasonable to accept more spent nuclear fuel for the purpose of supporting U.S. nuclear weapons nonproliferation policy. Acceptance of the proposed amounts of foreign research reactor spent nuclear fuel involved would increase DOE's total inventory of heavy metal less than one percent by mass and less than ten percent of the volume.

COMMENTOR NO. 61: SCHMALZ, BRUCE L. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 61: SCHMALZ, BRUCE L. (CONT'D.)

Response to Comment No. 61-4

The No Action Alternative is one of the options under consideration. As discussed in Section 4.6 of the EIS, adoption of the No Action Alternative would have no direct impact on the environment in the United States. However, the No Action Alternative does not support U.S. nuclear weapons nonproliferation policy and may have adverse diplomatic consequences.

COMMENTOR NO. 64: CARDINALE, GEORGE

Congress should conduct a thorough review before telling DOE call foreign reactor rods from huge problem of domestic nuclear waste!

George & Loretta Cardinale

64-1

RESPONSE TO COMMENT
COMMENTOR NO. 64: CARDINALE, GEORGE

Response to Comment No. 64-1

Members of the United States Congress have been provided with copies of the draft EIS. Acceptance of spent nuclear fuel from foreign research reactors under Management Alternative 1 to the proposed action would increase DOE's inventory of heavy metal (such as uranium) less than one percent by mass and about ten percent by volume (Section 2.2.1.3 of the EIS).

COMMENTOR NO. 65: HARRILL, WILLIAM

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: William Harrill **Phone:** 804-340-5242

Title and Organization:

Address: 820 Bitmore Dr

City: Va Beach **State** VA **Zip** 23454

*** COMMENTS ***

Enclosed is article on red mercury. Please note compound is mercury antimony sulfide not mercury lithium oxide. 65-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 65: HARRILL, WILLIAM

Response to Comment No. 65-1

Commerce in red mercury is outside the scope of this EIS (Section 1.4 of the EIS). The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly-enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

COMMENTOR NO. 66: CHUBB, WALSTON

May 17, 1995

Mr Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
Department of Energy
Washington, DC 20585

Dear Mr Head,

The dollar is falling in value relative to the yen and the mark. The national debt is rising above $45,000 per household. If we borrow more money on signature notes, the dollar will fall some more. We're BROKE! We're broke because back in 1974 we chose to be non-competitive in world trade. We could have chosen to be the lowest cost producer of goods. Instead, we created the N.R.C. and ordered it to insure that the electricity made in nuclear power plants was at least as costly as the electricity made in coal-fired plants. The Chinese aren't that stupid; and they also have plenty of coal. *66-1*

Bankrupt countries must look for ways to make and save more money. They must adopt a lower standard of living, work harder, and try to become the lowest cost producer of goods.

Unless you wish to see the U.S. wallowing in debt, you must require that all spent nuclear fuel be stored and reprocessed in the U.S. Either the U.S. will plan to reprocess all of its spent nuclear fuel and dispose of its excess plutonium in MOX, or the U.S. must plan to put up our excess plutonium as collateral for loans on an increasing national debt. By promoting and signing an extension of the nuclear non-proliferation treaty, the U.S. has tacitly agreed to dispose of its excess plutonium in either domestic or foreign MOX. Hiding it won't convince the world of our peaceful intentions. *66-2*

Clearly, the U.S. must plan to build facilities for reprocessing all types of spent nuclear fuel. Our creditors aren't likely to take more depreciating signature notes as payment for reprocessing our spent fuel into plutonium that we refuse to use. The U.S. cannot prosper in total isolation from the rest of the world. *66-1 (Cont'd.)*

Sincerely,

Walston Chubb

Walston Chubb
3450 MacArthur Drive
Murrysville, PA 15668

412-327-8592

cc NEI
NN

RESPONSE TO COMMENT
COMMENTOR NO. 66: CHUBB, WALSTON

Response to Comment No. 66-1

The commentor's preference for the chemical separation of the foreign research reactor spent nuclear fuel is noted. However, please note that the scope of this EIS does not include power generation, either in the United States or abroad.

Response to Comment No. 66-2

This EIS covers the inventory of foreign research reactor spent nuclear fuel listed in Tables 2-1 and 2-2. The commentor's support for construction of facilities for reprocessing other types of spent nuclear fuel is noted. The reprocessing of other spent nuclear fuel is outside the scope of this EIS. Similarly, the disposition of excess plutonium is to be discussed in the Programmatic Environmental Impact Statement for Storage and Disposition of Weapons-Usable Fissile Materials (Section 1.5 of the EIS.)

The Treaty on the Non-Proliferation of Nuclear Weapons does not discuss methods for disposal of plutonium. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

COMMENTOR NO. 68: LOSEY, DAVID

David C. Losey
1628 Citation Drive
Aiken, South Carolina 29803-5224

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U. S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Head;

I would like to offer these comments on the Draft EIS for *Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel.*

I would urge DOE to implement a program for responsibly managing these spent nuclear fuels in a way that will reduce proliferation risks and environment impacts. The Department of State, the Nuclear Regulatory Commission, the Arms Control and Disarmament Agency, and the International Atomic Energy Agency have all similarly urged DOE to develop a responsible management plan. 68-1

It is imperative that the management plan provide for promptly bringing the radioactive waste in these fuels to a stabilized form that is suitable, by present standards, for geologic emplacement. 68-2 The DOE should definitely avoid merely postponing the ultimate disposition of these wastes by planning interim storage of the fuel. This would leave the radioactive waste in a less stable form and leave the burden for future generations. 68-3

Sincerely,

David C. Losey

David Losey

RESPONSE TO COMMENT
COMMENTOR NO. 68: LOSEY, DAVID

Response to Comment No. 68-1

The basic objective of the proposed action is to adopt and implement a policy which supports the nonproliferation of nuclear weapons (Sections 1.1 and 1.2 of the EIS). The analysis in Section 4 of the EIS demonstrates that the environmental effects of the proposed action would be low.

Response to Comment No. 68-2

The commentor's emphasis on the need for prompt stabilization of the spent nuclear fuel so that it would be suitable for permanent disposal is noted. This option is covered by the EIS under Management Alternative 1, Implementation Alternative 6 and Management Alternative 2, Subalternative 1b, which are discussed in Sections 2.2.2.6, 2.3, 4.3.6, and 4.4 of the EIS. It is also part of Management Alternative 3, which is discussed in Sections 2.4 and 4.5 of the EIS.

Response to Comment No. 68-3

The commentor's opposition to interim storage is noted. Interim storage, however, would not necessarily leave the spent nuclear fuel in a less stable form if the storage is done properly.

The impacts of ultimate disposition of foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation. As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

COMMENTOR NO. 71: EUSON, JOHN

JOHN & ANITA EUSON
P.O. Box 340
San Ramon, CA 94583

22 May 1995

Department of Energy
ATTN: Charles Head - Project Director

re: Concord Weapons Station

We are residence of Martinez, CA, with a clear view of the Concord Weapons Station across the valley.

We recognize the importance of retrieving, storing and disposing of radio active materials from as many sources as possible, world wide, to prevent these materials from being converted into or used in the manufacturer of weapons. *71-1*

We support the Federal Governments efforts to do what is necessary to achieve these goals including the use of the Concord Weapons Station. We have full confidence that the facilities and personnel will work in the best interest of the community and the national interest in transporting, storing and receiving of these radio active materials. *71-2*

Our only suggestion to further implement the program, is to close Port Chicago Highway through the Concord Weapons Station. This, to prevent "nuts" from demonstrating, obstructing or otherwise impeding the operations at the facility. We do not need a repeat of the incident that occurred a few years ago. We do not need another pay off of some "nut" who gets injured while trying to block a railroad right of way. We personally resent our tax money being used to pay for a personal injury to someone who sits on a railroad track. What the hell does he expect when he hears a train coming? Only a fool would continue to sit there...now thanks to us taxpayers, a rich fool. Not one more dime of "tribute". **Secure the facility in total. No public road running through it.** *71-3*

Our last comment concerns the feature story on the news last night, where in a resident of Clyde decided to move when she heard that nuclear waste would be moving through the Concord Weapons Station. We would suggest that she faces a far greater risk of health damage to herself and her family being down wind and in close proximity to the Avon refinery and Shell refinery. She should move. *71-4*

The Not In My Back Yard syndrome is unfortunate. It is our responsibility to recover nuclear waste since we are the providers of the material in the first place. Even if we recover materials that the U.S. did not provide, it is our National and personal interest to recover as much as we possibly can to keep it out of the hands of those who would use it for other purposes. *71-1 (Cont'd.)*

Sincerly

/s/ John Euson
John Euson
Martinez, CA

cc: George Miller, Diane Feinstein, Brabara Boxer

RESPONSE TO COMMENT
COMMENTOR NO. 71: EUSON, JOHN

Response to Comment No. 71-1

The commentor's support for acceptance of nuclear weapons-grade materials of United States origin or non-United States origin is noted.

Response to Comment No. 71-2

The commentor's support for the use of Concord NWS is noted. Concord NWS is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States. If any foreign research reactor spent nuclear fuel were to be accepted into the United States, the selection of the actual port(s) of entry to be used would be made in the Record of Decision, to be issued no sooner than 30 days after issuance of this final EIS.

Response to Comment No. 71-3

DOE does not have the authority to make a decision on closing the Port Chicago Highway, so this comment is outside the scope of the EIS.

Response to Comment No. 71-4

The commentor's opinion that living near refineries poses a far greater risk than that posed by the shipment of foreign research reactor spent nuclear fuel through Concord NWS is noted. The evaluation of the incident-free risk associated with handling the foreign research reactor spent nuclear fuel in the port is presented in Section 4.2.2.2, while the accident risk is discussed in Section 4.2.2.3. In either case the risks were found to be low.

COMMENTOR NO. 73: VANHORN, LAURI

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Lauri VanHorn Phone: 510-370-3537

Title and Organization:

Address: 2716 Oak Rd #96

City: Walnut Creek State Ca Zip 94596

*** COMMENTS ***

This area is to populated + prone to earthquakes to take such a serious risk. 73-1

Maybe, the fuel should be sent to Washington DC — it's their stuff anyway!

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 73: VANHORN, LAURI

Response to Comment No. 73-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to Concord NWS, or to any of the ports analyzed in the EIS, is low.

All population within a fifty mile radius of the Concord NWS was considered when analyzing the impact of both incident-free transport and the range of hypothetical port accidents. The risks were found to be low. Appendix D, Section D.5 of the EIS provides details on accident analysis. Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

The Washington, D.C. area does not have the facilities required to safely manage the foreign research reactor spent nuclear fuel.

COMMENTOR NO. 74: JOHNSON, CANDICE L.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Candice L. Johnson **Phone:** 510 458-9165

Title and Organization: Housewife / teacher / mother

Address: GARY/CANDICE JOHNSON 500 LISA ANN COURT

City: BAY POINT CA 94565 **State** ____ **Zip** ____

*** COMMENTS ***

Please record that I and my family are appalled that you would put us at such risk to send nuclear weapons to our vicinity and on a regular basis use the Port Chicago Naval Weapons depot as a transport stop-over. 74-1

We already have silos over the hill of missiles & the port you plan to use already works with dangerous materials. Placing us at higher risk is inhumane

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 74: JOHNSON, CANDICE L.

Response to Comment No. 74-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to Concord NWS, or to any of the ports analyzed in the EIS, is low.

The commentor's reference to foreign research reactor spent nuclear fuel as being a weapon is incorrect. While the spent nuclear fuel is weapons grade material, which means that weapons could be made from it, it is not a weapon itself and cannot explode. The process of making a weapon from the spent nuclear fuel is very difficult and likely could only be attempted by a government, or large organization with access to high technology.

COMMENTOR NO. 75: SEWELSON, BESS

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Bess Sewelson Phone: 510 937-6605

Title and Organization:

Address: 2701 Goeden Run Rd #6

City: Walnut Creek State Ca Zip

*** COMMENTS ***

There are too many dangers. I strongly believe we should not transport this spent reactor fuel 75-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 75: SEWELSON, BESS

Response to Comment No. 75-1

The commentor's opposition to the transport of foreign research reactor spent nuclear fuel is noted. An evaluation of potential environmental effects expected during transport of spent nuclear fuel from foreign research reactors can be found in Section 4.2 of the EIS.

COMMENTOR NO. 76: DEBELLIS, TONY B.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Tony B. de Bellis Phone: 510 837 7086

Title and Organization:

Address: 231 Kuss Rd

City: Danville State CA Zip 94526

*** COMMENTS ***

Your plans are terrible... ill conceived ... politically expedient. 76-1

The Bay Area is put at risk to keep the military industrial complex in business. 76-2

Nuclear power is a non renewable black hole. Do nothing with spent fuel rods... let the plant operators store them - the GOOD HEADS 76-3

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 76: DEBELLIS, TONY B.

Response to Comment No. 76-1

DOE considers that implementation of a policy for management of foreign research reactor spent nuclear fuel in a manner that leads to the reduction and eventual elimination of the use of highly enriched (weapons grade) uranium in civil programs worldwide is in the best interests of the United States.

Response to Comment No. 76-2

Radiological and non-radiological health risks at candidate ports were evaluated (Section 4.2.2 of the EIS) and found to be very low for normal operations and in the case of accidents.

Response to Comment No. 76-3

Foreign research reactors are not used for generation of power. Research, medical, commercial, and educational applications of foreign research reactors are described in Section 1.1 of the EIS. As discussed in Section 1.2 of the EIS, many of the foreign research reactor operators are not currently able to store their spent nuclear fuel. Thus, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Nevertheless, the commentor's preference for the No Action Alternative (Section 2.5 of the EIS) is noted.

COMMENTOR NO. 80: GLENN, WILLIAM

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: William Glenn **Phone:** 503-254-2583
Title and Organization: Parent of 2
Address: 126 NE 86th
City: Portland **State** OR **Zip** 97220

*** COMMENTS ***

I will do everything I can to prevent nuclear waste from coming through the Port of Portland. I believe the people of Portland are against it. I feel a vote should be taken. I feel municipalities exposed to any possible threat should be financially paid off. I have never been in favor of any use of nuclear power and I in no way feel responsible for its storage in any form. There's no doubt in my mind that the people of Portland showed at a recent public hearing their feelings against this idea and their utter disgust for the proposed idea of moving nuclear waste through the Port. I volunteer to help you find other solutions. This one is not acceptable!! You need my help. → 80-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 80: GLENN, WILLIAM

Response to Comment No. 80-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Portland is noted. DOE considers that the port selection criteria successfully identify ports that can safely handle foreign research reactor spent nuclear fuel. The EIS demonstrates that the use of any of the ports identified by the port selection process, including Portland, would not pose any significant risk to either the port personnel or the population near the port (Sections 4.2.2.3 and 4.5 of the EIS).

COMMENTOR NO. 80: GLENN, WILLIAM (CONT'D.)

I am already disgusted by the fact that radiation is leaking a Hanford and I feel you don't care about the quality of life for my children and their children. 80-1 (Cont'd)

Sincerely

William E. Glenn

P.S. Even if it were deemed safe I'm against it. Categorically against it. Don't consider Portland as a port.

RESPONSE TO COMMENT
COMMENTOR NO. 80: GLENN, WILLIAM (CONT'D.)

COMMENTOR NO. 86: SCRATTISH, APRIL

Charles Head
Program Manager
Office of Spent Nuclear
Fuel Mangement (EM-37)
U.S. Dept. of Energy
1000 Ind. Ave. S.W.
Washington, D.C. 2058

May 24, 1995

April Scrattish
1418 So. Mildred #1306
Tacoma, WA 98465

Mr. Charles Head:

I am a Biology student at Tacoma Community College. I am writing in regard to the articles I have recently read in the Tacoma News Tribune (May 13 and 16, 1995) concerning the Port of Tacoma as a proposed sight for the storage of nuclear fuel elements.

I have spoken with Mick Shultz, Communications Manager at the Port of Tacoma, and he informed me of a few of the aspects of this course of action. According to the U.S. Department of Energy, the likelihood of any considerable danger resulting from these shipments is, in all probability, very low. However, I was also told that if an accident were to occur and one of the protective casks were to explode or otherwise be exposed in any certain manner, there would be soil contamination, not to mention a great amount of peril to the health and safety of humanity. I was told that any affected soil would then have to be moved away from the human population. I have but one question: Why? Why would we take potentially dangerous materials and place them in the midst of an extremely populous area, where there is even a minute possibility of such peril taking place? Why would we endanger ourselves in this manner? As I mentioned before, if soil is contaminated, it will have to be moved away from humans. So why don't we just place the nuclear elements in an area where there is no danger in the first place?

86-1

86-2

86-3

Thank you for allowing me to voice my opinion. I hope that, although I am only one lone voice, I hope that I will still be taken seriously.

Sincerely,

April J. Scrattish

April Scrattish

RESPONSE TO COMMENT
COMMENTOR NO. 86: SCRATTISH, APRIL

Response to Comment No. 86-1

If the foreign research reactor spent nuclear fuel is accepted into the United States there would be no storage of this material in the Port of Tacoma, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

The foreign research reactor spent nuclear fuel cannot explode, either in a transportation cask, or elsewhere. The worst accident that was considered possible is an accident where the ship carrying the foreign research reactor spent nuclear fuel collides with a petroleum tanker. In this case the cask was assumed to be damaged in the collision, then be immersed in the fire that resulted from the collision. In the unlikely event of a severe accident, the analysis performed for the EIS indicates that some radioactive material could be released from the cask and distributed into the environment. However, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the water and air quality in the port would be very small.

Response to Comment No. 86-2

Spent nuclear fuel from foreign research reactors will not explode, but spent nuclear fuel containing HEU could be used to construct nuclear weapons. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. Risks to the general population and workers during transportation of spent nuclear fuel from foreign research reactors were found to be low for both normal operations and severe accidents (Section 4.2.3 of the EIS).

Response to Comment No. 86-3

As discussed in Section 4.2.2 of the EIS, the likelihood of an accident severe enough to cause the release of radioactive material from a spent nuclear fuel transportation cask is low. Even in the case of a very severe accident, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Routine shipping, and handling of casks would not cause soil contamination.

While risks can be minimized, every activity carries some risk (Section 4.10.3 of the EIS). Management sites proposed for spent nuclear fuel from foreign research reactors are in remote locations (Sections 2.6.5 and 3.3 of the EIS).

COMMENTOR NO. 87: MILLER, JOYCE

May 23, 1995

Dear Sir,

I'm against any form of nuclear waste rods or what ever being sent to California, at the Concord Naval Base! Or anyplace in California.

Send it to Washington D.C. and you keep it in your back yard. Thank you.

Joyce Miller

Miller
1536 Gill Tree Court
Walnut Creek, CA 94598

87-1

RESPONSE TO COMMENT
COMMENTOR NO. 87: MILLER, JOYCE

Response to Comment No. 87-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS or elsewhere in California is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low. It should be noted that the foreign research reactor spent nuclear fuel would only pass through Concord NWS and the State of California on its way to a DOE management site.

The Washington D.C. area does not have the facilities or experience required to manage the spent nuclear fuel.

COMMENTOR NO. 88: FOSTER, GINNY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Ginny Foster Phone: 223-0761
Title and Organization: Citizen
Address: 2650 NW Upshur #26
City: Portland State Or Zip 97210

*** COMMENTS ***

Do not store non transport spent nuclear fuel wastehere We already have more nuclear waste in the NW than we can take care of. and in the U.S.

88-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 88: FOSTER, GINNY

Response to Comment No. 88-1

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. Management of foreign research reactor spent nuclear fuel in the United States is considered under Management Alternatives 1 and 3 (Sections 2.2 and 2.4 of the EIS). Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

COMMENTOR NO. 89: FULTON, THOMAS L.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Thomas L Fulton **Phone:** (503) 788-8827
Title and Organization: USN (Ret) concern government employee & citizen
Address: 5011 SE 87th Ave
City: Portland **State** OR **Zip** 97266

*** COMMENTS ***

I support USDOE stance that US must take the initiative in controlling HEU & LEU. But once chemical separation has been completed, the by-product waste that cannot be used for weapons of nuclear nature must be stored by the country that benefited from the nuclear power generated. France & UK are justified in their stance and the US must do the same. Transporting any Hazardous material could be fraught (over) 89-1 89-2 89-3

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 89: FULTON, THOMAS L.

Response to Comment No. 89-1

The commentor's support for the control of HEU and LEU by the United States is noted. Section 1.2 of the EIS discusses objectives of the proposed action and potential consequences of failure to adopt a policy for the management of spent nuclear fuel from foreign research reactors.

Response to Comment No. 89-2

DOE agrees that, in the long run, the countries that benefit from nuclear reactors should be responsible for the disposal of nuclear waste from those reactors. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

After this policy period, the United States would not accept any more foreign research reactor spent nuclear fuel and every nation that operates a research reactor would be responsible for its own nuclear waste disposal as is currently required by the United Kingdom and France. As discussed in Section 2.2.2.6 of the EIS, the United States does not conduct chemical separation to support the generation of nuclear power or production of nuclear weapons.

Response to Comment No. 89-3

An addition has been made to Section 2.2.1.5 of the EIS to describe the United States and international codes that are in place to ensure shipping safety, and the steps that would be taken to ensure that those codes would be followed.

COMMENTOR NO. 89: FULTON, THOMAS L. (CONT'D.)

if conducted in a haphazardous manner. Foreign flag vessels have below standards that any US flag commercial vessel is required. It must insist any transportation to our shores must be at our EPA standards which only can be met by US Flag Vessels. 89-3 (Cont'd.)

Thomas L Fulton 89-4

RESPONSE TO COMMENT
COMMENTOR NO. 89: FULTON, THOMAS L. (CONT'D.)

Any ship entering U.S. territorial waters must meet U.S. safety regulations, which ensures that any ship carrying foreign research reactor spent nuclear fuel would meet the minimum U.S. safety requirements.

Response to Comment No. 89-4

In regard to requiring ships to meet Environmental Protection Agency requirements, there are few Environmental Protection Agency regulations that apply to ocean-going ships such as those that would carry foreign research reactor spent nuclear fuel. Among the Environmental Protection Agency regulations that are applicable are a prohibition of bilge and sanitary waste discharge and disposal of trash and rubbish. These requirements are imposed on all ships, not just U.S. flag vessels.

COMMENTOR NO. 90: PATRICK, DIANA L.

MR HEAD
- I HOPE YOU WILL PROVIDE MORE DIALOGUE FOR BAY ~~AREA~~ RESIDENTS. IT FEELS LIKE THIS PROJECT IS ON FAST TRACK W/OUT CONSIDERATION OF EMERGENCY ISSUES
Diana Patrick

90-1

PO Box 1086
Martinez 94553

May 30, 1995

United States Department of Energy
Office of Environmental Management
Attn: Mr. Charles Head
1000 Independence Avenue, S.W.
Washington, DC 20585-0001

Dear Mr. Head,

Re: DEIS comments on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

Please respond to the following comments:

The DEIS appears to be a statement of purpose and outline of options that does not explore potential risks associated with moving and storing spent nuclear fuel. Since the DOE is both the applicant and the lead agency, how can the proposed project be reviewed objectively? 90-2 90-3

Alternatives: The EIS only considers continental solutions. Treatment and storage of spent nuclear fuel on an isolated island (perhaps one already radioactively contaminated) avoids risk to the continental United States and must be explored. 90-4

The DEIS does not, but must address the physical constraints and existing high risk uses of the waterway leading from the Golden Gate Bridge to the Concord Naval Weapons Station.

Harbor Conditions:

More petroleum and petroleum products pass through the San Francisco Bay Entrance than any other harbor on the West Coast. In 1992 Petroleum and Petroleum products represent 71% of all commodities passing under the Golden Gate. More gasoline exited San Francisco Bay than left the Los Angeles and Long Beach Harbors combined. Much of the 4,137,000 tons of gasoline exported was delivered to Los Angeles and 20% was exported to foreign ports. 90-5

1993 San Francisco Bay Entrance statistics[1] reveal a 50% increase in gasoline export over 1992; 8,028,000 tons of gasoline passed under the Golden Gate; with 1,567,000 tons coming in and 6,461,000 tons going out. This increase is also reflected in the Carquinez Strait region which increased gasoline transport from 2,988,000 tons shipped in 1992 to 4,173,000 in 1993 including 3,803,000 tons transported downbound (only 296,000 tons were shipped in the upbound direction).

In 1977 only 809,184 tons of gasoline moved within or through the Carquinez Strait region, increasing to 4,170,000 tons of gasoline movement in 1993. A 500% increase in less than 20 years.

[1] US Army Corps of Engineers, Waterborne Commerce Division, 1993 WCSC: Pacific Coast, Alaska and Hawaii

RESPONSE TO COMMENT
COMMENTOR NO. 90: PATRICK, DIANA L.

Response to Comment No.90-1

Seventeen public hearings were held on the draft EIS in the locations determined to be most likely to be directly affected by the EIS alternatives, specifically in the ports of entry and at the potential management sites. In addition to accepting comments from the public during these hearings, written comments were also welcomed and encouraged. DOE considers that these actions have provided ample opportunity for the public to comment on the draft EIS. DOE considers that if foreign research reactor spent nuclear fuel is managed in the United States, there is adequate regulatory and emergency preparedness infrastructure to ensure its safe acceptance and transportation to the designated management site. As discussed in Section 2.7.1 of the EIS, Federal funding to State, Tribal, and Local governments is being provided for maintaining emergency response programs. There are three national emergency response plans under which DOE provides radiological monitoring and assessment assistance. Under these plans, DOE provides technical advice and assistance to the State, Tribal, and local agencies involved with a radiological incident.

Emergency preparedness, security, and coordination of DOE with local emergency response authorities that would be involved with the acceptance and transportation of foreign research reactor spent nuclear fuel will be discussed in detail in the Transportation Plan, that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H which was added to the final EIS in response to public comments.

Response to Comment No. 90-2

Radiological and non-radiological risks to human health and the environment were evaluated in detail during preparation of this EIS. Section 4 of the EIS describes the results of the evaluation, and Appendices C through F provide supporting technical detail. In all cases the risks associated with acceptance, transport, and interim storage of foreign research reactor spent nuclear fuel were found to be low.

Response to Comment No. 90-3

NEPA requires that federal agencies like DOE prepare a detailed EIS on the effects of major federal actions with the potential to significantly affect the quality of the human environment. The public must be afforded an opportunity to review and to comment throughout the NEPA process, at hearings and/or in writing, on the proposed action. Also, Federal agencies must ensure that proposed actions are conducted in accordance with all applicable laws and regulations. The decision whether to implement the proposed action is therefore subject to review and governed by laws and regulations, not by the subjective judgments of an agency.

COMMENTOR NO. 90: PATRICK, DIANA L.

2

Hazardous Material activities approved but not in place, or under consideration, that could that will increase volitol shipments:

1. Wickland's Martinez Terminal recently received approval to load/unload 240 tankers with gasoline and other petroleum products. An increase from the average of 71[2] tankers/year that visited Wickland's Martinez Terminal between 1990 and 1994.

   total gasoline/petroleum transport will increase in all zones to the San Francisco Bay Entrance

   240 tanker visits equaling 480 trips requiring opening of the Benicia railroad bridge whose less than 300' wide opening has been hit by more vessels than the five other bridges. 90-6

2. Local refineries are increasing gasoline production.

3. The Army Corps of Engineers proposes deepening the San Francisco-to-Stockton Ship Channel from 35 feet at low tide to 45 feet to accommodate larger tankers. The SF Marine Exchange estimates that an average of 1,100 oil tankers enter San Francisco Bay and 2,300 tankers and barges arrive at refinery terminals annually.

The EIS must anticipate expanded marine traffic and larger tankers in order to describe risk.

Bridges: nuclear laden vessels must pass under six bridges before reaching the Naval Weapons Station. As stated, the Benicia rail bridge, with an opening width of less than three hundred feet, experiences the most accidents. 169 additional tankers will carry gasoline and other volitol material from the Wickland terminal east of the rail bridge, increasing marine trips under all bridges to about 338 additional trips. 90-7

In 1993 the tanker Miramar hit the rail bridge. The ship's hold was pierced but no product was released. Would a nuclear cask be compromised should a gasoline tanker hit the railroad bridge causing gasoline to escape and be ignited by sparks generated by the ship's hull scraping along the bridge structure?

Terrorism: through the years the Bay Area has suffered environmental terrorism. Power transformers have been bombed, Chevron's affluent was closed. Potential for terrorism compromising nuclear casks must be addressed. 90-8

About a month ago a tanker carrying anhydrous ammonia stalled and almost hit the Golden Gate bridge. We were told that a disaster, comparable to Bhopal, was averted by the quick response of the pilot who dropped anchor and reversed the engines. A release of deadly gas may not compromise the nuclear cask, but it could jeopardize the crew and safety of the cask. Review the spectrum of eclectic impacts. 90-9

Six refineries and a multitude of chemical plants line the waterway leading to the Weapons Station. Describe the variety of risks presented by transporting gasoline and other highly volitol material within the same waterway route as transporting nuclear casks. How would a cask respond to becoming engulfed within a gasoline tanker fire and explosion? If a gallon of gasoline has the explosive capability of eight sticks of dynamite, how far could a gasoline marine tanker explosion carry radioactive particles. How much of the Bay Area would be 90-10

[2] SF Marine Exchange

RESPONSE TO COMMENT
COMMENTOR NO. 90: PATRICK, DIANA L.

Response to Comment No. 90-4

Management Alternative 2, which is discussed in Sections 2.3 and 4.4.1 of the EIS, is the alternative to accepting foreign research reactor spent nuclear fuel into the United States. This alternative does not specify where the spent nuclear fuel would be stored; just that it would not enter the United States. Thus, if the comment is referring to an isolated island that belongs to another country, the commentor's alternative is covered under Management Alternative 2.

If the comment is referring to an isolated island that is part of the territory of the United States (e.g. Johnston Atoll), then the foreign research reactor spent nuclear fuel would legally be entering the United States and this subject is covered under management Alternative 1. A discussion has been inserted into Section 2.10 of the EIS to explain why this option is not feasible.

Response to Comment No. 90-5

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process. The passage meets the qualitative requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2 of the EIS).

DOE analyzed a severe accident in which a ship carrying a spent nuclear fuel transportation cask is involved in a collision with another ship, severe enough to breach the transportation cask and then subject the cask to a fire resulting from the collision (Section 4.2.2.3 of the EIS). These conditions are the same as the worst conditions that might be expected to result from the collision of a ship carrying a spent nuclear fuel cask with a petroleum tanker.

The accident analyzed does not reach the temperature required to melt foreign research reactor spent nuclear fuel (900 degrees Kelvin, or 1,160 degrees Fahrenheit). Appendix D, Section D.5.3 of the EIS presents a detailed discussion of accident probabilities and radioactive material source terms and Section D.5.4 presents the results of the analysis.

Response to Comment No. 90-6

The volume or size of the local marine traffic (present or future) was not considered in the calculation of risk associated with the shipment of foreign research rector spent nuclear fuel. In general, the number of ship mishaps is not proportional to the amount of ship traffic because port ship traffic is slow, and even when heavy, is normally a small number of ships per hour. Historically, increasing the volume does not significantly increase the probability of an accident. Rather, the number of ship mishaps is associated with navigational hazards and distances from the port to the open ocean or a large bay (port

rendered fallow? How many years would it take the area to recover? What is the worst case scenario? 90-10 (Cont'd.)

1992 PETROLEUM MARINE TRAFFIC

(compiled from U.S. Army Corps of Engineers Waterborne Commerce statistics)
(all values are short tons; reported as 6.6 barrels per ton)
(1 barrel = 42 gallons)

	petroleum and petroleum products	gasoline
LONG BEACH HARBOR		
upbound	23,746,000	339,000
downbnd	8,798,000	89,000
Total	32,544,000	415,000
LOS ANGELES HARBOR		
upbound	13,038,000	3,346,000
downbnd	4,931,000	411,000
Total	17,969,000	3,757,000
SAN FRANCISCO BAY (oceangoing trips)		
upbound	31,474,000	1,038,000
downbnd	16,363,000	4,137,000
Total	47,838,000	5,974,000
Richmond Harbor	16,949,000	2,230,000
San Pablo Bay	18,343,000	3,888,000
Carquinez Strait	18,652,000	2,994,000
Suisun Bay Channel*	1,203,000	53,000

The EIS must forecast future hazardous material shipments by type and volume and consider the risks presented should nuclear casks share this waterway. 90-11

Sincerely,

Diana L. Patrick

selection Criterion 2; Appendix D, Section D.1.9.2 of the EIS). Appendix D, Section D.5.1.3 of the EIS presents a discussion of the determination of the probability of ship accidents used in the EIS. In regard to the size of the vessels, increased volumes of hazardous cargos, such as gasoline, would not change the accident consequences because the most severe accidents analyzed already assumed a collision with a tanker and that the resulting fire was not limited by quantity of fuel available (Attachment D5 to Appendix D).

Response to Comment No. 90-7

Appendix D, Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Section D.5.4. The analysis shows that even in the event of a severe ship fire, neither the consequences nor risks are great (Section D.5.).

Response to Comment No. 90-8

Spent nuclear fuel transportation regulations, as detailed in Section 5.4.2 of the EIS, require armed escorts in front and behind a truck (and on the train for rail) while traveling in a city. This security measure would deter most would-be terrorists from attempting an attack. Nevertheless, Appendix D, Section D.5.9 of the EIS presents an analysis of an enveloping sabotage scenario involving a cask explosion. The consequences of such a scenario indicate that the general property destruction and numerous fatalities and injuries that could result from the explosion would result in far greater harm to the general health of the public in the immediate vicinity of such an explosion than caused by the release of radioactive material from the spent nuclear fuel in the transportation cask.

Response to Comment No. 90-9

The disabling or elimination of the ship's crew in a Bhopal-type event or from any cause could be the initiator of many of the accidents that are analyzed in Section 4.2.2.3 of the EIS. However, since in evaluating the accidents no human intervention (such as fire-fighting) was assumed, the calculated consequences of the accident would not be affected by the loss of the crew. For this reason, an event like the one described by the commentor would not worsen the calculated results of any of the accidents, so the results presented in Section 4.2.2.3 are still the conservative results for any of the accidents that might be expected.

Response to Comment No. 90-10

The analyses that were performed to evaluate the impact of various accidents divided all plausible accidents into six categories (Appendix D, Section D.5.3.1.1 of the EIS). The most severe accident category, release category 6, assumes that the ship carrying the

COMMENTOR NO. 90: PATRICK, DIANA L.

RESPONSE TO COMMENT
COMMENTOR NO. 90: PATRICK, DIANA L.

foreign research reactor spent nuclear fuel transportation cask is in a collision with a tanker and that a fire occurs that engulfs the damaged transportation casks. The consequences of accidents, including category six accidents (the worst case scenario), are discussed in Appendix D, Section D.5.4.2.2.

Response to Comment No. 90-11

The calculated risk associated with the shipment of foreign research reactor spent nuclear fuel is the product of the consequences of an accident and the probability of the accident occurring. The sharing of a waterway with shipments of hazardous materials is contained within the calculated risk. Additional hazardous material shipments or increased volumes per shipment would not change the accident consequences because the most severe accidents credible have been assumed by the accident analysis. As explained in response to Comment 90-6 above, increasing the volume of ship traffic does not significantly increase the probability of an accident.

COMMENTOR NO. 92: RUBY, LAWRENCE

663 Carrera Lane
Lake Oswego, OR 97034

30 May 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U. S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Proposed Transport of Spent Nuclear Fuel through Portland

Dear Mr. Head:

I am writing to summarize my testimony presented before you on 25 May, regarding DOE/EIS-0218D. By way of background, I am a registgered professional nuclear engineer (California) and during my career I have supervised 2 research reactors with fuel of the type described in the EIS. These activities occurred when I served as Professor of Nuclear Engineering at UC Berkeley, and as Professor of Nuclear Science at Reed College, Portland.

The EIS in Volume 2, page 63 ff, proposes to move spent nuclear fuel from overseas to Hanford or INEL by ocean freighter to the Port of Portland, where the fuel casks would be off-loaded to a warehouse. Subsequently, the casks would be reloaded to trucks or train for transport through the northern part of Portland and thence east along the south side of the Columbia River.

Both Portand, Oregon and Berkeley, California are surrounded by metropolitan areas of about 1.2 million people. However, in contrast to a situation where, a few years ago, research reactor fuel was moved through the streets of Berkeley in compliance with DOT regulations, the proposed transport through the streets of Portland is NOT in compliance with DOT regulations. DOT regulations specify, with respect to the transport of high-level radioactive materials, that a preferred route must be selected which minimizes radiological risk. In particular, "A preferred route consists of interstate system highways and bypass routes around cities, where possible, or an alternative route selected by a State routing authority." In the case of Berkeley, the move through city streets was necessary, because the reactor being decommissioned was situated in downtown Berkeley, but in the case of Portland, an alternative route is available with much lower radiological risk. The alternative is adapted from U.S. Navy methodology for moving high-level radioactivity to Hanford or INEL. In the alternative routing, ocean freighters would off-load their fuel casks onto barges at Astoria, which would then be towed up the Columbia river until they are well past the city of Portland, at which point the casks would be transferred to either truck or rail transport, headed east.

92-1

92-2

cc: Representives Furse and Wyden
Senators Hatfield and Packwood
Director, Oregon Dept. of Energy

Sincerely,

Lawrence Ruby

RESPONSE TO COMMENT
COMMENTOR NO. 92: RUBY, LAWRENCE

Response to Comment No. 92-1

DOE considers that the U.S. Department of Transportaion regulations do allow ground transport of spent nucleaur fuel from the Port of Portland. DOE has not yet selected ports, routes, or transport modes for the foreign research reactor spent nuclear fuel. A State of Oregon routing agency could designate a preferred route, which the shipments would be required to follow, in accordance with 49 CFR Part 397.103.

In addition, to further address this issue, individual Transportation Plans would be prepared for any shipments actually scheduled for acceptance through the Port of Portland (or any other prot of entry). These Transportation Plans would be prepared in consultation with appropriate State and/or local officials to ensure that details of the transportation process are understood, that the individuals or organizations who would perform all required activities are specified, and that these individuals and parties know what is expected of them (Section 2.7.5 and Appendix H of the Final EIS).

Response to Comment No. 92-2

The Port of Astoria, Oregon, was considered as a possible port for receiving the foreign research rector spent nuclear fuel. It was rejected because the port does not have appropriate experience (Appendix D, Section D.1.9.1 of the EIS).

There are two instances in which barge transport would be feasible as a substitute for truck or rail transport of foreign research reactor spent nuclear fuel: (1) up the Columbia River to the Hanfor Site and (2) up the Savannah River Site. New analysis on these two possible barge transport routes has been inserted into Appendix E, Section E.8.15 of the EIS. The net result of this analysis is that barge transport would present approximately the same level of risk to workers and the public as would truck or rail transport. This level of risk is low and the most likely outcome would be zero latent cancer fatalities.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE would be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel managed by DOE would be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 93: TENNANT, ELIZABETH M.

Monday, May 29, 1995

7557 28th Avenue NW
Seattle, WA 98117

Mr. Charles Head
Office of SNF Management, EM-37
U. S. Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Head:

I am writing to comment on the Department of Energy's Environmental Impact Statement on the handling spent nuclear fuel rods. I disagree with DOE's conclusion that the "preferred alternative" for handling these high-level nuclear wastes from other nations is to import them through Puget Sound and the Port of Tacoma for possible storage at Hanford. While I support ensuring that spent high-level fuel rods do not get into the hands of those who will convert them into weapons, I strongly oppose the "preferred alternative" because of the danger it poses to the workers, people, and resources of the Puget Sound area.. I think there are other, preferable ways to address the problems posed by these spent nuclear fuel rods --ways that will address the problem without endangering the people and natural resources of Puget Sound . 93-1

93-2

93-1 (Cont'd.)

- The preferred alternative in the EIS--based on the costs and risk data--should be reactor storage with international monitoring to ensure that fuel is not diverted for extraction of highly enriched uranium. 93-3

- Spent nuclear fuel rods should not be imported to the United States :
  - from nations that do not pose a proliferation risk;
  - when the rods are low enriched uranium wastes that cannot be used in bombs; and
  - where the use of dry cask storage (as done at U. S. reactors) is feasible and would allow for international inspection. 93-4

This would decrease the transportation risks involved.

RESPONSE TO COMMENT
COMMENTOR NO. 93: TENNANT, ELIZABETH M.

Response to Comment No. 93-1

DOE did not specify a "preferred alternative" in the draft EIS. DOE's preferred alternative is specified in Sections 2.9 and 4.7 of the final EIS.

The commentor's opposition to the use of Puget Sound, and the Port of Tacoma, is noted. In evaluating and selecting acceptable ports of entry, DOE developed evaluation criteria which identified ports that can safely handle foreign research reactor spent nuclear fuel. DOE considers that the use of any of the ports identified by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel or the population near the port. Risks associated with an accident would be low (Sections 4.2.2.3 and 4.5 of the EIS) and risks associated with incident-free handling of the spent nuclear fuel transportation cask would also be low (Sections 4.2.2.2 and 4.5 of the EIS).

The commentor's opposition to storage of foreign research reactor spent nuclear fuel at the Hanford Site is also noted. As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 93-2

The commentor's support for taking some action to keep the foreign research reactor spent nuclear fuel away from any weapons program is noted.

Response to Comment No. 93-3

The commentor's preference for Management Alternative 2, Subalternative 1a, (Overseas Storage) is noted. This alternative is described in Section 2.3 and the policy considerations and environmental impacts are presented in Section 4.4.1 of the EIS.

If any spent high level nuclear fuel rods must be imported because the criteria above cannot be met, this should be done only using dedicated or military ships and Department of Defense ports, and only to destinations where DOD has fully trained and well equipped emergency response personnel. Under no circumstances should importation be done using commercial freighters or public ports in large cities. This is necessary to protect the longshore workers and the public in the event of a shipboard fire and during transportation of the rods. 93-5 93-6

If any spent fuel rods are imported, it is imperative that they be handled by fully trained personnel who would be immediately ready to respond to a problem. It would be folly to rely on the training and preparedness of the local fire and hazmat units, which vary widely in their knowledge and ability. (A recent emergency preparedness exercise here in King County gave County emergency response personnel low marks for preparedness and response.) 93-7

No spent high-level nuclear wastes should be imported for storage at Hanford which already has extensive contamination and leakage problems. The nuclear fuel cooling basins along the Columbia River (the "K" basins) already are leaking and would be subject to massive failure in the event of an earthquake. These problems are exacerbated by recent Congressional decisions to cut back funds dedicated to cleaning up Hanford. Adding new spent high-level wastes to Hanford would worsen an already unacceptable situation. It is unfair to ask Washington's citizens to bear the additional environmental burdens and health risks posed by these waste by-products from other nations. If spent nuclear wastes must be imported into this country--and I am not convinced that they must be--it should be for storage at a less contaminated and more secure site. 93-8

I hope that you will take these comments into account, and revise the Department of Energy's recommendations.

Sincerely,

Elizabeth M. Tennant

Elizabeth M. Tennant

cc: Honorable Slade Gorton, U. S. Senate
Governor Mike Lowry
Honorable Jim McDermott, U. S. House of Representatives
Honorable Patty Murray, U. S. Senate

Response to Comment No. 93-4

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others, may not currently present the same nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3 of the EIS, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

Response to Comment No. 93-5

DOE considers that the foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present on military ships and at military bases. The security provided for the foreign research reactor spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ships and military ports is noted.

Response to Comment No. 93-6

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, DOE considers that commercial ports, facilities and commercial freighters represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation).

COMMENTOR NO. 93: TENNANT, ELIZABETH M. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 93: TENNANT, ELIZABETH M. (CONT'D.)

Response to Comment No. 93-7

According to U.S. regulation, all workers who handle or come in contact with spent nuclear fuel are required to receive appropriate prior training. Details of emergency preparedness and security measures for port activities as well as ground transportation would be contained in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders.

Response to Comment No. 93-8

See the response to Comment 93-1.

COMMENTOR NO. 95: BONDE, FREDERICK J.

4053 NE 109th
Seattle, WA 98125
June 1, 1995

Charles Head
Office of SNF Management EM-37
U.S. Dept. of Energy
1000 Independence Ave. SW
Washington, DC 20585

RE: Draft EIS for Shipment of Imported Nuclear Waste

The purpose of this letter is to comment on the above-referenced draft EIS released by DOE. I am strongly opposed to DOE's proposal to ship imported nuclear waste through the urban areas of Puget Sound or Portland, for the following reasons: 95-1

* Transporting waste using commercial freighters or public ports in large cities is very dangerous. Accidents can and do happen, putting 100s or 1000s of people at risk. In the case of a fire involving nuclear waste, large portions of cities could be permanently contaminated. 95-2 If nuclear waste must be imported, it should be done using dedicated ships and Dept. of Defense ports in nonurban areas. 95-3

* I oppose importation of spent nuclear fuel from nations that do not pose a proliferation risk. Why should the US pay for this and take the risks? To take the fuel from these nations will only encourage them to keep using nuclear technology and producing yet more waste, without facing the fact that we have no way to dispose of it safely. Even for nations that may pose a proliferation risk, there is no reason why we should take LEU wastes that cannot be used to produce nuclear weapons. 95-4

* Instead of importing nuclear waste from these countries, we should encourage them to use dry cask storage on site, as done at US reactors. This would eliminate all transportation risks. 95-5

* I oppose bringing additional nuclear waste to the Hanford Reservation. Hanford has serious leakage and other safety hazards from the nuclear waste already present at the site, which DOE is having trouble enough taking care of. DOE should concentrate on fixing the serious safety problems caused by the existing nuclear waste at Hanford, not import vast quantities of additional waste that could put Washington citizens at risk. 95-6

Sincerely,

Frederick J. Bonde

Frederick J. Bonde

cc: Rep. Jim McDermott, Senators Patty Murray and Slade Gorton, Governor Mike Lowry

RESPONSE TO COMMENT
COMMENTOR NO. 95: BONDE, FREDERICK J.

Response to Comment No. 95-1

The commentor's opposition to use of the Ports of Portland or Tacoma to receive foreign research reactor spent nuclear fuel is noted. As a part of the overall evaluation of impacts, DOE is identifying ports of entry in the United States that are acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. Portland and Tacoma are included in this evaluation. The analysis in the EIS indicates that the use of any of the ports indicated by the port selection process would not pose any significant risk to either the port personnel or the population near the port.

Response to Comment No. 95-2

The analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel demonstrate that commercial ports and facilities represent an acceptable option for the acceptance of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). Likewise, based on the analysis of impacts associated with accidents and incident-free operations, the analysis in the EIS indicates that commercial ships represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses indicate that there would be no reduction in the risks of the proposed action associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships or facilities.

In regard to fire, Appendix D, Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Section D.5.4. The analysis in Appendix D, Section D.5.5 of the EIS indicates that even in the event of a severe ship fire, neither the consequences nor risks are great. Although such a catastrophic accident would obviously impact the local environment, no significant impacts are predicted due to the presence of foreign research reactor spent nuclear fuel. In fact, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS)

Response to Comment No. 95-3

The analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, demonstrate that commercial ports and facilities represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 on consequences of port accidents and Section 4.2.2.2 for

COMMENTOR NO. 95: BONDE, FREDERICK J. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 95: BONDE, FREDERICK J. (CONT'D.)

Whether the shipments come as cargo on a scheduled carrier or on a chartered ship, no special precautions are expected to be required by the Coast Guard or any other authority. As such, there need be no additional requirements to use dedicated or military ships, nor any adverse consequences to the use of the commercial ships or facilities.

Response to Comment No. 95-4

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the RERTR program and encouraged other nations to support this program. Some of the nations which have supported it may not currently present the same nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel.

Response to Comment No. 95-5

The commentor's preference for the alternative of dry cask storage overseas is noted. This option was evaluated in the EIS as part of Management Alternative 2, Subalternative 1a (Sections 2.3 and 4.4.1 of the EIS).

Response to Comment No. 95-6

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 96: DREIZEN, DIANE

I want a record of all decisions made 96-1

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Diane Dreizen Phone:
Title and Organization: Citizen
Address: 4717 SW Fairhaven Drive
City: Portland, State OR Zip 97221

*** COMMENTS ***

High Level nuclear waste is exposed to added risk by transport. the safest thing is to leave waste where it is made. 96-2

the Longshoremen are not trained in nuclear waste handling. 96-3

the Port of Portland is not prepared for any nuclear accidents. 96-4

the exposure risks due to accidents are unacceptable in a city center of any size. 96-5

Management Alternative 2 is best - assist foreign nations with storage 96-6

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

We don't want any nuclear waste - stop producing it!!! 96-7

RESPONSE TO COMMENT
COMMENTOR NO. 96: DREIZEN, DIANE

Response to Comment No. 96-1

When DOE has completed the Record of Decision, as required under NEPA, the public may request copies as the information is public and notice of the availability of the Record of Decision will be provided in the Federal Register. In addition, all commentors who provided DOE with their name and proper address will be mailed a copy of the Record of Decision.

Response to Comment No. 96-2

Foreign research reactor operators cannot indefinitely store their spent nuclear fuel at the reactor site. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Radiological and non-radiological risks during transportation were evaluated and found to be low (Section 4.2.3 of the EIS).

Response to Comment No. 96-3

The foreign research reactor spent nuclear fuel is radioactive material, however, the dose rates from the casks used to transport it would be low. No special handling or loading/unloading procedures would be required for the foreign research reactor spent nuclear fuel when it is contained in standard shipping containers; experience with handling containers is sufficient. Therefore, no special training of longshoremen is required.

Response to Comment No. 96-4

DOE considers that if foreign research reactor spent nuclear fuel is managed in the United States, there is adequate regulatory and emergency preparedness infrastructure to ensure its safe acceptance and transportation to the designated management sites. As discussed in Section 2.7.1 of the EIS, Federal funding to State, Tribal, and local governments is being provided for maintaining emergency response programs. There are three national emergency response plans under which DOE provides radiological monitoring and assessment assistance. Under these plans, DOE provides technical advice and assistance to the State, Tribal, and local agencies involved with a radiological incident.

Emergency preparedness, security, and coordination of DOE with local emergency response authorities that would be involved with the acceptance and transportation of foreign research reactor spent nuclear fuel will be discussed in detail in the DOE Transportation Plan, that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments.

COMMENTOR NO. 96: DREIZEN, DIANE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 96: DREIZEN, DIANE (CONT'D.)

Response to Comment No. 96-5

The commentor's position that radiation exposure risks due to accidents are too high in cities of any size is noted. Sections 4.2.2, 4.2.3 and 4.2.4 of the EIS describe risks estimated for accidents at candidate ports, along transportation routes, and at interim management sites, respectively. Based on this analysis, the risks associated with the proposed action to health or the environment were determined to be low.

Response to Comment No. 96-6

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a which is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 96-7

Spent nuclear fuel is produced during operation of research or other types of nuclear reactors. It is not possible to eliminate the production of spent nuclear fuel from foreign research reactors without ceasing to operate the reactors. Section 1.2 of the EIS describes the research, medical, commercial, and educational applications for foreign research reactor.

COMMENTOR NO. 97: JOHNSTON, ANNE B.

812 31st Ave
Seattle WA 98122
May 27, 1995

Dear Mrs. Head,

I wish to protest the plan to bring spent Nuclear Fuel from overseas through the ports of Washington State, either Tacoma or Seattle. 97-1

There should be no importation of this material from countries that do not threaten the U.S. And no material that could not be converted into bombs. A way of storage in the other country should be developed which can be monitored by international inspectors. 97-2 97-3

What is left, that the country has to take back, should not be carried on commercial freighters, or trucks once it lands. It is far too risky to the public. What would we gain by taking the spent fuel from an unfriendly country if it were to destroy a big portion - and population of this country? 97-4 97-5 97-6

All these shipments should be by military ships and trucks, and go through military ports. After all, they are used to dealing with the material and are trained to do so. 97-7

Thank you for your attention to this. The other countries should pay their own costs and risks for their nuclear programs. 97-8

Sincerely yours,

Anne B. Johnston

RESPONSE TO COMMENT
COMMENTOR NO. 97: JOHNSTON, ANNE B.

Response to Comment No. 97-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Ports of Tacoma or Seattle is noted. After evaluation against the port selection criteria described in Appendix D, Section D.1.9 of the EIS, the Port of Seattle was eliminated from further consideration. The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 97-2

In order to reduce the use of highly enriched (weapons-grade) uranium in civil programs worldwide, the United States Government developed LEU fuels for foreign research reactors (Section 1.1 of the EIS). Foreign research reactor operators converted to LEU fuels with the expectation that their spent nuclear fuel would be accepted for disposition in the United States. Unless some near term action is taken, many foreign research reactor operators may be forced to cease operations before they can develop means for overseas disposition. Others might switch back to the use of HEU fuels, since these fuels can currently be disposed of by being reprocessed. It would be imprudent to publicly label selected nations as threatening to the United States (Section 2.10 of the EIS). Negative political and diplomatic reactions from nations so designated would likely preclude their cooperation in efforts to reduce international commerce in HEU.

Response to Comment No. 97-3

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a which is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 97-4

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, the EIS demonstrates that commercial ships represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses demonstrate that there would be no reduction in the risks associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships or facilities.

Response to Comment No. 97-5

Estimates of radiological and non-radiological risks during shipments of spent nuclear fuel from foreign research reactors over sea and land are given in Section 4 of the EIS.

COMMENTOR NO. 97: JOHNSTON, ANNE B. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 97: JOHNSTON, ANNE B. (CONT'D.)

Very low health and other environmental effects were found to result from the transport of such spent nuclear fuel. Nevertheless, the commentor's position that the risks are too high is noted.

Response to Comment No. 97-6

An objective of the proposed action is to reduce the amount of HEU which could be diverted to nations which do not support nuclear weapons nonproliferation (Section 1.2 of the EIS). Removal of HEU from international commerce reduces the likelihood that weapons-grade nuclear materials could fall into the hands of nations or groups that advocate or support terrorism. Conversely, as demonstrated by the analysis in Section 4 of the EIS, the risks associated with implementation of the proposed action to health or the environment would be low. Estimates of risks presented in Section 4 include normal operations and severe accident conditions.

Response to Comment No. 97-7

See the response to Comment 97 - 4 above.

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without the additional security that might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all of the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ships and ports is noted.

Response to Comment No. 97-8

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. A compromise between these extremes would be for developed countries to be charged a competitive fee, while U.S. taxpayers would absorb the full costs of the program for developing countries and absorb the amount above a competitive fee for developed countries to accept and manage this spent nuclear fuel. Charging a competitive fee is a market-based approach to the problem. Alternative financing arrangements discussed in Section 2.2.2.3 of the EIS include full subsidization for all countries, charging all countries the full costs of management, and subsidizing developing countries, but charging developed countries a full-cost recovery fee.

COMMENTOR NO. 98:
HUTCHISON, WILLIAM T. & MARIANNE D.

292 Bampfield Drive
Mount Pleasant, SC 29464
May 29, 1995

Charles R. Head
Office of Spent Fuel Management
EM-37
US Department of Energy
1000 Independence Ave.
Washington, DC 20585-0001

Dear Mr. Head:

This is to comment on the proposal to ship used nuclear fuel rods through the Wando Terminal located near Charleston, South Carolina.

We oppose this idea.

The area in near proximity to the Wando Terminal has had explosive population growth in the past few years. Our home is located one-half mile from the Wando Terminal. 98-1

We do not want these rods in such close proximity to our home, to us, to our friends, to our neighbors, or to our relatives.

Very sincerely yours,

William T. Hutchison

William T. Hutchison

Marianne D. Hutchison

Marianne D. Hutchison

RESPONSE TO COMMENT
COMMENTOR NO. 98:
HUTCHISON, WILLIAM T. & MARIANNE D.

Response to Comment No. 98-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Charleston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Charleston, or to any of the ports analyzed in the EIS, is low.

Appendix D of the EIS has been revised to specifically note the presence of Mount Pleasant in the immediate vicinity of the Wando Terminal, and the rate of population growth of Mount Pleasant (Attachment 2 to Appendix D). The demographic data pertaining to Mount Pleasant were considered in application of the port selection criteria, but still resulted in the Port of Charleston (that is, the Wando Terminal in Mount Pleasant) being identified as one of the proposed ports of entry.

COMMENTOR NO. 100: WALKING, LEE

445 Brockway Road #1
Chehalis, WA. 98532
May 22, 1995

Mr. Charles Head
Office of SNF Management. EM-37
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Sir:

RE: Bringing spent nuclear wastes to Hanford from other countries states

I don't want to live in an international dump. I don't want to live in a dump, period. I was brought up to believe the person (company, state, nation) that made the mess was responsible for cleaning it up. I still believe that. 100-1

The U.S. has enough deadly waste of its own to worry about....DON'T IMPORT MORE. The spent fuel at Hanford is already leaking. We should clean up what's there, not add to the problem. 100-2

Washington state tourism is already in danger (as well as liveability for its citizens)...clearcuts aren't pretty and increase flooding; the salmon's gone; and toxic dumpsites don't attract too many tours.

Even IF Hanford wanted more death and poison, I don't want it passing through the Port of Seattle, the Port of Tacoma or the Port of Portland...any high-density population area and their fragile water environments, where accidents can be horrendous. And there's always accidents...that's a given. 100-3

If this Contract On America is supposed to cut taxes and save money, this plan doesn't do that. Taxpayers (ME) will subsidize the importation and disposal costs of the nuclear wastes. Why should I pay for other people's garbage? 100-4

No importation of nuclear wastes of any kind!

Sincerely,

Lee Walkling

Ms. Lee Walkling

RESPONSE TO COMMENT
COMMENTOR NO. 100: WALKING, LEE

Response to Comment No. 100-1

The commentor's opposition to the acceptance of spent nuclear fuel from foreign research reactors is noted. Acceptance of foreign research reactor spent nuclear fuel is described under Management Alternative 1, Section 2.2 of the EIS.

The commentor's opposition to the involvement of the United States in management of foreign research reactor spent nuclear fuel is likewise noted. The commentor's position supports the No Action Alternative which is described in Section 2.5 of the EIS. As discussed in Section 4.6 of the EIS, adoption of the No Action Alternative would have a significant and negative impact U.S. nuclear weapons nonproliferation policy.

Response to Comment No. 100-2

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 100-3

The commentor's opposition to the use of the Ports of Portland, Seattle, or Tacoma to receive foreign research reactor spent nuclear fuel is noted. The port selection criteria discussed in Appendix D, Section D.1.9 of the EIS identify ports that can safely handle foreign research reactor spent nuclear fuel. Seattle was excluded from further consideration based on these selection criteria. The analyses provided in the EIS indicate that the use of any of the ports indicated by the port selection process, including Tacoma or Portland, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Sections 4.2.2.3 and 4.5 of the EIS) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Sections 4.2.2.2 and 4.5 of the EIS).

Response to Comment No. 100-4

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. A compromise between these extremes would be for developed countries to be charged a competitive fee, while U.S. taxpayers would absorb the full costs of the program for developing countries and absorb the amount above a competitive fee for developed countries to accept and manage their spent nuclear fuel. The reason for the United States to "pay for other people's garbage" is to reduce the risk of the spread of nuclear weapons to additional countries who might use them against the United States or our allies.

COMMENTOR NO. 101: ROOD, MARION

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: MARION ROOD Phone: Home (510) 827-9753 Work (510) 891-3102

Title and Organization: CITIZEN!

Address: 3024 WILDEWOOD DR

City: CONCORD State CA Zip 94518

*** COMMENTS ***

I am strongly opposed to this proposal! The ships would have to go under the Golden Gate Bridge (a National treasure)! - then navigate under 6 bridges, in shipping lanes containing oil & gasoline tankers, and passing large oil refineries. The roads leading out of the Concord Weapons Storage are also inadequate to handle this traffic. If there were a nuclear accident, 6 million Bay Area citizens would be affected. I currently have Leukemia (which is an environmental Cancer), and I don't need more toxic carcinogens 2 miles from my house! We must re-evaluate our entire nuclear development philosophy! 101-1 101-2 101-3 101-4 101-5

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 101: ROOD, MARION

Response to Comment No. 101-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 101-2

The passage from San Francisco Bay to Concord meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9 of the EIS). The favorable transit from open ocean is only one of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other considerations, such as port population, population along the route to the management site, port experience with handling containers, and port facilities would be considered in making the final selection of ports of entry. Appendix D, Section D.1.9 of the EIS provides details of the port selection process.

The port selection criteria do not consider the existence of land-based facilities such as refineries because they have no direct impact on the risk associated with the shipment of foreign research reactor spent nuclear fuel. The worst case accident is considered to be the collision of the ship carrying the foreign research reactor spent nuclear fuel with a petroleum tanker. In this accident the transportation cask is damaged in the collision, then subjected to a fire that resulted from the collision (Appendix D, Section D.5). The addition of some mishap at a land-based facility would not add to the severity of this accident, and so was not considered. Section 4.2.2.3 of the EIS discusses the assumptions that went into the port accident analysis and the results of those analyses.

Response to Comment No. 101-3

DOE has not yet selected ports, routes, or transport modes for the foreign research reactor spent nuclear fuel. If Concord NWS is selected, then DOE would choose the best route to I-680 in accordance with Department of Transportation regulations (49 CFR Part 397.101 (a)(2)). That route could use Route 4, Route 24, and/or Waterfront Road. The State of California routing agency can designate a preferred route, which the shipments would be required to follow, in accordance with 49 CFR Part 397.103. DOE considers that the roads leading out of the Concord NWS are adequate for this task.

Response to Comment No. 101-4

In the unlikely event of a severe accident, the analysis performed for the EIS indicates that some radioactive material could be released from the cask and distributed into the

environment. However, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also shows that the resultant contamination is so small that no cleanup would be required in any of the ports or surrounding areas. This result can be expected because the quantities of radioactive material present inside the cask are small, and even in the case of the worst accident, only a small part escapes the cask. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the air and water quality in the port would be very small. The analysis also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Section 4.2.2.3 and Appendix D, Section D.5 of the EIS detail the accident analysis and results.

Response to Comment No. 101-5

The basic purpose of this EIS is to provide an evaluation of environmental impacts that could result from management of spent nuclear fuel from foreign research reactors. An evaluation of the national nuclear development philosophy is beyond the scope of this EIS (Section 1.3 of the EIS).

COMMENTOR NO. 102: JENSEN, DAVID

May 23, 1995

Charles Head
Office of SNF Management EM-37
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Head:

I am writing to comment on the draft EIS proposing shipment of high-level nuclear waste through Puget Sound or Portland for possible storage at Hanford.

I support the "preferred" alternative of the EIS: that such waste be stored at reactor sites with international monitoring to ensure that fuel is not diverted for extraction of enriched uranium. 102-1

I strongly oppose importation of spent fuel from nations that do not pose a proliferation risk; of low enriched uranium that can't be used in bombs; and where dry cask storage is feasible and would allow international inspection. This reduces transportation risks. 102-2

I also strongly oppose using commercial freighters or public ports in large cities. This is necessary to protect longshore workers, the public on local roads and the public in event of shipboard fire. 102-3 Use dedicated or military ships and DOD ports. 102-4

Finally I strongly oppose importation of high-level nuclear wastes for storage at Hanford. Hanford already has cooling basins which leak into the Columbia River and which are subject to failure in event of earthquake. The new facility proposed for Hanford's wastes should NOT be increased in size to accomodate foreign nuclear wastes--USDOE is already having trouble funding safety upgrades and fuel removal from the cooling basins. 102-5

Other nations must pay the costs of their nuclear programs. It is not for the U.S. to pay these costs and bear the environmental burden and health risks. 102-6

Sincerely,

David Jensen

RESPONSE TO COMMENT
COMMENTOR NO. 102: JENSEN, DAVID

Response to Comment No. 102-1

No "preferred" alternative was identified in the draft EIS. The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 102-2

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no nuclear weapons proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported the program may not currently present the same nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

Response to Comment No. 102-3

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, DOE considers that commercial ports, facilities and commercial freighters represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation).

Response to Comment No. 102-4

The EIS demonstrates that commercial ships represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses demonstrate that there is no reduction in the risks of the proposed action associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships.

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ships and ports is noted.

Response to Comment No. 102-5

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 102-6

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. A compromise between these extremes would be for developed countries to be charged a competitive fee, while the U.S. taxpayers would absorb the full costs of the program for developing countries and absorb the amount above a competitive fee for developed countries to accept and manage their spent nuclear fuel. The reasons the United States would pay some of the costs for other countries are: 1) some countries would be unable to afford the costs of the proposed action and would have no safe alternative means of managing their spent nuclear fuel (i.e., the developing countries); and 2) some countries would continue to use and trade weapons-grade nuclear material indefinitely unless the United States charges a competitive fee and absorbs any cost above that fee.

COMMENTOR NO. 103: HEATH, PAMELA

May 23, 1995

Charles Head
Office of SNF Management EM-37
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Head:

I am writing to comment on the draft EIS proposing shipment of high-level nuclear waste through Puget Sound or Portland for possible storage at Hanford.

I support the "preferred" alternative of the EIS: that such waste be stored at reactor sites with international monitoring to ensure that fuel is not diverted for extraction of enriched uranium. 103-1

I strongly oppose importation of spent fuel from nations that do not pose a proliferation risk; of low enriched uranium that can't be used in bombs; and where dry cask storage is feasible and would allow international inspection. This reduces transportation risks. 103-2

I also strongly oppose using commercial freighters or public ports in large cities. This is necessary to protect longshore workers, the public on local raods and the public in event of shipboard fire. Use dedicated or military ships and DOD ports. 103-3 103-4

Finally I strongly oppose importation of high-level nuclear wastes for storage at Hanford. Hanford already has cooling basins which leak into the Columbia River and which are subject to failure in event of earthquake. The new facility proposed for Hanford's wastes should NOT be increased in size to accomodate foreign nuclear wastes--USDOE is already having trouble funding safety upgrades and fuel removal from the cooling basins. 103-5

Other nations must pay the costs of their nuclear programs. It is not for the U.S. to pay these costs and bear the environmental burden and health risks. 103-6

Sincerely,

Pamela Heath

RESPONSE TO COMMENT
COMMENTOR NO. 103: HEATH, PAMELA

Response to Comment No. 103-1

No "preferred" alternative was identified in the draft EIS. The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 103-2

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no nuclear weapons proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported the program may not currently present the same nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

Response to Comment No. 103-3

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, DOE considers that commercial ports, facilities and commercial freighters represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation).

Response to Comment No. 103-4

The EIS demonstrates that commercial ships represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses demonstrate that there is no reduction in the risks of the proposed action associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships.

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ships and ports is noted.

Response to Comment No. 103-5

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE would be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel managed by DOE would be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 103-6

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. A compromise between these extremes would be for developed countries to be charged a competitive fee, while U.S. taxpayers would absorb the full costs of the program for developing countries and absorb the amount above a competitive fee for developed countries to accept and manage their spent nuclear fuel. The reasons the United States is proposing to pay some of the costs for other countries are: 1) some countries are unable to afford the costs of the proposed action and have no safe alternative means of managing their spent nuclear fuel (i.e., the developing countries), and 2) some countries would continue to use and trade weapons-grade nuclear material indefinitely unless the United States charges a competitive fee and absorbs any costs above that fee.

COMMENTOR NO. 105: KRUEGER, PAT

Received by P. Wells on 6/7/95

Pat Krueger of Tacoma, WA
Does not want it shipped
through TACOMA, WA. 105-1

RESPONSE TO COMMENT
COMMENTOR NO. 105: KRUEGER, PAT

Response to Comment No. 105-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 106: MATIN, JEAN & FRED

9 Falcon Court
Pleasant Hill, CA 94523
FAX 510-838-2182

May 28, 1995

Secretary of the U.S. Department of Energy
Hazel O'Leary
U. S. Department of Energy
H.Q.
Forrestal Bldg.
1000 Independence Ave. S.W.
Washington, D.C. 20585
FAX 202-586-0956

Dear Secretary O'Leary;

This letter is coming to you from concerned citizens and residents of Contra Costa County in Northern California. The subject that concerns us is the matter of the selection of Port Chicago Naval Weapons Station as a port of entry for the spent nuclear fuel from other countries. We understand this nuclear fuel is to be transported to temporary storage outside of California and only God knows, when, where and how, to a final burial ground as yet unknown to the scientific community. To begin with, the concept of how to control the spent fuel should have been worked out long before original delivery to countries outside of the United States. Resorting to the excuse of lack of knowledge at that time could not be true. The matter of the hazards and perils of nuclear waste had been well documented by famous nuclear scientists as early as the 1950's. 106-1

Being where we are today in time, we cannot correct our mistakes made in the past by thoughtless or uninformed politicians, and perhaps by vested industrial interest groups. However, at this juncture, we feel the return of these highly hazardous wastes to a largely populated region through extremely busy waterways, surrounded by six busy bridges and several high production refineries which produce gasoline and other highly flammable products is a grave mistake. Furthermore, the Naval Weapons Station, geologically, is in close proximity of an earthquake fault, adding to the dangers of shipment and accidents. The record also clearly shows evidence of many serious accidents in the regions involving ships, as well as numerous accidents in the naval shipyard while transporting munitions. 106-2 106-3

During a meeting held in Concord, California in which many residents of the nearby region participated, we carefully listened to an interpretation of the interim study made by the U.S. Department of Energy, as given by Mr. Head. The explanation was pathetic and the statistics documented and published by your Department was full of errors intending to trivialize the potential for hazards and accidents. 106-4

RESPONSE TO COMMENT
COMMENTOR NO. 106: MATIN, JEAN & FRED

Response to Comment No. 106-1

The United States had addressed the issue of storage for decades by accepting spent nuclear fuel for disposition in the United States (Section 1.1 of the EIS). Passage of the National Environmental Policy Act in 1969, well after the process of providing research reactors and fuel to foreign countries had begun, led to the decision for DOE to allow the previous spent nuclear fuel acceptance policy to expire and to the decision to conduct this environmental review. Ultimate disposition of DOE's spent nuclear fuel, including the foreign research reactor spent nuclear fuel that may be accepted in the United States, is a high priority. For planning purposes, DOE has determined that its spent nuclear fuel, including foreign research reactor spent nuclear fuel, that is not otherwise dispositioned (e.g., chemically separated, with the high-level waste being converted into a vitrified glass for repository disposal) is authorized for disposal in a geologic repository. However, since the repository characterization program is in its early stages, the waste acceptance criteria for deposit of DOE's spent nuclear fuel in a repository have not been developed. Thus, a determination cannot be made at this time as to the requirements that must be met to allow placement of the foreign research reactor spent nuclear fuel in the repository. As a result, the analysis in the EIS for the time period beyond 40 years is qualitative rather than quantitative. The impacts due to ultimate disposition are discussed qualitatively in Section 4.2.7 of the EIS.

Response to Comment No. 106-2

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS provides an explanation of the "population" criterion. In regard to the amount of marine traffic and the number of refineries and bridges along the route to Concord NWS, the passage from San Francisco Bay to Concord still meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2). The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items of importance include population along the route to the management site(s), port experience with handling containers, and port facilities. Appendix D, Section D.1.9 presents details of the port selection process.

Response to Comment No. 106-3

Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

COMMENTOR NO. 106: MATIN, JEAN & FRED (CONT'D.)

Be it as it may, we would like to state our strong objection on behalf of our community, and warn you against making an unconscionable mistaken decision to select Port Chicago Naval Weapons Station as a port of entry of the spent nuclear fuel. 106-5

We and our community are determined to bring our objections, if not heeded by the Department of Energy, to the White House, the U. S. Congress and the media for discussion and debate to prohibit this catastrophic action. Considering today's political climate, we believe the present administration can ill afford to alienate the public, especially the very politically aware Californians that will play a crucial and decisive role in the future elections. We ask you to give your careful, full and personal attention to our objections and we request to either eliminate the possibility of selecting the Naval Weapons Station as an entry port, or to allow extended time for further study and Community debate on the subject. We would appreciate your timely response to this letter in advance of the decision date. 106-6

Sincerely,

Jean & Fred Matin

Jean and Fred Matin

RESPONSE TO COMMENT
COMMENTOR NO. 106: MATIN, JEAN & FRED (CONT'D.)

Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation cask. Further, the analysis of impacts associated with accidents involving foreign research reactor spent nuclear fuel presented in Section 4.2.2.3 of the EIS indicate that the use of any of the selected ports would not pose any significant risk to the port personnel or the population near the ports. Concord NWS has considerable relevant experience in handling containers, and has the capability to safely handle containerized foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9.1).

Response to Comment No. 106-4

The analyses performed in support of the EIS are documented along with the assumptions made and the results obtained in the EIS. This documentation provides a means of reproducing the results, if one wishes to do so. The results indicate that the consequences of implementing the policy would be low.

Response to Comment No. 106-5

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 106-6

The commentor's position on selection of Concord NWS as a candidate for acceptance of spent nuclear fuel from foreign research reactors is noted. DOE considers that the port selection criteria identify ports that can safely handle foreign research reactor spent nuclear fuel (Appendix D of the EIS). DOE further considers that the use of any of the ports identified in Section 2.2.1.6 of the EIS by the port selection process, including Concord NWS, would pose a low risk to either the port personnel or the population near the port. The acceptance period for comments on the draft EIS was extended from June 20 to July 20, 1995, for a total comment period of 90 days.

COMMENTOR NO. 107: FORM LETTER A

Charles Head, Program Manager, Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585
Phone: 202-586-9441 • Fax: 202-586-5256

re: *Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel*

Dear Mr. Head:

I understand that the Department of Energy (DOE) intends to return spent nuclear fuel rods through the Concord Naval Weapons Station (CNWS), and I have the following questions (to which I expect a prompt answer):

107-1 • If, as the DOE states, "the purpose of the proposed policy is to promote the U.S. nuclear weapon nonproliferation policy by seeking to reduce the amount of highly enriched uranium (HEV) used in civil programs worldwide," then why are we continuing to sell low-enriched uranium (LEV)—which, as you admitted at the hearing on May 22, in nuclear reactors generates plutonium—a primary ingredient of nuclear weapons?

107-2 • And if our policy is to remove and secure HEV, then why is the DOE offering to also accept LEV for ten years "from (foreign) reactors that have **already converted** to LEV."? (Spent Nuclear Fuels Acceptance Policy, Proposal 3.) It seems to make no sense.

107-3 • Is the purpose of this policy to enable the DOE to sell more and more nuclear fuel rods to those countries from whom we are accepting spent nuclear fuel? Is this a throughput? Does the use of more and more nuclear material increase or decrease the chances of nuclear weapons proliferation?

107-4 • If part of the benefit of this policy is what former Secretary of State Eagleburger referred to as "nuclear commerce" (letter dated 10/26/92 in the draft EIS, App. G), then how much money has been and will be received for the sale of nuclear fuel rods by the DOE to its customers in over forty foreign countries? Since we here in the Bay Area are being asked to share the risks of this commerce, is there some plan for us to share the benefits? Can we get some of this money locally? Perhaps the DOE could fund a local cancer treatment facility?

107-5 • Since all nuclear reactors create fissile materials, shouldn't the goals of nonproliferation be best served by conversion to other sources of energy? Can the DOE do *SOLAR?*

107-6 • Why don't we focus our policy on those countries that pose an actual risk of converting their nuclear fuel into bombs (e.g., Iran)? At the hearing you responded to this question by speculating about possible changes in regime, political disruptions, etc. Why do you want to bring to the U.S. spent nuclear fuel from Briton, France, Japan, Sweden and numerous other countries whose rate of domestic terrorism is less than our own?

107-7 • In the section of the draft EIS that refers to Concord, references are made to non-existent places: "Clydes," "Brizzly Bay," and "San Suisun Bay." Port Chicago is said to be 10 miles north of the city of Concord. Do these errors reflect how much the DOE cares about us? Are they an indication of the DOE's competency? Perhaps they reveal a master plan for the massive transformation of our geography?

107-8 • In the same section, mention is made of "the unlikely event of an explosion" at Port Chicago. True, any accident is, in a way, unlikely—as your statistics assume throughout the EIS. But you may have heard that, unlikely or not, we *had* a huge explosion there in 1944. What would be the consequences if such an explosion were to occur again, but not with just high explosives (HE)—but with *HE and* HEV?

107-9 • Again, in that same section, the rather truncated map of the CNWS contains some of the area occupied by our very busy Buchanan Airfield. Even though the airfield symbol appears in the map's legend, it does not appear on the map itself. Nor is the airfield mentioned in any of the text. Does this mean the DOE believes heavy local air traffic does not increase the risk of a terrible nuclear accident? Or maybe it just wasn't taken into consideration?

107-10 • Likewise, no mention is made of the six oil refineries, fifteen cities and six bridges that the nuclear casks, borne on merchant vessels, would encounter en route to CNWS. What would happen if such a ship collided with one of the hundreds of tankers loaded with gasoline that pass through the narrow channels of the Carquinez Straits? Is the DOE aware that over 9 million tons of petroleum and petroleum products passed through the Straits last year? Why are there no worst-case scenarios mentioned in the draft EIS? Is the DOE afraid to consider such possibilities—or is it afraid that *we* will?

107-11 We live here, Mr. Head—it is necessary for us to consider threats to our physical security, no matter how frightening. Nuclear nonproliferation is not only a general principle we believe in, but also a specific condition we will strive to create in our neighborhoods. Unless—and until—you can answer our questions satisfactorily, let's not move these incredibly dangerous materials. Why tempt fate and not be prudent until *after* the inevitable accident has occurred?

Sincerely,

Rolando Destrukto

A Concerned Citizen

RESPONSE TO COMMENT
COMMENTOR NO. 107: FORM LETTER A

Response to Comment No. 107-1

HEU could be used to make nuclear weapons if it were to fall into the hands of nations that do not support the nonproliferation of nuclear weapons. LEU is preferred as fuel for foreign research reactors because it cannot be used to make nuclear weapons (Section 1.1 of the EIS). In addition, due to the design of the LEU fuels and the research reactors in which they are used, only a minuscule amount of plutonium is produced (See Appendix B, Table B-6 of the EIS).

Response to Comment No. 107-2

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary to offset the considerable expenses of conversion and the reduction in reactor capabilities and increased operating costs that generally accompany conversion to LEU fuel.

Response to Comment No. 107-3

The purpose of the proposed action is not to enable DOE to sell more nuclear fuel; DOE does not sell nuclear fuel. The purpose of the proposed action is to reduce international commerce in HEU (Section 1.2 of the EIS). One method of accomplishing this objective is to encourage the use of LEU fuel in foreign research reactors. Use of LEU fuel offers the advantage of increased national security because LEU fuel cannot be used to make nuclear weapons (Section 1.1 of the EIS).

Response to Comment No. 107-4

The sale of fresh fuel for foreign research reactors is outside of the scope of this EIS (Section 1.3 of the EIS). The Energy Policy Act of 1992 places severe restrictions on the export of HEU. Since passage of that act, no new export licenses for HEU have been issued by the United States. No sales of fuel for foreign research reactors are included in the proposed action. Environmental effects of the proposed action were evaluated and found to result in no significant environmental risks or benefits (Section 4 of the EIS), including economic benefits.

Response to Comment No. 107-5

Conversion to other sources of energy is not feasible in the case of research reactors. Foreign research reactors are not used to produce commercial electric power, and the fission process is required to produce the neutrons which are necessary for medical, industrial, and educational applications of research reactors (Section 1.1 of the EIS describes applications). The use of LEU in foreign research reactors does not pose a proliferation threat because LEU cannot be used to make nuclear weapons.

COMMENTOR NO. 107: FORM LETTER A (CONT'D.)

Individuals submitting this form letter:

Finsilver, E.J.

O'Connor, Tim

Oestrukto, Roland

Reeves, Florence P.

RESPONSE TO COMMENT
COMMENTOR NO. 107: FORM LETTER A (CONT'D.)

Response to Comment No. 107-6

The United States has in the past, and continues to play, a leadership role within the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported the program such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

Response to Comment No. 107-7

The corrections identified by the commentor have been incorporated into the EIS.

Response to Comment No. 107-8

The worst accident analyzed involves the foreign research reactor spent nuclear fuel cask being damaged, then engulfed to a long-duration fire. A scenario that includes high explosives was not considered. Rather, administrative controls would be in place to preclude the handling of high explosives while the foreign research reactor spent nuclear fuel was on Concord NWS or in a ship near Concord NWS. While there would be high explosives in Concord NWS's bunkers while the foreign research reactor spent nuclear fuel was being handled, as long as the high explosives were not handled concurrently, there is little danger of explosion.

Response to Comment No. 107-9

Appendix D, Section D.5 of the EIS discusses the potential impacts and risks associated with low probability events such as ship crashes followed by severe fires. Given that Buchanan Field is a general aviation field located about 6 miles from the piers which could receive spent nuclear fuel shipments at Concord, and the air traffic near Concord NWS is controlled by the Federal Aviation Administration such that air traffic into and out of Buchanan Field is not over Concord NWS, it is unlikely that the probability of or consequences from a small aircraft crash are as large as the probabilities and risks of ship crashes and fires in the ship channel or at the pier. The crash of an aircraft into a ship carrying one or more casks of spent nuclear fuel is a low probability event which might initiate a severe accident. Therefore, based on the low probability of this accident scenario, it is not necessary to consider additional risk analysis since this scenario falls within the range of accident analysis already performed for the EIS and would not significantly affect the total risks already analyzed.

Response to Comment No. 107-10

CEQ regulations and guidance do not require a worst case analysis of accidents in an EIS. For the purpose of analysis in the EIS, there is no such thing as a worst case scenario because for any worst case that is postulated, a still more severe accident can be postulated by adding one more drum of gasoline, one more wrecked rail car, one more terrorist, etc. In addition, for each assumption that is made to make a postulated accident more severe, the probability of the accident becomes more remote. Nevertheless, DOE did analyze the severe accident in which a ship carrying a spent nuclear fuel transportation cask is involved in a collision with another ship, severe enough to breach the transportation cask and then subject the cask to a fire resulting from the collision (Section 4.2.2.3 of the EIS). These conditions are the same as the worst conditions that might be expected to result from the collision of a ship carrying a spent nuclear fuel transportation cask with a petroleum tanker. The EIS does not explicitly consider the existence of land-based facilities such as refineries because the addition of some mishap at a land-based facility would not add to the severity of the worst plausible accident. Instead, the port selection process considered whether a favorable transit to and from open water exists considering parameters such as navigation hazards and the distance from the port to the open ocean or large bay (Appendix D, Section D.1.9.2 of the EIS).

Response to Comment No. 107-11

The commentor's concerns are noted. The analyses presented in Section 4 of the EIS demonstrate that there would be no significant adverse or beneficial impacts on human health, wildlife, or the environment due to implementation of the proposed action. In addition, the analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3) and that the risks associated with incident-free handling of foreign research reactor spent nuclear fuel are also low (Section 4.2.2.2).

COMMENTOR NO. 108: POSEY, JEANNE & CHARLES

Hazel O'Leary
Department of Energy
1000 Independence Ave.
Washington, D.C., 20585

May 25, 1995

Dear Ms. O'Leary:

This letter is written to protest the decision to send all NUCLEAR WASTE through the San Francisco Bay to the CONCORD NAVAL WEAPONS STAION for further distribution along our State and Federal highways to places to contain such waste. 108-1

What is our government thinking of? Don't they realize the congested areas that they will be puting in jeopardy? Just one little leak in the San Francisco Bay could contaminate the whole bay and affect millions of people! 108-2

Why can't this waste be initially sent to a port of entry that is more remote? The Concord Naval Weapons Station is enough of a threat to the greater Bay Area without the addition of NUCLEAR WASTE within its' boundaries! 108-3

Please respond in writing as to why this decision cannot be changed and another location utilized.

PLEASE RECONSIDER THIS DECISION.

Sincerely,

A L Posey
1327 Santa Fe
Martinez Ca
94553

cc: President William Clinton
Rep. John Doolittle
Senator Barbara Boxer
Senator Diane Feinstein
Governor Pete Wilson
State Leg. David Knowles

RESPONSE TO COMMENT
COMMENTOR NO. 108: POSEY, JEANNE & CHARLES

Response to Comment No. 108-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing foreign research reactor spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 108-2

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. As stated in Section 2.6.2 of the EIS, in over four decades of spent nuclear fuel shipments, no transportation cask has ever released any of its contents (radioactive material) as a result of an accident. Spent nuclear fuel transportation casks passing through the Bay area to Concord NWS, or in any other port or waterway, cannot leak because the metallic fuel is transported dry. Based on past experience, DOE considers that the foreign research reactor spent nuclear fuel transportation casks would not release their radioactive contents, and would thus not affect the quality of the water. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

Response to Comment No. 108-3

Use of a remote port could slightly reduce the consequences of an accident which are low (Section 4.2.2 of the EIS), however, there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

COMMENTOR NO. 109: PERKINS, SUSAN J.

7731 14th Avenue
Seattle, WA 98117
May 30, 1995

Charles Head
Office of SNF Management EM-37
U.S. Dept. of Energy
1000 Independence Ave. SW
Washington, DC 20585

RE: **Draft EIS for Shipment of Imported Nuclear Waste**

The purpose of this letter is to comment on the above-referenced draft EIS released by DOE. I am strongly opposed to DOE's proposal to ship imported nuclear waste through the urban areas of Puget Sound or Portland, for the following reasons: *109-1*

* Transporting waste using commercial freighters or public ports in large cities is very dangerous. Accidents can and do happen, putting 100s or 1000s of people at risk. In the case of a fire involving nuclear waste, large portions of cities could be permanently contaminated. If nuclear waste must be imported, it should be done using dedicated ships and Dept. of Defense ports in nonurban areas. *109-2* *109-3*

* I oppose importation of spent nuclear fuel from nations that do not pose a proliferation risk. Why should the US pay for this and take the risks? To take the fuel from these nations will only encourage them to keep using nuclear technology and producing yet more waste, without facing the fact that we have no way to dispose of it safely. Even for nations that may pose a proliferation risk, there is no reason why we should take LEU wastes that cannot be used to produce nuclear weapons. *109-4*

* Instead of importing nuclear waste from these countries, we should encourage them to use dry cask storage on site, as done at US reactors. This would eliminate all transportation risks. *109-5*

* I oppose bringing additional nuclear waste to the Hanford Reservation. Hanford has serious leakage and other safety hazards from the nuclear waste already present at the site, which DOE is having trouble enough taking care of. DOE should concentrate on fixing the serious safety problems caused by the existing nuclear waste at Hanford, not import vast quantities of additional waste that could put Washington citizens at risk. *109-6*

Sincerely,

Susan J. Perkins

cc: Rep. Jim McDermott, Senators Patty Murray and Slade Gorton, Governor Mike Lowry

RESPONSE TO COMMENT
COMMENTOR NO. 109: PERKINS, SUSAN J.

Response to Comment No. 109-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Ports of Tacoma and Portland is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, the Port of Portland, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 109-2

The analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel presented in Sections 4.2.1 and 4.2.2 demonstrate that the use of either commercial or military ports and either commercial or dedicated ships would not pose any significant risk to the port personnel, the population near the ports, or the ships' crew. See also the response to comment 102-4.

Response to Comment No. 109-3

The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3, "Consequences of Port Accidents"). The worst plausible accident involves the foreign research reactor spent nuclear fuel cask being damaged, then exposed to a long-duration fire. The use of dedicated ships and/or military ports does not significantly alter the already low risk (Sections 4.2.1 and 4.2.2).

Response to Comment No. 109-4

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk is noted. The United States has played in the past, and continues to play, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel.

COMMENTOR NO. 109: PERKINS, SUSAN J. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 109: PERKINS, SUSAN J. (CONT'D.)

Response to Comment No. 109-5

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS. The commentor's preference for dry cask storage at the research reactor site is likewise noted.

Response to Comment No. 109-6

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 110: CROWLEY, SUSAN GARRETT

Susan Garrett Crowley
P.O. Box 963
Hood River, OR 97031
(503) 386-2686

June 1, 1995

Charles Head
Office of SNF Management, EM-37
U.S. Dept. of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

RE: WRITTEN COMMENTS; DEIS proposing importation of high-level nuclear waste through Northwest ports for possible storage at Hanford

Dear Mr. Head:

This letter is to express my chagrin and anger that importation of high-level nuclear waste from foreign countries for storage at Hanford is being considered. *110-1*

I live in Hood River, on the Columbia. Many citizens who live on the river are fearful that an entire national treasure--the Columbia River Gorge--is going to be sacrificed, ultimately, to the aftereffects of past nuclear storage. Please do all you can to avoid adding to an already painful burden that hangs over our heads. *110-2*

Countries that want to develop nuclear weapons will do so. The genie is out of the bottle; we have only ourselves to blame for that. Our accepting the waste of other countries will merely relieve them of the burden of dealing with it themselves. It will not keep them from pursuing weapons researches if they so choose. It is naive to believe otherwise. *110-3*

They should store it at their reactor sites, as we in the U.S. are now sadly forced to do. The solution is not to make ourselves a dump for the ultimate in garbage; it is to take diplomatic measures to assure that the nuclear number is written out of the international problem-solving equation as unworkable. *110-4*

If the nation insists, nonetheless, on adding even more to our already unconscionable load of nuclear garbage, it should be the burden of *another* part of the country. The Northwest and the Columbia River Gorge have already taken their share of this devil's residue. Please do not allow it to run it down our rivers and roads. Enough.

Very sincerely yours,

Susan Garrett Crowley

XC: Senators Hatfield and Packwood
Rep. Wes Cooley

RESPONSE TO COMMENT
COMMENTOR NO. 110: CROWLEY, SUSAN GARRETT

Response to Comment No. 110-1

The commentor's opposition to the importation of foreign research reactor spent nuclear fuel, or the use of the Hanford Site as an interim storage site for spent nuclear fuel from foreign research reactors is noted.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 110-2

DOE appreciates the commentor's concern for the water quality in the Columbia River Gorge. The EIS demonstrates that there would be no significant adverse impacts to any of the ports, bays, or waterways that the foreign research reactor spent nuclear fuel might pass through or near. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. Transportation casks passing through the Columbia River cannot leak (the spent nuclear fuel would be shipped dry), and would thereby not affect the quality of the water. As stated in Section 2.6.2 of the EIS, to date no spent nuclear fuel transportation cask has ever released any of its contents (radioactive material), even in actual accidents. A paragraph has been added to Section 4.2.2.2 of the EIS to emphasize the no-impact nature of these shipments on air and water quality.

Effects of past nuclear storage, presumably from the Hanford Site, are beyond the scope of this EIS. See also the response to comment 110-1, above.

As to the commentor's statement that Tacoma is tired of being considered a waste facility, if foreign research reactor spent nuclear fuel is accepted into the U.S., it should be noted that it would only pass through the port on its way to a management site, remaining in the Tacoma area for no longer than twenty four hours. Thus, neither Tacoma, nor any of the other nine potential receipt ports would be used as a waste facility.

COMMENTOR NO. 110: CROWLEY, SUSAN GARRETT (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 110: CROWLEY, SUSAN GARRETT (CONT'D.)

Response to Comment No. 110-3

An objective of the proposed action is to keep weapons-grade nuclear materials out of the hands of nations that wish to develop a nuclear weapons capability (Section 1.2 of the EIS). While sovereign nations can pursue nuclear weapons capability if they wish, United States' policy is to deny those nations both the required materials and technology necessary for a successful pursuit (Sections 1.1 and 1.2 of the EIS).

Response to Comment No. 110-4

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in (Sections 2.3 and 4.4.1 of the EIS). The commentor's preference for dry cask storage at the research reactor sites is likewise noted.

COMMENTOR NO. 115: HAMMER, BRUCE

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 115-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: ~~[illegible]~~ If this project must be implemented then there needs to be fairness: all ports (including population centers) need to be involved with shipments. Otherwise, I totally oppose this nuclear waste shipment plan. 115-2

Name: Bruce Hammer Telephone: (206) 471-9153

Address: 5816 South "A" City/State/Zip Code: Tacoma, WA 98408

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 115: HAMMER, BRUCE

Response to Comment No. 115-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 115-2

As a part of the overall evaluation of environmental impacts associated with the shipment of foreign research reactor spent nuclear fuel, the EIS identifies ports of entry in the United States that are acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. In evaluating and selecting acceptable ports of entry, evaluation criteria were developed to use in selecting ports of entry (Appendix D, Sections D.1.8 and D.1.9). The criteria include such factors as transit from open ocean, port population, population along the route to the management site, port experience with handling containers, and port facilities. While 153 commercial and eight military ports were initially considered, only the ports which are determined to be acceptable might be used in the case that foreign research reactor spent nuclear fuel is accepted into the United States.

COMMENTOR NO. 116: HAMMER, STAN

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 116-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: There is a strong element of favoritism in this decision — Ports of Seattle, Long Beach, Oakland, & Los Angeles are absent from this list. We urge the Port of Tacoma Commissioners to vigorously oppose this decison with all the ~~your~~ resources at your command. Make us proud, gentlemen. 116-2

Name: Stan Hammer Telephone: 272-5224

Address: 901 E. Wright City/State/Zip Code: Tacoma, WA. 98404

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 116: HAMMER, STAN

Response to Comment No. 116-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 116-2

Tacoma was one of 161 ports (153 commercial and eight military ports) considered. These ports were evaluated against selection criteria, resulting in 10 ports that met all of the criteria. Appendix D, Sections D.1.8 and D.1.9 of the EIS present a detailed discussion of the selection process and results.

COMMENTOR NO. 117: PEARSON, NANCY

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [ ] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: Thanks, Port officials, for arranging the meeting. I would like to see the several questions not adequately answered get a response from DOE. To avoid addressing the worst-case-scenario issue in a forthright manner only continues public question about the credibility of DOE activities. 117-1

Although I believe the risk of harm to people + the environment is very small, it makes more sense to me to use military facilities for these shipments — security + trained personnel can be controlled more easily. And people in Tacoma are tired of being considered a waste facility. 117-2

Name: Nancy Pearson Telephone:

Address: 6708 Bridgeport City/State/Zip Code: Tacoma WA 98407

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 117: PEARSON, NANCY

Response to Comment No. 117-1

There is no such thing as a worst case scenario because for any worst case that is postulated, a still more severe accident can be postulated by adding one more drum of gasoline, one more wrecked rail car, one more terrorist, etc. In addition, for each assumption that is made to make a postulated accident more severe, the probability of the accident becomes smaller. The EIS does not contain a worst-case scenario, but a broad range of port accident scenarios, including severe accidents, is discussed in Section 4.2.2.3 of the EIS. Appendix D, Section D.5.4.3.2 of the EIS presents the risks of a very high temperature fire that engulfs a cask, which was part of a sensitivity study on release fractions.

Response to Comment No. 117-2

Section 2.8 of the EIS addresses the security measures that would be taken to ensure that there would be no unacceptable risks of terrorism or theft of materials. DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present on military ships and at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military facilities is noted.

Two paragraphs have been added to Section 2.6.3.1 of the EIS to discuss why special security is not needed for the receipt of foreign research reactor spent nuclear fuel.

In regard to needing to use military facilities because of special training, spent nuclear fuel from foreign research reactors is shipped in standard ISO containers, and does not require special training of workers (Section 2.6.3.2.2 of the EIS); experience in handling of ISO containers, which all of the candidate ports have, is all that is necessary.

As to the commentor's statement that Tacoma is tired of being considered a waste facility, if foreign research reactor spent nuclear fuel is accepted into the U.S., it would only pass through the port on its way to a DOE management site, remaining in the Tacoma area for no longer than twenty four hours. Thus, neither Tacoma nor any of the other nine potential receipt ports would be used as a waste facility.

COMMENTOR NO. 118: GRAHAM, AMIE-RUTH K.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 118-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: I feel that the possable risks are by far out weighed by the short term benafits. the risk involved, as "slight" as it is is; I feel is not worth the few jobs that it would create. I would personally at risk. I and many people in my aquantiance have discussed this and would consider moving. I am strongly against these products/items/fuel through port of tacoma & our city streets and rail systems. 118-2

Name: Amie-Ruth K. GRAHAM Telephone: 564-3770

Address: 601 N. Jackson #5 City/State/Zip Code: Tacoma WA. 98405

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 118: GRAHAM, AMIE-RUTH K.

Response to Comment No. 118-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 118-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). The analysis in Section 4.2 of the EIS demonstrates that, the risks associated with implementation of the proposed action to human health or the environment would be low.

COMMENTOR NO. 119: BLOSE, CHARLENE J.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [X] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: I understand about prospect job opportunities realated to this shipping activity, but on personal knowledge about Commencement Bay Health it would benefit TACOMA Not to accept shipment. Also additional research should be sought in finding other ports of Entry that would be better at handling procedures for Nuclear elements.

Name: Charlene J. Blose Telephone: (206) 383-2429

Address: 771 Broadway City/State/Zip Code: TACOMA, WA 98403

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 119: BLOSE, CHARLENE J.

119-1 ***Response to Comment No. 119-1***

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

119-2 ***Response to Comment No. 119-2***

DOE initially considered 161 ports (153 commercial and eight military ports) as ports of entry for foreign research reactor spent nuclear fuel. These ports were evaluated against the selection criteria (Appendix D, Section D.1.9 of the EIS), resulting in 10 ports that met all of the criteria as being acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. The results of the application of these criteria to the initial 161 ports is set forth in Appendix D, Section D.1.9 of the EIS.

The experience criterion used in the port selection process evaluates the port's experience in handling containerized cargo, not necessarily for dealing with nuclear or radioactive material (Appendix D, Section D.1.9.1 of the EIS). Although the foreign research reactor spent nuclear fuel is radioactive material, the dose rates from the transportation casks used to transport it would be low, so no special handling would be required; experience with handling containers is sufficient. The Port of Tacoma has significant experience handling containers, so it met the experience selection criterion.

COMMENTOR NO. 120: ANDERSON, S.A.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [ ] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [x] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: While I am personally convinced this could be done safely through the Port of Tacoma, or any port, the level of preparation by the DOE panel was so poor that no one could be convinced. 120-1

Name: S. A. ANDERSON Telephone: (206) 857-3157

Address: 1211 102ND AVE G NW City/State/Zip Code: GIG HARBOR WA 98329

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 120: ANDERSON, S.A.

Response to Comment No. 120-1

The commentor's favorable statement on the use of the Port of Tacoma as the port of entry for foreign research reactor spent nuclear fuel is noted. The commentor's concerns about the preparation of the panel are noted. The Port of Tacoma is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States.

COMMENTOR NO. 121: BLAKESLEE, ELIZABETH E.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 121-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: _____

Name: ELIZABETH E. BLAKESLEE Telephone: 531-8850

Address: 112-127TH ST. SO. #2 City/State/Zip Code: TACOMA, WA 98444

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 121: BLAKESLEE, ELIZABETH E.

Response to Comment No. 121-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 122: SUTHERLAND, MARTIN A.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [ ] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [x] I am in favor of spent nuclear elements being shipped through the Port of Tacoma. 122-1
- [ ] I am undecided. *

COMMENTS: This is a threefold situation of spread of Nuclear Weapons. 122-2

1st - We must do all that we can to eliminate nuclear - (High Grade Uranium) to countries that do not follow the Guidelines set forth.

2nd - The Benefits in the long term of Having High Grade Uranium through the ports would be an opportunity for people in education, jobs, etc. 122-3

Name: Martin A. Sutherland Telephone: 272-0530

Address: 2032 East Morton City/State/Zip Code: Tacoma/WA/98404

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 122: SUTHERLAND, MARTIN A.

Response to Comment No. 122-1

The commentor's favorable statement on the use of the Port of Tacoma as the port of entry for foreign research reactor spent nuclear fuel is noted. The Port of Tacoma is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States.

Response to Comment No. 122-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). HEU can be used to produce nuclear weapons.

Response to Comment No. 122-3

The commentor's position that acceptance of spent nuclear fuel from foreign research reactors would provide economic benefits at ports of entry is noted. Impacts of the proposed action are discussed in Section 4 of the EIS.

COMMENTOR NO. 123: PHILBRICK, JOHN

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [ ] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [x] I am in favor of spent nuclear elements being shipped through the Port of Tacoma. 123-1
- [ ] I am undecided. *

COMMENTS: _____

Name: John Philbrick Telephone: 438 1033

Address: 1237 Dearborn Dr SE City/State/Zip Code: Olympia

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 123: PHILBRICK, JOHN

Response to Comment No. 123-1

The commentor's favorable statement on the use of the Port of Tacoma as the port of entry for foreign research reactor spent nuclear fuel is noted. The Port of Tacoma is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States. If any foreign research reactor spent nuclear fuel were to be accepted into the United States, the selection of the actual port(s) of entry to be used would be made in the Record of Decision, subsequent to completion of this final EIS.

COMMENTOR NO. 124: WRIGHT, CURTIS

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: MAIN REASON I OPPOSE IS SAFETY. BECAUSE OF RISK DUE TO RECENT GEOLOGICAL STUDY RELEASED REGARDING THE MUD FLOW CAUSED IF MT. RAINIER SHOULD BLOW. 124-1

Name: CURTIS WRIGHT Telephone: (206) 566-0526

Address: 7623 27 ST. W. #A2 City/State/Zip Code: TACOMA WA 98466

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 124: WRIGHT, CURTIS

Response to Comment No. 124-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a volcanic event and possible subsequent mud slides would be low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a mud slide, even if it buried the cask or caused structures to fall on top of the cask, would not be expected to compromise the transportation cask.

The evaluation of accident probabilities, both marine and land, were based on national accident rates, which include locale-specific conditions only as they impact the national statistics. However, local hazards such as mud slides, while they might be the event that might cause an accident such as those analyzed in the EIS, would not increase the consequences of the accident, which were found to be minor for both marine and land transportation accidents.

COMMENTOR NO. 125: BRAUCHER, RICHARD MARK

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 125-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: The risks involved in handling these materials outweigh any possible benefit the Spent Fuel Managemet Program offer Tacoma, Wa and the Puget Sound region. 125-2 Public safety and preservation of our area's natural resources demand optimum priority; followed by 125-3 active de-proliferation of Foreign Research Reactors and down scaling of nuclear energy dependent 125-4 projects domestically and abroad. Thank you for allowing the public to voice their concerns.

Name: RICHARD MARK BRAUCHER Telephone: 206-272-8941

Address: 819 N. 5th St #301 City/State/Zip Code: TAC. WA. 98403

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 125: BRAUCHER, RICHARD MARK

Response to Comment No. 125-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 125-2

See response to comment 125-1, above.

Response to Comment No. 125-3

Health and safety were primary considerations during the evaluation of environmental effects of the proposed action (Section 4 of the EIS). The risks to human health and the environmental effects associated with accepting foreign research reactor spent nuclear fuel would be low.

Response to Comment No. 125-4

The United States can influence, but not dictate, the development and application of nuclear technology in foreign nations through diplomacy and cooperative agreements. Long-standing policies of the United States support peaceful applications of nuclear technology for nations that agree not to develop nuclear weaponry (Sections 1.1 and 1.2 of the EIS). The proposed action does not require deactivation of foreign research reactors. It does encourage the use of LEU fuel in foreign research reactors. Research, medical, industrial, and agricultural applications of foreign research reactors are described in Section 1.1 of the EIS. Deactivation of domestic reactors is outside of the scope of this EIS (Section 1.3 of the EIS).

COMMENTOR NO. 127: GRANGER, MARK & ROCHELLE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Mark + Rochelle Granger Phone: (510) 439-7210

Title and Organization:

Address: 3131 Debra ct

City: Pittsburg State Ca Zip 94565

*** COMMENTS ***

C.C.C. has been confronted with a very serious decision. A decision that the D.O.E. has asked us, the people of C.C.C. to consider, evaluate, and comment on in 21 days. This seems to be a critically short period of time considering the D.O.E. has been allowed 7 years to address this issue. I am concerned, along with many of my neighbors, with the haste in which this report has been prepared. This is apparent through obvious same errors in the draft E.I.S. section on Concord, referring to some non-existent places such as" Clyder", " Brizzly Bay", and "San Suisun Bay ." If this is any indication of the thoroughness of this report, we are in trouble. 127-1

I am also concerned with other issues not address adequately in the E.I.S. The following is only a brief summary of a few of those concerns : 127-2

1. Why is the D.O.E. really accepting high enriched uranium from 28 different countries, many of which we have maintained friend relationships for years. With no permanent storage site designated, is it that we want to recycle it and sell it back to those countries for profit. It seems we are willing to expose our people to the results of nuclear handling catastrophes for profit. 127-3
2. Why are we handing and transferring highly toxic uranium from ships, to our highway 1/2 mile from a major earthquake fault that has predicted high activity level. 127-4
3. How do we, the citizens of C.C.C. benefit in any way to this very serious risk to our lives. 127-5
4. Why is a port that is surrounded by 4 million people being considered over less densely populated areas in Oregon and Washington. 127-6
5. No mention is made of the six oil refineries cities, six bridges, the proposal of six new coke burning domes along the route to the Concord Naval Weapons Station 127-7
6. Why are you considering a transporting nuclear fuel in such a busy , steadily growing port with such a risk of ship collision and fire? 127-8
7. No provisions have been made to improve the doc performance of the men employed to off load the cargo. It was stated in the meeting that the same employees would be used as are employed now. A scary thought when one considers that from 1987-1992, 93-100 accidents have occurred on that site. Not to mention the lack of substance abuse testing and improperly labeled containers. 127-9
8. Why no worse case scenarios ? Would it show the devastation that one accident would create? 127-10

In short I feel this report has been hastily prepared and puts our county at risk for nuclear disaster.

Rochelle Granger

Rochelle Granger
citizen of Pittsburg

RESPONSE TO COMMENT
COMMENTOR NO. 127: GRANGER, MARK & ROCHELLE

Response to Comment No. 127-1

The deadline for submission of comments in response to the draft EIS was extended from June 20 to July 20, 1995. DOE considers the comment period (90 days total) to be sufficient for public comment.

Response to Comment No. 127-2

Appendix D, Section D.2.1.6 of the EIS has been revised to incorporate the corrections identified by the commentor.

Response to Comment No. 127-3

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). Acceptance or other management of the spent nuclear fuel from our stable, developed allies is required because the actions taken by these countries (i.e., whether they cease the use of HEU in their civil programs) is a powerful example for the rest of the world, including many less developed, less stable countries.

In addition, the United States is currently attempting to convince Russia and China to implement programs to encourage their client states to also phase out use of HEU in their research reactors. If the United States cannot convince its own allies to stop the use of HEU, we would stand little chance of convincing Russia and China to cooperate in this effort.

Even in cases where DOE might use chemical separation as a means of preparing the spent nuclear fuel for disposition, any sale of separated uranium would only offset a portion of the costs that would be borne by the United States. DOE would not make a profit.

Response to Comment No. 127-4

The possibility of earthquakes in the Concord area was taken into account in the calculations in Section 4.2.2.3 and Appendix D of the EIS. Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquakes-induced ship and road accidents is small compared to other causes.

COMMENTOR NO. 127:
GRANGER, MARK & ROCHELLE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 127:
GRANGER, MARK & ROCHELLE (CONT'D.)

Response to Comment No. 127-5

The benefit to the citizens of the United States from the proposed action, including those in potential ports of entry, along transportation routes, or near potential management sites, is a reduction in the risk that weapons grade uranium from civil programs could be diverted into production of nuclear weapons that might be used against us or our allies. On the other hand, the analyses recorded in Section 4 of the EIS demonstrate that the risks associated with the proposed action are low.

Response to Comment No. 127-6

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other port, is low. The use of a remote port could slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion the port selection process.

Response to Comment No. 127-7

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process. The passage does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). Also, the port selection criteria do not consider the existence of land-based facilities such as refineries because the addition of some mishap at a land-based facility would not add to the severity of the worst plausible accident, which is considered to be the collision of the ship carrying the foreign research reactor spent nuclear fuel with a petroleum tanker.

Response to Comment No. 127-8

The EIS contains the results of analysis of a severe accident in which a ship carrying foreign research reactor spent fuel is involved in a collision with another ship, severe enough to breach the spent nuclear fuel transportation cask and subject the cask to a fire resulting form the collision (Section 4.2.2.3). The results of this analysis show that the risk is low.

COMMENTOR NO. 127:
GRANGER, MARK & ROCHELLE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 127:
GRANGER, MARK & ROCHELLE (CONT'D.)

Response to Comment No. 127-9

As the result of public concern borne from a September, 1993 television report, the Contra Costa County Board of Supervisors initiated an investigation of the safety at Concord NWS. Their report on the subject, *Safety at the Concord Naval Weapons Station*, dated November 2, 1993, concluded in part that, "There were no incidents involving explosions or radiation exposure. Many of the reported incidents were not accidents caused by Weapons Station employees but, rather, were discoveries by employees that materials being received had been damaged during loading or transit. In some cases the shipments had not been properly blocked, braced or banded."

In fact, the safety record at Concord NWS is significantly better than that of similar activities in ports in the private sector. According to the Department of Labor statistics, for the category of marine cargo handling, the number of lost workday cases per 100 full-time workers for 1993 was 7.1 nationwide (1994 data not available), which is typical. The number of lost workday cases per 100 workers at Concord NWS for the first three quarters of fiscal year 1995 was 5.3, which is also typical for Concord.

Response to Comment No. 127-10

CEQ regulations and guidance do not require a worst case analysis of accidents in an EIS. For the purpose of analysis in the EIS, there is no such thing as a worst case scenario because for any worst case that is postulated, a still more severe accident can be postulated by adding one more drum of gasoline, one more wrecked rail car, one more terrorist, etc. In addition, for each assumption that is made to make a postulated accident more severe, the probability of the accident becomes more remote.

The analyses that were performed to evaluate the impact of various accidents divided all accidents into six categories (Appendix D, Section D.5.3.1.1). The most severe accident category, release category 6, assumes that the ship carrying the foreign research reactor spent nuclear fuel transportation cask is in a collision with a tanker and that a fire occurs that engulfs the transportation cask. The consequences of accidents, including category six accidents (the worst case scenario), are discussed in Appendix D, Section D.5.4.2.2.

COMMENTOR NO. 128: SEENO, C.M.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: C.M. Seeno Phone:

Title and Organization: concerned citizen

Address: P.O. Box 977

City: Clayton State CA Zip 94517

*** COMMENTS ***

I and my family are very much opposed to the proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel. 128-1

We feel that this area is much too densely populated to allow such a possible hazard. 128-2

We feel this material should be stored in a remote area away from towns + citiesm and people. 128-3

We fear what would happen, if these reactors somehow were damaged - via an accident while transporting - terrorism or who knows what else. 128-4

We do not want this in our area. It is too dangerous

To Mail In Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 128: SEENO, C.M.

Response to Comment No. 128-1

The commentor's opposition to the proposed action as described in Section 2.1 of the EIS is noted. Sections 2.2, 2.3 and 2.4 of the EIS describe each of the proposed management alternatives.

Response to Comment No. 128-2

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other of the ten ports selected, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however, there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

Response to Comment No. 128-3

The commentor's preference for storage only in remote areas is noted. The populations surrounding the five potential management sites under are listed in Table A-6 in Appendix A of the EIS.

Response to Comment No. 128-4

The commentor's opposition to any nuclear material being transported through the Concord area is noted. Sections 4.2.2 and 4.2.3 of the EIS, however, show that the risks of receiving the foreign research reactor spent nuclear fuel at Concord and transporting it by truck or rail would be low. Section D.5.9 has been added to Appendix D of the EIS to address the issue of attack by disgruntled persons or terrorists.

COMMENTOR NO. 129: KIRKLAND, KIRK

Tahoma Audubon Society
2601 70th Avenue W, Suite E, Tacoma WA 98466

May 31, 1995

Charles Head
U.S. Department of Energy (EM-37)
1000 Independence Ave. S.W.
Washington D.C. 20686

Dear Mr. Head,

The Tahoma Audubon Society is opposed to the importing of high level spent fuled rods from 41 nations through Portland or the Puget Sound and the Port of Tacoma. We are appaled at the selection of Handford as a Phase II destination and storage facility. The local Audubon chapter represents more than 1600 members. *129-1*

If Alternative I is selected and the the United States is going to clean up other nation's nuclear wastes, then the importation should be done aboard miliatry ships and through military ports. No commercial freighters or public ports in large cities should be used. Without USDOE agreeing to pay for monitory, training or equipping local emergency personnel to respond when an accident occurs, this proposal is unfair to port workers and residents in Tacoma or Portland in the event of a truck, *129-2* *129-3* *129-4*
train, or a ship board fire accident.

Using the Port of Tacoma as a transhipment point is out of the question. Today the movement of oil tankers in Puget Sound is carefully restricted. A ship wreck involving nuclear fuel puts the hundreds of thousands of people who live along the shores of Puget Sound at risk. Without extreme precautions in place to provide for such an emergency, shipping nuclear fuel is just another Valdez oil spill waiting to happen -- with more distarous consequences. *129-5*

The history of USDOE funding and commitment to clean up Hanford is a good indication of USDOE ineffectiveness. After years of cleanup "studies" Handford still has nuclear fuel cooling basins along the Columbia River that are leaking. The new facility proposed for Hanford should not be increased until USDOE can solve it's current problems with safety upgrades and fuel removal form K-Basin. *129-6*

Shipping nuclear wastes in uninspected containers through populated ports and cities is a gross disregard for the health safety and welfare of the people of these communities by their government. *129-7*

We insist that the Alternative 2 be chosen. The nuclear material should be stored at the reactor and in the country where it was created with proper international monitoring and U.S. technical aid. *129-8*

Sincerely,

Kirk Kirkland
Co President

RESPONSE TO COMMENT
COMMENTOR NO. 129: KIRKLAND, KIRK

Response to Comment No. 129-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Ports of Tacoma and Portland or Puget Sound is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing spent nuclear fuel to the Ports of Tacoma or Portland, or to any of the ports analyzed in the EIS, is low.

With respect to commentor's opposition to the use of the Hanford Site, see response to comment 129-6, below.

Response to Comment No. 129-2

As discussed in Appendix D, Section D.1 of the EIS, both commercial and military ports were evaluated. Environmental effects of Management Alternative 1 and 3 at candidate commercial and military ports were evaluated and found to be insignificant (Sections 4.2.2 and 4.5). There is no reason to prefer commercial or military ports based on environmental consequences. As discussed in Appendix D of the EIS, there is no environmental basis for preferring military vessels to commercial vessels.

Response to Comment No. 129-3

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, the EIS demonstrates that commercial ships and facilities represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel. Section 4.2.2.3 of the EIS describes consequences of port accidents and Section 4.2.2.2 presents the impacts of incident-free operation.

Response to Comment No. 129-4

As discussed in Section 2.7.3.2 of the EIS, DOE provides funding to States and Tribes through the Office of Environmental Management and the Office of Civilian Radioactive Waste Management to assist with transportation related issues. This funding has been used in the past to enhance a jurisdiction's emergency management and response capabilities. Besides funding, much of DOE's assistance is provided in the form of technical assistance, for which DOE bears the cost. Assistance may be provided through

DOE's Radiological Assistance Program and under the National Contingency Plan, as well as through training, DOE sponsored meetings, informal discussions, and informational materials.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and interface.

Response to Comment No. 129-5

The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 and Appendix D, Section D.5 of the EIS).

Response to Comment No. 129-6

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE would be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel managed by DOE would be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 129: KIRKLAND, KIRK (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 129: KIRKLAND, KIRK (CONT'D.)

Response to Comment No. 129-7

The commentor's statement that suggests that the foreign research reactor spent nuclear fuel elements are shipped in "uninspected containers" is incorrect. The spent nuclear fuel transportation casks are maintained and inspected according to the regulations and requirements dictated in the casks' certificate of compliance issued by the U.S. Department of Transportation. The shipper is responsible to ensure compliance with all requirements. In addition, the loading of the spent nuclear fuel elements in the transportation cask would be performed according to an inspection procedure detailed in a TransportationPlan provided by DOE and the process would be observed by a DOE representative. General provisions of the Transportation Plan are given in Appendix H of the EIS.

Response to Comment No. 129-8

The commentor's preference for Management Alternative 2, Subalternative 1a is noted. At-reactor storage for long periods of time, however, is often not feasible (Sections 2.3 and 4.4.1 of the EIS).

COMMENTOR NO. 132: HERBERT, PAT

United States Department of Energy
Office of Environmental Management (EM-37)
Attn: Mr. Charles Head
1000 Independence Avenue, S. W.
Washington, D.C. 20585-0001

June 6, 1995

Dear Mr. Head:

This is my comment upon the Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel.

My choice, which is not really an option, is to process and store all waste from other countries somewhere on their continent. That means a receiving and storage station, wet and dry storage, and permanent storage facilities would need to be built perferably in a secluded area acceptable to those countries involved in producing the fuel and other wastes connected with their reactors and research facilities. 132-1

I am very much against shipping long distances by truck, rail, ship, or plane any nuclear or hazardous waste materials. 132-2 I support this viewpoint in this country as well as in other countries. I think it is very dangerous to even consider shipping all the fuel and wastes that have been produced in other countries to this one. 132-3 And, I don't think it compromises our stand on safety. We have for years trusted these countries with this material why shouldn't we let them, with our expertise, learn about cleanup, treatment, and storage? 132-4

What's wrong with using certain areas in Russia? There are vast amounts of land that are unpopulated and could serve as the facility for international fuel and wastes. It seems the most practicable to me and with the end of the Cold War what is the problem? Why do the people of the United States have to live with the wastes from other countries? Responsiblity must come with technological innovation and these countries must accept theirs which probably they don't mind doing if we would just allow them to proceed. 132-5

Thank you for allowing me to comment.

Sincerely,

Pat Herbert

Pat Herbert
P.O. Box 95966
Seattle, WA 98145

RESPONSE TO COMMENT
COMMENTOR NO. 132: HERBERT, PAT

Response to Comment No. 132-1

The option described in this comment is equivalent to Management Alternative 2. The alternative is described in more detail in Section 2.3 and the policy considerations and environmental impacts are presented in Section 4.4 of the EIS.

Response to Comment No. 132-2

The commentor's opposition to all forms of transport of all nuclear or hazardous waste materials is noted. However, DOE would also like to point out that spent nuclear fuel shipments have been carried out for over 40 years. During that period, there has never been an accident that has resulted in the breach of a spent nuclear fuel transportation cask or the release of radiological material from such a transportation cask. The EIS demonstrates that the risks from such activities are low (Sections 4.2.1, 4.2.2, and 4.2.3).

Response to Comment No. 132-3

See the response to comment 132-2, above.

Response to Comment No. 132-4

As explained in Section 1.1 of the EIS, the United States has not been leaving spent nuclear fuel from foreign research reactors in foreign countries for years. Starting in the early 1960s, the United States began accepting spent nuclear fuel from foreign research reactors specifically to prevent stockpiles of weapons-grade uranium abroad. It has only been since the policy for acceptance of HEU spent nuclear fuel expired in 1988 that spent nuclear fuel has been left at the research reactors sites while DOE developed a new policy for management of this spent nuclear fuel.

Nevertheless, the EIS specifically addresses the option of leaving the spent nuclear fuel in foreign countries (Management Alternative 2, Section 2.3 of the EIS). The EIS also explains the advantages and disadvantages that would follow from implementation of this alternative.

Response to Comment No. 132-5

At the end of the cold war, Russia and other members of the former Soviet Union were left with a large inventory of weapons-grade fissionable material. The United States is concerned over potential diversions of these materials to nuclear weapons programs and is taking actions to reduce this inventory. Shipping spent nuclear fuel from foreign research reactors to Russia would increase this concern. In any case, overseas management of spent nuclear fuel from foreign research reactors is discussed in Section 2.3 of the EIS.

COMMENTOR NO. 134: PAWLOSKI, BERNA J.

Hazel O'Leary
Department of Energy
1000 Independence Ave.
Washington, D.C., 20585

Dear Ms. O'Leary:

This letter is written to protest the decision to send all NUCLEAR WASTE through the San Francisco Bay to the CONCORD NAVAL WEAPONS STATION for further distribution along our State and Federal highways to places to contain such waste. 134-1

What is our government thinking of? Don't they realize the congested areas that they will be puting in jeopardy? Just one little leak in the San Francisco Bay could contaminate the whole bay and affect millions of people! 134-2

Why can't this waste be initially sent to a port of entry that is more remote? The Concord Naval Weapons Station is enough of a threat to the greater Bay Area without the addition of NUCLEAR WASTE within its' boundaries! 134-3

Please respond in writing as to why this decision cannot be changed and another location utilized.

PLEASE RECONSIDER THIS DECISION.

Sincerely,

Berna J. Pawloski
P.O. Box 457
Sutter Creek, CA
95685

cc: President William Clinton
Sen. John Doolittle
Senator Barbara Boxer
Senator Diane Feinstein
Governor Pete Wilson
State Leg. David Knowles

RESPONSE TO COMMENT
COMMENTOR NO. 134: PAWLOSKI, BERNA J.

Response to Comment No. 134-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 134-2

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. As stated in Section 2.6.2 of the EIS, in over four decades of shipments, no spent nuclear fuel transportation cask has ever released any of its contents (radioactive material) as the result of an accident. Spent nuclear fuel transportation casks passing through the Bay area to Concord NWS, or any other port or waterway, would not release their contents, because the foreign research reactor spent nuclear fuel is a solid metal fuel and it would be transported dry. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

Response to Comment No. 134-3

The use of a remote port could slightly reduce the consequences of an accident which would be low, however, there are other considerations that also must be made when selecting a port. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

* This is the best available copy of this comment document.

COMMENTOR NO. 136: FORM LETTER B

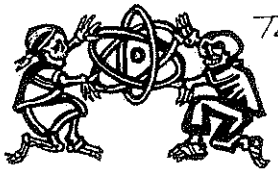
DANGER! RADIOACTIVE WASTE *Coming soon to a town near you!*

Fm: DeSirey-Dodge Peace Post
Chris Dodge/Jan DeSirey
4646 Columbus Ave. S.
Minneapolis, MN 55407 U

Dear Mr. Head:

Thanks for the offer, but we don't want your toxic garbage in the San Francisco Bay Area. The DOE, and the DOD, invented nuclear waste, peddled uranium all over the world, and now want the taxpayers to clean it up. No thanks!
The corporations who profitted should bear the cost and the responsibility of cleaning up their own mess.

136-1



To:

Mr. Charles Head
Office of Spent Nuclear Fuel
Management (EM-7)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 136: FORM LETTER B

Response to Comment No. 136-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Commentor No. 136: Form Letter B

Individuals submitting this form letter:

Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Anonymous
Axford, Roger W.
Baltzo, Andy
Berrean, Gina
Boehny, G. E. Martre
Burkhardt, Leonard B.
Demi, R.
Detwiler, Winifred
Dodge, Chris
Fletcher, Sonia
Goldberg, Ethel E.
Gray, Jerri
Gray, Walter
Hall, Freya
Harcott, Edita
Hollander, Leonore D.
Johnston, Candice
Lvx, Orland
Norton, Kurt
Perry, Suzanne
Rehm, Rush
Rose, J.
Scheritz, Andrei
Strickland
Yurma, R.H.
Zwickel, Abe
Zwickel, Jean

Response to Comment
Commentor No. 136: Form Letter B

COMMENTOR NO. 142: ROGERS, ELEANOR

June 7, 1995

Charles Head
U.S. Dept of Energy

Dear Sir,

I would like to object to the shipment of spent nuclear fuel to the Concord Naval Weapons Station in California. I feel it is a health risk and the thousands of people in this area should not be exposed to any accidental exposure 142-1

Sincerely
Eleanor Rogers
1236 Walker #313
Walnut Creek Ca
94596

RESPONSE TO COMMENT
COMMENTOR NO. 142: ROGERS, ELEANOR

Response to Comment No. 142-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 144: MINTON, MARY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Mary Minton Phone: 458-3009
Title and Organization: CoCo County Assessors - Clerical
Address: 260 Medburn St.
City: Clyde State CA Zip 94520

*** COMMENTS ***

I guess my main question is why should this be in the United States at all? Every place that is picked will be objected to by the citizens of that place. Clyde is a small isolated town now. Why subject it to more hazards? With the closing of Port Chicago Highway we are a one-lot town. Please — fight this with all your powers.

Thanks
Mary Minton

144-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 144: MINTON, MARY

Response to Comment No. 144-1

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons grade) uranium in civil programs worldwide (Section 1.2 of the EIS). Thus, the intent of the resultant proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their spent nuclear fuel (Section 1.2 of the EIS). The commentor's opposition to the use of Concord NWS as a port of entry is noted.

COMMENTOR NO. 145: GANIO, EMILY

June 7, 1995

Dear Mr. Head,

As a citizen of Contra Costa county I wish to voice my opposition ~~the~~ to the DOE proposal to transport spent nuclear materials to and from the Concord Naval Weapons Station. 145-1

I wish I had an alternative solution - I feel they should be stored "safely" where they are presently located rather than further jeopardizing humanity by moving them all over the place. 145-2

We already have enough trouble with what's already stored at Concord and what is going on at the Livermore Lab.

Register my "no" vote in further transportation of this dangerous material - 145-1 (Cont'd.)

Sincerely
Emily Ganio
2521 San Miguel Dr.
Walnut Creek, Ca. 94596

RESPONSE TO COMMENT
COMMENTOR NO. 145: GANIO, EMILY

Response to Comment No. 145-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 145-2

Overseas storage is addressed in the EIS as Management Alternative 2, Subalternative 1a. The commentor's preference for this alternative is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

COMMENTOR NO. 146: MURRAY, MARGARET L.

671 St Jones Ct
Walnut Creek Ca
94598

Mr. Charles Head
1000 Independence Ave SW
Washington DC.

Dear Mr. Head
I would like to have the Department of Energy provide details on health risks to the people who live near the Concord Weapons Station
How long would the spent fuel remain in Concord and how it would be taken away
Is there an island in the South Pacific?
Sincerely
Ms Margaret L Murray

146-1

146-2

146-3

RESPONSE TO COMMENT
COMMENTOR NO. 146: MURRAY, MARGARET L.

Response to Comment No. 146-1

The estimated health risks to the people who live near Concord NWS are presented in Sections 4.2.2 and 4.2.3 of the EIS. Further details are available in Appendices D and E.

Response to Comment No. 146-2

Under normal circumstances, the foreign research reactor spent nuclear fuel would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to it's destination as quickly as possible.

Response to Comment No. 146-3

Management Alternative 2, which is discussed in Sections 2.3 and 4.4.1 of the EIS, is the alternative to accepting foreign research reactor spent nuclear fuel into the United States. This alternative does not specify where the spent nuclear fuel would be stored; just that it would not enter the United States. Thus, if the comment is referring to an isolated island that belongs to another country, the commentor's alternative is covered under Management Alternative 2.

If the comment is referring to an isolated island that is part of the territory of the United States (e.g. Johnston Atoll), then the foreign research reactor spent nuclear fuel would legally be entering the United States and this subject is covered under Management Alternative 1. A discussion has been inserted into Section 2.10 of the EIS to explain why this option is not feasible.

COMMENTOR NO. 147: SLUSER, BETSY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Betsy Sluser Phone: 510-825-0344

Title and Organization:

Address: 1525 Crignet Ct.

City: Concord State CA Zip 94804

*** COMMENTS ***

We are new parents and new residents of Concord. Had we known that spent nuclear fuel would be proposed to be stored in Concord, we would never have considered moving here. There is no safe place to store this fuel. To consider exposing hundreds of thousands of residents to this extremely dangerous radioactive material is reckless. I propose you find another community better able to handle this material. 147-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 147: SLUSER, BETSY

Response to Comment No. 147-1

As explained in Section 2.6.5 of the EIS, the only sites considered in the EIS as candidate management sites for the foreign research reactor spent nuclear fuel were the Savannah River Site, the Idaho National Engineering Laboratory, the Hanford Site, the Nevada Test Site, and the Oak Ridge National Laboratory. Concord NWS is only being considered as a potential port of entry.

The potential impacts of managing the spent nuclear fuel are discussed in Section 4.2.4 of the EIS. The data presented demonstrate that the risk associated with spent nuclear fuel management is low.

COMMENTOR NO. 148: JENSEN, KURT & CAROL

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: KURT & CAROL JENSEN Phone: 510 748-0575

Title and Organization:

Address: 2049 WELLINGTON CT

City: CLYDE State CA Zip 94520

*** COMMENTS ***

I can't believe we are taking foreign reactor fuel and storing it for them. We have enough of this stuff already. NO emergency plans have been developed. Apparently this material will be traveling thru a very densely populated area. It will most likely adversely affect property values in this area. What about a threat of terrorism? Has this been addressed? WHAT ABOUT OUR HEALTH - ISN'T URANIUM CANCER CAUSING?!!? WHAT ABOUT THE MEDICAL STUDIES DONE TO ASSURE OUR HEALTH WILL NOT BE COMPROMISED, DUE TO THIS MATERIAL TRAVELING THROUGH OUR AREA?!?! GUESS WE'LL HAVE TO START REMINDING OUR ELECTED OFFICIALS THAT THEY ARE SUPPOSED TO BE LOOKING OUT FOR OUR INTERESTS.... I THINK THERE'S AN ELECTION COMING UP - OUR EMAIL WILL BE FORTHCOMING

148-1

148-2

148-3

148-4

148-5

Signed,
Extremely Unhappy!

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 148: JENSEN, KURT & CAROL

Response to Comment No. 148-1

The commentor's opposition to management of spent nuclear fuel from foreign research reactors in the United States is noted. Section 2.3 of the EIS demonstrates other alternatives considered for the implementation of the proposed action.

Response to Comment No. 148-2

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected.

Response to Comment No. 148-3

Estimates of radiological health effects presented in Section 4.2.3 of the EIS are based on conservative assumptions using representative truck and rail transportation routes from candidate ports to interim management sites, including consideration of traffic volumes and surrounding populations. Supporting detail for the calculations is given in Appendix E of the EIS. Radiological and non-radiological health effects were found to be low (Section 4.2 of the EIS).

Response to Comment No. 148-4

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures greatly reduce the risk of such actions. The security provisions are summarized in the new Appendix H of the EIS. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify details of the transportation process, including security provisions in port and during transit.

Response to Comment No. 148-5

General radiological health effects are discussed in Section 4.1.3 and the specific health effects of the proposed action and alternatives are presented throughout Section 4 of the EIS.

COMMENTOR NO. 149: GARDNER, EDWARD

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: EDWARD GARDNER Phone: 510-686-1837

Title and Organization: U.S. Citizen, Honorably Discharged Vier-Vet, [illegible]

Address: 120 NORMAN AVENUE

City: CLYDE State Calif. Zip 94520-1105

*** COMMENTS ***

Dear Sir; I have lived in the town of Clyde for ten years & County of Contra Costa for Forty Five: In recent years accidents at Concord Naval Weapons Sta, have increased, although the Navy will tell you different - I live across street from main thoroughfare & heat & see ambulances, fire trucks heading towards the River - (Source of Ammo Ships) at the time: Why would one want to ship spent nuclear waste under the Golden Gate up the waterways to an unloading area sitting squarely on top of an active & ready to pop Earthquake Fault. Shouldn't some thought be given to the citizens of S.F. Bay Area. Also since the only way out of Clyde by motor vechicle other than Helicopter is By (Via) Pt. Chicago Hwy - of which the Navy has blocked one end at the end of town - So Now we have a medical, fire, life threatening emergency, I need to leave - OOPS CAN'T THEIRS. A TRAIN FULL OF Bombs across the only road out of Clyde over

149-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 149: GARDNER, EDWARD

Response to Comment No. 149-1

As the result of public concern borne from a September 1993 television report, the Contra Costa County Board of Supervisors initiated an investigation of the safety at Concord NWS. Their report on the subject, "Safety at the Concord NWS" dated November 2, 1993, concluded in part that: "There were no incidents involving explosions or radiation exposure. Many of the reported incidents were not accidents caused by Weapons Station employees but, rather, were discoveries by employees that materials being received had been damaged during loading or transit. In some cases the shipments had not been properly blocked, braced or banded."

In fact, the safety record at Concord NWS is significantly better than that of similar activities in ports in the private sector. According to the Department of Labor statistics, for the category of marine cargo handling, the number of lost workday cases per 100 full-time workers for 1993 was 7.1 nationwide (1994 data not available), which is typical. The number of lost workday cases per 100 workers at Concord NWS for the first three quarters of fiscal year 1995 was 5.3, which is also typical for Concord.

Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the spent nuclear fuel transportation cask.

Overall, the analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 149: GARDNER, EDWARD (CONT'D.)

The Navy has no contingency plan for such emergency. If you believe they do, ask to see it in writing — fat chance!

Just another taxpayer —

149-2

RESPONSE TO COMMENT
COMMENTOR NO. 149: GARDNER, EDWARD (CONT'D.)

Response to Comment No. 149-2

DOE is aware of agreements between the Concord NWS and Contra Costa County which would be followed in the case of an accident. The Station has a Disaster Preparedness Plan which includes a Mutual Aid Agreement between the Naval Weapons Station and Contra Costa County. Under the terms of the agreement each party is to immediately notify the other of any emergency which presents an imminent danger. A similar mutual aid agreement also exists between the Station and the County Fire Protection District.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

COMMENTOR NO. 150: HOEKWATER, TRICIA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: TRICIA Hockwater Phone: 510/370-3472 work DAY

Title and Organization: Admin. Asst/Discovery Toys

Address: 2181 Carquinez Place

City: Pittsburg State CA Zip 94565

*** COMMENTS ***

I do not want nuclear fuel of any type housed in the area in or surrounding Contra Costa County, particularly, the city of Concord. Concord is a growing family city and this poses a real threat to ourselves and our children. As a resident of Pittsburg I spend a lot of time in Concord as well as daily travel to/from work via highway 4 - right past the Naval Weapons Station. I will fight this proposal and I have the support of my community and co-workers 150-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 150: HOEKWATER, TRICIA

Response to Comment No. 150-1

As explained in Section 2.6.5 of the EIS, the only sites which DOE is considering as locations for management of the foreign research reactor spent nuclear fuel are the Savannah River Site, the Idaho National Engineering Laboratory, the Hanford Site, the Nevada Test Site, and the Oak Ridge National Laboratory. Concord NWS is only being considered as a potential port of entry.

The potential impacts of managing the spent nuclear fuel are discussed in Section 4.2.4 of the EIS. The data presented demonstrate that the risk associated with the spent nuclear fuel management is low.

COMMENTOR NO. 151: GARDNER, W.B.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: W. B. Gardner **Phone:** 510-674-1940

Title and Organization:

Address: 2624 Trafalgar Ct

City: Clyde **State** Ca **Zip** 94520

*** COMMENTS ***

This type of operation should be conducted in a less populated area. In a minimum, Clyde should be leveled as was Port Chicago. This would pose a great risk to a small populated area although Bay Point and Concord do share in the risk. 151-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 151: GARDNER, W.B.

Response to Comment No. 151-1

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other port analyzed in the EIS, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

COMMENTOR NO. 152: ANDERSON, DOLORES E.

2763 Dos Rios Drive
San Ramon CA 94583
6 June 1995

Charles R. Head
U.S. Department of Energy
1000 Independence Ave SW
Washington DC 20585-0001

Dear Mr Head,

As a resident in Contra Costa County, California, I am aware that the DOE is considering potential ports to receive spent nuclear fuel returned from other nations.

Please be sure to provide our local officials with all details on potential hazards which may arise in conjunction with the shipments so that we may be forewarned. I know we have a moral obligation to dispose of these materials safely and I think our local citizens would agree if they are given sufficient facts. Thank you. 152-1

152-2

Yours truly,
Dolores E Anderson

RESPONSE TO COMMENT
COMMENTOR NO. 152: ANDERSON, DOLORES E.

Response to Comment No. 152-1

The estimated health risks to the people who live near Concord NWS are presented in Sections 4.2.2 and 4.2.3 of the EIS. Further details are available in Appendices D and E. DOE is required to inform the Governor of each State and any Tribal chair, or their designee, along a transportation route at least seven days before each shipment of hazardous cargoes, including radioactive materials (10 CFR Part 73). It would be the responsibility of the Governor to provide any further notification to State and local officials.

In addition, to further address this issue, individual Transportation Plans would be prepared for any shipments actually scheduled for acceptance through the Concord NWS (or any other port of entry). These Transportation Plans would be prepared in consultation with appropriate State and/or local officials to ensure that details of the transportation process are understood, that the individuals or organizations who would perform all required activities are specified and that these individuals and parties know what is expected of them (Section 2.7.5 and Appendix H of the EIS).

Response to Comment No. 152-2

The commentor's support for the purpose of the proposed action as described in Section 2.1, is noted. DOE considers that the EIS provides sufficient information and analysis to allow a reasonable decision.

COMMENTOR NO. 153: CLARK, LOUISE H.

Louise Harvey Clark
6 Blackthorn Road
Lafayette, CA 94549
(510) 299-0900

June 6, 1995

Charles Head, Program Manager
Office of spent Nuclear Fuel Management (EM-37)
FAX: 202-586-5256

Dear Mr. Head,

I understand that the Department of Energy intends to return spent nuclear fuel rods through the Concord Naval Weapons Station. I understand that these toxic materials will be moved along our city streets and freeways. Have you experienced these freeways? Has anyone ever told you that they were safe for our local drivers much less, proposed drivers of highly toxic materials? 153-1

I would like you to address the traffic count and accident rates on these freeways before you consider adding to them, trucks with highly toxic cargo.

I live a stone's throw from one of these freeways. My grandchildren live three miles away, also a stone's throw from one of those freeways. Would you want your grandchildren exposed to such potential hazards? 153-2

I look forward to hearing your answers to my questions.

Sincerely,

Louise H Clark

Louise H. Clark

RESPONSE TO COMMENT
COMMENTOR NO. 153: CLARK, LOUISE H.

Response to Comment No. 153-1

The frequency of accidents on highways has been taken into account in all ground transport risk estimates in the EIS. As discussed in Section 4.2.3 and Appendix E of the EIS, spent nuclear fuel has been transported along highways, railways, and waterways for over four decades without release of the radioactive contents from the spent nuclear fuel transportation cask, even as a result of an accident.

Response to Comment No. 153-2

Sections 4.2 and 4.5 of the EIS discuss the risks and consequences of transporting foreign research reactor spent nuclear fuel, and demonstrate that the risks would be low to persons located near a port, transportation route, or a management site.

COMMENTOR NO. 154: CUTTER, BETTY LOU

June 5, 1995

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
U.S. Dept. of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Head:

I understand the Dept of Energy intends to return spent nuclear fuel rods through the Concord Naval Weapons Station. I understand this is in an effort to reduce the amount of enriched uranium in civil programs worldwide.

It would seem our intention would be better served if we first stopped selling uranium to other countries and worked on conversion to other sources of energy. 154-1

This plan seems like a terrible thing to do. An accident would be far more than serious. There's Buchanan airfield, six oil refineries, fifteen cities, and six bridges. 154-2

I don't think the matter has been carefully considered.

Sincerely,
Betty Lou Cutter
2500 Lucy Lane #108
Walnut Creek, Calif.
94595

RESPONSE TO COMMENT
COMMENTOR NO. 154: CUTTER, BETTY LOU

Response to Comment No. 154-1

The current inventory of HEU at foreign research reactors is a concern because portions of it could be diverted to weapons programs. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). Conversion of foreign research reactors to other sources of energy such as solar or wind power is not feasible because the alternate sources of energy cannot provide the neutrons required for the research, medical, commercial, and educational benefits of these reactors (Section 1.1 of the EIS).

Response to Comment No. 154-2

The analysis in Section 4.2.2.3 of the EIS on impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident.

See the response to comment 107-9 for a discussion of the impacts of Buchanan Field upon the receipt of foreign research reactor spent nuclear fuel at Concord NWS.

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process. The passage, although it passes near bridges and refineries, does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2 of the EIS).

Population of the port and surrounding areas is also a consideration of the port selection criteria. The population criterion for port selection (Criterion 5) is discussed in more detail in Appendix D, Section D.1.9.5 of the EIS.

COMMENTOR NO. 155: GANIO, MARIO

1521 San Miguel Dr.
Walnut Creek, CA 94596
June 7, 1995

Dear Mr. Head

Speaking for my wife and my self, our children and their children, we oppose you're storing, even on a temporary basis, nuclear waste material in the San Francisco/Oakland bay area. 155-1

Sincerely,

Mario Ganio
(510) 935-2863
marzy@aol.com

RESPONSE TO COMMENT
COMMENTOR NO. 155: GANIO, MARIO

Response to Comment No. 155-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS and the San Francisco Bay area is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS and the San Francisco Bay area, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 156: GANDY, STEVE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: STEVE GANDY **Phone:** 510 682-9522
Title and Organization: PRIVATE US CITIZEN
Address: 225 SUSSEX ST.
City: CLYDE **State** CA **Zip** 94520

*** COMMENTS ***

THIS AREA SHOULD NOT BE CONSIDERED FOR THIS PROGRAM. IT IS A FAR TOO POPULATED REGION TO RISK SAFETY OF A GREAT NUMBER OF PEOPLE SHOULD THERE ARISE PROBLEMS IN THE FUTURE. ALSO THERE ARE NEIGHBORHOOD HOUSES TOO CLOSE TO THIS PROPOSED ACTIVITY. 156-1

IF THIS PROGRAM MUST BE ADMINISTERED A REMOTE LESS POPULATED REGION NOT NEAR HOMES CAN BE FOUND. MY RECOMMENDATION IS TOO SPEND AS MUCH TIME AS POSSIBLE INVESTIGATING THE PROPER SITE. THERE SHOULD BE NO RUSH TO FIND A SITE, AND THAT THIS IS NOT THE APPROPRIATE LOCATION. 156-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 156: GANDY, STEVE

Response to Comment No. 156-1

Concord NWS was one of ten ports that was determined to be acceptable to receive the foreign research reactor spent nuclear fuel, if the material is to be accepted by the United States. Population of the port, surrounding areas to a radius of 10 miles, and the population along the transportation routes were considered in the port selection criteria. The population around Concord and on the routes to the management sites was low enough to qualify Concord NWS as an acceptable port. The population criterion for port selection (Criterion 5) is discussed in more detail in Appendix D, Section D.1.9.5 of the EIS.

Response to Comment No. 156-2

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other port analyzed in the EIS, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process. DOE considered 161 ports (153 commercial and eight military ports) as ports of entry for foreign research reactor spent nuclear fuel. These ports were evaluated against selection criteria, resulting in 10 ports that met all of the criteria as being acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. Appendix D, Sections D.1.8 and D.1.9 present a detailed discussion of the process and results.

COMMENTOR NO. 157: STENNICK, JOHN

157-1

We look would this happen

A dangerous plan

The U. S. Department of Energy has proposed the importation of high-level nuclear waste from 41 nations throughout the world, which would be routed through Portland or Puget Sound and destined for the "K-Basin" area at our own Hanford on the Columbia River. This is a part of the proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel.

The spirit of this plan is noble in trying to curtail the production of nuclear bombs by Third World nations. However, when one looks more closely at the specifics, one realizes that the DOE is planning to import the high-level radioactive waste from countries like Japan, Australia, Canada, Sweden, Switzerland, etc.

In my opinion, these countries are not exactly part of the Third World. These nations should be held accountable for their own spent fuel and should plan for the safe storage of this highly toxic waste within their own borders.

The DOE is planning to use normal shipping lanes for the transportation of this imported waste. Traffic and shipping accidents are likely and could result in fires. The storage casks are our only protection from this waste that may be headed up our rivers and down our highways very soon.

Hanford is not an acceptable sight for the storage of even more high-level waste. In fact, Hanford already has a leaking storage pool alongside the Columbia River. This river is the lifeblood of our region and must not be ruined by nuclear contamination.

I urge all citizens to write a letter to the Department of Energy, C/O Charles R. Head, at the office of Spent Fuel Management, EM-37, 1000 Independence Ave. SW, Washington, D.C. 20585-0001. He will only accept correspondence on this issue until the cutoff date of June 20.

Stop this degrade!

RESPONSE TO COMMENT
COMMENTOR NO. 157: STENNICK, JOHN

Response to Comment No. 157-1

The commentor's opposition to the following alternatives is noted: a) acceptance of spent nuclear fuel from countries other than third world countries, b) use of normal shipping lanes, highways, and rail lines for transportation of spent nuclear fuel, and c) use of the Hanford Site for management of spent nuclear fuel from foreign research reactors. As discussed in Sections 1.2 and 2.2 of the EIS, one alternative under consideration is to accept such spent nuclear fuel from developed and developing countries for a limited period of time. The intent of this proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). The analysis given in Section 4 of the EIS indicates that radiological health risks and environmental effects resulting from the proposed action and management alternatives would be low.

The selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 163: WHITING, MARCUS

TO: Mr. Ivan Selin
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

FROM: Marcus Whiting
340 - 4th Avenue
San Francisco, CA 94118

RE: NO! to Foreign Nuclear Waste Storage at Hanford, Washington

Dear Chairman Selin,

I am writing in opposition to plans being made to store nuclear waste from foreign countries (e.g., North Korea) at the Hanford Nuclear Reservation in Washington State. 163-1

I reiterate. It is entirely unacceptable to import radioactive nuclear waste products from a foreign country and bury them under the ground at Hanford, Washington.

I have summarized my thoughts on this subject into two categories:

a) Political
b) Environmental

Political

The thought of "bargaining" with North Korean officials to acquire (buy?) their nuclear waste and store it in the United States in order to further persuade them to reduce their nuclear arms program is, in my opinion, a far-fetched, unrealistic policy. I imagine this concept is being implemented in conjunction with other avenues of negotiation in a broad attempt to make the North Koreans conform to international concerns, but I believe it is ill-conceived and unconscionable. 163-2

To address the *concept* of a potential threat of North Korean nuclear proliferation and, through a skewed type of political metamorphosis, transcribe the ownership and custodianship of that nation's nuclear waste over to *us* and literally deposit it at the feet of your constituents here in the United States is unreasonable in the least! We certainly didn't ask for this nor do we have the technology or ability to deal with it safely, efficiently or permanently. 163-3

To manifest and dictate policies which propagate the use of nuclear energy, and thusly exasperate the huge problem of nuclear waste, is irresponsible and unkeeping with the safety and survival needs of all living things on this planet.

RESPONSE TO COMMENT
COMMENTOR NO. 163: WHITING, MARCUS

Response to Comment No. 163-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 163-2

DOE is not negotiating with North Korea to accept its spent nuclear fuel. If foreign research reactor spent nuclear fuel is accepted into the U.S., then aluminum-based and TRIGA reactor spent nuclear fuel elements from South Korean research reactors would be accepted for disposition (Tables 2-1 and 2-2 of the EIS).

Response to Comment No. 163-3

The proposed action is to adopt a policy to manage spent nuclear fuel from foreign research reactors in 41 foreign nations, which includes South Korea, but not North Korea (Section 2.2.1.3 of the EIS). Section 2.6.5 describes storage technologies for spent nuclear fuel.

COMMENTOR NO. 163: WHITING, MARCUS (CONT'D.)

NO! to Foreign Nuclear Waste Storage at Hanford, Washington

Environmental

We all know one of the biggest problems surrounding nuclear technology is the inability to transport and dispose of the waste safely and efficiently.

Having been raised in the Seattle, Washington-area, I have been aware of the impact that the nuclear industry has had on the environment in the Columbia River basin and surrounding areas.

Although there exists safety procedures and protocols at Hanford that some consider to be the best in the world, there *is* no safe and fully-efficient waste disposal program, regardless of claims from the nuclear industry.

The proposed route is:

- By ship to Concord Naval Weapons Station, CA
  - across the Pacific Ocean - obviously subject to major storms
  - through the Golden Gate, negotiating through San Francisco Bay and the Carquinez Strait - an area where approximately 4.5 million people live and work
- By rail to Hanford Nuclear Reservation in Washington State
  - a journey of approximately 600-700 miles complete with its own set of hazards (we all remember Southern Pacific Railroad's disastrous de-railment into the American River at Dunsmuir, CA just a short time ago)

163-4

The risk of exposure to the atmosphere, the ocean, the groundwaters, the plants and animals, not to mention humans, during transport alone(!) cannot be justified by any one person, corporate entity, political image, lobbying effort or perceived need for consumable power.

The long-lasting effects of storing nuclear waste anywhere on this planet are, to-date, largely unknown and without precedent. But we *do* know some of the short-term effects...

- It is a matter of public, common knowledge that seepage from the nuclear wastes currently being stored at the Hanford Nuclear Reservation has entered the atmosphere and ground.
- The radioactivity is swept by the groundwater into the Columbia River where it travels downstream, impacting wildlife and humans.

These are indisputable facts which have been proven, documented and published in the media and scientific journals throughout the State of Washington and the nation.

Please do all you can to STOP the shipment of foreign nuclear waste to be stored at Hanford Nuclear Reservation in Washington State.

IT'S ABHORRENT AND WRONG!

Thank you

MARCUS WHITING

RESPONSE TO COMMENT
COMMENTOR NO. 163: WHITING, MARCUS (CONT'D.)

Response to Comment No. 163-4

As discussed in Section 4.2.3 and Appendix E of the EIS, spent nuclear fuel has been transported safely along highways, railways, and waterways for over four decades.

The impacts of ultimate disposition of spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1 of the EIS). As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

COMMENTOR NO. 169: FORM LETTER C

June 7, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management
U.S. Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Head:

I am writing to oppose the federal government's plan to ship nuclear waste through the San Francisco Bay area and store this waste at the Concord Naval Weapons Station. 169-1

Nuclear shipments to the Concord Naval Weapons Station would pass through the heavily populated and seismically active San Francisco Bay area and be stored near active earthquake faults, six oil refineries, many chemical plants and the Concord High School. 169-2 The freeways along which the nuclear waste would be carried, 680, I-80 and 5, are major commuter routes which run through the heart of the Bay's dense population. 169-3

I strongly oppose the Department of Energy's proposal on this matter and urge you to delete the San Francisco Bay area from your list of proposed sites for the storage of nuclear waste. Thank you.

Sincerely,

Nicholas Fount

RESPONSE TO COMMENT
COMMENTOR NO. 169: FORM LETTER C

Response to Comment No. 169-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 169-2

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 provides an explanation of the "population" criterion. In regard to the number of refineries and chemical plants along the route to Concord NWS, the passage from San Francisco Bay to Concord NWS meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other considerations such as population along the route to the management site, port experience with handling containers, and port facilities would also be considered in making the final selection of ports of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation cask. Further, the analyses of impacts associated with accidents involving foreign research reactor spent nuclear fuel presented in Section 4.2.2.3 of the EIS demonstrates that the use of any of the selected ports would not pose significant risk to port personnel or the population near the ports. Concord NWS has considerable relevant experience in handling containers, and has the capability to safely handle containerized foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9.1 of the EIS).

Response to Comment No. 169-3

Estimates of radiological health effects presented in Section 4.2.3 of the EIS are based on conservative assumptions using representative truck and rail transportation routes from candidate ports to interim management sites, including consideration of traffic volumes and surrounding populations. Supporting detail for the calculations is given in Appendix E of the EIS. Radiological and non-radiological health effects of the proposed action and management alternatives were found to be low.

Commentor No. 169: Form Letter C (Cont'd.)

Individuals submitting this form letter:

Dippo, Rosemary

Famcureaux, Norma P.

Foust, Nicholas

Mosley, Raechael Ann

Nieser, Collen

Smith, Janie V.

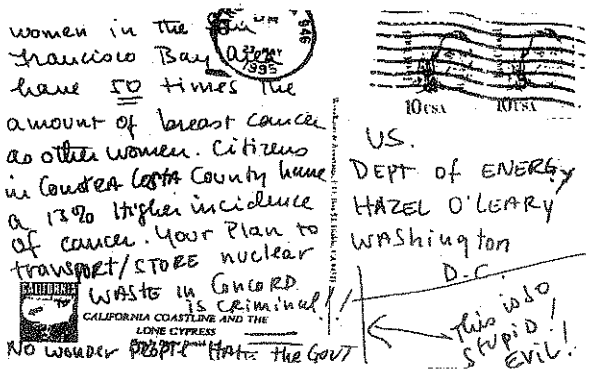
The Spillane Family

Sungar, Virginia

Ullman, Beverly R.

Response to Comment
Commentor No. 169: Form Letter C (Cont'd.)

COMMENTOR NO. 196: ANONYMOUS



196-1

RESPONSE TO COMMENT
COMMENTOR NO. 196: ANONYMOUS

Response to Comment No. 196-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 201: TURNER, DOUG

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Doug Turner **Phone:**

Title and Organization:

Address: 1201 Tuskegee Dr

City: Oak Ridge **State** TN **Zip** 37830

*** COMMENTS ***

I support the policy of returning the highly enriched uranium reactor fuel as much as economically practical. Any fuel returned to the U.S. should be managed as determined in the ROD for the PEIS for Spent Nuclear Fuel. The fuel that is returned, should be processed and the fissile material should be reused 201-1 201-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

All comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to the extent practicable.

RESPONSE TO COMMENT
COMMENTOR NO. 201: TURNER, DOUG

Response to Comment No. 201-1

The commentor's support for accepting and managing foreign research reactor spent nuclear fuel in the United States (Management Alternative 1 or 3; Sections 2.2 and 2.4 of the EIS, respectively) is noted.

Response to Comment No. 201-2

The commentor's support for the chemical separation alternative is noted. This is Implementation Alternative 6 to Management Alternative 1, which is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

COMMENTOR NO. 202: WORTHINGTON, MARJORIE

1947 Clovercrest Street
Enumclaw, WA 98022
May 12, 1995

Charles Head
Office of SNF Mngmt. EM-37
U.S. Dept. of Energy
1000 Independence Ave. SW
Washington, D.C.

Dear Sir:

May I urge you to listen carefully to the concerns of citizens in the Pacific Northwest regarding shipment of High -Level Nuclear Wastes using commercial freighters and public ports, where there is a very real danger to the public in the handling of such wastes? (Shipboard fires, offloading, transport on highways or waterways, etc.)

USDOE policy should be changed in the following areas:

a. No importation
   - of Spent Nuclear Fuel from nations that do not pose a proliferation risk.
   - of Low Enriched Uranium wastes that can not be used in bombs
   - where the use of dry cask storage is feasible and would allow for international inspection. 202-1

b. No importation using commercial freighters or public ports (instead dedicated or military ships and DOD ports), to protect longshore workers, the public on local roads, and the public in the event of shipboard fire. 202-2

c. No importation of High-Level Nuclear Wastes for storage at Hanford! Continuing to even consider Hanford as a viable storage area is totally unacceptable policy. Nuclear fuel cooling basins along the Columbia River are already leaking and subject to massive failure in case of an earthquake. Foreign reactor wastes should not be accepted here when we cannot even keep up with funding of proper safety measures for removal of fuel from the Hanford K-Basin. Other nations must pay the cost of their own programs and bear responsibility for environmental and health risks within their own borders. 202-3

Thank you for your attention to these requests.
Marjorie Worthington

RESPONSE TO COMMENT
COMMENTOR NO. 202: WORTHINGTON, MARJORIE

Response to Comment No. 202-1

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible, is noted.

The United States has played in the past, and continues to play, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3 of the EIS, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

Response to Comment No. 202-2

The commentor's opposition to the use of commercial freighters and public ports is noted. Estimated risks during marine transport and at candidate ports were found to be low (Sections 4.2.1 and 4.2.2 of the EIS).

Response to Comment No. 202-3

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 203: THOMAS, TAMLYN

To: Charles Head
Office of SNF Mngment
EM-37

Dear Sir -

Unfortunately I am unable to make an appearance at the public hearing May 24 in Seattle regarding the planned transportation & storage of other nation's nuclear waste to Hanford. Your department's plans for use of Washington State, it's highways and citizens for such a potentially dangerous role appears so irresponsible & inconsiderate of those who live here that I can only assume you have no one you know and care for who lives in the Northwest. Hanford has a long history of difficulty handling nuclear waste; the volume the DOE is proposing it is only a matter of time before significant accidents and exposure would happen. 203-1

If you were to implement such a plan it would be absolutely essential that the countries whose waste we are storing foot the bill for extensive training of all areas possibly effected by contam- 203-2

RESPONSE TO COMMENT
COMMENTOR NO. 203: THOMAS, TAMLYN

Response to Comment No. 203-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 203-2

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. One of these options would be for developed countries (which represent about 87 percent of the spent nuclear fuel total mass and about 78 percent of the spent nuclear fuel elements) to pay a competitive fee for U.S. management of their spent nuclear fuel. This fee would be based on, among other things, the charges these countries would incur for the most realistic alternatives available to them, e.g., reprocessing at a facility in Dounreay, Scotland. Also, under the basic implementation, DOE would subsidize the costs of managing the spent nuclear fuel from developing countries. The United States does not believe the developing countries can afford to pay the expense for spent nuclear fuel management either in the United States or in the host country. Additionally, many countries accepted U.S. supplies of HEU (and avoided developing their own enrichment or reprocessing programs) specifically because they expected the United States to accept the spent nuclear fuel.

COMMENTOR NO. 203: THOMAS, TAMLYN (CONT'D.)

ination ~~[illegible]~~ & emergency training in handling accidents, spills and evacuation. They should also pay for specialized areas of Port not part of the public port system to receive these shipments. All shipments should be transported through the absolutely least populated areas and tightly regulated. 203-2 (Cont'd.) 203-3

All of the above is in case this ludicrous plan should actually see the light of day. Truly it should not happen at all - it is only too easy for other countries to continue or even increase their production of nuclear waste when there is no cost to them in terms of having to find a place within their own borders to store the waste & when they do not have to deal with their own citizen's' protests over the safety of such nuclear waste storage. 203-4

Furthermore, if this is meant as a deterrant to immoral characters gaining access to fuel for nuclear weapons your department is a sad 203-5

RESPONSE TO COMMENT
COMMENTOR NO. 203: THOMAS, TAMLYN (CONT'D.)

Response to Comment No. 203-3

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Port of Tacoma, or any of the other selected ports, is low. The use of a remote port might slightly reduce the consequences of an accident which would be low (Section 4.2.2 of the EIS), however, there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

All shipments of radioactive material are tightly regulated. Internationally the International Atomic Energy Agency (part of the United Nations) and the International Maritime Organization regulate such shipments. In the United States, the U.S. Department of Transportation, DOE, and the NRC all have regulations and rules that apply to these shipments. Section 5 of the EIS provides a detailed description of the applicable laws, regulations and other requirements.

Response to Comment No. 203-4

If foreign research reactor spent nuclear fuel were accepted into the United States, it would only be done for a limited period of time. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. The intent of the resultant proposed policy, therefore, is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Foreign research reactors are on notice that once the acceptance policy has lapsed, their spent nuclear fuel would no longer be accepted for disposition in the United States (final paragraph of Section 1.2).

Response to Comment No. 203-5

Spent nuclear fuel from foreign research reactors has been accepted into the United States for over three decades without incident (Section 4.3.2 of the EIS). Several thousand transcontinental shipments of spent nuclear fuel have been conducted during that time. No transportation cask containing spent nuclear fuel has ever been stolen or released its radioactive contents, including casks involved in traffic accidents.

COMMENTOR NO. 203: THOMAS, TAMLYN (CONT'D.)

study in human nature. If someone wants this waste somewhere along the long route from production to Hanford they will find a way of obtaining it. Our money would be much better spent investing in other forms of energy production. If we as a nation had put a strong effort into alternative energy production in the 1960's by now, 30 years later, we would have had high tech, highly feasible solar, wind + who-knows-what-else energy sources. Please reconsider this ill [redacted] conceived plan as if your very close family lived in Tacoma or Portland, down river on the Columbia, anywhere in the Northwest.

203-5 (Cont'd.)

203-6

203-1 (Cont'd.)

Thank you,

Tamlyn Thomas

1543 NE 89th
Seattle 98115

RESPONSE TO COMMENT
COMMENTOR NO. 203: THOMAS, TAMLYN (CONT'D.)

Response to Comment No. 203-6

Consideration of solar and wind power are outside the scope of this EIS. However, it should be noted that as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources.

COMMENTOR NO. 205: LINQUIST, JACK

June 8 1995

Dear Mr R. Head

I am against the D.O.E plan. Hanford is not acceptable sight for the storage of High-level waste. Our Columbia River is the life blood of our region & must not be ruined by nular contamination.

Yours truly
Jack Linquist
Box 314
Cathlamet, Wn 98612

Jack Linquist
Box 314
Cathlamet Wn 98612

205-1

RESPONSE TO COMMENT
COMMENTOR NO. 205: LINQUIST, JACK

Response to Comment No. 205-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 206: WADE, MARIANNE

June 1, 1995

Honorable Hazel O'Leary
Department of Energy
1000 Independence Ave SE
Washington D.C. 20583

Hello H. Hazel O'Leary:

I have spent most of the last thirteen years in Washington state. Raised in California through the sixties and seventies I witnessed unbearable insults to the environment. I spent most of my childhood rationing water that was already so treated there could very well have been more fluoride than hydrogen. I thought everybody flushed their toilets only twice a day. And despite the beauty of San Francisco and the love I have for it, let's face it the city has only two seasons.

Needless to say, I have marveled at the Northwest. It has a wonderful ecosystem. Diversity of nature ranging from rainforest to desert, ocean to mountain. Even though much of the land has been decimated by logging, challenged by Mt. St. Helens, and abused by the ignorant, nature prevails here. Despite a busy port, here in Tacoma I have witnessed days of such clarity I could see the rooftops of houses miles away across the sound. Most of the residents here focus on the beauty and try to support the environment. Perhaps you are familiar with the recycling statistics from the Puget Sound, specifically the efforts of Tacomans? 206-1

I don't mean to drip with civic pride because frankly most of the local policies and politicians make me cringe. But the Department of Energy's proposal to utilize Tacoma as a point of entry for spent nuclear waste sickens me more. Even though I drive by the Port of Tacoma with a slight shrug and a grimace, I understand it brings in much needed revenue. The billows above the port are a constant visual reminder of how greatly humans threaten the environment. Ship traffic is heavy enough here. I don't want to see any enter loaded down with spent fuel rods.

Please reconsider the proposal. I understand Mick Shultz of the Port of Tacoma has been organizing a fact-finding action the results of which should have been held at the last DEIS meeting. I also understand the Port of Tacoma Commission officially registered its opposition to this proposal May 12. Have they received a response? I have to agree with Port Commission president Patrick O'Malley, this state has had its share of waste issues. Perhaps you followed the closure and current destruction of the Asarco smelter in the tiny arsenic-laden town of Ruston, nestled in the north-end of Tacoma. I witnessed the explosion of the stack myself from a distance reported as "safe from the arsenic cloud". Tacoma has enough to deal with. 206-2

I respect your position as Secretary, but I don't envy it. I realize the disposal of nuclear waste is a real issue that needs to be addressed. I know there are no easy answers. I just don't believe there are "acceptable levels" of nuclear waste. I believe the Earth to be one entity and in that sense it doesn't matter where nuclear waste is stored, we all share it and we'll all be affected by it. True, Tacoma is a smaller urban district than Seattle but it is still heavily populated with residents very near the port. Please reconsider this proposal. Have Tacoma removed as a possible point of entry. I wish you much luck in this endeavor and hope a creative alternative can be found. 206-1 (Cont'd.)

Thank you for your time and consideration.

Sincerely,

Marianne Wade
302 N. Yakima #B3
Tacoma, WA 98403

RESPONSE TO COMMENT
COMMENTOR NO. 206: WADE, MARIANNE

Response to Comment No. 206-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

In regard to Tacoma's ship traffic, if the foreign research reactor spent nuclear fuel is accepted by the United States, it could arrive either in commercial or chartered ships (discounting that coming from Canada, which would come overland). If commercial ships were used, the ship traffic into Tacoma would be unchanged because the commercial ships that would be used to transport the spent nuclear fuel would call at Tacoma whether or not they were carrying foreign research reactor spent nuclear fuel. If chartered ships were utilized, and all the West Coast-bound ships came to Tacoma, Tacoma's ship traffic would increase by no more than about one ship a month (186 shipments spread over 13 years under Management Alternative 1) and could be as low as one ship every four months.

Response to Comment No. 206-2

DOE has responded to public comments on the draft EIS, including comments received from the Port of Tacoma Commission, in preparing the final EIS.

Nuclear waste is a by-product of using research reactors. Research reactors play a vital role in important medical, agricultural, and industrial applications, and also provide a tool for fundamental scientific research. These reactors are a vital tool in cancer therapy and radioimmunoassay blood testing. Research reactors have also been used in the environmental sciences (Section 1.1 of the EIS).

COMMENTOR NO. 208: RAMUS, EVELYN

Ridgefield, Wa.

June 12, 1995

Mr. Charles Head

Office of Spent Fuel Management

Dear Sir:

What in the world can you be thinking of to accept nuclear waste from foreign countries when our own is not adequately stored? These countries should take of their own waste. 208-1 208-2

Hanford has leaks already which are a great concern to people in this area. At least find somewhere other than Hanford.please. 208-3

Why should this country always be the one to pay??? We are already so far in debt it is a disgrace. 208-4

I strongly object to disposing further nuclear waste at Hanford.

Very Sincerely Yours,

Evelyn Ramus

RESPONSE TO COMMENT
COMMENTOR NO. 208: RAMUS, EVELYN

Response to Comment No. 208-1

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

Response to Comment No.208-2

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

Response to Comment No. 208-3

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 208-4

Sections 2.2.1.2 and 2.2.2.3 of the EIS discuss alternative financing arrangements that range from charging the foreign research reactor operators a fee that would cover all the costs of the proposed action, to having DOE subsidize all of the reactor operators' costs. One compromise position that is evaluated is to charge developed countries a competitive fee, while developing countries would be subsidized. If less than the full cost of the proposed action is charged to the foreign reactor operators, the difference would be the cost to the United States of gaining participation by other countries in our nuclear weapons nonproliferation programs.

COMMENTOR NO. 209: BICKETT, GARY

June 9, 1995

Charles E. Head
U.S. Department of Energy
Office of Spent Fuel Management
EM-37
1000 Independence Ave. SW
Washington, D.C. 20585-0001

Re: High Level Nuclear Waste Importation Proposal

Dear Mr. Head:

The Hanford Nuclear Reservation is already the most contaminated place on this planet. Your Department's proposal to store even more high level radioactive waste at this site is preposterous! We must not be the recipient of other country's waste problems. We have enough of our own. Where is your common sense thinking? *209-1*

And then I understand your not only contemplating acceptance of this waste from third world countries, but also countries like Australia, Japan, Canada, Sweden and so on. They are suppose to be our allies - not some immediate threat. They are responsible for their own problems. I most strongly oppose any consideration of importing high level nuclear materials from any outside country. *209-2*

Further more, Hanford should never be considered for long or short term storage of spent nuclear fuels as it is not a safe place and already has enormous problems that you don't know how to resolve. *209-1 (Cont'd.)*

Try taking care of our own problems rather than running around appeasing other countries at U.S. Tax payers expense. *209-2 (Cont'd.)*

Sincerely,

Gary Bickett

Gary Bickett
15105 Twin Fir Road
Lake Oswego, OR 97035

c: Representative Elizabeth Furse
Senator Mark Hatfield

RESPONSE TO COMMENT
COMMENTOR NO. 209: BICKETT, GARY

Response to Comment No. 209-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 209-2

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk is noted. The United States has played in the past, and continues to play, a leadership role within the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

COMMENTOR NO. 211: QUINN, PATRICIA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: PATRICIA QUINN Phone: (510) 944-5476

Title and Organization:

Address: 1313 CORTE DE LOS VECINOS

City: WALNUT CREEK State CA Zip 94598-2901

*** COMMENTS ***

I wish to voice my support of the leaders here in Contra Costa County who have voted to oppose the federal government plan to ship nuclear waste through the Concord Naval Weapons Station. As they have argued, this is a well-populated and very seismically active area. Nuclear waste shipments would have to pass six oil refineries, chemical plants, and oil tankers. In fact I heartily support the proposal to make Contra Costa County a nuclear free zone. Enclosed is a clipping from this week's Contra Costa Times. 211-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 211: QUINN, PATRICIA

Response to Comment No. 211-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS provides an explanation of the "population" criterion. Despite the presence of refineries along the route to Concord NWS, the passage from San Francisco Bay to Concord does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2 of the EIS). The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items include population along the route to the management site, port experience with handling containers, and port facilities. Appendix D, Section D.1.9 of the EIS provides details of the port selection process.

The risk of releasing radioactive material from a spent nuclear fuel transportation cask as the result of a seismic event is low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation cask.

COMMENTOR NO. 212: THOMAS FAMILY

50% unbleached pulp and 50% post-consumer fibre paper

June 5, 1995

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Head,

We are opposed to any shipment of nuclear material through the San Francisco Bay area into CNWS for the following reasons.

-There is no data to show that a fuel cask can survive a prolonged fire such as in an oil fire or cargo ship fire. 212-1

-There is no permanent storage site in the US. The temporarily stored material will have to be moved again. 212-2

-There is no guarantee that fuel in these rods will not be separated for bomb use by the US. 212-3

-The DOE does not have a consistent policy in regards to nonproliferation. Nonproliferation is achieved when no nuclear material is being produced. This means no HEU, LEU or nuclear power. All have the potential for diversion to weapons or terrorism. We do not want to live with the continued threat of nuclear material being produced and moved around. STOP THE PRODUCTION. 212-4

Require the countries that are producing this material to properly store it. Most of the countries especially our western allies can do this. Take special precautions with those countries with which there is concern of theft or diversion. 212-5

Sincerely,
Dennis Thomas
Sophia Thomas

Thomas Family
147 St. Germain Lane
Pleasant Hill, CA. 94523

RESPONSE TO COMMENT
COMMENTOR NO. 212: THOMAS FAMILY

Response to Comment No. 212-1

The regulations governing the design and construction of "Type B" casks such as would be used to transport the foreign research reactor spent nuclear fuel requires them to withstand a high intensity, engineered fire for 30 minutes (Appendix B, Section B.2). Real life tests have been conducted to determine the accuracy of the techniques used to demonstrate compliance with this regulatory requirement. Further, examinations of real life fires on land and at sea, and fire tests have demonstrated that high intensity fires are very unlikely to be sustained for lengthy periods, and even then not in a single location.

In respect to the impact a ship fire might have on a spent nuclear fuel transportation cask, there are three facts that would mitigate the potential damage. First, ship fires tend to move to different areas of the ship as the combustible material is consumed, so the cask would not be exposed for the entire duration of the fire. Second, a ship fires intensity is normally limited by the amount of oxygen that can reach the interior of a hold. Third, all ships that would be used to transport foreign research reactor spent nuclear fuel have built-in fire suppression equipment, which at a minimum would keep fires well below the extreme temperatures needed to damage the transportation cask. For these reasons, it would be almost impossible for the spent nuclear fuel inside the transportation cask to reach 900 degrees Kelvin (1,160 degrees F), the melting point of research reactor spent nuclear fuel. The probability of reaching such a temperature was calculated to be less than one in a billion (Attachment D5 to Appendix D of the EIS). To put this temperature into perspective, steel used in a ships structure buckles at around 700 degrees Kelvin (800 degrees F).

Nevertheless, in spite of the improbability of such fires, the EIS contains the results of an analysis of such a fire (Section 4.2.1.3 of the EIS). The results of the analyses are given in Appendix D of the EIS.

Response to Comment No. 212-2

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation.

Response to Comment No. 212-3

As stated in Section 2.2.2.6 of the EIS, the United States does not conduct chemical separation in support of nuclear weapons construction. If a policy to use chemical separation is adopted, the preferred option would be to blend HEU down to LEU to

Response to Comment No. 212-4

The commentor's opposition to nuclear technology is noted. The use of LEU fuel in foreign research reactors is advocated by the United States because it cannot be used to make nuclear weapons. Policies which encourage the use of LEU instead of HEU for civilian programs were developed by the United States and other nations in order to satisfy the aspirations of foreign nations to participate in the peaceful benefits of nuclear technology, while reducing the risk of nuclear weapons proliferation (Section 1.1 of the EIS).

Response to Comment No. 212-5

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

As discussed in Sections 1.1 and 1.2 of the EIS, the Reduced Enrichment for Research and Test Reactors (RERTR) program has been very successful, and many foreign research reactors have been modified to operate with high-density LEU fuel instead of HEU fuel. This success was due to the acceptance of the spent nuclear fuel from these foreign research reactors into the U.S. Without this incentive, many of the research reactor operators would not have decided to use LEU fuel in their reactors.

If some foreign research reactor operators were to withdraw from the RERTR program now and rely instead on HEU fuel, with its attendant lower costs and enhanced performance, other research reactor operators would be under pressure to convert to the use of HEU for competitive reasons. Management of the spent nuclear fuel from stable, developed allies is important because the actions taken by these countries is a powerful example for the rest of the world, including many less developed, less stable countries.

COMMENTOR NO. 217: RAINWATER, DAN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: DAN Rainwater Phone: 510 6895297

Title and Organization: Resident

Address: 158 Norman Ave

City: Clyde State CA. Zip 94520

*** COMMENTS ***

I do NOT want your Nuclear waste Transported by my home! 217-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 217: RAINWATER, DAN

Response to Comment No. 217-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 218: JACOBSON, DENISE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Denise Jacobson **Phone:** (503) 281-9594

Title and Organization:

Address: 3346 NE 12th Ave

City: Portland **State** OR **Zip** 97212

*** COMMENTS ***

I am unequivocally opposed to the plan to ship spent fuel rods from various countries to the U.S. for processing and storage. Our (U.S.) promises under the Nuclear Non-proliferation treaty are far better served by cooperating with the foreign countries involved to process & store in "dry casks" their own spent fuel rods. We in the U.S. have not yet found a safe way to deal with the Hanford, Nevada and other sites where nuclear contamination threatens and in fact has already made life unlivable for human and natural population. 218-1 218-2 218-3

Please focus your attention on clean up of existing waste and stop promoting further nuclear development for peace or war.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 218: JACOBSON, DENISE

Response to Comment No. 218-1

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

Response to Comment No. 218-2

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Section 2.3 and 4.4.1 of the EIS.

Response to Comment No. 218-3

As discussed in Section 2.1, the intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly-enriched (weapons grade) uranium in civil programs worldwide (Section 1.2 of the EIS). DOE does not consider that these objectives promote further nuclear development. The cleanup of contamination at certain sites which resulted from nuclear weapons development is independent from the proposed action in this EIS. The environmental impacts from management of foreign research reactor spent nuclear fuel at the proposed management sites are discussed in Sections 4.2 and 4.4 and Appendix F, Section F.4 of the EIS.

COMMENTOR NO. 219: PEELLE, ROBERT

130 Oklahoma Avenue
Oak Ridge, TN 37830
June 10, 1995

United States Department of Energy
Office of Environmental Management (EM-37)
Attn. Mr. Charles Head
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0001

Dear Sir:

Subject: Comment on DEIS concerning foreign research reactor SNF.

I agree with the main line of the preferred alternatives in the EIS (DOE/EIS-0218D). That is, in the case the uranium was enriched in the US, we should participate in the spent fuel handling and have the material brought to this country. I thought that was the original understanding, even if the agreements were not explicit. If so, we must be reliable partners. 219-1

We should avoid fueling additional foreign reactors with HEU. Apparently, that policy issue is not involved in this EIS.

A doubtful part of the plan is the 10- year time frame. That time interval passes very rapidly, so we should try for 15-20 years, with a review of some features scheduled after 10 years. 219-2

We should not consider reprocessing returned fuel unless our own fuel of similar design is reprocessed. In the case of Al-clad fuel, reprocessing might be preferable to wet storage because of likely cladding degradation. Generally, dry storage should be preferred using sealed containers. Realistically, permanent storage is far away in time. 219-3 219-4

I doubt that plans should be considered that would require 10-yr storage at INL or SRL followed by a move to Oak Ridge or elsewhere. Extra handling is bad policy, and people are more worried about road transport of spent fuel than risk estimates suggest is warranted. Minimize handling. 219-5

If the West Bear Creek site is further considered in Oak Ridge, the site as drawn may be too close to the 219-6

RESPONSE TO COMMENT
COMMENTOR NO. 219: PEELLE, ROBERT

Response to Comment No. 219-1

The DOE did not specify a "preferred alternative" in the draft EIS. DOE's preferred alternative is specified in this final version of the EIS (Sections 2.9 and 4.7). The commentator's support for Management Alternative 1 as described in Section 2.2 is noted.

The Energy Policy Act of 1992 established stringent limitations on the export of HEU from the United States. Since enactment of this Act into law, no new export licenses have been issued by the United States.

Response to Comment No. 219-2

As discussed in Section 2.2.1.1, the 10-year policy refers to the period of generation of foreign research reactor spent nuclear fuel, the amount of which can be reasonably approximated. Actual shipments could be made for a period of 13 years. The additional three years would allow for the cooling of the fuel generated towards the end of the policy period and other contingencies. The commentor's preference for an even longer acceptance period is noted.

Response to Comment No. 219-3

The commentor's position on domestic chemical separation is noted. This alternative is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS. It is also part of Management Alternative 3, which is discussed in Section 2.4 and 5.5 of the EIS.

Response to Comment No. 219-4

As described in Section 2.2.1.9 of the EIS, the storage technology identified for the basic implementation of Management Alternative 1 is dry storage. The commentor's support for dry storage technology is noted.

Response to Comment No. 219-5

The commentor's suggestion that foreign research reactor spent nuclear fuel should not be managed on an interim basis at the Idaho National Engineering Laboratory or the Savannah River Site and then transported to another site is noted.

Response to Comment No. 219-6

The commentor's suggestion concerning the West Bear Creek site at Oak Ridge is noted.

ORR boundary. I think the adjacent site is controlled by TVA and presently unused, so a buffer could likely be arranged. 219-6 (Cont'd.)

There is a little too much emphasis on the number of fuel elements to be returned, and the number of kg of heavy metal. For hazards analysis, it would seem the decay power per element is the simplest pertinent quantity, and I suggest this be estimated, tabulated, and summed at five year intervals for each overseas facility of concern. 219-7

I did not find a clear statement, but I gained an impression that source terms for spent fuel batches were estimated assuming the fuel had been used constantly at full power. If so, all the dose tabulations are considerably in error though conservative. I suggest a better approximation be used. For example, I assume every facility has fuel element burnup estimates. If this were used along with fuel loading and discharge dates, an adequate approximation of decay power could be made for various dates in the future. For dose calculations, this would be quite conservative because of self shielding. 219-8

I found a minor error in the discussion of school systems in the Oak Ridge area. At least Clinton High, Harriman, and Oak Ridge have independent school systems. Perhaps there are others. There are also some private schools. I did not check to learn if the totals were correct. 219-9

The above does not mean that I accept all of our non-proliferation policy, for it does not seem self consistent. As concerns the foreign research reactor fuels of concern, the policy seems wise and should be implemented. 219-10

Sincerely
Bob Peelle
Robert Peelle
phone or fax (615)483-8974

Response to Comment No. 219-7

The use of decay power is an alternative approach, but does not provide a clear indication of what is involved in spent nuclear fuel management or, especially, the transport of the fuel. The commentor's approach would not respond to public concerns over the number of elements, the amount of HEU removed from civilian commerce, or the number of shipments to and through the United States.

Response to Comment No. 219-8

Although the approach that the commentor has suggested is a real life evaluation, it would not change the results of the impact analysis and its accuracy would depend upon the quality of reactor specific information. The commentor's interpretation of the EIS's approach is correct. Appendix B of the EIS clearly states the assumptions and reasons that were used for the estimation of radionuclide inventories in different types of fuel. For impact analysis purposes, one can not use the average or actual values from one reactor to another, but rather needs to determine the maximum values in order to bound the consequences. DOE agrees with the commentor that the approach used in the EIS produces very conservative results.

Response to Comment No. 219-9

Section 3.3.4.9 of the EIS has been corrected. The correction does not influence the socioeconomic analysis in the EIS.

Response to Comment No. 219-10

The commentor's support for management of spent nuclear fuel from foreign research reactor's in the United States is noted.

COMMENTOR NO. 220: BUTLER, JOEL

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: JOEL BUTLER **Phone:** 510 689-3224

Title and Organization: CONCORD RESIDENT

Address: 4395 N. CANDEBIRCH CT

City: CONCORD **State** CA **Zip** 94521

*** COMMENTS ***

A COPY OF MY LETTER OF 4 JUNE 1995 ADDRESSED TO THE CONCORD CITY COUNCIL IS ATTACHED.

I ATTENDED THE MAY FORUM AT CONCORD CENTRE BUT THE OPPOSITION WAS FORCEFULLY VOCAL AND OPPORTUNITY TO COMMENT WAS NOT EASY — AT LEAST FOR ANY SUPPORTIVE VIEWS.

ALL OF US MUST BECOME INFORMED, INVOLVED AND SEEK THE BEST WAYS TO SUPPORT OUR GOVERNMENT IN ANY PEACE RELATED ENDEAVORS.

GOOD LUCK WITH THIS PROPOSAL.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 220: BUTLER, JOEL

COMMENTOR NO. 220: BUTLER, JOEL (CONT'D.)

4 June 1995

Concord City Council
1950 Parkside Drive
Concord, Calif 94520

Honorable Council Members:

I have been a resident of Concord since January 1965. I have seen our city grow, diversify, adjust, strive to meet and accept the challenges of change. Our record has been remarkable to date.

Now we are concerned about a proposal for a new and different activity at our neighboring Naval Weapons Station.

NWSConcord has been a busy, sometimes secretive, but a very good contributing neighbor. We have Park acreage, Highway 4 passage, and I believe BART passage. NWS personnel have consistently contributed talent on schools and community projects. Some local citizens are employed by the Station.

It would seem that shipping "spent nuclear fuel" into the Station, off loading, and transshipping it, would mean improving the port facilities which should mean positive projections for the Concord area.

Any industrial/military activity can pose hazards when mismanaged. The proposed activity is being brought before us in the sunlight. We have been asked to hear about it, question it, share our concerns and provide input for consideration in the decision making process.

I see this proposal for NWSConcord as a non military process with potential benefits for the Concord area.

I have concerns for possible shipping accidents at locations such as the Richmond-San Rafael, Carqinez and Benicia bridges. I would expect extreme caution would be excercised at those bridges, as well as at the port site. In addition, railroads to be used would receive regular critical inspection and maintenance. Highway transit would use escort essentially as that now employed for wide/high loads.

It is my feeling that rejection of the battleship Missouri from our general area, contributed to the current status of our local military bases.

Our NWSConcord essentially stands alone as the remaining military base not yet earmarked for closure. Is this proposal a direction for change and for possible port capability improvements?

220-1

220-2

220-3

220-4

220-1 (Cont'd.)

RESPONSE TO COMMENT
COMMENTOR NO. 220: BUTLER, JOEL (CONT'D.)

Response to Comment No. 220-1

The commentor's support for the use of the Concord NWS as the port of entry for foreign research reactor spent nuclear fuel is noted. The Concord NWS is one of ten candidate ports of entry which were determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States. If any foreign research reactor spent nuclear fuel is to be accepted into the United States, the selection of the actual port(s) of entry to be used will be in the Record of Decision, subsequent to completion of this final EIS.

Response to Comment No. 220-2

In regard to the number of bridges and navigational hazards along the route to Concord NWS, commentor's recommendation for exercising caution would be followed to the maximum extent possible. If foreign research reactor spent nuclear fuel is accepted by the United States, responsibility for shipping would be with the foreign research reactor operators. However, DOE would insist that only reputable shipping firms, United States or foreign flag, be used for the marine transport.

Response to Comment No. 220-3

The railroad tracks, engines, and cars would receive normal inspection and maintenance. No special inspection or maintenance would be required for rail transportation of foreign research reactor spent nuclear fuel.

Response to Comment No. 220-4

The requirements for physical protection of foreign research reactor spent nuclear fuel shipments during shipments are specified in 10 CFR Part 73.37. The principal points are (1) cooperation with local law enforcement agencies, (2) armed escorts, and (3) communications with a communications center that is staffed 24 hours per day. (Section 5.4.2 of the EIS.)

For truck shipments in heavily populated areas, one escort vehicle containing an armed guard would lead the truck and another escort vehicle containing another armed guard would follow the truck. In less populated areas, there would be only one escort vehicle instead of two. For rail shipments, the escort would ride on the train in a location that permits observation of the shipment car while the train is in motion.

COMMENTOR NO. 220: BUTLER, JOEL (CONT'D.)

It seems to me to be the trend and if it is, I urge the Council to look favorably on this proposal. 220-1 (Cont'd.)

I urge you to hear all concerns, to weigh them carefully as you consider your position on this matter.

Thank you for reading my concerns.

Sincerely,

Joel Butler

RESPONSE TO COMMENT
COMMENTOR NO. 220: BUTLER, JOEL (CONT'D.)

COMMENTOR NO. 237: LANTZ, SHIRLEY A.

15 June 95

Shirley A. Lantz
3104 North 20th Street
Tacoma, Washington 98406

Charles Heal, Program Manager
Office of Spent Nuclear Fuel Management
US Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585

No! Do not bring Nuclear Waste through Tacoma! you can come up with better solutions then endangering a now pristine part of the beautiful northwest with nuclear Hot garbage from all over the world.

No! Do not expose our northwest ~~west~~ homes, waters, people and wildlife with this Nuclear garbage.

No! I do not want our ~~my~~ homes to degrade in property values. We have spent our life devoted to a friendly enviornment for our

237-1

RESPONSE TO COMMENT
COMMENTOR NO. 237: LANTZ, SHIRLEY A.

Response to Comment No. 237-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. Also, the environmental effects evaluated in the EIS determined that there would be no adverse ecological impacts to any of the ports that might be used to receive the material (Section 4.2.2). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, after more than 30 years of spent nuclear fuel shipments, no radioactive materials have ever been released from a spent nuclear fuel transportation cask as a result of an accident (Section 2.6.2 of the EIS).

COMMENTOR NO. 237: LANTZ, SHIRLEY A. (CONT'D.)

- 2 -

Community and State. With your proposed plan to ship 192 Tons of High level Nuclear waste through the Port of Tacoma for over 13 years will effect Negative down grading of the entire area of Tacoma and the surrounding area because of the following: 237-2

Human Life will be endangered
Wild Life (Bald Eagles Nest in our Parks along the bays and other water ways) will be endangered
Employees handling High level Nuclear waste are dangerously vulnerable 237-3
Property values (Private & Public) will drop —

Why would we be endangered from High level Nuclear waste — Because:

Release of radiation explosion
Possibility of small Nuclear
Lack of funding to carry through due to future politics/private sector disinterest 237-4

RESPONSE TO COMMENT
COMMENTOR NO. 237: LANTZ, SHIRLEY A. (CONT'D.)

Response to Comment No. 237-2

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates the risk to humans and wildlife associated with the shipment of foreign research reactor spent nuclear fuel through any of the ports, is low.

Response to Comment No. 237-3

In many instances, the perception by the public of the risk associated with acceptance of foreign research reactor spent nuclear fuel may be greater than the actual risk, or the risk from other even more hazardous activities. However, such adverse impacts have not been observed during the almost 30 years over which foreign research reactor spent nuclear fuel was accepted into the United States in the past. Under NEPA regulations, the socioeconomic effects evaluated for this EIS do not include those associated with psychological fear of receiving foreign research reactor spent nuclear fuel.

Response to Comment No. 237-4

The risk of radiation releases is low, as shown in Section 4 of the EIS; there is no possibility of a nuclear explosion from the proposed action; the potential for lack of funding is outside the scope of this EIS; the threat from terrorists would be reduced by accepting this material into the U.S. because in this case the terrorists could not make a bomb out of it; the possibility of earthquakes was taken into account in the EIS; and the subject of union bargaining is also outside the scope of this EIS.

COMMENTOR NO. 237: LANTZ, SHIRLEY A. (CONT'D.)

– 3 –

Terrorist activity in US and Europe (remember Okla Cy. 1995)
Earthquake activity known in region
Union bargaining (strikes)

237-4 (Cont'd.)

As a retired Civil Service Fort Lewis, WA employee (28 yrs of service) — I retired here in Tacoma in my home of 35 years because I felt safe enough to live a happy life — to raise two productive good citizen children to adulthood and to see & enjoy two Grandchildren growing toward a "safe enough" adulthood. Safe enough to me does not include a dangerous proposal for our area of High-level nuclear waste being shipped to or from the Port of Tacoma.

237-5

The Environmental Corporation of America (ECA) can take their idea of using Tacoma for over 13 years (or any amount of time back to their thinking — planning table. We don't need or want their plans!

My suggestions for ECA is to

RESPONSE TO COMMENT
COMMENTOR NO. 237: LANTZ, SHIRLEY A. (CONT'D.)

Response to Comment No. 237-5

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5 of the EIS, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 237: LANTZ, SHIRLEY A. (CONT'D.)

-4-

resolve the High-Level Nuclear problem by letting all those European Countries (who have more money Now Then the US) such as Japan, Switzerland etc etc do their own dirty Hot Nuclear deactivating in their own Countries! 237-5 (Cont'd.)

Shirley A. Lantz

RESPONSE TO COMMENT
COMMENTOR NO. 237: LANTZ, SHIRLEY A. (CONT'D.)

COMMENTOR NO. 238: REDLER, JAY & VIRGINIA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Jay Redler + Virginia Redler Phone: 682-6916
Title and Organization: Former Member of CCIA Board
Address: 356 Highland Place
City: Clyde State Ca Zip 94520

*** COMMENTS ***

My Wife and I feel that we do not want nuclear waste in our back yard. You can find another storage to take it to. 238-1

Jay Redler

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 238: REDLER, JAY & VIRGINIA

Response to Comment No. 238-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or 3) there would be no storage of this material at Concord NWS, any other port, or anyplace except for DOE management sites. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

COMMENTOR NO. 239: BLOMBERG, CRAIG

Craig Blomberg, RN, BSN
Box 1094
Davis, CA 95617
Phone: 916-756-4493

Comments on the draft FRR SNF EIS
Attention: Charles R. Head
Office of Spent Fuel Management (EM-37)
1000 Independence Ave., S.W.
Washington, DC 20585-0001

Dear Mr. Head,

I have learned of possible plans to bring HEU and LEU back to the U.S. via various ports of entry through-out the country to "temporary" storage and feel such action would be unsafe and inappropriate. 239-1 The countries to whom we "leased" that uranium have every bit of storage technology available to them that we do. 239-2 Moving such waste could have catastrophic effects if spilled at sea...it should be moved as little as possible. 239-3 When we develop a "permanent" storage system in this country we could then consider such a policy. But for now, let's deal with our own soil and let other countries deal with theirs. 239-4

Incidentally, I am quite interested in progress made for the long-term management of LEU and HEU. If you have some type of executive summary outlining such progress I would be quite interested in receiving a copy. 239-5

Respectfully,

Craig Blomberg, RN BSN

RESPONSE TO COMMENT
COMMENTOR NO. 239: BLOMBERG, CRAIG

Response to Comment No. 239-1

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States, is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration. Based on the environmental impact assessment presented in Section 4.2 of the EIS, the risk to the environment and the health and safety of the public associated with acceptance and management of foreign research reactor spent nuclear fuel in the United States is low.

Response to Comment No. 239-2

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5 of the EIS, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

Response to Comment No. 239-3

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive contents have ever been released from a transportation cask as a result of an accident. The probability of an accident at sea is discussed in Appendix C, Section C.5.5 of the EIS, while the port accident probabilities are found in Appendix D, Section D.5.3.1.3. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3).

Response to Comment No. 239-4

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1. of the EIS).

Response to Comment No. 239-5

The Congress has mandated in the Nuclear Waste Policy Act, as amended, that DOE develop geologic repository(s) for permanent disposal of spent nuclear fuel and high-level waste to ensure that this and future generations are protected from any hazards. Accordingly, DOE is proceeding to characterize the Yucca Mountain Site to determine if it is a suitable site for a repository. Regarding the commentor's request for an executive summary outlining progress in this area, an information packet "Nevada and the Yucca Mountain Project" has been forwarded to your address.

COMMENTOR NO. 242: CLARK, BARBARA

P.O. Box 1222
Walla Walla, WA 99362
June 13, 1995

Charles Head
Office of SNF Management EM-37
USDOE
1000 Independence Ave SW
Washington DC 20585

RE: DOE/EIS - 0218D

Dear Mr. Head:

I am unable to attend any of the hearings on the DEIS and ask that my written comments be included in the record.

I urge the Department to select Alternative 3, the combination, for dealing with wastes generated by foreign "research" reactors. Any choice to use nuclear technology requires acceptance of responsibility for extremely dangerous wastes which are part of the technology. 242-1

There should be no importing of wastes from those countries which do not pose a proliferation risk. There should be no importing of LEU waste from any country. And there should be no importing of high level waste where it is feasible to provide dry cask storage with international inspection. Those who use the technology should bear the costs and risks. Further, it is in no one's interest to increase the inherent risks associated with nuclear products by adding the risks of transportation accidents. 242-2

In the remaining circumstances, where importing to the US appears necessary, this should not be done through public ports or on commercial vehicles. (This presumably leaves military transport and ports.) Civilian dock workers and the public need to be protected. We taxpayers have subsidized the nuclear industry sufficiently with our money*; it is wrong that we be further required to submit to safety risks above what we already endure for the benefit of the industry. 242-3

Finally, with Hanford cleanup of the wastes already on the site being as problematic and questionable as it is, it would be irresponsible to add more high-level waste to the site. Hanford is far from Washington DC, but it's not far from those of us who live here. We also want a safe life for our children. 242-4

I hope the Department of Energy will soon recognize that the costs and risks to taxpayers are much less with solar and other renewable technologies than they are with nuclear and will begin a rapid phase-out of its subsidy of the nuclear industry. 242-5

Barbara Clark
Barbara Clark

*and our health

RESPONSE TO COMMENT
COMMENTOR NO. 242: CLARK, BARBARA

Response to Comment No. 242-1

The commentor's qualified support for Management Alternative 3, the hybrid alternative, is noted. Management Alternative 3 is described in Section 2.4 of the EIS.

Response to Comment No. 242-2

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has in the past, and continues to play a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.2 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3 of the EIS, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

Response to Comment No. 242-3

The commentor's opposition to the use of commercial transport and public ports is noted. Estimated risks for marine transport, at candidate ports and along transportation routes were found to be low (Sections 4.2.1, 4.2.2, and 4.2.3 of the EIS, respectively).

Response to Comment No. 242-4

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent

COMMENTOR NO. 242: CLARK, BARBARA (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 242: CLARK, BARBARA (CONT'D.)

nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 242-5

Costs and risks of solar and other renewable technologies are outside the scope of this EIS. However, as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources, such as solar and wind.

COMMENTOR NO. 243: CRUZ, EDWIN C.

June 15, 1995

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

Dear Mr. Head,

I writing to you my concerns regarding the Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel.

We are a family of three residing in Clyde, California which neighbors the Concord Naval Weapons Station. I am deeply concerned that the U.S. Government has in its proposal to transport and/or store nuclear wastes in our neighborhood. I firmly believe that the potential for catastrophic accidents and sabotage is a definite possibility. 243-1

We have lived in our community for over 5 years now. Should the government proceed with their proposed policy, my family and I will immediately vacate and move elsewhere. The welfare and well-being of my family cannot be guaranteed by the U.S. Government's assurances that transport of nuclear waste poses no danger.

Sincerely,

Edwin C. Cruz

RESPONSE TO COMMENT
COMMENTOR NO. 243: CRUZ, EDWIN C.

Response to Comment No. 243-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or 3) there would be no storage of this material in the Port of Concord NWS, any other port, or anyplace except management sites. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS). The worst consequence of a sabotage event would be the violation of the transportation cask. However, since the worst case accident analyzed assumes that the cask is violated and further assumes the presence of a large engulfing fire (which would not be present in the sabotage case), the analyzed worst case accident is more severe than the sabotage case. For this reason neither a severe accident nor an act of sabotage would jeopardize the health or safety of the public.

COMMENTOR NO. 244: MCSPADDEN, CAROLYNN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Carolyn McSpadden **Phone:** 702-656-7705
Title and Organization: member of the public, retired teacher
Address: 4722 Antelope Wells Dr.
City: Las Vegas **State** Nev. **Zip** 89129

*** COMMENTS ***

As a member of the general public, I have not read the E.I.S., but based upon what I understand of the issue, as stated in the title of this page, I want to make it known that I would like to have the HEU returned to the United States. I feel this is preferable to leaving it in foreign countries, where it so easily could fall into the wrong hands, and be used against us. I certainly trust the D.O.E. to handle this material, and prefer they do so over foreign governments. 244-1

Sincerely,
Carolyn McSpadden

P.S. I appreciate the opportunity to enter my wishes on this matter.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

All comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to the extent practicable.

RESPONSE TO COMMENT
COMMENTOR NO. 244: MCSPADDEN, CAROLYNN

Response to Comment No. 244-1

The commentor's support for Management Alternative 1, as described in Section 2.2 of the EIS, is noted.

COMMENTOR NO. 245: CHRISTWITZ, BARBARA

6/15/95

7700 Kelsey Creek Dr
Kelseyville CA 95451

Mr. Chas. Head
Office Spent Nuclear Fuel (EM-77)
U.S. DOE
1000 Independence Ave., SW
Washington, DC, 20585

Dear Mr. Head:

Please carefully consider my comments regarding DOE's plan to bring spent nuclear fuel from foreign reactors into the U.S. for storage through Concord Naval Weapons Base. CNWB is a very poor choice for many reasons, but chiefly because of its high population, numerous bridges, and 7 oil refineries in the Carquinez Straits alone, with 240 ship-loads of petroleum products a year in the Bay. An accident would be catastrophic. 245-1

Thank you for your attention to this matter.

Seriously,
Barbara Christwitz

RESPONSE TO COMMENT
COMMENTOR NO. 245: CHRISTWITZ, BARBARA

Response to Comment No. 245-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 presents an explanation of the "population" criterion. Despite the existence of refineries and bridges along the route to Concord NWS, the passage from San Francisco Bay to Concord does meet the qualitative requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2 of the EIS). The volume or size of the local marine traffic (present or future) was not considered in the calculation of risk associated with the shipment of foreign research reactor spent nuclear fuel. In general, the number of ship mishaps is not proportional to the amount of ship traffic because port ship traffic is slow, and even when heavy, is normally a small number of ships per hour. Historically, increasing the volume does not significantly increase the probability of an accident. Rather, the number of ship mishaps is associated with navigational hazards and distances from the port to the open ocean or a large bay (port selection Criterion 2; Appendix D, Section D.1.9.2 of the EIS). Appendix D, Section D.5.3.1.3 of the EIS presents a discussion of the determination of the probability of ship accidents used in the EIS. The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items of importance include population along the route to the management site, port experience with handling containers, and port facilities. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

COMMENTOR NO. 246: SEABROOK, MARY C.

6/14/95

US Department of Energy
Office of Environmental Management (EM-37)
Att: Charles Head
1000 Independence Ave., SW
Washington DC 20585

This is a response to the comment period which is open through June 20 regarding the Department's proposal to ship spent nuclear fuel rods through Wando Terminal in Charleston SC. 246-1

I object to this proposal.

The expressway east of the Wando River which serves the terminal passes immediately adjacent to three schools and numerous residential subdivisions which were established prior to the construction of the terminal. I believe that there is risk involved and that such shipments should be directed to more remote terminals. 246-2

Mary C. Seabrook

Mary C. Seabrook
685 Linns Point
Mount Pleasant SC 29464

copies: Senator J. Strom Thurmond
Senator Ernest F. Hollings
Representative Mark Stanford

RESPONSE TO COMMENT
COMMENTOR NO. 246: SEABROOK, MARY C.

Response to Comment No. 246-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Charleston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Charleston, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 246-2

The population along representative truck transport routes was taken into account in the calculations of ground transport risks. In all cases the risk was found to be low. This subject is discussed in detail in Section 4.2.3 and Appendix E of the EIS.

COMMENTOR NO. 247: PAUL, CLARENCE L.

June 14, 1995

Department of Energy
c/o Charles E. Head
Office of Spent Fuel Management, EM-37
1000 Independence Ave.SW
Washington, D.C. 20585 - 0001

It seems that the attempt to find a repository for OUR nuclear waste repositories dwindled from two, then to one and now to NONE. This is a long line of broken promises. Now the cleanup of Hanford has been put into reverse. I was appalled to learn that WE are allowing more waste to accumulate at Hanford by accepting 41 foreign nations problems. This seems to be causing the accumulated materials to exceed our capabilities to ever clean up , which puts the Columbia River and all those downstream of Hanford "IN HARMS WAY". We are spending $$$$$$$$ in an attempt to save the salmon. Lets also try to save the people who trusted you to protect them. 247-1 247-2

Since IWO JIMA was won at a terrible cost of American lives - why can it not be used to save lives all over the world by making it THE WORLD'S NUCLEAR REPOSITORY ?! Why must we try to solve the world's ill's when we can't even solve our own. 247-3

Clarence L. Paul
4312 N.E. 40 street
Vancouver, Wa. 98661-3535
Phone (360) 695 - 2777

Clarence L. Paul

cc: Wa. State DOE Nuclear Waste Program
Hanford Advisory Board-Portland, Or
Heart of America NW
Vancouver Columbian
Vancouver Audubon Society
Nat'l Audubon Soc.Wa. State Office

RESPONSE TO COMMENT
COMMENTOR NO. 247: PAUL, CLARENCE L.

Response to Comment No. 247-1

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation. As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

Response to Comment No. 247-2

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 247-3

The commentor's preference for overseas storage in a remote location is noted. Under Management Alternative 2, Subalternative 1a (Section 2.3 of the EIS), the United States would assist foreign research reactor operators in storing their spent nuclear fuel in their own country or some other location outside of the United States. The disadvantages of storage in remote locations include costs of constructing suitable storage facilities and the difficulty of providing security in remote areas. This option would leave a concentrated quantity of highly enriched (weapons-grade) uranium outside of the United States. From the viewpoint of nuclear weapons nonproliferation, it is less risky to provide for disposition of these materials in the United States. As demonstrated by the analysis in Section 4 of the EIS, the risks associated with implementation of the proposed action to human health or the environment would be low.

COMMENTOR NO. 249: PENCE, ALISON

Alison Pence
252 7th Street
San Francisco, CA 94131

Mr. Charles Head
Office of Spent Nuclear Fuel Mgt. (EM-37)
U.S. DOE
1000 Independence Ave., SW
Washington DC 20585

June 12, 1995

Dear Mr. Head:

I am responding to the proposal that would transport nuclear waste through Concord. I attended the hearing held in Concord on May 22, 1995 and join in the chorus of residents and bay area citizens who think, for many reasons, radioactive material should be transported and stored elsewhere. My primary concern is that the Bay Area is heavily populated and seismically active. If, as you said, "a container just fell off a truck", getting it back on the truck and through passable roads would not be a high priority after an earthquake. It has been six years since the '89 quake and some freeways are still closed! 249-1

You yourself said that in the big EIR (not just for foreign fuels), the recommendation is to have waste received either in South Carolina or in Washington state. 249-2

I think that if you ship to this side of the U.S. at all, you should send shipments to Washington. They are closer to Idaho than we are, they have experience with nuclear elements and they might welcome the work. As you know, the community here is hostile towards your proposal. 242-3

Sincerely,

Alison Pence

Alison Pence

RESPONSE TO COMMENT
COMMENTOR NO. 249: PENCE, ALISON

Response to Comment No. 249-1

The population within a 50-mile radius of the Concord NWS was considered when analyzing the potential impact of a range of hypothetical port accidents. The risks were found to be low (Appendix D, Section D.5 of the EIS). Earthquakes were not analyzed seperately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

Response to Comment No. 249-2

As stated in the May 30, 1995 Record of Decision for the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement, aluminum-based foreign research reactor spent nuclear fuel will be managed at the Savannah River Site. Any other foreign research reactor spent nuclear fuel will be managed at the Idaho National Engineering Laboratory.

Response to Comment No. 249-3

The distance from the port to the management site is only one of the considerations in selecting potential ports of entry for the foreign research reactor spent nuclear fuel. Other considerations such as port population, route population, port experience with handling containers, and access to the ocean would be considered in making the final selection of port of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

COMMENTOR NO. 250: FITZSIMMONS, JAMES & COLLEEN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: James E./Colleen A. Fitzsimmons **Phone:** (510) 686-0581

Title and Organization: Citizens of the United States/U.S. Taxpayers

Address: 2090 Smith Lane

City: Concord **State** CA **Zip** 94518-3515

*** *COMMENTS* *** June 14, 1995

We strongly object to this proposal regarding shipping, handling and "temporary" storage of spent nuclear fuel rods from foreign countries through the Naval Weapons Station at Concord, California. *250-1*

We feel that the D.O.E. should halt this plan and have our government re-examine the present U.S. position on INTERNATIONAL responsibility regarding the treatment of nuclear waste. *250-2* Foreign countries must be told that one of the prices of acquiring nuclear technology from our country will be the setting aside of areas within their own countries for disposal of the wastes they create - all costs to be borne by that country. *250-3* The safety of our citizens should be your paramount concern. A secondary factor would be the cost to be paid by those same citizens.

The dollar costs to the U.S. of monitoring a program such as one described above certainly would not exceed what is presently burdening our taxpayers. *250-4*

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 250: FITZSIMMONS, JAMES & COLLEEN

Response to Comment No. 250-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or 3) there would be no storage of this material at Concord NWS, any other port, or anyplace except for management sites. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

Response to Comment No. 250-2

The commentor's opposition to management of spent nuclear fuel from foreign research reactors in the United States is noted. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

Response to Comment No. 250-3

The commentor's preference for the No Action Alternative is noted. This alternative is discussed in Sections 2.5 and 4.6 of the EIS.

Response to Comment No. 250-4

The cost of storing and disposing of the spent nuclear fuel within each of the 41 countries participating in this program would greatly exceed the cost of any action (storage, reprocessing, processing without separation of the uranium, geologic disposal, etc.) at only one or two sites. To ensure security and safety, U.S. monitoring would require development of independent spent nuclear fuel storage installations in many countries that have no nuclear infrastructure (excluding the research reactor). In some countries, there is little industrial or security infrastructure. Concentrating the spent nuclear fuel in only one or two locations for management (regardless of the approach) is less costly and more secure than any distributed alternative.

COMMENTOR NO. 251: O'BRIEN, RAYMOND J.

ÓB

June 13, 1995

Mr. Charles Head, Program Manager
Office of Spent Fuel Management (EM-37)
United States Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0001

Dear Mr. Head:

By way of this letter, I would like to raise the following concerns regarding the Draft Environmental Impact Statement for the receipt and transport of spent nuclear fuel through the Concord Naval Weapons Station, Concord, California:

1.) **The Draft Environmental Impact Statement makes no mention of specific proposed trucking/rail routes for the transshipment of spent nuclear fuel rods.** In fact, the final Environmental Impact Statement for this project should only be issued after the permanent storage sites have definitively been approved. Only after that action is taken should the nearest ports of receipt be considered and specific transshipment routes proposed. 251-1

2.) **The Draft Environmental Impacts Statement draws an arbitrary effected zone of ten miles around the Concord Naval Weapons Station.** Yet many municipalities along possible truck and rail routes have not even been notified of your proposed project, even though they may be expected to shoulder the emergency management response in the event of an accident. Likewise, the arbitrary demographics zone of ten miles surrounding the Concord Naval Weapons Station camouflages the disproportionate environmental burden and risk that a community like Bay Point (1 ½ miles from the proposed loading dock at Concord Naval Weapons Station) will have to bear. Environmental Justice policy declares that low income communities should not be saddled with potentially hazardous environmental projects. Bay Point, the community with the lowest demographics of any community within your effected zone, will be unfairly burdened by this proposed project 251-2 251-3

Caisléan Beag an Scáth an Chnuic
813 Cuskey Street/Bay Point, California/94565-6766

RESPONSE TO COMMENT
COMMENTOR NO. 251: O'BRIEN, RAYMOND J.

Response to Comment No. 251-1

The ground transport route options and identification process are discussed in Section 2.6.4. Over a hundred representative ground transport route options were analyzed in Appendix E including routes to all of the potential foreign research reactor spent nuclear fuel management sites. The results are presented in Section 4.2.3 of the EIS. In all cases the risks were found to be low.

Response to Comment No. 251-2

For the purposes of the port selection criterion associated with population (Criterion 5), a 10-mile (16 km) radius from the port was used (Appendix D, Section D.1.9.5 of the EIS). However, the impact evaluation covered a 50-mile radius around the port. The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS). Regardless of the radius of consideration used, communities closer to the port would bear a disproportionate amount of risk. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low, even for the most-affected individuals.

In regard to informing the public, the draft EIS was mailed to more than 1,500 people and an official DOE announcement of the meeting location and purpose was advertised in local newspapers. Public service announcements were also provided to local radio stations and to cable-access television. The meeting announcement was included in the Federal Register concerning the EIS. In addition, 1-800 numbers were provided for preregistration and for requesting copies of the draft EIS.

Response to Comment No. 251-3

Appendix A of the EIS responds to Executive Order 12898 which directs federal agencies to identify and address disproportionately high and adverse environmental effects of their policies and activities on minority populations and low-income populations. Environmental effects of Management Alternative 1 and 3 were evaluated and found to have no significant beneficial or adverse effects on the general population, including minority populations and low-income populations, surrounding Concord NWS or other candidate ports of entry (Sections 4.2 and 4.5 of the EIS). Section 3.2.1 of the EIS identifies low-income households and describes the racial and ethnic composition of resident minority populations surrounding each of the candidate ports. Environmental justice at candidate ports, along ground transportation routes, and at interim management sites is discussed in Sections 4.2.2.6, 4.2.3.7, and 4.2.4.5, respectively, of the EIS.

COMMENTOR NO. 251: O'BRIEN, RAYMOND J. (CONT'D.)

page 2
To: Mr. C. Head
6/13/95

I hope that you will find these concerns relevant, and trust that they will be addressed in your Final Environmental Impact Statement.

Sincerely,

Raymond J. O'Brien

Raymond J. O'Brien

RESPONSE TO COMMENT
COMMENTOR NO. 251: O'BRIEN, RAYMOND J. (CONT'D.)

COMMENTOR NO. 252: MCGOWAN, TOM

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: TOM MC GOWAN Phone: (702) 382-9745 (AM).
Title and Organization: INDIVIDUAL MEMBER OF THE PUBLIC
Address: 720 SO. CASINO CENTER BLVD., #5
City: LAS VEGAS State NEV. Zip 89101

(A) IN PREFACE:--(SEE OTHER SIDE)-- *** COMMENTS ***

(1). THE FACILITATOR AND BOTH DOE/HQ-ASSIGNED SPEAKERS WERE PROFESSIONAL, DEDICATED, EXPERTISED, PUBLIC-ASSISTIVE AND RESPONSIVE, COURTEOUS AND EXTREMELY EFFECTIVE PURSUANT TO THEIR ASSIGNED PURPOSE.

(2). THE MODIFIED 'ROUND-TABLE' MEETING AND DISCUSSION FORMAT WAS AN IMPROVEMENT UPON DOE'S (NON-UNIQUE) TRADITIONAL 'AUDIENCE' (NOT 'MEETING') POLICY, BUT FALLS FAR SHORT OF AN OPTIMALLY OMNI-PARTICIPANT AND PRODUCTIVE GENUINE OPEN PUBLIC MEETING AND/OR GENUINE PUBLIC CONSENSUS DEVELOPMENT PROCESS.

(3). THE ENSURED EFFECTIVE ALTERNATIVE SOLUTION TO THE ENTIRE FRR/SNF ISSUES COMPLEX, EXPRESSLY INCLUSIVE OF ENSURED NUCLEAR NON-PROLIFERATION, IS READILY AVAILABLE IN RECOMMENDATION AND PROPOSAL. IF SERIOUSLY INTERESTED, YOU MAY SO INDICATE, VIA NOTIFICATION, AT YOUR EARLIEST CONVENIENCE, OF THE SCHEDULING OF A ONE(1) HOUR MEETING, PRESENTATION, QUERY AND DISCUSSION OF THE FULLY-DETAILED PROPOSAL, IN FURTHERANCE OF ITS ADOPTION AND IMPLEMENTATION IN THE GENUINE BEST PUBLIC INTEREST.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

All comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to the extent practicable.

(4). THANKS FOR THE COFFEE, THE COOKIES, THE CONVIVIAL COMRADERIE, AND YOUR SINCERELY DEDICATED EFFORTS IN THE NATIONAL PUBLIC INTEREST.

TOM MC GOWAN

252-1

RESPONSE TO COMMENT
COMMENTOR NO. 252: MCGOWAN, TOM

Response to Comment No. 252-1

The commentor's support concerning the format used by DOE for the public hearings, the professionalism, responsiveness and courtesy of the facilitator and DOE representatives, and the United States nuclear weapons nonproliferation goals, is noted.

COMMENTOR NO. 253: RAYMER, TERESA L.

JUNE 14, 95

DEAR U.S. DEPARTMENT OF ENERGY,
I AM VERY UP SET ABOUT YOUR
NUCLEAR NUKE STORAGE PLAN.
IT WOULD BE A TRAGIC END TO
TURN "GOD'S COUNTRY" THE GREAT
NORTHWEST INTO A NUCLEAR DUMP! 253-1
WHY USE US TAX PAYERS TO PAY
FOR THIS?

WASHINGTON STATE HAS ENOUGH PROBLEMS
WITH POLLUTION PROBLEMS WITHOUT
ADDING NUCLEAR WASTE TO IT. 253-2
PLEASE "DONT" DO THIS TO ARE
BEAUTIFUL GREEN STATE!!!

SINCERELY

MRS. TERESA L. RAYMER
P.O. BOX 4244
VANCOUVER, WA
98662-0244

RESPONSE TO COMMENT
COMMENTOR NO. 253: RAYMER, TERESA L.

Response to Comment No. 253-1

Sections 2.2.1.2 and 2.2.2.3 of the EIS discuss alternative financing arrangements that range from charging the reactor operators a fee that would cover all the costs of the proposed action, to having DOE subsidize all of the reactor operators' costs. One compromise position that is evaluated is to charge developed countries a competitive fee, while developing countries would be subsidized. If less than the full cost of the proposed action is charged to the reactor operators, the difference would be the cost to the United States of gaining participation by other countries in our nuclear weapons nonproliferation programs.

Response to Comment No. 253-2

The commentor's opposition to the use of Washington State is noted. However, it should be noted that the analyses provided in Section 4.2 of the EIS demonstrate that there would be no significant adverse impacts to any of the water ways, ports, or highways that the material might pass through or near. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. As stated in Section 2.6.2 of the EIS, to date, after more than 30 years experience in shipping, no spent nuclear fuel transportation cask has ever released any of its contents (radioactive material), even in actual highway accidents. Based on this experience, DOE considers that spent nuclear fuel transportation casks passing through the Port of Tacoma, Washington State, or any other port or state, would not release their radioactive contents.

COMMENTOR NO. 254: HERRMANN, ELIZABETH

June 16, 1995

Department of Energy
c/o Mr Charles R Hess
Office of Spent Fuel Management
EM-37 1000 Independence Ave S.W.
Washington D.C. 20585-0001

Dear Sir

I urge you to deny access to our country as a storage space for nuclear waste from other countries. 254-1

Yours truly,

Elizabeth Herrmann
1015 NE 86th Ave
Vancouver, WA 98664

RESPONSE TO COMMENT
COMMENTOR NO. 254: HERRMANN, ELIZABETH

Response to Comment No. 254-1

The commentor's opposition to the management of foreign research reactor spent nuclear fuel in the United States is noted. In assessing the environmental and policy impacts of the proposed action, DOE has also considered and evaluated Management Alternative 2 which involves management of foreign research reactor spent nuclear fuel overseas. Management Alternative 2 is discussed in Section 2.3 of the EIS.

COMMENTOR NO. 256: YURMAN, RICH

June 13 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management
DOE
WASHINGTON DC

Dear Mr. Head:

As a resident of the San Francisco Bay Area I am deeply concerned by DOE's plans to transship spent nuclear fuel from other countries via the Concord Naval Weapons Station to various sites in the U.S. This means truckloads of the most dangerous toxic materials known will pass through one of the most highly populated areas of our country where an accident or derailment could put all of us in this area at grave risk. And this danger is compounded by CNWS's long history of mishandling shipments and having major accidents. 256-1

To top off all this, the contaminated material, toxic for 250,000 years, cannot be stored safely anywhere on the planet. 256-2

Therefore I urge you, as the responsible official, to reconsider this project and cancel the use of CNWS as a receiving station for overseas nuclear wastes in the form of spent nuclear fuel. 256-1 (Cont'd.)

Thank you for your time & attention

Yours,
Rich Yurman

RESPONSE TO COMMENT
COMMENTOR NO. 256: YURMAN, RICH

Response to Comment No. 256-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low. Not only is the risk low, but the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS).

Regarding the commentor's concern about the population of the area, the port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS presents an explanation of the "population" criterion.

As the result of public concern borne from a September, 1993 television report, the Contra Costa County Board of Supervisors initiated an investigation of the safety at Concord NWS. Their report on the subject, "Safety at the Concord NWS" dated November 2, 1993, concluded in part, "There were no incidents involving explosions or radiation exposure. Many of the reported incidents were not accidents caused by Weapons Station employees but, rather, were discoveries by employees that materials being received had been damaged during loading or transit. In some cases the shipments had not been properly blocked, braced or banded."

In fact, the safety record at Concord NWS is significantly better than that of ports in the private sector with similar activities. According to the Department of Labor statistics, for the category of marine cargo handling, the number of lost workday cases per 100 full-time workers for 1993 was 7.1 nationwide (current data not available), which is typical. The number of lost workday cases per 100 workers at Concord NWS for the first three quarters of fiscal year 1995 was 5.3, which is also typical for Concord.

Response to Comment No. 256-2

It is true that some of the man-made nuclide in the spent nuclear fuel would be toxic for a long time (more than 250,000 years) similar to those found naturally in our environment. Both the man-made and naturally present toxic materials have been stored safely without undue harm to the public or the environment. In the case of man-made material, experience at the Savannah River Site has shown an excellent storage capability of foreign research reactor spent nuclear fuel type for more than 20 years. The research reactors, with the lifetime cores, keep the same fuel in the reactor pool for approximately 40 years. Others, as indicated in Appendix F, Section F.2.9 of the EIS, have experience in safe storage of spent nuclear fuel in dry storage for more than 30 years. DOE proposes to store the foreign research reactor spent nuclear fuel in dry storage after receipt and characterization of the spent nuclear fuel. The EIS concluded that the risks of storing the foreign research reactor spent nuclear fuel in dry storage at only of the potential management sites are low (Section 4.2.4, and Appendix F, Section F.4).

COMMENTOR NO. 257: WINCHESTER, ELLEN & JOHN

Ellen M. Winchester
John W. Winchester
2405 Delgado Drive
Tallahassee, FL 32304
Phone 904-576-0954

June 15, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Dept. of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Head:

As interested citizens we wish to make the following comments on DOE EIS 02180, March 21995, Foreign Research Reactor Spent Nuclear Fuel (FRRSNF). We believe that only the spent fuel from research reactors in unstable countries should be accepted for management by the United States in view of (1) the immense amount of US domestic spent fuel awaiting disposal, (2) the scientific uncertainties regarding the security from contamination of future or current ecosystems of all storage methods so far proposed, (3) the resistance of states and communities to selection as sites of either interim or permanent storage, (4) the possibility that no method of permanent storage will be established for many decades, (5) the likelihood that states and communities will strongly resist establishment of interim storage facilities within their boundaries, and (6) the probable strong resistance of communities through which the FRRSNF would be transported en route to interim storage and the resultant civic unrest. 257-1

We realize that all of these objections to US acceptance of FRRSNF from stable countries also apply to acceptance of FRRSNF from unstable countries, but we believe the proliferation risks of leaving this dangerous but commercially valuable material in unstable political environments outweigh the risks attached to receiving it, as these risks are described above. With regard to claims of U.S. failure to live up to its original commitment to accept FRRSNF produced from U.S. origin HEU, we believe the governments of stable countries realize that the problems involved in establishing the perpetual guardianship of the plutonium and highly enriched uranium in spent fuel--or the high level wastes resulting from reprocessing--are much more difficult to solve than they appeared to be at the time the original "Atoms for Peace" agreements were signed. Further, we believe that these generally prosperous countries should be willing to manage their own share of this global burden. So far as trusting stable governments to manage their spent fuel responsibly under I.A.E.A. safeguards is concerned, the quantity of research reactor spent fuel overflowing their storage pools is small compared to their burden of commercial spent fuel, which we have no alternative to trusting them to manage without increasing commerce in weapons grade uranium or plutonium. 257-2

An additional reason for accepting the FRRSNF from politically unstable countries that seems reasonable to us is the lack abroad of LEU reprocessing facilities, mentioned in the EIS, and the resulting incentive to use HEU. 257-3

Finally, however, we are puzzled by the emphasis in this EIS on reprocessing as an acceptable alternative to unreprocessed spent fuel management. We thought that alternative was ruled out in the U.S. more than a decade ago. Since reprocessing produces difficult to store high level and other kinds of toxic wastes which are greater in bulk than spent fuel, as well as weapons grade uranium and plutonium, we doubt it protects health and safety, can be stored more safely, provides cost savings, etc. The fact that DOE is obliged to place HEU under UN safeguards is a recognition that reprocessing creates more problems than it solves. 257-4

Sincerely,

Ellen M. Winchester
John W. Winchester
Professor of Oceanography, Florida State University

RESPONSE TO COMMENT
COMMENTOR NO. 257: WINCHESTER, ELLEN & JOHN

Response to Comment No. 257-1

The United States has in the past and continues to play a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

Response to Comment No. 257-2

Management Alternative 3, described in Section 2.4 of the EIS, considers management of the spent nuclear fuel from foreign research reactors in the United States and overseas. As discussed in Section 2.10 of the EIS, it would be imprudent to publicly label selected nations as a proliferation risk because such designations are subjective and would likely lead to adverse political and diplomatic consequences. Many research reactor operators located in nations which are closely allied with the United States cannot, at this time, dispose of their own spent nuclear fuel in their country (Sections 1.1 and 1.2 of the EIS). Thus, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

Response to Comment No. 257-3

The current lack of LEU reprocessing capability abroad applies to the new high-density LEU fuel which is made of a uranium-silicon-aluminum alloy. The commentor's emphasis on this reason for preferring the acceptance of foreign research reactor spent nuclear fuel into the U.S. is noted.

Response to Comment No. 257-4

The advantages and disadvantages of domestic chemical separation are discussed in Sections 2.2.2.6 and 4.3.6 of the EIS. It is included in the EIS because it is a reasonable alternative. Furthermore, it would not be necessary to store HEU under United Nations safeguards if it is blended down to LEU.

COMMENTOR NO. 259: HOWE, DOROTHY

875 12th Street
Washougal Wa., 98671
June 12, 1995

Dear Mr. Head,

I have just read a very disturbing article saying the Dept. of Energy has proposed to import high-level nuclear waste from 41 nations. If this is true, I am very much opposed to this plan. 259-1

Our own country already has more nuclear waste than we know what to do with so why should we import it from other countries?. Hanford already has more waste than it can handle so why should more waste be stored there? 259-2

Besides the expense to our country and danger of accidents in transporting it, I am very much opposed to this plan. 259-3

Yours truly,
Mrs. Dorothy Howe

RESPONSE TO COMMENT
COMMENTOR NO. 259: HOWE, DOROTHY

Response to Comment No. 259-1

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States, is noted. Based on the environmental impact assessment presented in Section 4.2 of the EIS, the risk to the environment and the health and safety of the public from the acceptance and management of foreign research reactor spent nuclear fuel in the United States would be low.

Response to Comment No. 259-2

Management of spent nuclear fuel from foreign research reactors in the United States is one of three management alternatives evaluated in the EIS (Sections 2.2 through 2.4). The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

If the decision made after completion of this EIS is for the United States to implement a new policy for management of spent nuclear fuel from foreign research reactors (the proposed action, Section 2 of the EIS), the United States would assist with management of this spent nuclear fuel for a limited time (see last paragraph of Section 1.2 of the EIS) to provide foreign research reactor operators with an incentive to complete their conversion to LEU fuel, and give them time to develop their own means for dealing with their spent nuclear fuel.

Response to Comment No. 259-3

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 260: CALL, BETH

102 Otis
Walla Walla, WA 99362
June 13, 1995

Dear Mr. Head,

I am writing in regard to DOE-EIS-0218D. The thought of importing nuclear waste from other nations when we are so far from having a safe way of disposing of our own waste is appalling. *260-1*
Storage at Hanford which is so close to the Columbia whose storage facilities are already leaking and complet ely incapable of sustaining the shocks of an earthquake is even more terrifying. *260-2*
The risks of shipping these highly hazardous wastes through what would necessarily be be some highly populated areas like Puget Sound, Seattle, and Portland is unthinkable. *260-3*

I do understand that there is a risk that unstable or hostile nations may use their waste to produce nuclear weapons and thus that some compromise may be necessary. In future no nuclear fuel except low enriched uranium should be made available. Then we would not have to worry about disposing of these wastes; the nations using it could do so themselves, accepting the responsibility for disposing of the hazardous wastes they choose to produce. *260-4*

There is no need for the U.S. to accept Spent Nuclear Fuel from nations that do not pose a proliferation risk. As explained above, we should not accept Low Enriched Uranium wastes that can not be used in bombs. Where dry cask storage is feasible and subject to international inspection, storage should take place in the producing country, thus eliminating all transportation risks. *260-5* *260-6*

Where importation is unavoidable, namely enriched uranium from unstable or unfriendly governments, it should not use commerial freighters or public ports in large cities. This would protect longshore workers, the public on local roads, and the public if there should be a shipboard fire. *260-7*

Hanford should be completely ruled out as a possible storage facility for High-level Nuclear Wastes. The USDOE is already having trouble funding safety upgrades and fuel removal from K-Basin. *260-2 (Cont'd)*
Nations that choose to use nuclear power must accept the environmental, health and financial costs which come with it. The U.S. and all the other countries must realize that it is time to further develop the non-polluting, infinitely renewable sources of sun and wind power that free us being enslaved to means of power production whose wastes ultimately threaten our very existence. *260-8*

Thank you,

Beth Call

Beth Call

RESPONSE TO COMMENT
COMMENTOR NO. 260: CALL, BETH

Response to Comment No. 260-1

The commentor's opposition to management of spent nuclear fuel from foreign research reactors in the United States, is noted. Spent nuclear fuel from foreign research reactors has been safely managed in the United States for nearly four decades (Section 1.1 of the EIS). Sections 2.3, 2.5, and 4.5 of the EIS describe other alternatives under consideration.

Response to Comment No. 260-2

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 260-3

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Puget Sound, Seattle, Tacoma, or Portland is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to Puget Sound, Seattle, Tacoma or Portland, or to any of the ports analyzed in the EIS, is low. The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS, "Consequences of Port Accidents).

Response to Comment No. 260-4

The Energy Policy Act of 1992 contains provisions that bar essentially all exportation of HEU by the United States (See Section 1.1 of the EIS). Since passage of this Act, no new export licenses for HEU have been issued by the United States.

Response to Comment No. 260-5

The United States has assumed in the past and continues to assume a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it may not currently present the nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel.

Response to Comment No. 260-6

Overseas storage is addressed in Management Alternative 2, Subalternative 1a. The commentor's preference for this alternative is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 260-7

The analyses of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, which are presented in Sections 4.2.1 and 4.2.2 of the EIS, demonstrate that the use of commercial ships would not pose any significant risk to the port personnel or the population near the port for any of the ten selected ports. One port selection criteria (Criterion 5) evaluates the population of ports, removing the largest-population ports (Appendix D, Section D.1.9.5 of the EIS), as the commentor suggests.

Response to Comment No. 260-8

Consideration of solar and wind power are outside the scope of this EIS. However, it should be noted that as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources.

COMMENTOR NO. 267: BERGER, HEDY

Re: Concord Naval Weapons Station; Nuclear Fuel Plan

From Hedy Berger
1557 Franklin
SF CA 94109
(concerned citizen)
Phone/Fax
(415) 292-5554

June 16, 1995

Dear U.S. Department of Energy,

As a response for your environmental report I hope you include my concern for the underlying reasons the plan to appropriate nuclear fuel from the world suggests. One simply doesn't see why one branch of government supports the creation of poison while another branch is required to hide it. One logically concludes that the poison is worth more to create and hide than not to create and not to hide. In all fairness, one might consider it correct to hide poison; in and of itself as an absolute principal; with the purpose of preventing it from those who would administer it to an innocent life form. On the other hand one would conclude that this is not the principal which is being made sacred, in fact, it is this principal which is being desecrated, since it is the same body hiding it which has dished it out. It is in a similar way that one might conclude how there has been the desecration of the principal of the environment, or what one might call the harmony of indigenous life forms. Certainly this principal cannot be nourished by the same mouth which says a monotony of laws rewarding biological decadence, one might further conclude that letters such as the one one has been asked to write for the purpose of the environmental report is going to be useless towards its proposed purpose. Contrary to trust, this decision technology builds suspician. One finds the request of the commentary perverse, like being asked by the perpetrators to write a list of the risks between the death sentence of the world and the death sentence of a place within that world, as if the list would be long enough, eventually, to call a wrong a right, having forgotten the eradication of contamination creators, and having forgotten the common knowledge of it meaning anything to anyone exposed, because any thing can be exposed, so long as it's worth it (supposedly) to condone poisonous methods. But whether it's worth it to proceed in this negative direction is questionable to the extent that more irreversable destruction means less happy terrorists, and more angry everyday citizens of the world... an all around miserable stew. If you don't know how to stop making poison how are you going to convince anyone you know where it goes? And even if you don't make it yourself but tell everyone else to make it, isn't that all the more reason to suspect your motives in high security collections of it? Until there is a strong message for the earth maintained with integrity and sacrifice in every way, until a real care is established, I cannot support an establishment, a process, or a people, or a person, saying one thing and doing another. Hedy Berger

267-1

RESPONSE TO COMMENT
COMMENTOR NO. 267: BERGER, HEDY

Response to Comment No. 267-1

The commentor's opposition to the proposed policy is noted.

COMMENTOR NO. 269: TETERS, DARLENE

June 15, 1995

TO: DEPARTMENT OF ENERGY - the Office of Spent Fuel Management (Fax# 202-586-4073)
C/O MR. CHARLES R. HEAD

First, of all I don't feel it is up to our Nation to house HIGH-LEVEL RADIOACTIVE NUCLEAR WASTE FROM 41 NATIONS. Waste from countries like Japan, Australia, Canada, Sweden & Switzerland etc. In my opinion these countries are not exactly part of the third world. These nations should be held accountable for their own spent fuel and should plan for the safe storage of this highly toxic waste within their own borders. 269-1

Second, I don't want this high-level nuclear waste from 41 nations throughout the world which will be routed through Portland Oregon or Puget Sound destined for the "K BASIN" area at or own HANFORD, WASHINGTON on the Columbian river. Hanford is not an acceptable site for average or even more high-level waste, in fact, Hanford already has a leaking storage pool alongside the columbian River. this river is the lifeblood of our region and must not be ruined by nuclear contamination. Right now our government has not found a sure and safe way to store radioactive waste. We must remember that the dangers from this waste will not go away for hundreds or even thousands of years. The first several years of the operation is expected to cost UNITED STATES CITIZENS about 1 Billion, like all bids the cost will be more as usual. Our longshoremen have refused to handle these extremely toxic materials because they would be exposed to up to 200 Millirems of radioactivety per hour. Even children stuck in traffic jam could be exposed to a significant dose. 269-2 269-3 269-4 269-5 269-6

Third, I don't trust our general or foreign shipping line to handle this HIGH-LEVEL RADIOACTIVE WASTE on our rivers & highways. In our own country we have had oil spills that has caused alot of damaged. The ships are differential not design to handle this deadly cargo, accidents do happen under the best of plans. Our President don't want the high-level radioactive waste to get in the wrong hands, so bombs can't be made. In the best of foreign countries corruption can happen. MONEY DOES TALK, this radioactive waste can be sold and the rest ship to the United States. As you can tell I don't support this proposed importation of high-level nuclear waste from the 41 nations to the UNITED STATES. 269-7 269-8

Sincerely,
Darlene Teters

Darlene Teters
2845 Lewis River Road
Woodalnd, Washington 98674

RESPONSE TO COMMENT
COMMENTOR NO. 269: TETERS, DARLENE

Response to Comment No. 269-1

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

Response to Comment No. 269-2

The commentor's objection to bringing foreign research reactor spent nuclear fuel through the Ports of Portland and Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel through either port, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 269-3

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 269-4

Costs for the complete program (40 years) could approach or exceed $1 billion. Costs to the United States taxpayers would likely be in the low to middle hundreds of millions, depending on which countries participate, how the spent nuclear fuel is handled, when the fees are collected, and other factors. Costs could go much higher, depending on risks relating to geologic disposal. The reason for even considering these expenses is the importance of removing weapons-grade nuclear material from civilian commerce and supporting a conversion of all the world's research reactors to non-weapons-grade material.

COMMENTOR NO. 269: TETERS, DARLENE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 269: TETERS, DARLENE (CONT'D.)

Response to Comment No. 269-5

There is a maximum allowable radiation dose rate of 200 mrem per hour however, this limit is on the dose rate at the surface of the transportation cask, which would be inside of the container. The maximum radiation dose rate limit of interest to those that would be near the container, such as longshoremen, is 10 mrem per hour at a distance of 2 meters from the surface of the container (both dose rate limits come from regulation 49 CFR Part 173). The actual total dose that a longshoreman would get handling a cask is quite small due to the fact that a handler would not be present at the surface of the container for long and the total time near the cask is quite short. Appendix D, Section D.4.3.2.1 of the EIS presents the time/distance analysis of cask handling, Section D.4.5 of the EIS presents the resulting doses and risks, and Appendix F, Section F.5 of the EIS presents an evaluation of the dose rates from a transportation cask containing foreign research reactor spent nuclear fuel. The maximum allowable exposure for port workers would be 100 mrem per year, the same radiation dose limit established by the NRC to protect individual members of the public (Section 4.2.2.2 of the EIS). As the analysis in the EIS indicates, both the dose and dose rate for the port workers are low.

Response to Comment No. 269-6

DOE considers that the risk estimates in the EIS are conservative. That is, the actual risks would likely be even lower than those presented in Section 4.2.1 of the EIS.

Response to Comment No. 269-7

If foreign research reactor spent nuclear fuel is accepted into the United States, responsibility for shipping would be with the foreign research reactor operators. However, DOE would insist that only reputable shipping firms, United States or foreign flag, be used for the marine transport. The EIS evaluated the use of four types of ships, including purpose-built ship, for use in transporting foreign research reactor spent nuclear fuel (Section 2.6.3.2.1). No significant difference in the incident-free or accident risk was found between any of the types of ships (Sections 4.2.1 and 4.2.2), so DOE sees no need to restrict the types of vessels that might be used to transport the foreign research reactor spent nuclear fuel.

Response to Comment No. 269-8

The commentor's opposition to the acceptance of foreign research reactor spent nuclear fuel from the 41 nations listed in Section 1.3 of the EIS is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

COMMENTOR NO. 271: GUMM , JULIA

6-16-95
DEPARTMENT OF ENERGY
C/O MR. CHARLES R. HEAD
MR. FRANK COLE
OFFICE OF SPENT FUEL MANAGEMENT, EM. 37
1000 INDEPENDENCE AVE. SW
WASHINGTON, DC 20585-0001

THIS IS TRULY UNBELIEVEABLE! WHAT WE HAVE BEEN READING IN THE PAPERS....PLEASE TELL US SOMEONE HAS GOTTEN THE WRONG INFORMATION.

"U.S.DEPARTMENT OF ENERGY HAS PROPOSED TO IMPORT HIGH-LEVEL NUCLEAR WASTE FOR 41 NATIONS THROUGHOUT THE WORLD"!.

HANFORD NUCLEAR RESERVATION CLEAN UP HAS COST BILLIONS A YEAR.....WHEN WILL IT EVER BE FINISHED? NOT TO MENTION THE MANY DANGERS OF TRANSPORTING TOXIC WASTE. ALSO, THIS WASTE WILL NOT GO AWAY FOR THOUSANDS OF YEARS. 271-1

WHAT THIS PROPOSAL WILL DO TO THE FUTURE GENERATIONS... WILL BE DEVESTATING...FINANCIALLY AND PHISICALLY.

SINERELY.

JULIA GUMM

RESPONSE TO COMMENT
COMMENTOR NO. 271: GUMM, JULIA

Response to Comment No. 271-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 273: CLEAVELAND, ROBERT G.

ROBERT G. CLEAVELAND
3716 North 39th Street
Tacoma, Washington 98407-5720
(206) 752-4090

VIA FAX TO 202/586-5256

June 19, 1995

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
U.S. Department of Energy
1000 Independence Ave S.W.
Washington, D. C. 20585

Dear Mr. Head:

As a 27-year resident of Tacoma, I am writing in opposition to your plan to use the Port of Tacoma as one of three potential west coast ports for shipping high level nuclear waste. I oppose your plan for two reasons:

1. Beyond all the obvious NIMBY (Not In My Back Yard) reasons of security and safety you have already heard, I am not aware that Tacoma or any other regional community has requested the use of the Port of Tacoma. Why Tacoma? More than direct proximity to destination dumps sites inland, is it the path of least political resistance to Seattle or Portland ports? 273-1

2. Other than money and management, why is the U.S. choosing to become the nuclear waste site for spent uranium from research reactors in 41 countries? Given recent publicity from Hanford, I don't believe the Department of Energy has yet demonstrated its ability to manage nuclear waste from our own military and civilian nuclear sources. I believe the U.S. needs to adequately manage its own spent nuclear waste before seeking waste internationally. 273-2

I would appreciate hearing your perspective. I will be attending tonight's hearing in Tacoma. I look forward to your reply to my inquiry. Thank you for your consideration.

Sincerely,

Bob Cleaveland

RESPONSE TO COMMENT
COMMENTOR NO. 273: CLEAVELAND, ROBERT G.

Response to Comment No. 273-1

As a part of the overall evaluation of environmental impacts, the EIS identifies ports of entry in the United States that would be acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. In evaluating and selecting acceptable ports of entry, the EIS developed evaluation criteria (Appendix D, Section D.1.9 of the EIS). DOE considers that the port selection criteria successfully identify ports that can safely handle foreign research reactor spent nuclear fuel. The Port of Tacoma is currently included in this evaluation. The decision as to which port(s) would be used in the case that foreign research reactor spent nuclear fuel is accepted into the United States, will be made in the Record of Decision.

Response to Comment No. 273-2

Spent nuclear fuel from foreign research reactors has been safely managed in the United States for nearly four decades (Section 1.1 of the EIS). Storage technologies and site management options are discussed in Sections 2.6.5.1 and 2.6.5.3 of the EIS, respectively.

COMMENTOR NO. 285: AGAINST NUCLEAR WASTE PETITION

6/19/95

We do not want nuclear waste to come through, around or near Tacoma, Puyallup, Graham, Fife, Federal Way or any towns or communities near them. We do not want to store it, process it or in any way be associated with nuclear waste in our Counties. 285-1

1. Barbara Turosik - 4605 - 91st STREET Court E.;
2. [illegible] - 2717-145th St E, TACOMA 9844
3. Leona Turosik 9716 Portland ave. Tacoma
4. Diane MacGaugan 5501 N 23 98406
5. [illegible] 10101 - 40th Ave E, Tacoma, Wa 9844
6. John Struthers 3415 - 28th ST. CRT. E. Tacoma
7. Sam Smith 2906 35th ave East Tacoma Wa 98443
8. Marie R. Taylor 5307 So. Oakes Tacoma Wa. 98409
9. [illegible] 5307 So. Oakes Tacoma, Wa. 98409
10. Joyce Collins
11. Marilyn Melvill 4324 No 8th Tac. Wa 98406
12. Joan Healey P.O. Box 98432 Tacoma, Wa. 98498
13. Evelyn Rapp 3719 - N Vicondia " " 9840;
14. Laura Roberts 17805 84th Ave E Puyallup, WA 98373
15. Donna Slusarz 3827 So G St Tacoma Wa 984
16. Earl R. Hill 3827 So. G St Tacoma Wa 984
17. Diane & Robert Harris, 23116 - 46th Ave. E, Spanaway, WA 9838
18. Clifton & Lynn Healey P.O. Box 98432 Tacoma, WA 98498
19. Terkovich Valerie 12529 Ave Dubois S.W. Tacoma WA 98
20. D. Hermansen 5310 Varco Rd NE Tac 9842
21. M. J. Peterson 411 So. 61st St. Tac. 98408

RESPONSE TO COMMENT
COMMENTOR NO. 285: AGAINST NUCLEAR WASTE PETITION

Response to Comment No. 285-1

The commentor's opposition to all actions that would involve bringing foreign research reactor spent nuclear fuel through or near the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or any other port analyzed in the EIS, is low.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 285: AGAINST NUCLEAR WASTE PETITION (CONT'D.)

22. Patty Sprunker 7004-32nd St. Ct. W #103 Tac. 9846
23 ROBERT E. HAWES 801 N. M ST. APT. 6 TACOMA, WA 98403 (206) 572-14
24 ROBERT G. CLEAVELAND 3716 N 39th St Tacoma 98407 206/752-4
25 Robert E. Trutter 1320 Broadway Plaza Tacoma 98
26 Frances Acheson 2121 S. Alaska St. Tacoma 9840
27. Dick Marzano 6402 Gregory St. W. Tacoma. 98466
28 Rick Ryan 3535 53rd AVE NE TACOMA 984
Craig Hittle 905 PIERCE LN NE TACOMA 98422
Jackie Haught 1836 N. Baltimore " 98407
Joyce Fairbanks 1620 S. Mildred, Ste 3-289 Tacoma 98466
29. Henry Peters Port of Seattle P.O. Box 1209 Sea 9811
30 [illegible] 3114 N Alder 87 Tacoma 98407
31 Arden E. Gordine 28802 26th Ave S Federal Way, WA 98003-4
32. JEFF R EVENS 1436 S. MASON AVE TACOMA WA 9840
33. Wendy Isenhart 2605 North Warner Tacoma 9840
34. DOUG BREWER 2809 NORTH PUGET SOUND TACOMA 98407
35. Harold H. Noble 3320 Locust Ave. W. University Pl. Wash. 98466
36. Jeannie M. Noble " " " " " " " "
37. Lyle Fenton 6207 So. Montgomery St. Tacoma/WA 984
38 Gerald Pollet 1305-4th #208 Seattle WA 98101
39 Claudia MacMahon 405 6th Ave Tacoma, WA 98402

RESPONSE TO COMMENT COMMENTOR NO. 285: AGAINST NUCLEAR WASTE PETITION (CONT'D.)

COMMENTOR NO. 286: LOCHBURN JUNIOR HIGH PETITION

Lochburn Jr High

Dear US Department of energy,
My name is Robin Shaughnessy
I am 13 years old and I go to Lochburn Jr. High. You may think I am not old enough to understand what this is about, but I do. and I don't want you to ship nuclear waste in our waters. I know enough to know that if the nuclear waste spills it can kill humans as well as animals. What I want to know is if nuclear waste is so hazardous, why do we make it? I have enclosed a list of names of people who agree with me.

1 Robin Shaughnessy 13
2 Nanette Ewing
3 Rocky Aguinde 15 age
4 Melissa Gullan 14 age
5 Kristy [illegible] 14 age
6 Elizabeth McNair 14 age
7 Ron Bai
8 Sonja Robertson
9 Mel Solis
10 Laurel A. Hamer
11 Jayme Mutton 14
12 Heather M. [illegible]
13 Angela M. Poulin
14 [illegible]
15 Sirina Denton
16 Kathy Kim
17 [illegible]
18 [illegible]
19 [illegible]

286-1

RESPONSE TO COMMENT
COMMENTOR NO. 286: LOCHBURN JUNIOR HIGH PETITION

Response to Comment No. 286-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel into the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Foreign research reactor spent nuclear fuel in a transportation cask cannot "spill" because it is solid metallic fuel and is shipped dry. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, with over 40 years of experience, no radioactive material has ever been release from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

The spent nuclear fuel considered in this EIS is a by-product of using research reactors. Research reactors play a vital role in important medical, agricultural, and industrial applications, and also provide a tool for fundamental scientific research. These reactors are a vital tool in medical and environmental testing and research (Section 1.1 of the EIS).

COMMENTOR NO. 286: LOCHBURN JUNIOR HIGH PETITION (CONT'D.)

20 Jackson Velasquez 14 yrs.
21 James Burton
22 Will Schultz 14 yrs.
23 Robert A. Ogburn 15 yrs.
24 [illegible] 14 yrs.
25 Richard [illegible] 14 yrs.
26 Jamal [illegible] 15 yrs
27
28 [illegible] 14 yrs. get it out
29 Alisa McFarland 14 yrs.
30 Sean Kong 14 yrs.
31 Hillary [illegible] 14 yrs.
32 [illegible] 14 yrs
33 [illegible] 14 yrs
34 Mike Packer 14 yrs
35 Bobby Troup 14 yrs
36 D. Ellen Talbo 14 yrs.
37 Chris [illegible] 43
38 Nicole Kennedy 14
39 Angela [illegible] 15
40 Sandra Hill 14
41 Krista Armstrong 14
42 Jennifer Welch 15
43 Chris Welch 13
44 HEATHER EHRNSBERGER 15
45 Leslie Gluseby 15
26 MALISSA SHAUGHNESSY 15

RESPONSE TO COMMENT COMMENTOR NO. 286: LOCHBURN JUNIOR HIGH PETITION (CONT'D.)

COMMENTOR NO. 288: WHITACRE, KATHRYN & JIM

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Kathryn + Jim Whitacre Phone: 752 2296

Title and Organization: —

Address: 3317 Nora #9

City: Tacoma State WA Zip 98407

*** COMMENTS ***

The Sound is a sensitive environment that could NOT tolerate any accident. Shipping traffic is substantial & becoming more dense. Having a carrier of nuclear waste does not seem viable to us. The rigors of navigating in the sound seem contra indicate it as a viable. Once the ship is berthed then transporting it through the densely populated area of the Puget Sound - whose hiway infra structure is aging & being taxed by a rapidly increasing population - seems very threatening to the people & entire environmental structure. Don't do it! Our region is also earthquake prone. Of all the arguments against this - "mother Nature" offers one of the best. ~~Not~~ To also argue our watershed is used from Canada to S. Cal. — NO. 288-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 288: WHITACRE, KATHRYN & JIM

Response to Comment No. 288-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. The EIS did evaluate and consider the environmental impacts (Appendix D, Section 4.2.4.2.8), the population of the area around the port and along transit routes (Section D.1.9.5), the health and safety impacts (Section 4.2), and earthquakes (Appendix D, Section D.1.9.6).

Of the concerns mentioned, only the volume or size of the local marine traffic (present or future) was not considered in the calculation of risk associated with the shipment of foreign research reactor spent nuclear fuel. In general, the number of ship mishaps is not proportional to the amount of ship traffic because port ship traffic is slow, and even when heavy, is normally a small number of ships per hour. Historically, increasing the volume does not significantly increase the probability of an accident. Rather, the number of mishaps is associated with navigational hazards and distances from the port to the open ocean or a large bay (port selection Criterion 2; Appendix D, Section D.1.9.2 of the EIS). Appendix D, Section D.5.3.1.3 of the EIS presents a discussion of the determination of the probability of ship accidents used in the EIS.

COMMENTOR NO. 289: RYAN, RICHARD P.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: RICHARD P. RYAN **Phone:** (206) 927-3203

Title and Organization: NE TACOMA HOMEOWNER

Address: 3535 55TH AVE NE

City: TACOMA **State** WA **Zip** 98422-3128

*** COMMENTS ***

① THIS EIS PUTS THE BURDEN OF NUCLEAR CLEAN UP ON THE CITY WHERE THE ACCIDENT OCCURS 289-1

~~② [illegible]~~

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 289: RYAN, RICHARD P.

Response to Comment No. 289-1

Under the Price-Anderson Act, DOE would indemnify contractors for public liability with respect to spent nuclear fuel if there is a "nuclear incident," as defined under law. In pertinent part, a "nuclear incident" is one that causes, for example, injury or sickness or property damage, resulting from radioactive, toxic, explosive, or other hazardous properties of the material.

Several accident scenarios including a breach of the cask and fire sufficient to oxidize the contents were analyzed during preparation of the EIS. Results of the accident analysis at the ports are given in Section 4.2.2 of the EIS with supporting detail in Appendix D, Section D.5. No catastrophic effects were found to result from severe accidents involving foreign research reactor spent nuclear fuel.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: RICHARD P. RYAN **Phone:** (206) 927-3703
Title and Organization: NE TACOMA HOMEOWNER
Address: 3535 35TH AVE NE
City: TACOMA **State** WA **Zip** 98422-3123

*** COMMENTS ***

ACCORDING TO THIS EIS SECURITY IS NOT AN ISSUE UNTIL THE SPENT FUEL REACHES EITHER SAVANNAH OR IDAHO. I THINK THE DOE IS NEGLECTING THE POSSIBILITY THAT TERRORIST COULD NOT ATTEMPT TO PIRATE A SHIPMENT. YOUR BELIEF THAT THE CONTAINERS ARE TOO LARGE IS A FARCE. ANY NATION WILLING WILL BE ABLE TO REMOVE A CARGO CONTAINER OR HOLD IT FOR RANSOM ONCE INSIDE THE PUGET SOUND. 289-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

Response to Comment No. 289-2

As discussed in Section 2.7 and Appendix H of the EIS, DOE considers security to be a serious issue all along the transport route.

The requirements for physical protection of spent nuclear fuel shipments are specified in 10 CFR Part 73.37. The principal points are (1) cooperation with local law enforcement agencies, (2) armed escorts, and (3) communications with a communications center that is staffed 24 hours per day. (Section 5.4.2 of the EIS.) For truck shipments in heavily populated areas, one escort vehicle containing an armed guard would lead the truck and another escort vehicle containing another armed guard would follow the truck. In less populated areas, there would be only one escort vehicle instead of two. For rail shipments, the escort would ride on the train in a location that permits observation of the shipment car while the train is in motion.

COMMENTOR NO. 289: RYAN, RICHARD P. (CONT'D.)

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: RICHARD P. RYAN Phone: (206) 927-3703

Title and Organization: NE TACOMA HOME OWNER

Address: 3535 55TH AVE NE

City: TACOMA State WA Zip 98422-3123

*** COMMENTS ***

TACOMA WA IS NOT ACCESSIBLE TO OPEN WATER, "DIRECTLY". THERE IS AN APPROXIMATELY 10 HR TRANSIET THROUGH THE PUGET SOUND (2000 MILES OF INLAND COASTLY) IN ORDER TO REACH OPEN WATER. 289-3

THIS TRANSIET WILL BE ADJACENT TO MANY HIGH POPULATION AREAS.

To Mail in Comments, Address Correspondence to:

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Office of Spent Fuel Management, EM-37
U.S. Department of Energy
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Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 289: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 289-3

The passage from the Straight of Juan de Fuca to Tacoma meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). Favorable transit from open ocean is only one of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other considerations, such as port experience with handling containers, port facilities, access to land transportation, and population in the port and along the route to the management site, have also been considered in making the final selection of ports of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process. In evaluating the risk associated with accidents, the population along the Sound as well as in the Port of Tacoma itself were considered. Appendix D, Section D.5.3.2 of the EIS presents a discussion of population distribution.

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: RICHARD P. RYAN **Phone:** (206) 927-3703
Title and Organization: NE TACOMA HOMEOWNER
Address: 3535 55TH AVE NE
City: TACOMA **State** WA **Zip** 98422-3123

*** COMMENTS ***

THE MORE THE FUEL IS MOVED THE MORE LIKELY THE CASE OF AN ACCIDENT OCCURING, THE HEU SHOULD REMAIN AT ITS FOREIGN SITES. 289-4

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

Response to Comment No. 289-4

The commentor's preference for storing spent nuclear fuel at foreign research reactor sites is noted (Management Alternative 2, Section 2.3 of the EIS). Risks to human health and the environment which could result from transportation of spent nuclear fuel from foreign research reactors were evaluated and found to be low (Section 4 of the EIS).

COMMENTOR NO. 289: RYAN, RICHARD P. (CONT'D.)

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: LAURA RICHARD P. RYAN **Phone:** (206) 927-3203

Title and Organization: NE TACOMA HOMEOWNER

Address: 3535 55TH AVE NE

City: TACOMA **State** WA **Zip** 98422-3203

*** COMMENTS ***

EXPOSURE TO TEMPERATURES OF 1475°F FOR 30 MINUTES IS NOT EXCEPTABLE, SHIP BOARD FIRES EXCEED 1475° AND WILL LAST MUCH LONGER THAN 30 MINUTES. 289-5

DO NOT SHIP HEU TO US STORAGE SITES, MAINTAIN ON LOCATION, THE MORE HEU IS MOVED AND RE-PACKAGE THE MORE LIKELY IT WILL BE COMPROMISED. 289-6

To Mail in Comments, Address Correspondence to:

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Office of Spent Fuel Management, EM-37
U.S. Department of Energy
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Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 289: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 289-5

The transportation casks that would be used for the foreign research reactor spent nuclear fuel are certified if their design meets certain tests, including a fire test, and if the individual casks pass periodic inspections (Section 2.6.2 of the EIS). These certification standards were developed for use of the transportation casks on land, hence the 30 minute fire test, which is considered to be the extent of a high intensity fire resulting from a collision with a tanker truck. The duration of a ship fire is directly related to the amount of combustibles carried on board. In spite of this potential, the number of severe fires on ships is relatively small. Data available on the last 15 years from Lloyd's of London indicates that of 1,073 ship collisions in port worldwide, only eleven led to fires, and of those, only five caused extensive damage, with only one actually causing buckling of structures.

In respect to the impact a ship fire might have on a spent nuclear fuel transportation cask, there are three facts that would mitigate the potential damage. First, ship fires tend to move to different areas of the ship as the combustible material is consumed, so the cask would not be exposed for the entire duration of the fire. Second, a ship fire's intensity is normally limited by the amount of oxygen that can reach the interior of a hold. Third, all ships that would be used to transport foreign research reactor spent nuclear fuel have built-in fire suppression equipment, which at a minimum would keep fires well below the extreme temperatures needed to damage the transportation cask. For these reasons, it would be almost impossible for spent nuclear fuel inside the transportation cask to reach 900 degrees Kelvin (1,160 degrees F), the melting point of research reactor spent nuclear fuel. The probability of reaching such a temperature was calculated to be less than one in a billion (Attachment D5 to Appendix D of the EIS). To put this temperature into perspective, steel used in a ship's structure buckles at around 700 degrees Kelvin (800 degrees F).

The EIS contains the results of an analysis of the effects of an accident that involves a severe fire (severity category 6), which does not reach the temperature to melt research reactor nuclear fuel. Appendix D, Sections D.5.3 and D.5.4 present a detailed discussion of accident probabilities and radioactive material source terms and the results of the analyses, respectively.

In conclusion, although long duration ship fires are possible, and have occurred, they are uncommon events. Analyses in the EIS indicate that even in the event of a severe ship fire involving a transportation cask, neither the consequences nor risks are great (Appendix D, Section D.5.5 of the EIS).

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: RICHARD P. RYAN Phone: (206) 927-3703

Title and Organization: NE TACOMA HOMEOWNER

Address: 3535 55TH AVE NE

City: TACOMA State WA Zip 98422-3123

*** COMMENTS ***

SINCE HEU WAS ENRICHED IN THE UNITED STATES AND TRANSPORTED OUT OF CONUS IT SHOULD BE RETURNED THROUGH THE SAME PORTS IT WAS PREVIOUSLY TRANSPORTED THROUGH. 289-7

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

Response to Comment No. 289-6

The commentor's position that foreign research reactor spent nuclear fuel should remain at the locations where it is generated is noted. Overseas management is Management Alternative 2, and is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 289-7

Accepting the foreign research reactor spent nuclear fuel through the same port by which the enriched uranium left is not practical, partially because some of the enriched uranium was shipped out by airplane, an option not available for the foreign research reactor spent nuclear fuel. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 289: RYAN, RICHARD P. (CONT'D.)

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: RICHARD P. RYAN **Phone:** (206) 927-3703

Title and Organization: NE TACOMA HOMEOWNER

Address: 3535 35TH AVE NE

City: TACOMA **State** WA **Zip** 98422-3123

*** COMMENTS ***

IF HEU IS TO BE TRANSPORTED TO TACOMA THERE SHOULD BE A PROVISION MADE TO INSPECT THE CARGO PRIOR TO ENTERING THE PUGET SOUND TO ENSURE ~~COMPLIANCE TO TRANSPORTATION REQUIREMENTS~~ HAVE NOT BEEN COMPROMISED. 289-8

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 289: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 289-8

The foreign research reactor spent nuclear fuel containers would be inspected many times during their trip to the United States. First, the transportation cask and the container that carries the cask would be inspected for integrity at the foreign research reactor site. Next, the container would be inspected prior to loading it on the ship in the foreign port. During the time that the container would be onboard the ship, it would be inspected daily to ensure the container's integrity and to verify that the container was properly secured to the ship (Appendix C, Section C.4.1 of the EIS). Then the container would be inspected in the U.S. port of entry prior to overland transport (Appendix D, Section D.4.4 of the EIS). This inspection schedule exceeds the regulatory requirements and has proven sufficiently thorough during over 40 years of previous shipments.

COMMENTOR NO. 290: RYAN, LAURA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: LAURA RYAN **Phone:** (206) 927-3203

Title and Organization: NE TACOMA HOMEOWNER

Address: 3535 55TH AVE NE

City: TACOMA **State** WA **Zip** 98422-3123

*** COMMENTS ***

THE EIS DOES NOT CONTAIN PROVISIONS FOR LIMITING THE NUMBER OF HEU CONTAINERS (CASKS) THAT CAN BE SHIPPED. THERE IS NO PROVISION FOR HOW CLOSE HAZARDOUS MAT'L CAN BE SHIPPED IN PROXIMITY OF HEU CONTAINERS (CASKS) 290-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 290: RYAN, LAURA

Response to Comment No. 290-1

As described in detail in Sections 5.3 and 5.4 of the EIS, in addition to a series of applicable domestic regulations, international transportation of hazardous material is governed by the International Movement of Dangerous Goods (IMDG) Code, which is associated with the International Maritime Organization. This code essentially establishes the international rules for shipping hazardous cargos, which includes foreign research reactor spent nuclear fuel. Included are regulations that deal with carriage of radioactive material (Class 7 materials). They are based on the International Atomic Energy Agency regulations and deal with segregation of radioactive materials packages from other dangerous goods and other aspects of stowage, including the quantity of radioactive material to be shipped. To ensure that the IMDG Code and all other safety requirements, such as the Safety of Life at Sea (SOLAS), are followed, DOE would contractually require that only reputable shipping firms be used to ship the foreign research reactor spent nuclear fuel covered by this proposed action.

COMMENTOR NO. 291: BARNES, MARGARETE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Margarete Barnes **Phone:**

Title and Organization:

Address: 611 So. 78th St

City: Tacoma **State** WA **Zip** 98408

*** COMMENTS ***

I am against any nuclear shipments through Tacoma or the Puget Sound. 291-1
Keep our area safe for people to live

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 291: BARNES, MARGARETE

Response to Comment No. 291-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through either the Port of Tacoma or Puget Sound is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel through Puget Sound and into the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 292: SLUSARZ, DONNA

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Donna Slusarz **Phone:** 4756977

Title and Organization:

Address: 3827 So. G. St

City: Tacoma **State** Wa **Zip** 98408

*** COMMENTS ***

Lets tell the world we don't want nuclear power, we don't want nuclear wastes. 292-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 292: SLUSARZ, DONNA

Response to Comment No. 292-1

The commentor's opposition to nuclear power or nuclear waste is noted.

COMMENTOR NO. 293: OTIS, GLENN

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

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Name: Glenn Otis **Phone:** 564-0505

Title and Organization:

Address: 3921 Baise St W

City: Tacoma **State** Wa **Zip** 98466

*** COMMENTS ***

NO 293-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 293: OTIS, GLENN

Response to Comment No. 293-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 294: FORM LETTER D

June 19, 1995

U S Department of Energy
Washington DC

Attn: Committee for locating port to dispose of nuclear waste

I am opposed to your proposal to bring weapons grade nuclear waste through the Port of Tacoma.

Although I understand the need to dispose of nuclear waste somewhere, I do not believe it is appropriate to transport this level of radioactive waste through densely populated areas. The Port of Tacoma is a busy port, the I-5 corridor is one of the most congested traffic areas in the country, and there are suburban communities all around the major roads in the Puget Sound area. Putting the safety of thousands of families at risk for expediency is not a sound policy. 294-1

In addition, I have concerns about the level of safety provided for container freight in the event of an on-board ship fire. I understand that there are not adequate precautions to avoid spillage of nuclear waste into the water, whether it be in the ocean or in Puget Sound, in the event of a fire. 294-2

Our Port does not support your proposal. Our elected city officials do not support your proposal. The Port's union does not support your proposal. Other concerned groups do not support your proposal. My family and I do not support your proposal.

Sincerely,

Signature

Lauren Burlison
Name

8612 23rd ST CP W
Address

Tacoma 98466
City, State Zip

RESPONSE TO COMMENT
COMMENTOR NO. 294: FORM LETTER D

Response to Comment No. 294-1

The commentor's opposition to the use of the Port of Tacoma for receipt of foreign research reactor spent nuclear fuel is noted. Populations surrounding candidate ports and along transportation routes to management sites were a factor in the selection of candidate ports (Appendix D, Section D.1.9 of the EIS). The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 294-2

Sections 4.2.1 and 4.2.2 of the EIS provide an evaluation of consequences and risks of onboard ship fires. Supporting details are given Appendix D. If a policy to accept foreign research reactor spent nuclear fuel is adopted, fuel elements would be shipped in casks which are resistant to destruction by collision and fire (Section 2.6.2 of the EIS). In the unlikely event that a cask was breached by collision and/or fire, the radiological consequences have been demonstrated to be low and the associated risks would also be low (Section 4 of the EIS).

Commentor No. 294: Form Letter D (Cont'd.)

Individuals submitting this form letter:

Burlison, Lauren

Eannarino, Tim

Greenheck, William T.

Hoffman, Linda R.

Jennings, Sally

Jonker, Janie

Pennington, Valerie

Salter, Annie

Response to Comment
Commentor No. 294: Form Letter D (Cont'd.)

COMMENTOR NO. 302: GIDDINGS, ROXY

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About [illegible] Waste Through Tacoma.

Comments: [illegible] Do Not do option #1 [illegible] Remove to [illegible] any [illegible] into the water anywhere. Clean up nuclear waste [illegible] Find [illegible] to the "research" reactors [illegible] anyway. The people in Washington have eliminated the office of marine safety [illegible] care of shipping [illegible] waste. I am a child [illegible] Pasco.

Name: Roxy Gidd[illegible] Telep[illegible] (306) 5[illegible]

Address: [illegible] City/Sta[illegible] Tacoma, WA 98[illegible]

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave., [illegible] Washington, DC 20585

DEAD[illegible] 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

302-1
302-2
302-3
302-4
302-5
302-6

RESPONSE TO COMMENT
COMMENTOR NO. 302: GIDDINGS, ROXY

Response to Comment No. 302-1

The commentor's preference for Management Alternative 2 is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 302-2

The commentor's opposition to Management Alternative 1 as described in Section 2.2 of the EIS is noted.

Response to Comment No. 302-3

In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in any U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1000 feet). Appendix C, Section C.5.5 of the EIS provides information on the probability of a cask sinking in coastal and deep ocean waters.

Response to Comment No. 302-4

The commentor's request that nuclear wastes at Bremerton be cleaned up is outside the scope of this EIS.

Response to Comment No. 302-5

The Energy Policy Act of 1992 placed strict limitations on the export of HEU by the United States (Section 1.1 of the EIS). Since passage of this Act, no new export licenses for HEU have been issued by the United States. As described in Section 1.1 of the EIS, research reactors are used for research, medical, commercial, and educational applications.

Response to Comment No. 302-6

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. The elimination of the Office of Marine Safety is outside the scope of this EIS.

COMMENTOR NO. 303: WITHROW, WAYNE

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: As the [illegible] of [illegible] Local 120 and on behalf of [illegible] has passed a resolution against this transshi[illegible] enriched [illegible] through the Port of Tacoma) and [illegible]-chair of Pierce Co. Jobs with Justice, I am here to announce our clear and continued [illegible] and will actively [illegible]

Name: Wayne Withrow Telep[illegible] 8 [illegible] 475-8909

Address: 6238 S. Montgomery St City/State [illegible] Tacoma 98409

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. S[illegible] Washington, DC 20585

DEADLINE [illegible] 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma—Pierce County Visitor & Convention Bureau, Tacoma—Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

303-1

RESPONSE TO COMMENT
COMMENTOR NO. 303: WITHROW, WAYNE

Response to Comment No. 303-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

PORT of TACOMA U.S.A.

June 19, 1995

Dear Concerned Citizen,

Thank you for inquiring about the nuclear fuel shipments that could move through the Port of Tacoma. The Port of Tacoma is one of 10 possible ports of entry listed in the Draft Environmental Impact Statement.

Enclosed are a Port of Tacoma fact sheet on the nuclear fuel shipments, a form for your opinion, and a list of risk issues that the Department of Energy has overlooked.

The best way to voice your opinion and have an impact upon the nuclear fuel shipments is to write the Department of Energy. The DOE does not record verbal comments at public hearings and the only record will be written responses. The public comment period closes June 30, 1995. The Port of Tacoma urges you to write the DOE at the following address:

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue SW
Washington DC, 20585
Phone Number (202) 586-9441
Fax Number (202) 586-5256

P.O. Box 1837 • Tacoma, Washington 98401-1837 • Telephone: (206) 383-5841
Commissioners: Stephen R. Anderson • Jack A. Fabulich • Mike Fletcher • Patrick O'Malley • Jerry M. Thorpe
Executive Director: John J. Terpstra

COMMENTOR NO. 303: WITHROW, WAYNE (CONT'D.)

Port of Tacoma and City of Tacoma Risk Issues

DOE USED OUTDATED INFORMATION ON THE PORT - - The Department of Energy (DOE) used outdated information on the Port of Tacoma. The DEIS lists only one terminal through where these shipments would potentially be shipped. The Port of Tacoma has 6 Container Terminals. The map displayed in the DEIS is incorrect in that the configuration of these terminals is shown in a state in existence in the year 1980 or before. On-dock rail yard configurations are not shown at all and waterways are shown incorrectly. Similar mistakes are made for the Port of Seattle map.
Given these errors in analyzing facilities for handling these shipments there certainly is no guarantee that the nearby population centers were shown correctly and evaluated correctly. In addition transport routes in the Port area may also be incorrect. 303-2

DOE DID NOT CONSIDER THE DEEP WATER DEPTH IN PUGET SOUND – DOE described in the DEIS that it would be very difficult or impossible to recover fuel casks from depth greater than 200 meters in case of an accident. The DEIS states that those depths are only found in the ocean. DOE did not correctly research this matter since there are several areas in the Puget Sound region showing water depth of over 200 meters in major shipping lanes to and from the Port of Tacoma. 303-3

DOE DID NOT RECOGNIZE THEIR CONTRIBUTING TO THE "DIRTY PORT" STIGMA - -Commencement Bay and the Port of Tacoma are located in a federally designated Superfund site. This site is on the National Priority list for cleanup under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Over two hundred million dollars have and will be spent in efforts to clean up this environmentally sensitive area. DOE did not recognize that the shipment of nuclear materials would contribute to the "Dirty Port " stigma. 303-4

DOE DID NOT ADEQUATELY CONSIDER SEVERE FIRES/EXPLOSIONS – DOE did not properly evaluate and determine the impact of a severe fire or explosion involving a shipping cask of nuclear spent fuel, which would cause severe damage and have long-term effects on a large area near the disaster site. Further more the effects of crippling many businesses in the area effected was also not determined. 303-5

DOE DID NOT ADEQUATELY CONSIDER SECURITY ISSUES–DOE did not adequately address the security requirements for these shipments. This material is useable in nuclear weapons and therefore highly attractive to terrorists. Proper security measures to counter possible acts by terrorists were not provided for in the DEIS. 303-6

DOE DID NOT ADEQUATELY RECOGNIZE CRIPPLING BUSINESS ISSUES - - DOE did not properly address first response capability of the local fire and emergency agencies in case of a shipping cask breach and the spread of radiation from the accident 303-7

RESPONSE TO COMMENT
COMMENTOR NO. 303: WITHROW, WAYNE (CONT'D.)

Response to Comment No. 303-2

Updated information on the Port of Tacoma has been incorporated into Appendix D, Section D.2.1.9 of the EIS. A review of the map of Seattle and transport routes found no outdated or inaccurate information. The data on populations that are presented, and used in the analyses, are from the 1990 census.

Response to Comment No. 303-3

In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1000 feet). Appendix C, Section C.5.5 of the EIS provides information on the probability of a cask sinking in coastal and deep ocean waters. Section 4.2.1.3 of the EIS has been rewritten to more clearly state DOE's intentions in cask recovery.

Response to Comment No. 303-4

Shipment of foreign research reactor spent nuclear fuel would not jeopardize the significant cleanup effort undertaken in the area of Commencement Bay and the Port of Tacoma as noted by the commentor. Nor should it contribute to any "dirty port" stigma because the analysis in the EIS indicates that there would be no significant adverse impacts to any of the ports or bays, or the quality of water or air (Section 4.2.1.1 and Appendix C, Section C.2 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. Based on over 30 years of experience in shipping spent nuclear fuel, DOE considers that spent nuclear fuel transportation casks passing through the Port of Tacoma, Commencement Bay, or any other port or waterway would not release their radioactive contents, and thus would not affect air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and emphasize the no-impact nature of these shipments on air and water quality.

Response to Comment No. 303-5

Appendix D, Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Section D.5.4. The analysis shows that even in the event of a severe ship fire, neither the consequences nor risks are great (Appendix D, Section D.5.5). Although such a catastrophic accident would obviously impact the local environment and also the local businesses, no impacts are predicted due to the presence of foreign research reactor spent nuclear fuel. In fact, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 and Appendix D, Section D.5 of the EIS).

In addition to evaluating the worst case plausible fire, the EIS also evaluated the impacts of a ship fire so severe that it is considered not plausible. These results are discussed in Appendix D, Section D.5.4.3.2 and Attachment D5 to Appendix D.

COMMENTOR NO. 303: WITHROW, WAYNE (CONT'D.)

site. No provision were made in the DEIS for upgrading and training of local first response teams. In addition long-term effects on loss of business, infrastructure and long-term-effect on the aquisition of future business was completely ignored by DOE. 303-7 (Cont'd)

DOE DID NOT ADEQUATELY CONCISER LIFE CYCLE COSTS, BENEFITS AND GENERAL RISK AS WELL AS FULLY IGNORING FAIRNESS/EQUITY ISSUES IN SELECTING SMALLER PORTS -- DOE did not analyze the effects of an accident classified as a disaster on the local area infrastrucure and population. DOE did not address effects and costs incurred in the local area should an accident occur. 303-8

Note: These two pages constitute pages 17-25 on the page of contents.

RESPONSE TO COMMENT
COMMENTOR NO. 303: WITHROW, WAYNE (CONT'D.)

The effects of a severe explosion on a foreign research reactor spent nuclear fuel transportation cask were not evaluated because the radiological impacts of the fire discussed above would be worse, or "bound" the results of an explosion. With a severe fire not only is the cask violated, as it might be by a large explosion, but the heat of the fire would lift what is released from the cask, spreading the radioactive material farther, affecting more people.

Response to Comment No. 303-6

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

Response to Comment No. 303-7

Under NEPA, the socioeconomic effects evaluated for this EIS do not include those associated with psychological fear of receiving spent nuclear fuel at the Port of Tacoma. Foreign research reactor spent nuclear fuel shipments are subject to the same types of potential hazards as those of other ships carrying nonradiological hazardous materials.

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan to be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H of the EIS. The provisions include an interface between DOE and State, Tribal, and local authorities

Response to Comment No. 303-8

Several accident scenarios including a breach of the cask and fire sufficient to oxidize the contents were analyzed during preparation of the EIS. Results of the accident analysis at the ports are given in Section 4.2.2 of the EIS with supporting detail in Appendix D, Section D.5. No catastrophic effects were found to result from severe accidents involving foreign research reactor spent nuclear fuel.

COMMENTOR NO. 306: PORTER, CHRISTINE

June 18, 1995

U.S. Department Of Energy
Washington, D.C.

Dear Sirs:

I **am opposed** to nuclear shipments through the Port of Tacoma.

I feel it is a threat to our environment, both by having nuclear storage in our state, as well as the potential for accidents that could happen during shipment which would affect both the ocean, off Washington State, and the waters in Puget Sound. *306-1*

Sincerely,

Christine Porter
Signature

Christine Porter
Name (Print)

2623-204th Ave Ct E
Address

Sumner WA 98390
City/State/Zip

RESPONSE TO COMMENT
COMMENTOR NO. 306: PORTER, CHRISTINE

Response to Comment No. 306-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma and to storage in the State of Washington is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 308: SQUYRES, DEANNA

June 19. 1995

U.S. Department of Energy
Washington DC

Attn: Committee for locating port to dispose of nuclear waste

I am opposed to your proposal to bring weapons grade nuclear waste through the Port of Tacoma. I am unable to attend the community hearing and would like it noted that my voice is in this written form. *308-1*

I am also concerned about the lack of publicity regarding and advertising of the second public meeting, as well as the decision to not include comments made by concerned citizens as part of the public record. *308-2*

I recognize the difficulty in effectively transporting nuclear waste for disposal. I also recognize the need for sound judgment in the decision making for that process. Sound judgement should not ignore the fact that accidents do happen; and should an accident occur in or near the Port of Tacoma the lives of thousands could be impacted not to mention the environmental impact. I strongly believe that this needs to occur in an area less densely populated, and where there would be minimal environmental impact should an accident occur. *308-3*

My family and I have lived in Tacoma all of our lives and travel through the port area on a regular basis. This unsafe use of the port not only puts the personal safety of me and my family at risk, but the lives of thousands of others.

Our Port does not support your proposal. Our elected city officials do not support your proposal. The Port's union does not support your proposal. Other concerned groups do not support your proposal. My family and I do not support your proposal. *308-1 (Cont'd.)*

Sincerely,

Deanna Squyres

Deanna Squyres
4532 South 52nd Street
Tacoma, Wa. 98409

RESPONSE TO COMMENT
COMMENTOR NO. 308: SQUYRES, DEANNA

Response to Comment No. 308-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 308-2

DOE placed advertisements for the June 19, 1995 hearing in the Tacoma Tribune on June 12 and 18, 1995. In addition, interest groups placed advertisements in the same paper. As for the commentor's concern that DOE would not include comments made "by concerned citizens as part of the public record," this is untrue. While DOE did request that comments be submitted in writing, all oral comments presented at each hearing were summarized and have been addressed in this Volume 3 of the final EIS. All comments, written and oral, are part of the public record.

Response to Comment No. 308-3

The analysis in Sections 4.2.2 and 4.5 of the EIS indicate that the risk associated with bringing foreign research reactor spent nuclear fuel through the Port of Tacoma, or any other port analyzed in the EIS, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

COMMENTOR NO. 309: AMDAHL, ONETA

June 19, 1995

U.S. Department of Energy
Washington DC

Attn: Committee for locating port to dispose of nuclear waste

I am opposed to your proposal to bring weapons grade nuclear waste through the Port of Tacoma. My husband attended the second hearing that was held in Seattle, and we are both very concerned about the lack of publicity involved in advertising the meeting, as well as the decision not to make comments made by concerned citizens part of the public record. *309-1* *309-2*

I commute from North East Tacoma, through the Tacoma Tide Flats, to my place of employment in Tacoma every day with my young son. I am extremely concerned about my family's personal safety as well as the impact on the environment if any accidents were to occur in the shipment and ground transfer of the nuclear waste (via I-5 and through the mountain passes). It was disclosed at the second hearing that the on-board fire precautions were not adequate to contain nuclear waste from spilling into the water in the event of a fire. *309-3* *309-4*

Recent terrorist activities lend yet another cause for concern. The tragedy that occurred in Oklahoma City shows the unexpected will happen anywhere in America, and I do not want to provide the opportunity to have that occur in Tacoma. Allowing weapons grade nuclear waste to go through a densely populated area puts a lot of citizens at risk. *309-5*

Our Port does not support your proposal. Our elected city officials do not support your proposal. The Port's union does not support your proposal. Other concerned groups do not support your proposal. My family and I do not support your proposal. *309-1 (Cont'd.)*

I understand this is a difficult situation in that the nuclear waste has to go somewhere. However, I do feel strongly that it does not need to go through a densely populated area and putting citizens at risk. *309-6*

Sincerely,

Oneta Amdahl

Oneta Amdahl
5301 Port View Place NE
Tacoma, WA 98422-1551

RESPONSE TO COMMENT
COMMENTOR NO. 309: AMDAHL, ONETA

Response to Comment No. 309-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 309-2

DOE did request that comments be submitted in writing, however, all oral comments presented at each hearing were summarized and have been addressed along with the written comments, in this Volume 3 of the final EIS. All comments, written and oral, are part of the public record. As to advertising for the public hearings, advertisements were placed in the Tacoma Tribune on June 12 and 18, 1995. In addition, the meeting was further publicized by interest groups who placed their own ads in the Tacoma Tribune.

Response to Comment No. 309-3

The risks of ground transport are discussed in Section 4.2.3 and Appendix E of the EIS. In all cases, the risks are shown to be low.

Response to Comment No. 309-4

The EIS does not address marine spills in Puget Sound or elsewhere because the solid metal fuel is transported dry inside a transportation cask, so there is nothing to spill. However the maximum impacts of a sunken cask, both recovered and unrecovered, are evaluated in Section 4.2.1.3 of the EIS. Should an accident occur in Puget Sound that resulted in a cask containing foreign research reactor spent nuclear fuel sinking, the cask would be recovered, regardless of the depth.

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radiative contents have ever been released from a spent nuclear fuel transportation cask as a result of an accident.

Response to Comment No. 309-5

The analysis of the consequences and risk associated with an accident in port involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 and Appendix D, Section D.5 of the EIS) and that the risk associated with accidents in port for the entire proposed action, was low (Section 4.2.2.3 of the EIS). Likewise the consequences and risks associated with marine transport were found to be low (Section 4.2.1.3 of the EIS).

Section D.5.9 has been added to Appendix D of the EIS to address terrorism and sabotage. DOE considers that the foreign research reactor spent nuclear fuel could safely be transported to the management site(s), if any foreign research reactor spent nuclear fuel is accepted into the United States. The security measures employed would meet or exceed all the security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. DOE supports these regulations as being adequate to protect the foreign research reactor spent nuclear fuel.

Appendix H has been also added to the final EIS in response to public comments, to better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

Response to Comment No. 309-6

The commentor's opposition to the use of densely populated areas as ports of entry for foreign research reactor spent nuclear fuel is noted. The port selection criteria discussed in Appendix D, Section D.1.9 of the EIS identify ports that can safely handle foreign research reactor spent nuclear fuel. The analyses provided in the EIS indicate that the use of any of the ports identified by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis demonstrates that the risks associated with an accident would be low (Sections 4.2.2.3 and 4.5 of the EIS) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks would also be low (Sections 4.2.2.2 and 4.5 of the EIS).

COMMENTOR NO. 313: POWERS, MARY SHEILA

Tacoma 19 June 1995

Concern: Mr. Charles Head ①

The information re: risks of cancer are inaccurate. Please see studies by the Monroe, MI IHM Sisters on the incidence of cancer in the downwinder ~~Detroit~~ area ~~after~~ the Fermi incident until today. The Physicians for Social Responsibility ~~are~~ need to be consulted. Outside physicians (~~not~~ just physicist) need to be included as experts - eg. Canadians. 313-1

Mary Sheila Powers
Tacoma, WA
① response to talk 6/19/95

RESPONSE TO COMMENT
COMMENTOR NO. 313: POWERS, MARY SHEILA

Response to Comment No. 313-1

The methods used in this EIS to estimate risks of cancer due to radiation exposure are endorsed and accepted by the U.S. Nuclear Regulatory Commission and the International Commission on Radiological Protection. These bodies developed these standards in consultation with physicians.

COMMENTOR NO. 314: BERG, ARILL & JANE

6/9/95

Nuclear Waste in Tacoma Meeting

As a citizen of NE Tacoma (on the hill North of Port of Tacoma) I am against shipping waste through populated port in this country and especially in the Sound Area. This is for several reasons ① I don't trust to DOE to handle this waste properly based their Hanford track record ② this is an area with high seismic potential - an accident could be deadly ③ I'm against using Hanford as a National depository for our wastes from throughout the world - its not a good idea & we (in the other Washington) have paid our dues! Tacoma is trying hard to change its reputation for pollution Simpson leading the way and ASARCO gone. ④ Property values will go down because of the fear of nuclear contamination since this area will not be associated with stable quality of life. ⑥ People live here and these events may put people at risk w/o their knowledge, on water, near railroad tracks, and on the port. ⑦ have, mountain avalanches on the rail lines & extreme winds at times. ⑧ Find a remote, stable, permanent depository if want to accept this permanently dangerous material. 314-1 314-2

RESPONSE TO COMMENT
COMMENTOR NO. 314: BERG, ARILL & JANE

Response to Comment No. 314-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

As discussed in Section 4 of the EIS, foreign and domestic spent nuclear fuel has been transported in the United States for over 40 years by DOE without a single radiological incident. As discussed in Section 4 and Appendix F, this spent nuclear fuel could be safely stored at one or more of the candidate management sites pending ultimate disposition.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Spent nuclear fuel transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, an avalanche or a seismic event, even if it caused structures at the Port of Tacoma to fail, is not expected to compromise the spent nuclear fuel transportation cask. Further, the analyses of impacts associated with accidents involving foreign research reactor spent nuclear fuel presented in Section 4.2.2.3 of the EIS demonstrate that the use of any of the selected ports would not pose any significant risk to the port personnel or the population near the ports. The Port of Tacoma has considerable relevant experience in handling containers, and has the capability to safely handle containerized foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9.1 of the EIS).

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford site.

DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not impact normal commercial operations, and therefore not endanger the ports' status with respect to their clients. This is based on the fact that the foreign research reactor spent nuclear fuel would be accepted into the United States in standard shipping containers that would require no special handling or precautions. As

COMMENTOR NO. 314: BERG, ARILL & JANE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 314: BERG, ARILL & JANE (CONT'D.)

such, there should be no adverse commercial or economic reaction to the use of the port. Historically, there were no adverse commercial impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

Response to Comment No. 314-2

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1. of the EIS). As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

COMMENTOR NO. 315: PORTER, JOANNE C.

JO ANNE PORTER
2623 - 204TH AVE. COURT EAST
SUMNER, WA 98390

June 18, 1995

U.S. Department Of Energy
Washington, D.C.

Dear Sirs:

I am opposed to nuclear shipments through the Port of Tacoma.

I feel it is a threat to our environment, both by having nuclear storage in our state, as well as the potential for accidents that could happen during shipment which would affect both the ocean, off Washington State, and the waters in Puget Sound. 315-1

Recent terriorist activities lend yet another cause for concern. There is really no valid reason for using our densely populated area for the shipment of nuclear waste. Any incident or accident would have a long lasting effect on the environment where we live.

Find another location, but not here in Puget Sound.

Sincerely,

JoAnne C. Porter

RESPONSE TO COMMENT
COMMENTOR NO. 315: PORTER, JOANNE C.

Response to Comment No. 315-1

The commentor's opposition to the use of the Port of Tacoma for receipt of foreign research reactor spent nuclear fuel is noted. The analyses provided in the EIS indicate that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Sections 4.2.2.3 and 4.5 of the EIS) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel are also low (Sections 4.2.2.2 and 4.5 of the EIS).

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

The analysis of the consequences and risk associated with an accident in port involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 and Appendix D, Section D.5 of the EIS) and that the risk associated with accidents in port for the entire proposed action, was low (Section 4.2.2.3 of the EIS). Likewise the consequences and risks associated with marine transport were found to be low (Section 4.2.1.3 of the EIS).

Section D.5.9 has been added to Appendix D of the EIS to address terrorism and sabotage. DOE considers that the foreign research reactor spent nuclear fuel can safely be transported to the management sites, if the foreign research reactor spent nuclear fuel is accepted into the United States The security measures employed would meet or exceed all the security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. DOE supports these regulations as being adequate to protect the foreign research reactor spent nuclear fuel.

COMMENTOR NO. 315: PORTER, JOANNE C. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 315: PORTER, JOANNE C. (CONT'D.)

Appendix H has been added to the final EIS in response to public comments, to better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

COMMENTOR NO. 316: HEALEY, JOAN M.

P.O. Box 98432
Tacoma, Wa. 98498
June 19, 1995

Hello council members;

My name is Joan M. Healey a past member of the medical community and a present student of Tacoma Community College and a third generation Pacific Northwesterner. As a Washingtonian born individual I am opposed to all nuclear waste going through the Port of Tacoma for several reasons; 316-1

1. Traveling by rail and the handling and containment of nuclear waste is always risky. This state has experienced one severe rail accident that cost people their lives, it could happen again. 316-2
2. Washington State is known for its beauty and clean environment. Let's keep it that way. 316-3
3. The possibilities of nuclear contamination to the general population is definitely not worth the danger. 316-4

The risk of placing Pierce county as another 3 Mile Island 316-5 or a Nuclear Russian mistake is not a joke and traveling by rail to a final destination is a problem waiting to happen. 316-2 (Cont'd.) Can you assure us that some fanatic would not use the Port of Tacoma as a political statement like Oklahoma City. 316-6 I want the future generations to be healthy and happy people. Don't open Pandora's box and jeopardize this population and the beauty of this state to a nuclear holocaust. This is my home and shelter, my state, don't allow the monetary rewards to this area to influence and seduce good peoples judgments. Do what is best for the community and the people, don't listen to Wahington D.C. politics. 316-1 (Cont'd.)

Thank you.

Joan M. Healey

RESPONSE TO COMMENT
COMMENTOR NO. 316: HEALEY, JOAN M.

Response to Comment No. 316-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 316-2

The risk of transporting the foreign research reactor spent nuclear fuel by rail is presented in Section 4.2.3 of the EIS, and the risk is shown to be low.

Response to Comment No. 316-3

The commentor's desire to maintain the beauty and cleanliness of the State of Washington is noted. As discussed in Section 4.2 of the EIS, the risk of adverse impacts to the environment associated with marine transport, ground transport, and interim management of the foreign research reactor spent nuclear fuel at any of the geographical locations considered in this EIS, would be low.

Response to Comment No. 316-4

Section 4.2.2.3 of the EIS demonstrates that the risk of contamination to the general population near Tacoma would be low.

Response to Comment No. 316-5

See response to Comment No. 316-4 above.

Response to Comment No. 316-6

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures greatly reduce the risk. All shipments of foreign research reactor spent nuclear fuel would be conducted meeting, or exceeding, all the security requirements in the Code of Federal Regulations (10 CFR part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. To better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel, Appendix H has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

COMMENTOR NO. 317: HESS, GEORGE H., M.D.

4437 Soundview Dr. W.
Tacoma, WA. 98466
June 19, 1995

Statement of George H. Hess, M.D.
Re: Shipment of Nuclear Waste through Port of Tacoma.

My wife and I have been long-time members of Physicians for Social Responsibility. This organization has always insisted that nuclear benefits be ballanced against possible risks. Certainly, even a slight miscalculation in handling can result in lethal effects lasting hundreds of centuries. *317-1*

Initially splitting of the atom was intended only for military distructive purposes. Atoms for peace was a secondary spinoff which has left the unsolved problem of disposal of nuclear waste. Foreign nuclear waste is being returned to the U.S. because of its explosive potential in the hands of terrorists or foreign goverments. So basically this is a military rather than a civilian problem. My question therefore is: Why should this cargo travel through the Port of Tacoma or any other westcoast city? *317-2*

May I suggest that The Naval Submarine Base at Bangor on Hood Canal is the proper transfer port. In addition to the security afforded by a military base, the personel are accustomed to handling nuclear material used both as fuel and weapons.

George H. Hess, MD.

George H. Hess, M.D.

RESPONSE TO COMMENT
COMMENTOR NO. 317: HESS, GEORGE H., M.D.

Response to Comment No. 317-1

DOE agrees that nuclear benefits should be balanced against risks. The risks associated with the proposed action are presented in Section 4 of the EIS, and they are shown to be low.

Response to Comment No. 317-2

Commentor's recommendation of the use of the naval facility at Bangor, Washington for the receipt of foreign research reactor spent nuclear fuel is noted. As recommended by the Military Traffic Management Command, a total of eight military ports were evaluated as candidates given their experience with dry containerized cargoes. The naval facility at Bangor was determined to have inappropriate experience with transshipping containerized dry cargoes. Appendix D, Sections D.1.8 and D.1.9 of the EIS present a detailed discussion of the process and results.

Section 2.8 of the EIS addresses the security measures that would be taken to ensure that there would be no unacceptable risks of terrorism or theft of materials. DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present at military bases. The security provided for the spent nuclear fuel shipments is required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ports is noted.

COMMENTOR NO. 320: WRIGHT, CURTIS

6-19-95

TO D.O.E.

FROM CURTIS WRIGHT
5719 91 AVE. CT. E., PUYALLUP, WA 98371
PH 206 566-0526

RE: NUCLEAR WASTE COMING THROUGH PORT OF TACOMA, WA

I HAVE 3 MAJOR REASONS NOT TO SHIP NUCLEAR WAS THROUGH THE PORT OF TACOMA.

FIRST, A MILITARY POINT OF ENTRY SHOULD BE USED FOR SECURITY REASONS. ALSO, UNDER THE PROPOSED CONGRESSIONAL CUTBACKS, THE DOE'S FUNCTION WOULD PRIMARILY BE TAKEN OVER BY THE MILITARY. 320-1

SECOND, IN THIS PUGET SOUND (TACOMA) AREA WE HAVE HAD AN INCREASE IN SEIMICE ACTIVITY. IN ABOUT THE LAST 6 MONTHS WE HAVE HAD 2 NOTICEABLE EARTHQUAKES. THE MOST RECENT BEING ON 5-20-95. A POINT OF CONTACT REGARDING THIS WOULD BE THE SEIEMALIG LAB AT THE UNIVERSITY OF WASHINGTON (SEATTLE 320-2

RESPONSE TO COMMENT
COMMENTOR NO. 320: WRIGHT, CURTIS

Response to Comment No. 320-1

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security that might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ports is noted. Sections 4.2.2.2 and 4.2.2.3 of the EIS provide the analysis on impacts of incident-free operation and consequences of port accidents, respectively.

Response to Comment No. 320-2

The EIS evaluates the risk associated with port activities in Section 4.2.2. The port impacts are evaluated for both incident-free and accident conditions. The seismicity of the Port of Tacoma or the stability of the land of Mt. Rainier does not affect the risk associated with incident-free operations. Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

COMMENTOR NO. 320: WRIGHT, CURTIS (CONT'D.)

THIRD, A STUDY THAT I BELEIVE WAS DONE FOR THE STATE OF WASHINGTON REGARDING THE UNSTABLE LAND ON MT. RAINIER IF IT SHOULD LET OF STEAM. THE GEOLOGICAL TYPE REPORT WAS IN THE LOCAL SEATTLE-TACOMA NEW THE FIRST PART OF MAY, 1995. THIS REPORT SAID THAT MUD WOULD FLOW DOWN THE PUYALLUP VALLEY AND WOULD BE AS HIGH AS 30 FEET IN ORTING, WA. THIS IS OF GREAT CONCERN TO ME BECAUSE THE PUYALLUP VALLEY ENDS AT THE PORT OF TACOMA. AS YOU MAY KNOW, MT. ST. HELENS IS IN WASHINGTON STATE AND HAD AN EXPLOSION/MUD FLOW A FEW YEARS AGO. 320-3

ALSO, A MAP AT THE BACK ROOM OF THIS HEARING SHOWS A SHIPPING ROUTE THAT GOES THROUGH THE PUGET SOUND. THIS ROUTE ON THE MAP GOES BY SEATTLE, WA, WHICH IS A VERY POPULATED AREA, AS IS THE REST OF THE PUGET SOUND AREA. 320-4

Curtis Wright

RESPONSE TO COMMENT
COMMENTOR NO. 320: WRIGHT, CURTIS (CONT'D.)

Response to Comment No. 320-3

The commentor's concern associated with the geological characteristics of the Tacoma region is noted.

Response to Comment No. 320-4

The commentor states that the population of the Puget Sound area and surrounding communities is large, hence it is not appropriate to use the Port of Tacoma to bring in the foreign research reactor spent nuclear fuel. Section 4.2.2 of the EIS evaluates the impacts of the proposed action on ports. The results of these analyses, which take into account population, indicate that the risk associated with this activity at any of the assessed ports is low, including that to nearby areas such as Seattle.

COMMENTOR NO. 321: VARNER, PAULA

6-19-95

This is not merely a case of "not in my backyard". The lack of regulations & guidelines, training for those who will be handling the casks, monitoring standards which appear to be nearly non-existent add up to an incomprehensible proposal.

The US government allowance levels for leakage is so high it is nearly impossible anyone was serious when they were written.

The burden on the taxpayers in Pierce Co. specifically & PA generally does not seem to have been taken into consideration.

How can movement of this material be across our land be given serious consideration when we have no input as to packaging regulations at the port of departure?

There are so many more reasons to refuse & participate in the movement of this material through PA there is not time for one person to list them all in a letter. Hanford is not equipped for this storage - who will pay to make it an "safe storage site"?

In the words of Nancy Regan,

321-1

321-2

321-3

321-4

321-5

RESPONSE TO COMMENT
COMMENTOR NO. 321: VARNER, PAULA

Response to Comment No. 321-1

The laws, regulations, and other requirements applicable to transportation and storage of foreign research reactor spent nuclear fuel are described in Section 5 of the EIS. As discussed in Section 2.6.3.2.2 of the EIS, foreign research reactor spent nuclear fuel transportation casks would usually be transported in standard shipping containers. Cranes would be used to unload the containers or transportation casks from the vessel and onto trucks or rail cars. No special training would be required for dock workers. Standard shipping containers are usually unloaded in less than two minutes per container, while unloading non-containerized casks would require several minutes longer. Shipments of spent nuclear fuel are inspected throughout transportation and handling (Sections 2.6.3 and 2.6.5 of the EIS).

Response to Comment No. 321-2

Radiation risk factors used in the analysis are endorsed and accepted by the U.S. Nuclear Regulatory Commission and the International Commission on Radiological Protection. Everyone receives some radiation from natural sources. As discussed in Section 4.10.2 of the EIS, measured variations in this background radiation dose are larger than the increase that could occur under the proposed action.

Response to Comment No. 321-3

The impact to the health and safety of the public in the vicinity of the ports of entry and the ground transportation routes has been assessed in Section 4.2 of the EIS and found to be low. DOE has not identified a financial burden to the taxpayers of the vicinity that would result from the transportation of foreign research reactor spent nuclear fuel through the Port of Tacoma.

Response to Comment No. 321-4

The regulatory requirements applicable to the transportation casks that would be used to transport the foreign research reactor spent nuclear fuel are discussed in Appendix B, Section B.2 of the EIS. These requirements include regulations established by the U.S. Department of Transportation and the NRC. In addition, a DOE representative would be present at the foreign research reactor site prior to the loading of the spent nuclear fuel in the transportation cask. Further, a Transportation Plan detailing inspection procedures for the loading of the spent nuclear fuel at the foreign research reactor site would be provided by DOE prior to policy implementation. General provisions of the Transportation Plan are provided in Appendix H, which was added to the final EIS in response to public comments.

COMMENTOR NO. 321: VARNER, PAULA (CONT'D.)

"Just Say NO!"

Paula Varner
3315 N 27th St
Tacoma WA 98407

RESPONSE TO COMMENT
COMMENTOR NO. 321: VARNER, PAULA (CONT'D.)

Response to Comment No. 321-5

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 322: POWERS, M. SHEILA

...en comment for the public record:

(2) ~~[illegible]~~ We do need to dispose of the nuclear waste that we create. ~~[illegible]~~ We need to "clean up our own garbage." However, each group of nations must clean up its own garbage (nuclear waste). The U.S.A. should not be considered the only "safe place" to dispose of dangerous materials since Japan and France also have the capacity to "safely" store nuclear waste.

(3) Please explore other options for Asian countries to dispose of nuclear waste in Japan, and European & African countries to dispose of nuclear waste in France. The U.S.A. should consider the interests of its own ~~stores~~ people in terms of safety and a liveable environment.

(1) The D.O.E. ~~[illegible]~~ uses a risk factor in ~~[illegible]~~ what it considers "safe" in transporting and handling nuclear waste that most Americans would not consider safe. There should be zero tolerance for radiation leakage. All handlers of nuclear radiation should be expertly prepared for any eventually. Such is not the case in Tacoma. Firefighters, longshore workers, & railroad personnel are not prepared for a →

322-1

322-2

322-3

RESPONSE TO COMMENT
COMMENTOR NO. 322: POWERS, M. SHEILA

Response to Comment No. 322-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5 of the EIS, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

Response to Comment No. 322-2

Radiation risk factors used in the analysis are endorsed and accepted by the U.S. Nuclear Regulatory Commission and the International Commission on Radiological Protection.

Everyone receives some radiation from natural sources. As discussed in Section 4.10.2 of the EIS, measured variations in this background radiation dose are larger than the increase that could occur under the proposed action.

Response to Comment No. 322-3

Foreign research reactor spent nuclear fuel shipments are subject to the same types of potential hazards as those of other ships carrying nonradiological hazardous materials.

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS

COMMENTOR NO. 322: POWERS, M. SHEILA (CONT'D.)

nuclear accident. No transporting should be done even within the U.S. until there is a rigorous standard of safety. 322-3 (Cont'd.)

(4) more exploration must be done about nuclear waste containment & abatement 322-4

M. Sheila Powers
4538 Tacoma Avenue
Tacoma, WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 322: POWERS, M. SHEILA (CONT'D.)

in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected.

Response to Comment No. 322-4

The commentor's request to conduct additional study into nuclear waste containment and abatement is outside the scope of this EIS.

COMMENTOR NO. 323: KUEBER, MARY E.

(Page 1 of 5 Pages)

2405 S. Star Lake Rd 70-101
Federal Way,WA 98003

May 26, 1995

MEMO TO: U.S. Dept. of Energy
RE: PROPOSED NUCLEAR WEAPONS NONPROLIFERATION POLICY CONCERNING FOREIGN RESEARCH REACTOR SPENT NUCLEAR FUEL----PORT OF TACOMA PUBLIC MEETING, WA.

FROM: Mary E. Kueber-U.S. Citizen, Envir. Scientist

Dear DOE:

The United States' plan to control the availability of nuclear materials globally, is ambitious, admirable and necessary. The campaign and achievement of Nuclear Weapons Nonproliferation Policy is perhaps, the most important step humankind has made ensuring health and safety for the next Century and beyond. Along with monitoring of nuclear nations, and prodding of rogue nuclear nations into compliance, the clean up from the Cold War period is critical. 323-1

I have read the Draft Environmental Impact Statement for the above proposed project. The concern here is the proposed use of the Port of Tacoma, Wa., and Hanford, WA., site. The Port of Seattle has previously rejected the proposed use of that port for reasons, in addition to interference with international economic commerce. The Port of Tacoma, positioned even deeper inward along an enclosed waterway, of high population density, and an active earthquake zone, shares the same concerns. The proposed Hanford, WA., site has the largest and most complex volume of untreated Plutonium waste in the United States, with continuing technological problems affecting processing. 323-2 323-3

As the intention of final geologic disposal is in the State of Arizona, the most expeditious route would appear to be NWS Concord, CA., then to E-MAD Nevada for processing, and finally the Arizona site. An Eastern route, serving adjacent Nations, would include the Galveston Texas Port, and/or the Savannah River Port(GA). Vitrification overseas, with use of facilities in Scotland and France, with title transference, and final disposal in the United States, would be optimal. The country of utilization should take a good portion of responsibility in peaceful use and processing of nuclear material. The U.S. could share its technology in spent nuclear fuel processing at one or more overseas sites, where adequate security provisions could be ensured. The final vitrified product could then be secured by the U.S. in geological internment. 323-4 323-5 323-6

Obviously, most of humankind are pleased to see control and processing of spent radioactive fuel. Many want it done, but, "not in my backyard". What the concern should be is, selection of the most expeditious, safest, most prudent and fair modus operandi. My mother always told my sister and me, "Bake something 323-7

RESPONSE TO COMMENT
COMMENTOR NO. 323: KUEBER, MARY E.

Response to Comment No. 323-1

The commentor's support for the nonproliferation of nuclear weapons is noted.

Response to Comment No. 323-2

DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not impact normal commercial operations, and therefore not endanger the ports' status with respect to their clients. This position is based on the fact that the foreign research reactor spent nuclear fuel would be accepted into the United States in standard shipping containers that would require no special handling or precautions. As such, there should be no adverse commercial or economic reaction to the use of the port. Historically, there were no adverse commercial impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

The passage from the Straight of Juan de Fuca to Tacoma, meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection. (Appendix D, Section D.1.9.2 of the EIS). Likewise, the Port of Tacoma meets the requirements of Criterion 5 (Human Population). Appendix D, Section D.1.9.5 of the EIS provides details of this criterion and how it is applied. Favorable transit from open ocean and human population are only two of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other considerations, such as port experience with handling containers, port facilities, and access to land transportation, would also be considered in making the final selection of ports of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Spent nuclear fuel transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at the Port of Tacoma or elsewhere to fail, is not expected to compromise the transportation cask. While local hazards, such as earthquakes, may slightly increase the probability of an accident, they would not increase the consequences of the accident, which were found to be very minor for both marine and land transportation accidents (Section 4.2.2.3 of the EIS).

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at

COMMENTOR NO. 323: KUEBER, MARY E. (CONT'D.)

(2)

-if you want to. But, clean up your mess in the kitchen, when you are through". Whoever is cooking in the nuclear kitchen should clean up their respective mess. 323-7 (Cont'd.)

The State of Washington has historically cooperated, if not, welcomed the U.S. Governmental programs in the Nuclear Defense of Democracy. The fact, previously given, that Hanford, WA., contains the largest most complex volume of Plutonium in the U.S., with current problems in processing the spent fuel is given as evidence. Billions of dollars have already been spent on research and development, with vitrification, remaining a process on paper. Deteriorating storage sites have been documented at Hanford. This situation should give good reason to pause the importation of unprocessed spent nuclear fuel from overseas locations. It seems, that the United States has made promises to other Nations concerning this matter, before first cleaning up the serious nuclear mess in its own kitchen. The U.S. is not, and should not be viewed by the global community as a nuclear dump site. The Treaty On Non-Proliferation of Nuclear Weapons should be permanent cornerstone legislation. Responsibility in peaceful use of nuclear materials, must be shared by those who choose to use them. The mess left in the nuclear kitchen must be cleaned up by those who choose to "bake" there. Hopefully, LEU fuel will become the primary source for research reactors and medical use, lessening the danger and costs of reprocessing spent fuel. Decentralization of sites, with vitrification occuring overseas, and burial in the United States would be the optimum route for safety and security 323-8 323-9 323-10

Thank you for the opportunity to render comment on the Nuclear Waste Handling Project, and for U.S. Government participation in this project ensuring the safer world for present and future generations. Thankyou to the Department of Energy, and DOE Secretary O'Leary for investigative work regarding nuclear waste management problems, and for sharing this information with citizens. This memo closes with quotations from DOE Officials in a published article on this subject.

> Now that nuclear testing has ended, at least in the U.S., the government is left with a vast, pulsating landscape of atomic waste dumps to clean up. The people who developed nuclear reactors and weapons were no more prescient about future environmental hazards than they were about health risks. The storage of spent fuel and other nuclear materials was shockingly sloppy. "Every time you turn over a new document, there's a $5 billion problem," says Dan Reicher, a special assistant to O'Leary.
>
> The DOE's nuclear-weapons complex spread over 4,000 square miles in 13 states appears to be particularly hazardous. The secretary bucked her own bureaucracy by insisting that the DOE release a report on deteriorating storage sites for spent nuclear fuel. Aides warned that disclosure could cause liability problems. O'Leary insisted, "I want this done," she said. But there's a lot more to do. "It's as if you had a party for 45 years, and you never cleaned it up," says

RESPONSE TO COMMENT
COMMENTOR NO. 323: KUEBER, MARY E. (CONT'D.)

the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford site.

Response to Comment No. 323-3

See last paragraph of response to comment 323-2, above.

Response to Comment No. 323-4

The distance from the port to the DOE management site is only one of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other considerations such as port population, route population, port experience with handling containers, and access to the ocean would also be considered in making the final selection of port of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

Actually, prior to its deposition in the geologic repository, the foreign research reactor spent nuclear fuel (if it is accepted by the United States), would first be stored at a DOE management site. As stated in the last paragraph of the response to Comment 323-2, the foreign research reactor spent nuclear fuel will be managed at the Savannah River Site (aluminum-based fuels) or the Idaho National Engineering Laboratory (all other type fuels). Thus, no foreign research reactor spent nuclear fuel will be either managed or reprocessed at the Nevada Test Site.

It should also be noted that the Yucca Mountain site in Nevada is currently being studied for potential use as the final geologic repository, not a site in Arizona.

Response to Comment No. 323-5

The commentor's preference for using Galveston, Texas, or Savannah, Georgia for the eastern ports of entry, and Concord NWS for the western port of entry is noted. Section 4.2.2 of the EIS demonstrates that the risk associated with bringing foreign research reactor spent nuclear fuel through these ports, or through any of the ports analyzed in the EIS, is low.

Response to Comment No. 323-6

The commentor's preference for overseas reprocessing with disposal in the United States is noted. This is Management Alternative 2, Subalternative 1b, which is discussed in Sections 2.3 and 4.4.2 of the EIS.

COMMENTOR NO. 323: KUEBER, MARY E. (CONT'D.)

(3)

-Thomas Grumbly, DOE assistant secretary for environmental restoration and waste management. Grumbly is a worrier. He predicts that figures currently quoted for the total cost of the cleanup-from $200 billion to $300 billion-may not even be close. "It could be a couple of times larger than that," he says. He frets about the notorious storage tanks at Hanford, where so many different wastes have been dumped that no one knows exactly what kind of witches' brew is in them. "Every time the phone rings after 10 o'clock, I think, "This is it, we've had an event," says Grumbly. Like his boss, he thinks the time has come for "throwing open the blinds" to shed some light on the nuclear-waste crisis. The by-products(nuclear) of the cold war has left us with "the single largest environmental and health risk in the nation," he says. (NEWSWEEK, "National Affairs-America's Nuclear Secrets", December 27, 1993, pages 14 &18.)

Thankyou.

Sincerely,

Mary E. Kueber, Ph.D.

Mary E. Kueber, B.S., M.A., Ph.D.
Environmental Science

RESPONSE TO COMMENT
COMMENTOR NO. 323: KUEBER, MARY E. (CONT'D.)

Response to Comment No. 323-7

The commentor's position that foreign research reactor operators should manage their spent nuclear fuel is noted. However, many foreign research reactor operators have no means for disposition of their spent nuclear fuel (Section 1.1 of the EIS). Thus the intent of the proposed policy is to give them a limited period of time to arrange for disposition of their spent nuclear fuel, and to encourage conversion to LEU fuel in foreign research reactors.

Response to Comment No. 323-8

See last paragraph of the response to comment 323-2, above.

Response to Comment No. 323-9

The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

Response to Comment No. 323-10

The commentor's preference for overseas reprocessing with disposal in the United States is noted. This is Management Alternative 2, Subalternative 1b, which is discussed in Sections 2.3 and 4.4.2 of the EIS.

COMMENTOR NO. 324: HAZLETON, DEANNE

Tacoma, WA 6/19/95
Deanne Hazleton

Nuclear technology is not adequately engineered and developed for safety. We cannot guarantee the safety of our selves our children or our children's children. Hasn't ASCARCO, (a fly weight in the hazardous department) taught us enough?) No NUCLEAR WASTE ANYWHERE!! 324-1

RESPONSE TO COMMENT
COMMENTOR NO. 324: HAZLETON, DEANNE

Response to Comment No. 324-1

The commentor's opposition to nuclear technology is noted. Section 4 of the EIS demonstrates that the risks of the proposed action would be low.

COMMENTOR NO. 326: ROTH, LAUREEN

TACOMA, WA 6/6/95

I AM OPPOSE THE transportation
OF NUCLEAR MATERIEL THRU THE PORT 326-1
OF TACOMA, THRU OUR STATE & IN
OUR NATION. I support proposition 2 326-2
I QUESTION OUR ability TO STORE
POINTING TO THE DEBACKLE AT HANFORD 326-3
I QUESTION THE CREDIBILITY OF THE
INFORMATION & STATISTICS WE HAVE BEEN
GIVEN POINTING AGAIN TO THE MIS-
INFORMATION WE HAVE BEEN
GIVEN ABOUT THE DANGERS — 326-4
LEAKS, CONTAMINATING OUR
CITIZENS, PREVARICATING ABOUT
THE DANGER TO THE CHILDREN,
LIVESTOCK, ELDERS, INVIRONMENT
PIERCE COUNTY DOES NOT DESERVE
THIS - WE WILL FIGHT IT TO THE
LAST DRAW LAUREEN ROTH
Laureen Roth 214 SO 96TH ST.
TACOMA, WA - 98408

RESPONSE TO COMMENT
COMMENTOR NO. 326: ROTH, LAUREEN

Response to Comment No. 326-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 326-2

The commentor's preference for Management Alternative 2 is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 326-3

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 326-4

As discussed in Section 4 of the EIS, estimates of risks are based on conservative assumptions. Actual risks are likely to be even lower than those presented in Section 4.

COMMENTOR NO. 327: ANONYMOUS

This doesnt
just have to
do with today
it has to do
with the future.
What will
happen when
I have children
and they the
government
decide to do
this again?
I dont want
my children
to have to
go through
this too.
We already
have enough
polution. I will
admit that we
have more
than enough
people in the
US, but what
will happen
if there is a
spill?

327-1

327-2

RESPONSE TO COMMENT
COMMENTOR NO. 327: ANONYMOUS

Response to Comment No. 327-1

The commentor's opposition to the proposed policy, and the commentor's concerns for future generations are noted. Many foreign research reactor operators have no means for disposition of their spent nuclear fuel (Section 1.1 of the EIS). Thus the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). After expiration of the policy period and the associated acceptance period, if any, (Section 1.2 of the EIS), foreign research reactor operators would be responsible for disposition of their spent nuclear fuel.

Response to Comment No. 327-2

Foreign research reactor spent nuclear fuel in a transportation cask cannot "spill" because it is solid metallic fuel and is shipped dry. Spent nuclear fuel shipments have been conducted for over 40 years. In all that time, there has never been an incident in which the spent nuclear fuel transportation cask was breached or in which it released any of its contents. Nevertheless, the consequences of some radioactive material being released from a spent nuclear fuel transportation cask during an accident are discussed in Sections 4.2.1.3, 4.2.2.3, 4.2.3.3, and 4.2.4.1 of the EIS. In all cases, the consequences would be low.

COMMENTOR NO. 327: ANONYMOUS (CONT'D.)

I know I don't
want any people
or annimals to
die. We have
enough endangered
species. We
don't need more,
we don't kneed
more graves.
Think about
the Futuer.

327-3

RESPONSE TO COMMENT
COMMENTOR NO. 327: ANONYMOUS (CONT'D.)

Response to Comment No. 327-3

The effects of radiation on plants and animals is discussed in Section 4.1.6 of the EIS. The impacts to people are discussed throughout Section 4 of the EIS. In all cases the impacts are demonstrated to be low.

COMMENTOR NO. 328: PRESTON, ANITA W.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. — 328-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: The no action selection is my preferred choice. — 328-2
However, as this may be unacceptable to D.O.E., my next choice — 328-3
would be "Management Alternative 2" to keep the nuclear
fuel overseas. Primarily for public safety. I strongly oppose — 328-1 (Cont'd.)
the nuclear fuels from being transported through the
Port of Tacoma. In addition, I oppose storage of the fuels
at Hanford, WA. The state of Washington has done more than it's — 328-4
share in dealing with nuclear waste, we don't want anymore.
It concerns me also that the D.O.E. has not provided funding
for the local implementation of safety training, monitoring — 328-5
and

Name: Ms. Anita W. PRESTON Telephone: (206) 759-8968
Anita W. Preston
Address: 2611 N. 30th St City/State/Zip Code: Tacoma, WA 98407-6329
(mail me the outcome please)

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 328: PRESTON, ANITA W.

Response to Comment No. 328-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 328-2

The commentor's preference for the No Action Alternative, as discussed in Sections 2.5 and 4.6 of the EIS, is noted.

Response to Comment No. 328-3

Management Alternative 2 is the alternative in which no foreign research reactor spent nuclear fuel is accepted into the United States, and the commentor's preference for this alternative (as a second choice) is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 328-4

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 328-5

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be

COMMENTOR NO. 328: PRESTON, ANITA W. (CONT'D.)

and providing necessary equipment for emergency personnel. There is also a concern of tarnishing the image of Tacoma which we have been improving steadily. 328-5 (Cont'd.) 328-6

RESPONSE TO COMMENT
COMMENTOR NO. 328: PRESTON, ANITA W. (CONT'D.)

specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected.

Response to Comment No. 328-6

Based on the evaluation of impacts presented in Section 4 of the EIS, the risk associated with the shipments of foreign research reactor spent nuclear fuel through any of the ports identified is not greater than the risk associated with the handling of other hazardous cargos. DOE agrees that, in many instances, the perception by the public of the risks associated with spent nuclear fuel may be greater than the actual risk, or the risk from other even more hazardous activities. However, adverse impacts have not been observed during the 30 plus years foreign research reactor fuel was accepted into the United States in the past. Under NEPA, the socioeconomic effects evaluated for this EIS do not include those associated with psychological fear of receiving spent nuclear fuel. Based on past experience, DOE considers that shipping foreign research reactor spent nuclear fuel through the Port of Tacoma would not adversely affect the image of the port.

COMMENTOR NO. 329: HUDSON, ROGENE

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 329-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: Why should we take waste from other countries 329-2

Name: Rogene Hudson Telephone: (206) 759-6173

Address: 4107 N. 24 City/State/Zip Code: Tacoma Wa 98406

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 329: HUDSON, ROGENE

Response to Comment No. 329-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 329-2

The commentor's opposition to acceptance of spent nuclear fuel from foreign research reactors is noted. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

DOE is proposing this action to provide foreign research reactor operators with an incentive to continue the conversion of their reactors to the use of LEU fuel, and to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

Public Opinion Survey

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We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [X] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: We are in the process of cleaning Tacoma up. Why would we want nuclear trash to pass thru our waters and land? I want my kids to enjoy the beauty of our area. I don't want to have to cry about nuclear spills and health problems.

NO WAY TO Nuclear Trash in our town!

Name: Carrie Vollmer Telephone: 759-4651

Address: 4101 N. 24th City/State/Zip Code: Tacoma WA 98406

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

330-1

Response to Comment No. 330-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 331: LAMENDOLA, ROBERTA

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: I think it unconscionable to even consider shipping spent nuclear waste through the Port of Tacoma, or anywhere else. Find a way to store the waste where it now resides

Name: Roberta LaMendola Telephone: 759-3634

Address: 2220 N. Tyler City/State/Zip Code: Tacoma WA 98406

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

331-1

331-2

RESPONSE TO COMMENT
COMMENTOR NO. 331: LAMENDOLA, ROBERTA

Response to Comment No. 331-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma or other ports is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 331-2

Overseas storage is Management Alternative 2, Subalternative 1a, and the commentor's preference for this alternative is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

COMMENTOR NO. 332: HETTICK, OLIVER C.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: Much resources are being used to clean-up Commencement Bay (a Super-Fund) project. Potentially, Nuclear transshipment of foreign waste could close our harbor and subsequent shipping activity and stop recreational use. 332-1

Name: Oliver C. Hettick Telephone: 206-759-2917

Address: 4202 N 24th St Tacoma, Wa. 98406 City/State/Zip Code: 98406

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 332: HETTICK, OLIVER C.

Response to Comment No. 332-1

The acceptance of foreign research reactor spent nuclear fuel through the Port of Tacoma would neither affect the activities being conducted in Commencement Bay as a result of being a Superfund Site, nor would it jeopardize the significant cleanup effort undertaken in the area of Commencement Bay and the Port of Tacoma. The analysis in the EIS indicates that there would be no significant adverse impacts to any of the ports or bays, or to the quality of water or air (Sections 4.2.1.1 and 4.5, and Appendix C, Section C.2 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. Based on over 30 years of experience, DOE considers that foreign research reactor spent nuclear fuel transportation casks passing through the Port of Tacoma, Commencement Bay, or any other port or waterway, would not release their radioactive contents, and thus would not affect air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality. Also, a sentence has been added to Appendix D, Section D.2.1.9 of the EIS recognizing the designation of the Commencement Bay as a Superfund Site.

COMMENTOR NO. 333: HETTICK, REGINA

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

333-1

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: _____

Name: Regina Hettick Telephone: (206) 759-2917

Address: 4202 N. 24th St. City/State/Zip Code: Tacoma, Wa. 98406

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 333: HETTICK, REGINA

Response to Comment No. 333-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 334: ELLS, S.

Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the **Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995.** You may also send it by facsimile to (206) 593-4570.

SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

- [x] I oppose spent nuclear elements being shipped through the Port of Tacoma. 334-1
- [ ] I am in favor of spent nuclear elements being shipped through the Port of Tacoma.
- [ ] I am undecided. *

COMMENTS: 4% of their supply is not going to help them 334-2
Develop a way to store 100% of the waste in their country.

Name: [illegible] Telephone: 206 759 7605

Address: 2220 No. Tyler City/State/Zip Code: Tac 98403

* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

RESPONSE TO COMMENT
COMMENTOR NO. 334: ELLS, S.

Response to Comment No. 334-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 334-2

The commentor's reference to "4% of their supply" is not clear to DOE. The alternative amounts of spent nuclear fuel that DOE is considering are discussed in Sections 2.2.1.3 and 2.2.2.1 of the EIS. One of the alternatives considered is to assist with management of 100% of the foreign research reactor spent nuclear fuel.

Overseas storage is Management Alternative 2, Subalternative 1a, and the commentor's preference for this alternative is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

COMMENTOR NO. 338: JOHNSON, ANITA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

The Titanic was safe, the second hand smoke was safe, Abortion was safe, Chernobal was safe, Lead Paint was safe, breast implants were safe, Nuclear waste is safe? NO Nuclear Waste in Tacoma. 338-1

Name and Address: Anita Johnson
5999 6th K St.
Tacoma, WA 98404

RESPONSE TO COMMENT
COMMENTOR NO. 338: JOHNSON, ANITA

Response to Comment No. 338-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 339: MORFEE, TOM

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Our Association of some 500 families residing in Western Pierce County opposes this concept. This is a highly populated area, vulnerable to nuclear accident. Commencement Bay is already a Superfund toxic site. Washington (at Hanford) has already paid its nuclear dues!

339-1

Name and Address: Tom Morfee, President
Peninsula Neighborhood Assoc.
P.O. Box 507 Gig Harbor, Wa. 98335
Phone (206) 858-3400 FAX (206) 858-3586

RESPONSE TO COMMENT
COMMENTOR NO. 339: MORFEE, TOM

Response to Comment No. 339-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The Port of Tacoma was one of ten ports that was indicated to be acceptable to receive the foreign research reactor spent nuclear fuel, if the material were to be accepted into the United States. Population of the port and surrounding areas to a radius of ten miles is one of the considerations of the port selection criteria. The population criterion for port selection (Criterion 5) is discussed in more detail in Appendix D, Section D.1.9.5 of the EIS.

The acceptance of foreign research reactor spent nuclear fuel through the Port of Tacoma would neither affect the activities being conducted in Commencement Bay as a result of being a Superfund Site, nor would it add any additional burden to this designation. The transport of the spent nuclear fuel on the Bay would not add any hazardous material to the Bay or the environment. DOE has added a sentence to the EIS (Appendix D, Section D.2.1.9) recognizing the designation of the Commencement Bay as a Superfund Site. The analysis of impacts, as documented in Section 4 of the EIS, shows that there would be no significant adverse impacts on the port, people, or natural environment from shipments of foreign research reactor spent nuclear fuel through any of the ports of entry.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford site.

COMMENTOR NO. 340: OMERO, HELGA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am very much against importing transportions or shipping nuclear waste thru this port or any port 340-1

Name and Address:
Helga Omero
1501 S. Winnifred
Tacoma Wash. 98465

RESPONSE TO COMMENT
COMMENTOR NO. 340: OMERO, HELGA

Response to Comment No. 340-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma or any port is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 341: SULLIVAN, MAURA E.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Mr. Head, 6/4/95

It is 9:42 pm. You are cleaning your fingernails. At least act interested. You are our government's spokesman. Be a leader. Tell the truth. 341-1

I am 26. How can I change our government when people like you make the public distrust it?

Name and Address: Maura E. Sullivan
4440 Memory Ln. W.
Tacoma, WA 98466

RESPONSE TO COMMENT
COMMENTOR NO. 341: SULLIVAN, MAURA E.

Response to Comment No. 341-1

The commentor's observations are noted. As required by NEPA, the public hearings held for this EIS provided an opportunity for interested individuals, or organizations and governmental representations, to voice concerns, raise questions, or provide support for the proposed action. DOE considers the analyses and conclusions presented in the EIS are a complete and accurate representation of the risks and potential environmental impacts that could occur as a result of implementation of the proposed action.

COMMENTOR NO. 342: HILEEN, J. LOUISE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I feel very strongly about the necessity of keeping nuclear waste out of Tacoma and environs. If the waste is to be stored in Nevada it would seem there are parts of that area which would require a shorter route from the missing area in a less populated area. 342-1

Name and Address: J. Louise Hileen
1909 No. I St. #207
Tacoma, WA 98403

RESPONSE TO COMMENT
COMMENTOR NO. 342: HILEEN, J. LOUISE

Response to Comment No. 342-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 343: ALLEN, ROGER E.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I AM OPPOSED TO IT. It seems to me that SEA shipment (A MONTH TRANSIT TIME ???) Transfer to docks, then to trucks or RAIL CARS ETC - gives maximum exposure, and maximum opportunity for accidents in highly populated areas. Why not ship by air? Can avoid highly populated areas - maximum flexibility in scheduling + routes. US Gov't planes could be used to increase security and safety -

Name and Address: ROGER E. ALLEN
2809 N. GARFIELD Rd.
TACOMA, WA 98403

343-1

343-2

RESPONSE TO COMMENT
COMMENTOR NO. 343: ALLEN, ROGER E.

Response to Comment No. 343-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. The incident-free exposures and risks of accidents in transit are presented in Appendices C, D, and E and Section 4.2 of the EIS. In all cases the risks were shown to be low.

Response to Comment No. 343-2

DOE appreciates the commentor's suggestion. The option of air transport was considered, but dismissed for the reasons given in Section 2.10 of the EIS.

COMMENTOR NO. 344: GEORGES, GRACE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

The Pacific N.W. is one of the most beautiful areas in the world and Tacoma is quite central. I think the idea of shipping nuclear waste through here is completely unthinkable and unacceptable. It borders on the criminal. If this is not stopped what will be the destiny of the City of Destiny?

Name and Address: Grace Georges
108 53rd St Ct E
Puyallup 98371

344-1

RESPONSE TO COMMENT
COMMENTOR NO. 344: GEORGES, GRACE

Response to Comment No. 344-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 345: TYLER, VALERIE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I don't think it should come through such a populated area. There is too much chance of an accident with vessel, truck and train. 345-1

Name and Address: Valerie Tyler
14320 200th Ave SE
Renton, WA 98059

RESPONSE TO COMMENT
COMMENTOR NO. 345: TYLER, VALERIE

Response to Comment No. 345-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 346: PETERSON, H.J.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I THOUGHT AT FIRST NOTICE THIS WAS A BAD JOKE, AND SO DIDN'T ATTEND THE INITIAL HEARING. NUKE WASTE THROUGH A SUPERFUND SITE? ABSOLUTELY NOT! NOT TO MENTION THE FACT DOE IS ESPECIALLY SUBJECT TO MURPHY'S LAW

346-1

Name and Address: H.J. PETERSON
411 SO. 61ST ST.
TACOMA, WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 346: PETERSON, H.J.

Response to Comment No. 346-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 347:
LANDER, MR. & MRS. LEONARD VANDER

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We are very much against any Nuclear Waste coming into the U.S. Each Country should care for their own in their Country. 347-1

We are certainly against it coming into The City of Tacoma — even more so. 347-2

Name and Address: Mr + Mrs Leonard Vander Lander
7020 E. Tonia Tacoma WA 98404

RESPONSE TO COMMENT
COMMENTOR NO. 347:
LANDER, MR. & MRS. LEONARD VANDER

Response to Comment No. 347-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

Response to Comment No. 347-2

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 348: HILL, EARL R.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We need to improve our local environment. A dramatic change to the way we think and act starts here. Setting an example of high standards will come back on us 10 fold in the future, benefiting our, your children. Lets not take a giant step backwards. Lets take risks to improve not destroy or harm

Name and Address: Earl R Hill
3827 So. G Tacoma Wa 98408

348-1

RESPONSE TO COMMENT
COMMENTOR NO. 348: HILL, EARL R.

Response to Comment No. 348-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 349: FARM, JERRY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

The nuclear waste created in America, or by America should be "taken care of" by America. That waste created elsewhere should be handled by the government of the country responsible. My children and grandchildren should not be endangered so America can be the "nuclear waste collector" of the world. Don't bring it here. 349-1

Name and Address: Jerry Farm
2801 Rainier Road L-23
Steilacoom, Wa 98388

RESPONSE TO COMMENT
COMMENTOR NO. 349: FARM, JERRY

Response to Comment No. 349-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 350: FARM, CLIFFORD L.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I THINK THIS PROPOSAL IS VERY IRRESPONSIBLE AND POSES A SERIOUS THREAT TO PUBLIC HEALTH AND SAFETY. DON'T DO IT! 350-1

Name and Address: CLIFFORD L. FARM
2801 RIGNEY RD. L23
STEILACOOM, WA 98388

RESPONSE TO COMMENT
COMMENTOR NO. 350: FARM, CLIFFORD L.

Response to Comment No. 350-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 351: PENDLETON, DOLORES

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I do not want the nuclear waste coming thru Tacoma. I live on the Commencement Bay shoreline next to railroad tracks as many other do. This city is concentrated too close to the port and rail system. 351-1

Name and Address: Dolores Pendleton
2002 Schuster Parkway #202
Tacoma, WA 98402

RESPONSE TO COMMENT
COMMENTOR NO. 351: PENDLETON, DOLORES

Response to Comment No. 351-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 352: PETERSON, H.E.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

- THE AREA IS TO POPULATED
- TRANSPORTATION AND ROUTES NOT ADEQUATE
- STORAGE AREA MUCH TO FAR AWAY

352-1

Name and Address:

H.E. PETERSON
411 SO 61ST ST
TACOMA WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 352: PETERSON, H.E.

Response to Comment No. 352-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The port selection process is documented in Appendix D of the EIS. To evaluate and select acceptable ports of entry, the EIS developed five evaluation criteria which are discussed in Appendix D, Section D.1.9. One of the criteria (Criterion 5) evaluates the population in and around the port, and along the routes from the port to the DOE management sites. Criterion 5 indicates those ports that can safely handle foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9 of the EIS) with the least risk to populations near the port. By seeking to minimize the risk to populations surrounding the ports of entry, the EIS further diminishes the low risks associated with an accident (Section 4.2.2.3 of the EIS). DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port.

COMMENTOR NO. 353: STAKESBERRY, CATHREW

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think its terrible that were getting waste from other Countries let them keep their own waste. 353-1

Name and Address: Cathrew Stakesberry
6214 104th St E.
Puyallup Wash. 98373

RESPONSE TO COMMENT
COMMENTOR NO. 353: STAKESBERRY, CATHREW

Response to Comment No. 353-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 354: MCELROY, JUNE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

No They can keep their Waste over seas We have enuf of our own. It is to dangers to be on heiways with nuclear Waste.

Name and Address: June J McElroy
7407-20 Ave Ea Tac Wa 98404

354-1

RESPONSE TO COMMENT
COMMENTOR NO. 354: MCELROY, JUNE

Response to Comment No. 354-1

Management Alternative 2 and the No Action Alternative are the alternatives in which no foreign research reactor spent nuclear fuel would be accepted into the United States, and the commentor's preference for this alternative is noted. These alternative is discussed in Sections 2.3, 2.5, 4.4, and 4.6 of the EIS..

COMMENTOR NO. 355: DAM, DONALD A.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I do not want nuclear waste coming through Tacoma from 41 other countries. I don't feel it is safe for us or our children or grandchildren. I believe it will decrease property values and the value of our city to outsiders. 355-1

Keep it in Europe for future use.

John 3:16-21

Name and Address: Donald A. DAM
1818 E. 31st
Tacoma, WA 98404

RESPONSE TO COMMENT
COMMENTOR NO. 355: DAM, DONALD A.

Response to Comment No. 355-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

In regard to a possible reduction in property values as a result of the receipt of foreign research reactor spent nuclear fuel at the Port of Tacoma, DOE would have no control over such possible side-effects. However, by developing this EIS, which demonstrates that the risks are low, by conducting public hearings, and through safe operation, DOE hopes to convince residents in the Tacoma area that the shipment of foreign research reactor spent nuclear fuel is truly a low-risk operation, thereby maintaining property values. Historically, there were no adverse commercial impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

COMMENTOR NO. 356: MELVILLE, MARILYN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We have enough to worry about with the oil being transferred from Alaska, so we shouldn't have to worry about Nuclear Waste. I feel the countries should keep ~~to~~ the waste right on their countries. 356-1

Name and Address:
Marilyn Melville
#324 No 8th
Tacoma, WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 356: MELVILLE, MARILYN

Response to Comment No. 356-1

Overseas storage is Management Alternative 2, Subalternative 1a and the commentor's preference for this alternative is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

COMMENTOR NO. 357: LITTLE, ADAM

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

NOT IN MY BACK BAY!!

WHY ISN'T THE PUBLIC NOTIFIED ~~[illegible]~~ ALL ALONG? BETTER YET WHY DOESN'T ANY OF THESE COMPANIES THINK OF THE FUTURE INSTEAD OF QUICK SOLUTIONS WHEN THEY'RE OUT OF TIME? 357-1

Name and Address: ADAM LITTLE
352½ McKinley AVE
TACOMA WA 98404

RESPONSE TO COMMENT
COMMENTOR NO. 357: LITTLE, ADAM

Response to Comment No. 357-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Concerning the commentor's question of why the public has not been informed all along, DOE has attempted to conduct this EIS in a completely open manner. Prior to preparation of the draft EIS, public scoping meetings were held in locations near most of the potential ports of entry and interim management sites, and written comments were also accepted. In response to these public comments, a wider range of potential ports of entry and interim management sites were considered in the draft EIS. After issuance of the draft EIS, seventeen public hearings were held in the locations determined to be most likely to be directly affected by the EIS alternatives.

The draft EIS was mailed to more than 1,500 people and an official DOE announcement of the meeting location and purpose was advertised in local newspapers. Public service announcements were also provided to local radio stations and to cable-access television. The meeting was included in the Federal Register Announcement concerning the EIS. In addition, 1-800 numbers were provided for preregistration and for requesting copies of the draft EIS. In addition to accepting public comments during the hearings, written comments were also welcomed, and encouraged. DOE considers that these actions have provided ample opportunity for the public to be involved.

COMMENTOR NO. 358: KELLER, MONTY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I THINK THERE ARE 41 COUNTRIES WHO NEED TO DEAL WITH THEIR OWN "SPENT" FUEL. THEY NEED TO KNOW HOW IT FEELS TO HAVE THESE MATERIALS WITHIN 1.5 MILES OF THEIR CHILDREN - MINE ARE 17 MO. & 3 YRS. HOW OLD ARE THEIR CHILDREN???

358-1

Name and Address: Monty Keller
21721 130TH ST. E. SUMNER, WA.
98390

RESPONSE TO COMMENT
COMMENTOR NO. 358: KELLER, MONTY

Response to Comment No. 358-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 359: JAQUEZ, JOHN JR.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

IF THESE NUCLEAR FUEL Rods ARE COMPLETLY SAFE, THEN WHY ARE YOU SHIPPING THEM HALFWAY AROUND THE World TO DISPOSE OF THEM. WHY NOT DISPOSE OF THEM WHERE THEY CAME FROM! 359-1

Name and Address: JOHN JAQUEZ JR. 501 No. E ST. TACOMA WA 98403

RESPONSE TO COMMENT
COMMENTOR NO. 359: JAQUEZ, JOHN JR.

Response to Comment No. 359-1

The purpose and need for moving the spent nuclear fuel is discussed in Section 1.2 of the EIS. The proposed action would support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide.

COMMENTOR NO. 360: HELMER, MARIE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am violently opposed to it. Unfortunately there was no early activity against it + all we can hope now is for success thru work + more work by concerned Tacomans. Wake up! Tacoma 360-1

Name and Address: Marie Helmer
909 No. L, Tacoma 98403

RESPONSE TO COMMENT
COMMENTOR NO. 360: HELMER, MARIE

Response to Comment No. 360-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 361: WILLIS, KATHI

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Citizens of Tacoma & Pierce County have a Port that makes a significant contribution to the economic vitality of our area. The potential of having nuclear waste come through our port could jeopardize the growth of business & potentially cause some existing businesses to relocate! 361-1

Name and Address: Kathi Willis, 1905 Overmeadow NE
Tacoma, WA 98422

RESPONSE TO COMMENT
COMMENTOR NO. 361: WILLIS, KATHI

Response to Comment No. 361-1

In preparing the EIS, DOE has considered accepting the foreign research reactor spent nuclear fuel at any of 10 ports selected on the basis of specific criteria described in Section 2.6.3.1 of the EIS. For each port selected the impacts from activities related to the shipments of foreign research reactor spent nuclear fuel were evaluated in Section 4.2.2. The evaluation includes impacts from routine activities, credible accidents, including shipboard fires, emergency management and response, cumulative impacts, mitigation measures, and environmental justice concerns. The risk to the environment and the health and safety of workers and public resulting from the proposed action for all candidate ports was determined to be low.

COMMENTOR NO. 362: LAMENDOLA, ROBERTA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think it unconscionable to even consider shipping spent nuclear waste anywhere. Find a way to store it where it lives now. 362-1

Name and Address: Roberta LaMendola
2220 N. Tyler
Tacoma WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 362: LAMENDOLA, ROBERTA

Response to Comment No. 362-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5 of the EIS, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 363: YORK, BARBARA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Personally, I have experienced the inadequate disposal of contaminates in the past (contaminated well water from the City of Tacoma Dump.

I do not desire a continuation of earth's contamination - now - it passing through Tacoma. Man in his ignorance assumes great knowledge!

Name and Address: Barbara York
6917 88th Street S.W.
Lakewood, WA 98499

363-1

RESPONSE TO COMMENT
COMMENTOR NO. 363: YORK, BARBARA

Response to Comment No. 363-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 364: GOLDEN, MIKE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Although there is a strong need to remove fissionable products from the international market, there are better ways to do this than to ship it through the Port of Tacoma. A military port would be a better option – military ports regularly handle nuclear materials and can provide better security as well as trained emergency personnel. 364-1

Name and Address:

Mike Golden
3631 South Alaska St.
Tacoma, WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 364: GOLDEN, MIKE

Response to Comment No. 364-1

The commentor's support of the proposed nuclear weapons nonproliferation policy is noted. The commentor's preference for the exclusive use of military ports to ship foreign research reactor spent nuclear fuel is also noted. However, Section 4.2.2.3 of the EIS demonstrates that there is no additional risk from the use of commercial ports.

Section 2.8 of the EIS addresses the security measures that would be taken to ensure that there would be no unacceptable risks of terrorism or theft of materials. DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security that might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ports is noted.

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures can greatly reduce the risk of such actions. Security would be provided for all shipments of foreign research reactor spent nuclear fuel, as required by the Code of Federal Regulations (10 CFR Part 73). The security provisions are summarized in the new Appendix H that has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify details of the transportation process, including security provisions in port and during transit.

COMMENTOR NO. 365: GOLDEN, LISA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Even though I know the U.S. needs to remove these products from foreign markets, I think they could choose a better place than Tacoma. Tacoma's port has a lot to offer in the way of wildlife, such as seals, fish, eagles, etc. We do not need to ruin the environment in which we live. The waste needs to be taken some where else! 365-1

Name and Address: Lisa Golden 3631 S. Alaska St. Tacoma, WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 365: GOLDEN, LISA

Response to Comment No. 365-1

The commentor's support of the proposed nuclear weapons nonproliferation policy is noted. The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is also noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 366: SKELLY, IRENE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We just don't want any nuclear waste coming through Tacoma, let alone coming in on rail across the whole state to Hanford where we already have leaking waste into the Columbia River which is contaminated and is causing too much cancer and other diseases etc. 366-1

Name and Address: Irene Skelly
2904 So MELROSE
TACOMA, WA. 98405

RESPONSE TO COMMENT
COMMENTOR NO. 366: SKELLY, IRENE

Response to Comment No. 366-1

The commentor's opposition to the transportation of foreign research reactor spent nuclear fuel through the Port of Tacoma and its management at the Hanford Site is noted.

In preparing the EIS, DOE has considered accepting the foreign research reactor spent nuclear fuel at any of ten ports selected on the basis of specific criteria described in Section 2.6.3.1 of the EIS. For each port selected the impacts from activities related to the shipments of foreign research reactor spent nuclear fuel were evaluated in Section 4.2.2 of the EIS. The evaluation includes impacts from routine activities, credible accidents, including shipboard fires, emergency management and response, cumulative impacts, mitigation measures, and environmental justice concerns. The risk to the environment and the health and safety of workers and public resulting from the proposed action for all candidate ports was determined to be low.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 367: NICHOLSON, M.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Most ports are not required to pay anything towards emergency and/or medical services. 367-1
Will some monies be allotted to the agency expected to do this? Why are we voluntarily 367-2
to take other countries nuclear wastes? We have enough problems disposing of our own. Do to Tacoma & other N. Am. cities 367-3

Name and Address: M. NICHOLSON.
1422. So FERDINAND DR.
TACOMA, Wa. 98405-1107.

this does not seem to be a final disposition? Accidents do happen. 367-4

RESPONSE TO COMMENT
COMMENTOR NO. 367: NICHOLSON, M.

Response to Comment No. 367-1

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected.

Response to Comment No. 367-2

The commentor's opposition to acceptance of spent nuclear fuel from foreign research reactors is noted. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

Response to Comment No. 367-3

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 367-4

The impacts of ultimate disposition of foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1 of the EIS).

COMMENTOR NO. 368: DRYDEN, EVELYN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We here in the Northwest are late in recognizing the waste we are making of our environment - and while we can still make a difference it is vital we do so. I really resent dumping the wastes of other countries - including as we are not doing well enough on our local waste problems - I urge that we say no! 368-1

Name and Address: Evelyn Dryden
909 No 1 St #106
Tacoma 98403

RESPONSE TO COMMENT
COMMENTOR NO. 368: DRYDEN, EVELYN

Response to Comment No. 368-1

The commentor's opposition to the transportation of foreign research reactor spent nuclear fuel through the Port of Tacoma is noted.

In preparing the EIS, DOE has considered accepting the foreign research reactor spent nuclear fuel at any of 10 ports selected on the basis of specific criteria described in Section 2.6.3.1 of the EIS. For each port selected, the impacts from activities related to the shipments of foreign research reactor spent nuclear fuel were evaluated in Section 4.2.2. The evaluation includes impacts from routine activities, credible accidents, including shipboard fires, emergency management and response, cumulative impacts, mitigation measures, and environmental justice concerns. The risk to the environment and the health and safety of workers and the public resulting from the proposed action for all candidate ports was determined to be low.

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1. of the EIS).

COMMENTOR NO. 369: BARNES, MARGARETE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am against nuclear shipments in our Puget Sound area. 369-1

Name and Address: Margarete Barnes
611 So 78th Str
Tacoma WA. 98408

RESPONSE TO COMMENT
COMMENTOR NO. 369: BARNES, MARGARETE

Response to Comment No. 369-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Puget Sound area is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Puget Sound area, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 370: WAY, KELLY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think nuclear waste through the Port would ruin all we've done to clean up the bay and enhance our reputation as a clean, safe industrial port. The safety risk would be too great. There aren't enough trained response personnel, especially with 11th St being taken away. I'm against it 100%

370-1

Name and Address:

Kelly Way
PO Box 45204
Tacoma Wa 98445

RESPONSE TO COMMENT
COMMENTOR NO. 370: WAY, KELLY

Response to Comment No. 370-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

DOE will continue to work with State and local officials to ensure that emergency response capabilities are adequate and that the communications channels between DOE and State and local governments remain open.

COMMENTOR NO. 371: KAMMILLER, LARRAIN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Bad idea & I am against it. "Minimum risk" means what & to whom? We have a mountain ready to erupt & service threat of earthquake that we have no control over but we can control this. This is the same stuff we dumped on Japan. Was it good!

371-1

Name and Address:

Larrain Kammiller
3816 So Park Ave
Tacoma WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 371: KAMMILLER, LARRAIN

Response to Comment No. 371-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at the Port of Tacoma to fail, is not expected to compromise the spent nuclear fuel transportation cask.

DOE would like to point out that the foreign research reactor spent nuclear fuel is neither volatile nor unstable. The fuel that the proposed policy deals with is a metal which contains enriched uranium matrixed in, all clad with either aluminum or stainless steel. This type of fuel is very stable. Section 2.6.1 of the EIS presents a detailed description of the foreign research reactor spent nuclear fuel.

COMMENTOR NO. 372: THOMAS, JAMIE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

IT'S MY UNDERSTANDING THAT IT WAS THE D.O.E. WHO MADE THE INITIAL DECISION 20+ YEARS AGO TO SUPPLY THE 41 COUNTRIES WITH THE ORIGINAL NUCLEAR FUEL. YOU'VE NOW ADMITTED THAT THAT DECISION WAS UNWISE. I NOW QUESTION WHY THE PUBLIC SHOULD TRUST YOU TO MAKE A SMART MOVE NOW. ALSO, WHEN WAS THE LAST TIME CANADA WAS CONSIDERED A THREAT TO US? WHY NOT LET THEM (AND OTHERS) HANDLE THEIR OWN WASTE??

Name and Address: JAMIE THOMAS (MS.)
3924 N. 32ND ST.
TACOMA, WA 98407

372-1

RESPONSE TO COMMENT
COMMENTOR NO. 372: THOMAS, JAMIE

Response to Comment No. 372-1

As discussed in Section 1.1 of the EIS, shortly after the end of the Second World War, the United States recognized that it must take action to prevent the spread of nuclear weapons throughout the world. Cooperative agreements were reached with other nations in which the United States provided assistance for peaceful applications of nuclear technology to foreign nations that agreed to refrain from developing nuclear weapons and that agreed to allow international inspection of their nuclear activities. One means of assisting other nations with peaceful applications of nuclear technology is to provide them with research reactors and fuel for those reactors. This approach, far from failing, has worked well, as demonstrated by the small number of countries possessing a nuclear weapons capability.

Canada is not considered a threat to the United States. As discussed in Section 1.2 of the EIS, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators, including Canada, time to convert their research reactors to the use of LEU fuel and to make arrangements for disposition of their LEU spent nuclear fuel.

COMMENTOR NO. 373: TROTTER, ROBERT E.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Total opposition for 2 primary reasons;
The economic impact of negative perception
by the ~~[illegible]~~ traveling public on Tacoma/Pierce
Counties Tourism industry;
2) The potential for catastrophe to a
unique/fragile eco-system i.e. the
Puget Sound

Name and Address: Robert E. Trotter
Sheraton Tacoma Hotel
1320 Broadway Plaza
Tacoma, WA 98402

373-1

RESPONSE TO COMMENT
COMMENTOR NO. 373: TROTTER, ROBERT E.

Response to Comment No. 373-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

In regard to the economic impact of the negative perception that the commentor alludes to, DOE considers that the economic impacts of the receipt of foreign research reactor spent nuclear fuel would be low, if quantifiable at all. Historically, there were no significant adverse commercial impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

The EIS analyses determined that there would be no significant adverse impacts to the ecology of any of the ports that might be used to receive the material (Sections 4.2.4.2.8 and 4.5 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, after more than 30 years of spent nuclear fuel shipments, no radioactive material has ever been released from a spent nuclear fuel transportation cask, even as a result of an accident (Section 2.6.2 of the EIS). Based on this experience, DOE considers that spent nuclear fuel transportation casks passing through the Port of Tacoma, or any other port, would not release their radioactive contents, so would not affect either the air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality. No significant health, safety, or environmental risk were found to exist at any of the candidate commercial or military ports identified (Sections 4.2.2 and 4.5 of the EIS).

COMMENTOR NO. 374: CASEY, NICELLE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

my opinion is NO!

Name and Address: Nicelle Casey 5941 S 1st
tacoma, Wa 98408

374-1

RESPONSE TO COMMENT
COMMENTOR NO. 374: CASEY, NICELLE

Response to Comment No. 374-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 375: CASEY, MARY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

MY VIEW IS THAT TACOMA IS A DENSELY POPULATED CITY AND THAT A SMALLER PORT WITH A LOWER POPULATION BASE WOULD BE A BETTER ALTERNATIVE. I HAVE TRAVELED THE GLOBE VIA U.S. AIR FORCE AND BELIEVE WE SHOULD ALL BE MORE SELF RELIANT...NOT ALWAYS DEPENDING ON OTHERS TO BE RESPONSIBLE FOR OUR DAY TO DAY LIVES.

375-1

Name and Address: MARY CASEY
5911 SO J ST TACOMA, WA 98408

RESPONSE TO COMMENT
COMMENTOR NO. 375: CASEY, MARY

Response to Comment No. 375-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

COMMENTOR NO. 376: KRONTZ, RAY A.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

TO GET TO TACOMA, THE NUCLEAR WASTE IS FIRST SHIPPED THROUGH PUGET SOUND, A HEAVILY POPULATED REGION AND AN ECOLOGICAL REGION THAT WOULD BE DEVASTATED BY ANY RADIOACTIVE LEAKAGE. IN ORDER TO TRANSFER THE MATERIALS TO IDAHO, IT WILL NEED TO BE TRUCKED OR SHIPPED BY RAIL. FROM TACOMA, BY RAIL, IT WOULD HAVE TO GO THROUGH SEATTLE, OR SOUTH TO PORTLAND DEPENDING ON WHY AND THE EXTRA RISK OF THE LENGTHIER TRIP FROM TACOMA? 376-1

Name and Address: RAY A. KRONTZ
2001 N CEDAR ST
TACOMA WA 98406

THE SAME IS TRUE FOR THE MAIN TRUCKING ROUTES.

RESPONSE TO COMMENT
COMMENTOR NO. 376: KRONTZ, RAY A.

Response to Comment No. 376-1

The commentor's opposition to the use of the Port of Tacoma for receipt of foreign research reactor spent nuclear fuel is noted. Populations surrounding candidate ports and along transportation routes to interim management sites were a factor in the selection of candidate ports (Appendix D, Section D.1.9 of the EIS). The analysis Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The EIS analyses determined that there would be no significant adverse impacts to the ecology of any of the ports that might be used to receive the material (Sections 4.2.2 and 4.5 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, after more than thirty years of spent nuclear fuel shipments, no radioactive material has ever released from a spent nuclear fuel transportation cask, even as a result of an accident (Section 2.6.2 of the EIS). Based on this experience, DOE considers that spent nuclear fuel transportation casks passing through the Port of Tacoma, or any other port, would not release their radioactive contents, so would not affect either the air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

COMMENTOR NO. 377: KELLY, EUGENE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE IDEA OF TRANSPORTING A NUCLEAR WASTE THROUGH ANY METROPOLITAN AREA IS APPALLING. THAT ANYONE COULD EVEN CONTEMPLATE THIS ACTION INDICATES THEIR IRRESPONSIBILITY IN REGARDS TO THE SAFETY OF THE LOCAL POPULATION! BAD IDEA! 377-1

Name and Address: EUGENE KELLY
811 N SHERIDAN
TACOMA WA 98403

RESPONSE TO COMMENT
COMMENTOR NO. 377: KELLY, EUGENE

Response to Comment No. 377-1

The commentor's opposition to the use of the Port of Tacoma for receipt of foreign research reactor spent nuclear fuel is noted. Populations surrounding candidate ports and along transportation routes to DOE management sites were a factor in the selection of candidate ports (Appendix D, Section D.1.9 of the EIS). The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 378: LINVILLE, OTHEL

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think it is dangerous to ship this waste through such a closed in populated area as The Puget Sound. The potential for accidents and the number of people that would be affect is in great. Why doesn't the other countries reprocess it first to less potential danger? 378-1

Name and Address: Othel Linville
P.O. Box 70
Indianola WA 98342

RESPONSE TO COMMENT
COMMENTOR NO. 378: LINVILLE, OTHEL

Response to Comment No. 378-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Puget Sound and the Port of Tacoma is noted. However, the analysis in the EIS indicates that the risks associated with an accident are low (Sections 4.2.2 and 4.5), and pose no significant risk to port personnel, the local population, or the environment. The commentor's preference for Management Alternative 2, to reprocess the foreign research reactor spent nuclear fuel overseas, is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

COMMENTOR NO. 379: LINVILLE, SUE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am absolutely horrified. No matter what "safeguards" are taken, the potential results from a disaster – ships, catching on fire, collisions – who knows – are too horrific to expose such a populated area, let alone the ecological damage to a unique part of the planet.

379-1

Name and Address: Sue Linville
PO Box 90
Indianola WA 98342

I'm also sick of government officials having such power to affect the lives of citizens. Who do these people answer to.

RESPONSE TO COMMENT
COMMENTOR NO. 379: LINVILLE, SUE

Response to Comment No. 379-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 380: PEALET, J.C.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

380-1 1- This area is too populated to use as a flow-thru point for dangerous spent nuclear fuels/materials

2. Accidents always happen! We don't want to deal forever with the results of accidents

380-2 3 - Remember the happenings at Richland - leaky containers

Name and Address: J.C. Pealet
2623-204 Ave Ct E
Sumner WA 98390

→ air release → so fast. You can't imagine anything that will be around to enforce it

RESPONSE TO COMMENT
COMMENTOR NO. 380: PEALET, J.C.

Response to Comment No. 380-1

The commentor's opposition to the use of the Port of Tacoma for receipt of foreign research reactor spent nuclear fuel is noted. Populations surrounding candidate ports and along transportation routes to DOE management sites were a factor in the selection of candidate ports (Appendix D, Section D.1.9 of the EIS). The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The probability of an accident at sea is discussed in Appendix C, Section C.5.5 of the EIS, while the port accident probabilities are found in Appendix D, Section D.5.3.1.3 of the EIS. This analysis demonstrates that the risks associated with an accident are low (Section 4.2.2.3).

Response to Comment No. 380-2

DOE considers that there would be no significant adverse impacts to any of the ports that might be used to receive the foreign research reactor spent nuclear fuel. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, after more than thirty years of spent nuclear fuel shipments, no radioactive material has ever been released from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality. In the unlikely event of a severe accident, the analysis performed for the EIS shows that some radioactive material could be released from the cask and distributed into the environment. However, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the water and air quality in the port would be very small. Sections 4.2.2.3 and Appendix D, Section D.5 of the EIS detail the accident analysis and results.

COMMENTOR NO. 381: BUCKINGHAM, DAVID

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I THINK WASHINGTON SHOULD STORE ITS OWN NUCLEAR WASTE, OTHER STATES & COUNTRIES SHOULD STORE WHAT THEY USE. 381-1

Name and Address: DAVID BUCKINGHAM
8212 358TH ST E.
EATONVILLE, WA - 98328

RESPONSE TO COMMENT
COMMENTOR NO. 381: BUCKINGHAM, DAVID

Response to Comment No. 381-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 382: TAYLOR, MARIE A.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Why give us other's poop?! Hey, it is my job to keep my house & property clean. So, why should I have to pay the cost, risk, & responsibility for someone else's mess. Let them be responsible for their nuclear poop! 382-1

Name and Address: Marie A. Taylor
5307 So. Oakes, Tacoma Wa 98409

RESPONSE TO COMMENT
COMMENTOR NO. 382: TAYLOR, MARIE A.

Response to Comment No. 382-1

The commentor's opposition to Management Alternative 1 (management in the United States, Section 2.2 of the EIS, or elements of Management Alternative 3, Section 2.4) is noted. The commentor's support for Management Alternative 2 (management overseas, Section 2.3 of the EIS) or the No Action Alternative (Section 2.5 of the EIS) is noted.

An objective of the proposed action is to reduce the risk of weapons-grade nuclear materials falling into the hands of nations having the technology and intent to develop a nuclear weapons capability, while providing minimal disruption to the operations of foreign research reactors.

COMMENTOR NO. 383: TAYLOR, MONTE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am completely and Totaly against shipping, storing or any other method of nuclear waste being introduced into Tacoma. I have been in Tacoma since I was 3 years old and enjoy the mountains, forests, lakes, rivers and ocean. I do not want this beautiful region destroyed by an accident involving nuclear waste. Our Natural Resources are too valuable. 383-1

Name and Address: Monte Taylor
5307 So. Oakes
Tacoma, Wa. 98409
(206) 475-4356

RESPONSE TO COMMENT
COMMENTOR NO. 383: TAYLOR, MONTE

Response to Comment No. 383-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 384: GOLDEN, ALTA M.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I understand the need for a safe depository for Spent Nuclear Waste, however, I'm absolutely against using the Port of Tacoma for this purpose. A more rational plan seems to be the use of a military base. I repeat - I'm absolutely against using the Port of Tacoma. 384-1 384-2

Name and Address: Alta M. Golden
#22 Heron Island
Lakebay, Wa
98349

RESPONSE TO COMMENT
COMMENTOR NO. 384: GOLDEN, ALTA M.

Response to Comment No. 384-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 384-2

The commentor's preference for the exclusive use of military ports to ship foreign research reactor spent nuclear fuel is noted. However, the analysis in Section 4.2.2.3 of the EIS demonstrates that there is no additional risk from the use of commercial ports.

COMMENTOR NO. 386: LEWIS, EDWARD G., MRS.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We do not think it is a good idea & strongly oppose it. Too little known about long term effects, on future generations. It is not needed or wanted here!

Name and Address: Mrs. Edw G Lewis
5119 So. Dickes
Tacoma, Wa. 98409

386-1

RESPONSE TO COMMENT
COMMENTOR NO. 386: LEWIS, EDWARD G., MRS.

Response to Comment No. 386-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 387: AMDAHL, ONETA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am opposed to weapons grade nuclear waste going through the Port of Tacoma and the Puget Sound area. 387-1

Name and Address: ONETA AMDAHL
5301 PORT VIEW PL NE
TACOMA WA 98422

RESPONSE TO COMMENT
COMMENTOR NO. 387: AMDAHL, ONETA

Response to Comment No. 387-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 388: BESTROM, BETH

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Tacoma is spending a lot of money cleaning up the city and Ruston Way - why bother if this waste comes to town! I don't believe this is an accident-free proposition. There have been too many already around the world. I have children I'd like to see grow up safely. We have to contend with gang violence, drive-by shootings, drugs - Don't add nuclear waste to our list of problems! 388-1

Name and Address: Beth Bestrom
4517 48th St CTE
TACOMA WA 98443

RESPONSE TO COMMENT
COMMENTOR NO. 388: BESTROM, BETH

Response to Comment No. 388-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 389: BESTROM, ERIN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think nuclear waste should not come through Tacoma. I am a healthy 17 year old, and I'd like to stay that way. It could kill our beautiful animals or our forests. I don't think nuclear waste through Tacoma is a bad idea 389-1

Name and Address: Erin Bestrom - 4517 48th St. ct. E Tacoma, WA 98443

RESPONSE TO COMMENT
COMMENTOR NO. 389: BESTROM, ERIN

Response to Comment No. 389-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 390: CHRISTIANSEN, NINA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think nuclear waste should not come through Tacoma. It could kill crops, plants, and animals. The nuclear waste could go in the water and kill the fish or poison the fish. if we cought one and ate it we could get really sick. Tacoma doesnt need waste. 390-1

Name and Address: Nina Christiansen PO BOX 1161 Tacoma 98442. I am twelve years old.

RESPONSE TO COMMENT
COMMENTOR NO. 390: CHRISTIANSEN, NINA

Response to Comment No. 390-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 391: HESS, B.H.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Not a good idea. DOE policy to prevent spent fuel becoming a weapon is a military problem & should be handled by Defense dept 391-1

Use Bangor Sub Base & avoid civilian concentrations 391-2

Name and Address: B. H. Hess
4437 Sandalwood Dr
Tacoma WA 98466

RESPONSE TO COMMENT
COMMENTOR NO. 391: HESS, B.H.

Response to Comment No. 391-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma and preference for the Department of Defense handling this issue are noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 391-2

The commentor's preference for the use of Bangor Sub Base and military ports to ship foreign research reactor spent nuclear fuel is noted. However, the analysis in Section 4.2.2.3 of the EIS demonstrates that there is no additional risk from the use of commercial ports.

COMMENTOR NO. 392: SIMAC, ANN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

1. The risk is too great. 392-1
2. Why should the U.S. be a dumping ground for Europe's waste. 392-2
3. Nothing is 100% safe or otherwise. 392-3
4. We are not prepared to face a problem if the need arises.

Name and Address: Ann Simac
4408 N. 39
Tac WA 98407.

RESPONSE TO COMMENT
COMMENTOR NO. 392: SIMAC, ANN

Response to Comment No. 392-1

The commentor's opinion that the risk is too great is noted. Section 4 of the EIS demonstrates, however, that the risks are low.

Response to Comment No. 392-2

An objective of the proposed action is to reduce the threat of nuclear weapons proliferation (Section 1.2 of the EIS). Through cooperation with foreign nations in handling spent nuclear fuel from research reactors, the United States hopes to reduce international commerce in materials which could be used to build nuclear weapons.

Response to Comment No. 392-3

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected.

COMMENTOR NO. 393: KAUFMAN, DON

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I'M NOT SO MUCH AGAINST THE NUKE WASTE COMING THRU TACOMA, AS I AM ABOUT SHIPPING IT OVER LAND, THEN "STORING" THE STUFF, AT TAXPAYERS EXPENSE, AND RISK IN YEARS TO COME. HANFORD IS BAD ENOUGH NOW. 393-1

Name and Address: DON KAUFMAN
9921 WALLER RD.
TACOMA, WA. 98446

RESPONSE TO COMMENT
COMMENTOR NO. 393: KAUFMAN, DON

Response to Comment No. 393-1

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 394: BROSMAN, LARRY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

PLEASE DO NOT LET IT HAPPEN!
THE US GOVERNMENT WOULD END UP
BEARING MOST OF THE ECONOMIC [redacted] 394-1
BURDEN AND ALL OF THE ENVIRONMENTAL
RISK IF AN ACCIDENT DID OCCUR.
ALSO I BELIEVE THE US WOULD [redacted]
ALWAYS BEAR THE MAJOR ECONOMIC BURDEN OF 394-2
STORAGE AND TRANSPORT COSTS

Name and Address: LARRY BROSMAN
1003 N. FIRST ST, #202
RENTON, WA [redacted] 98055

RESPONSE TO COMMENT
COMMENTOR NO. 394: BROSMAN, LARRY

Response to Comment No. 394-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through any U.S. port is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to any of the ports analyzed in the EIS, is low.

DOE is considering that there would be no significant adverse impacts to any of the ports that might be used to accept the foreign research reactor spent nuclear fuel. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive material has ever been released from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality. In the unlikely event of a severe accident, the analysis performed for the EIS shows that some radioactive material could be released from the cask and distributed into the environment. However, the analysis in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the water and air quality in the port would be very small. Sections 4.2.2.3 and Appendix D, Section D.5 of the EIS detail the accident analysis and results.

Response to Comment No. 394-2

Sections 2.2.1.2 and 2.2.2.3 of the EIS discuss alternative financing arrangements that range from charging the reactor operators a fee that would cover all the costs of the proposed action, to having DOE subsidize all of the reactor operators' costs. One compromise position that is evaluated is to charge developed countries a competitive fee, while developing countries would be subsidized. If less than the full cost of the proposed action is charged to the reactor operators, the difference would be the cost to the United States of gaining participation by other countries in our nuclear weapons nonproliferation programs.

COMMENTOR NO. 395: PODMORE, RON

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

IN RECENT EVENTS WE (OUR COUNTRY) HAVE HAD FEDERAL BUILDING & OUTPOST SUBJECT TO TERRORIST ATTACK, IF GOVERNMENT CAN'T ~~PROTECT~~ PREVENT THIS THEN WE GOING TO STOP THE TERRORIST ATTACKS ON THESE WASTE SITE? 395-1

Name and Address: RON PODMORE / ADAM LITTLE
3815 N PEARL
TACOMA WA 98407

RESPONSE TO COMMENT
COMMENTOR NO. 395: PODMORE, RON

Response to Comment No. 395-1

The threat of a terrorist attack on a spent nuclear fuel management site cannot be calculated accurately. It is clear, however, that the threat would be greater if the material were left in the 41 countries where it is now. In the present situation, some of the spent nuclear fuel could be diverted into a nuclear weapon development program. In addition, the DOE sites at which the foreign research reactor spent nuclear fuel (and target material) would be managed, if it is accepted into the U.S., are well protected by full-time security forces.

COMMENTOR NO. 396: SHAUGHNESSY, ROBIN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We oppose the idea of Nuclear Wast in Tacoma. Exhaust fumes are enough polution. Nuclear Waste can kill humans as well as animals. why take the risk of a spill? They generated it they can keep it. 396-1

Name and Address: Robin Shaughnessy
6917 88th St. SW
Lakewood, WA 98499

RESPONSE TO COMMENT
COMMENTOR NO. 396: SHAUGHNESSY, ROBIN

Response to Comment No. 396-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 397: SLUSARZ, DONNA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I never wanted nuclear power any were in the world, let alone the waste brought here in our docks. I have seriously considered moving if the spent fuel is brought here. There's no amount of money that worth the risks.

Name and Address: Donna Slusarz
3827 So G St.
Tacoma Wa
98408

397-1

RESPONSE TO COMMENT
COMMENTOR NO. 397: SLUSARZ, DONNA

Response to Comment No. 397-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 398: VARNER, PAULA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I have several concerns which all congeal to one inescapable conclusion: don't bring the nuclear waste into Puget Sound. My concerns include but are not limited to 1) no US gov's regulation at port of departure; 2) no ability to regulate the use of specific types of casks 3) lack of resources to pay for training, monitoring of emergency issues; 4) fire; 5) US regulations allowance for cask leakage is unacceptable 6) Tacoma is not prepared to handle the storage adequately. I stop here only because of space limit 398-1 398-2 398-3 398-4 398-5 398-6

Name and Address:

Paula Varner
3315 N 27th St
Tacoma WA 98407

RESPONSE TO COMMENT
COMMENTOR NO. 398: VARNER, PAULA

Response to Comment No. 398-1

U.S. regulations do not apply and cannot be enforced at the port of departure. However, DOE has three ways to ensure that shipments of foreign research reactor spent nuclear fuel would be safely conducted. First, DOE would require that the shipper meet the safety requirements of the International Atomic Energy Agency, which do apply at the port of departure. Second, DOE would require that all shipments meet U.S. regulations when the shipments enter U.S. territorial waters (this is a Coast Guard requirement). Third, through the contract that DOE would enter into with the overseas operators of the foreign research reactors, DOE would insist that only reputable shipping firms be used and that modern, well-equipped ships transport the foreign research reactor spent nuclear fuel.

Response to Comment No. 398-2

Spent nuclear fuel is required to be transported in "Type B" transportation casks that are certified for transporting radioactive materials. These transportation casks are subject to stringent design, fabrication, and operating requirements imposed by the competent authority for the country of origin (the Nuclear Regulatory Commission, in the United States) to withstand very severe accidents without releasing their contents. Regardless of where a transportation cask is designed, fabricated, or certified for use, if used internationally it must meet certain minimum performance requirements and regulations established by the International Atomic Energy Agency. The selection of a specific model of "Type B" transportation cask to be used would depend on the particular type of spent nuclear fuel to be shipped.

Response to Comment No. 398-3

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipments and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for

COMMENTOR NO. 398: VARNER, PAULA (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 398: VARNER, PAULA (CONT'D.)

the identification and resolution of emergency management and security issues specific to the communities that would be affected.

Response to Comment No. 398-4

Appendix D. Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Appendix D., Section D.5.4 of the EIS. The analysis shows that even in the event of a severe ship fire, neither the consequences nor risks are great (Appendix D., Section D.5.5). Although the nonradiological effects of such a catastrophic accident would obviously impact the local environment, no additional impacts are predicted due to the presence of foreign research reactor spent nuclear fuel.

Response to Comment No. 398-5

Regulations concerning "Type B" spent nuclear fuel transportation casks as specified in 10 CFR Part 71.5, require that there be no loss or disposal of radioactive contents during normal operation. The spent nuclear fuel elements contained in a transportation cask are mechanically sound. The cask would not contain water, thus there would be no "leakage" of radioactivity during transport. The only hazard is a very small, allowable radiation that emanates from the cask. The regulations governing the acceptable radiation level (10 CFR Part 71.47) are documented in Section 5.4 and Appendix B, Section B.2 of the EIS. The radiation level allowed by the regulations would not put an undue harm to the individual member of the public, or the general population as a whole. Historically, the radiation level associated with the transport of foreign research reactor spent nuclear fuel was one to two order of magnitude less than that allowed by 10 CFR Part 71.47. The EIS evaluated the risk of transporting foreign research reactor spent nuclear fuel using the allowed limits and concluded that the overall risk would be negligible (Section 4 and Appendix E of EIS).

Response to Comment No. 398-6

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 399: SIMAC, JOHN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

The risk is too great. We have too much pollution as it is with out risking more. 399-1

Name and Address: JOHN SIMAC
4908 No 39th ST
Tacoma Wa, 98407

RESPONSE TO COMMENT
COMMENTOR NO. 399: SIMAC, JOHN

Response to Comment No. 399-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 400: LANTZ, SHIRLEY A.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I DO NOT WANT IT Here! NO, NO, NO, a Thousand Times NO! 400-1

The 40 European - Asian Countries can Keep it. They can Nutenalized The Stuff. 400-2

Name and Address: Shirley A. Lantz
TACOMA, WA

RESPONSE TO COMMENT
COMMENTOR NO. 400: LANTZ, SHIRLEY A.

Response to Comment No. 400-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 400-2

The commentor's preference for Management Alternative 2 is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

COMMENTOR NO. 401: ROGALSKI, J.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We have no facilities for this problem; Lets cure the problem, where it started. Return to sender.

Name and Address: Jim Rogalski Jr
3108 NO. 20TH ST
TAC, E 84 06

401-1

RESPONSE TO COMMENT
COMMENTOR NO. 401: ROGALSKI, J.

Response to Comment No. 401-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 402: ROGALSKI, PAULINE A. PARR

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I do not want nuclear waste coming through Tacoma or anywhere in the vicinity. Hanford has been a source of concern for me for years. Please do not create any more problems for us 402-1 402-2

Name and Address: Pauline A. Parr Rogalski
3108 No. 20th St.
Tacoma, Wash. 98406
206-752-9668

RESPONSE TO COMMENT
COMMENTOR NO. 402: ROGALSKI, PAULINE A. PARR

Response to Comment No. 402-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 402-2

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 403: LANTZ, RUSSELL J.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

LEAVE IT WHERE IT IS. THE COUNTRIES THAT HAVE THE MONEY TO CREATE THE STUFF CAN BUILD THE PLANTS TO DENETURALIZE IT. AEC & DOE HAVE BEEN PUSHING PAPER & MONEY AT THE IMMENSE BATCH OF WASTE IN HANFORD FOR MANY YEARS AND SO FAR HAVE ACCOMPLISHED NOTHING. IT WILL BE THE SAME WITH THIS STUFF 403-1

Name and Address: Russell J Lantz 3104 MO 20 TACOMA WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 403: LANTZ, RUSSELL J.

Response to Comment No. 403-1

The commentor's preference for the overseas storage alternative is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

COMMENTOR NO. 404: HEALOY, JOAN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I gave a type statement before the meeting to a comperson who signed up to speak. I oppose nuclear shipments going through the Port of Tacoma. The risks are considerable to the environment and the population. I am a Washington State born person and wish to live here; however not if it's going to be risky to the health of my children & other members of my family.

404-1

Name and Address:
Joan Healoy
P.O. BOX 98432
Tacoma, Wa. 95495

RESPONSE TO COMMENT
COMMENTOR NO. 404: HEALOY, JOAN

Response to Comment No. 404-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 405: KENDALL, DR. ROSS S.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma. Unbelievable to propose shipping nuclear waste through a populated area, one growing + a city struggling to rebuild its economy + reputation! How can we believe any reassurances of safety from a government that lied for years about the safety of Hanford. This would be a death blow to the growth of Tacoma. I would seriously consider moving to protect my children. I warn the government, even if this is approved, WE WILL NOT LET IT HAPPEN! There will be civil disobedience!

405-1

Name and Address:

ROSS S. KENDALL, MD, Radiation

1501 CRESTAL SPRINGS RD.

TACOMA, WA 98465

RESPONSE TO COMMENT
COMMENTOR NO. 405: KENDALL, DR. ROSS S.

Response to Comment No. 405-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 406: EVANS, ROBERT

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Neither through Tacoma nor the other selected ports ~~should be used~~ is defensible. 406-1

The logical, cost-effective, least hazardous solution is to allow the materials to be stored, re-processed & re-used by the ~~seem~~ responsible, equipped & trained personnel within the U.K., France, Canada, Germany, Switzerland, Sweden & Japan - seven nations controlling 70% of the material. If we become a recipient, we are not equipped, can't store or reprocess. We do become an established conduit through which all other nuclear wastes can come to the U.S. - as Senator M. Uzkowski (Alaska) has already proposed. 406-2 406-3

Name and Address:

Robert Evans

2218 North Union

Tacoma, WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 406: EVANS, ROBERT

Response to Comment No. 406-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma or any other port is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 406-2

The commentor's preference for overseas storage and reprocessing is noted. This is Management Alternative 2, which is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 406-3

An objective of the proposed action is reduce the threat of nuclear proliferation (Section 1.2 of the EIS). Because of the research, medical, commercial, and educational benefits available from research reactors, foreign nations are reluctant to shut down their research reactors. Successful implementation of the proposed action would encourage foreign research reactor operators to find long-term solutions for disposition of their spent nuclear fuel without a disruption of their operations and unfavorable diplomatic consequences (Section 2.2.2.2 of the EIS)

COMMENTOR NO. 407: AVERY, JOHN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

As one of the community organizers who helped to fill the room & gather the comments of citizens, I plead for our government to listen to the eloquence expressed through this process. We are concerned for many valid reasons - most having to do with safety but also for being used by our government & the options presented to us are too dangerous to consider. Consider again and deal responsibly to the citizen's concerned

Name and Address: John Avery 2501 N. Union Tacoma, WA 98406

407-1

RESPONSE TO COMMENT
COMMENTOR NO. 407: AVERY, JOHN

Response to Comment No. 407-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 408: CHESSER, MARI

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

WE HAVE A LARGE QUANTITY OF NUCLEAR WASTE GENERATED IN THE U.S. THAT WE DON'T HAVE A RESPONSIBLE DISPOSAL SOLUTION. FOR, WE DON'T NEED ADDITIONAL SPENT FUEL FROM OTHER COUNTRIES. WE DON'T NEED TO SET OURSELVES UP AS POLICEMEN FOR INTERNATIONAL NUCLEAR WASTE. 408-1

Name and Address: MARI CHESSER
3823 N. 38th ST.
TACOMA, WA. 98407

RESPONSE TO COMMENT
COMMENTOR NO. 408: CHESSER, MARI

Response to Comment No. 408-1

The commentor's opposition to acceptance of spent nuclear fuel from foreign research reactors is noted. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

COMMENTOR NO. 409: HAMILTON, C.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

From the information provided to date I oppose the nuclear waste coming through Tacoma. 409-1

Name and Address: C. Hamilton
4510 N. 31st

RESPONSE TO COMMENT
COMMENTOR NO. 409: HAMILTON, C.

Response to Comment No. 409-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 410: POHL, DR. GERALDINE L.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

This nuclear waste was NOT produced by people or business here. WHY should any place in the Puget Sound accept the problem generated by business of countries thousands of miles away??? NO! NO! NO! Outside forces from the United States of America are most careless of our Country! 410-1

Name and Address: Dr. Geraldine L. Pohl
4027C Rucker Avenue, Everett
Washington 98201

RESPONSE TO COMMENT
COMMENTOR NO. 410: POHL, DR. GERALDINE L.

Response to Comment No. 410-1

The commentor's opposition to the use of the Puget Sound for the transportation of foreign research reactor spent nuclear fuel is noted. Section 1.1 of the EIS discusses the need to safely manage the uranium in foreign research reactor spent nuclear fuel, originally produced in the United States, for the purpose of reducing proliferation risks. The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Puget Sound, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 411: GUBBE, KIM

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I do not want nuclear waste to come through Tacoma. I do not live in Tacoma but close to the route (I-5) that the waste will be traveling down. I do not want ~~tom~~ or my children to be exposed to this nuclear waste just for driving by. It Not to say what would happen if there was an accident. I also feel that Mt. Rainier is very active and what would happen when it ~~[illegible]~~ blows.

411-1

Name and Address: Kim Gubbe
7140 191st Ave SW #31
Rochester, WA 98579

RESPONSE TO COMMENT
COMMENTOR NO. 411: GUBBE, KIM

Response to Comment No. 411-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 413: HAWKINS, CARL

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Keep this port free of Nuclear Waste. I do not feel it is in our economic or National interest to accept this waste 413-1 413-2

Name and Address: CARL HAWKINS
8920 33rd ST W #2
TACOMA, WA 98466

RESPONSE TO COMMENT
COMMENTOR NO. 413: HAWKINS, CARL

Response to Comment No. 413-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 413-2

The commentor's opposition to accepting foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

COMMENTOR NO. 414: NAVARRO, RUDY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Tacoma should not be a Port of Entry for Nuclear Waste. The entire Puget Sound Area would be at risk. The regulations that safeguard the entry and transportation of nuclear waste (HLW) are totally inadequate on many levels. Washington State environmental agencies have pointed out a number of technical descriptions in the proposal. Puget Sound area City Councils are unanimously against Tacoma being a Port of Entry. The technical reasons for excluding Seattle are essentially the same as Tacoma. The notion that the U.S. be responsible for this world problem needs to be examined. 414-1 414-2

Name and Address:
Rudy Navarro
4936 N. Vassher St. Tacoma, Wa. 98407

RESPONSE TO COMMENT
COMMENTOR NO. 414: NAVARRO, RUDY

Response to Comment No. 414-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

All shipments of radioactive material are tightly regulated. Internationally the International Atomic Energy Agency (part of the United Nations) and the International Maritime Organization regulate such shipments. In the United States, the U.S. Department of Transportation, DOE, and the NRC all have regulations and rules that apply to these shipments. Section 5 of the EIS presents a detailed description of the applicable laws, regulations and other requirements.

The Port of Seattle is not among the ten candidate ports listed in Section 2.2.1.6 of the EIS; however, the Port of Tacoma is a candidate port (Appendix D, Section D.1.9 of the EIS) which could receive foreign research reactor spent nuclear fuel under Management Alternative 1 or 3.

Response to Comment No. 414-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). This policy is being developed to encourage peaceful applications of nuclear technology, while opposing the spread of nuclear weaponry. Prior to 1989, it was the policy of the United States to accept spent nuclear fuel containing uranium enriched in the United States (Section 1.1 of the EIS). Thus, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Thus, foreign research reactor operators are on notice that once the acceptance period expires, the United States would no longer accept foreign research reactor spent nuclear fuel.

COMMENTOR NO. 415: SCHMERTZ, CHRISTINE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

The Department of Energy is concerned about National Security risks and the benefits for the DOE in selecting Tacoma as a Port of Entry. There are no benefits, only risks to Tacoma and the whole Puget Sound region. The DOE has not carefully evaluated the specific risks of this choice - Puget Sound depth, high population and dense traffic. Furthermore, risks have not been dealt with 415-1

Name and Address: Christine Schmertz
4931 N. Visscher St.
Tacoma, WA 98407

fire, terrorist attacks, leaks, etc. and general exposure to radioactive materials. Can we spend money on research?

RESPONSE TO COMMENT
COMMENTOR NO. 415: SCHMERTZ, CHRISTINE

Response to Comment No. 415-1

The benefit to the citizens of the United States from the proposed action, including those in potential ports of entry, along transportation routes, or near potential management sites, is less risk that weapons grade uranium from civil programs could be diverted into the production of nuclear weapons that might be used against us or our allies. On the other hand, the analyses recorded in Section 4 of the EIS indicate that the risks from the proposed action would be low.

A sentence has been added to Appendix D, Section D.2.1.9 of the EIS regarding Commencement Bay being a Superfund Site. The analysis of impacts in Section 4 of the EIS demonstrates that there would be no significant adverse impacts on the ports, people, or natural environment from shipments of foreign research reactor spent nuclear fuel and the overall impacts to Commencement Bay would be unchanged by the various management alternatives.

The population in close proximity to the terminal as well as those as far away as 50 miles, was considered when the effects of possible accidents were calculated (Appendix D, Section D.5 of the EIS). These calculations demonstrate that the risk from accidents to all individuals is low. Likewise, the incident-free radiation exposure to people nearer to the cask than those living outside the fence around the port was calculated and found to pose no significant risk (Section 4.2.3.2 of the EIS). The dose rate at 100 feet from a cask containing foreign research reactor spent nuclear fuel is essentially zero. For these reasons, the close-in population near the Port of Tacoma would not be subjected to any significant risk from the use of the terminal to accept foreign research reactor spent nuclear fuel.

Appendix D, Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Appendix D, Section D.5.4 of the EIS. The analysis indicates that even in the event of a severe ship fire, neither the consequences nor risks were found to be great (Appendix D, Section D.5.5). Although the nonradiological effects of such a catastrophic accident would obviously impact the local environment, no additional impacts are predicted due to the presence of foreign research reactor spent nuclear fuel.

The analysis of the consequences and risk associated with an accident in port involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS) and that the risk associated with accidents in port for the entire proposed action, was low (Section 4.2.2.3 of the EIS). Likewise the consequences and risks associated with marine transport were found to be low (Section 4.2.1.3 of the EIS).

COMMENTOR NO. 415: SCHMERTZ, CHRISTINE (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 415: SCHMERTZ, CHRISTINE (CONT'D.)

Section D.5.9 has been added to Appendix D of the EIS to address terrorism and sabotage. This section concludes that, while certain terrorist and sabotage attempts cannot be precluded, theft would be. DOE considers that the foreign research reactor spent nuclear fuel can safely be transported to the management sites, if the foreign research reactor spent nuclear fuel is accepted into the United States. The security measures employed would meet or exceed all the security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. DOE supports these regulations as being adequate to protect the foreign research reactor spent nuclear fuel.

Appendix H has been added to the final EIS in response to public comments, to better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

COMMENTOR NO. 416: REYNOLDS, ROB

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

416-1 No one wants "spent nuclear fuel" to be handled in their community, especially since the Tacoma port is extremely busy and there is a large urban community around + through which the fuel will be unloaded and rehandled. There are always "accidents" even though reasonable caution is used. We have only to look at the history of the nuclear fuel industry to see the truth of this. These nuclear waste products need to be disposed of in a less densely populated area.

Name and Address: Rob Reynolds
2822 N. Union
Tacoma, WA 98407

RESPONSE TO COMMENT
COMMENTOR NO. 416: REYNOLDS, ROB

Response to Comment No. 416-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with xbringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 417: TUROSIK, LEONA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

We do not need the Nuclear Waste going thru Tacoma and surrounding cities. 417-1

This material should be handled by the Military through the United States Government. that have qualified personnel to handle nuclear waste. 417-2

Name and Address: Leona Turosik
9116 Portland Ave E
Tacoma Wa 98445

RESPONSE TO COMMENT
COMMENTOR NO. 417: TUROSIK, LEONA

Response to Comment No. 417-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 417-2

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without the additional security that might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all of the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ports is noted.

COMMENTOR NO. 418: DAM, NATALIE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think it would be a detriment to our city and affect our property values adversely, especially on the East side. It makes a lot more sense to me to store it in some remote area, like Liberia, and have an international monitoring team. 418-1 418-2

Name and Address: Natalie Dam
1818 E. 30th
Tacoma, WA 98404

RESPONSE TO COMMENT
COMMENTOR NO. 418: DAM, NATALIE

Response to Comment No. 418-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 418-2

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

COMMENTOR NO. 419: PEDERSEN, MARY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think that it is dangerous and the people of Tacoma should not have to put up with it. It would not be safe in any container. If a earthquake should happen, there would never be an end to problems. And the citizens of Tacoma Port need that I am against any of it, to be transported here.

Name and Address:

MARY PEDERSEN
3315 No 35th
Tacoma, Washington 98467

419-1

RESPONSE TO COMMENT
COMMENTOR NO. 419: PEDERSEN, MARY

Response to Comment No. 419-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 420: RIPPLE, GOLEN

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

The port of Tacoma security is very undereoupted to handle nuclear waste, in the event of any Terrorist activity

Name and Address: Golen Ripple
728 Broadway
Tacoma Wa 98402

420-1

RESPONSE TO COMMENT
COMMENTOR NO. 420: RIPPLE, GOLEN

Response to Comment No. 420-1

The commentor's concern regarding port security is noted. DOE considers that the foreign research reactor spent nuclear fuel could safely be received at commercial ports including the Port of Tacoma, without additional security. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all of the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security.

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures can greatly reduce the risk of such actions. Security would be provided for all shipments of foreign research reactor spent nuclear fuel, as required by the Code of Federal Regulations (10 CFR Part 73). The security provisions are summarized in the new Appendix H that has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify the details of the transportation process, including security provisions in port and during transit.

COMMENTOR NO. 421: BATES, SONNIE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I am opposed to the possibility.
As a business owner near the port, a parent
and concerned citizen I know the possibility
of human error or evil intent is too great
to be in favor of transport of such waste except
directly to waste storage - air seems preferable,
at sites specifically protected & designed protected
by safeguards an ordinary port like
ours does not have.

Name and Address: Sonnie Bates 2510 McKinley Ave E
Tacoma Wa 98404

421-1

RESPONSE TO COMMENT
COMMENTOR NO. 421: BATES, SONNIE

Response to Comment No. 421-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 422: ROBERTS, LAURA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I feel that this area is too heavily populated for the risk. There should be facilities that have special training in dealing with this type of transfer that would be more appropriate. 422-1

Name and Address: Laura Roberts
17805 84th Ave. East
Puyallup, WA 98373

RESPONSE TO COMMENT
COMMENTOR NO. 422: ROBERTS, LAURA

Response to Comment No. 422-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 423: HARRIS, DIANE & ROBERT

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Not now, not ever! Tacoma and surrounding communities are a part of a very populated corridor which is growing by leaps & bounds. There is no assurance that a nuclear accident will not happen and such an accident would have horrendous consequences. We are adamantly opposed 423-1

Name and Address:
Diane & Robert Harris
23116 - 46th Ave. E.
Spanaway, WA 98387-6118

RESPONSE TO COMMENT
COMMENTOR NO. 423: HARRIS, DIANE & ROBERT

Response to Comment No. 423-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 424: ANDERSON, J.H.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Exceedingly opposed! 424-1

Name and Address: J. H. Anderson
7[illegible] Sacramento St. SW.
Tacoma, WA 98499

RESPONSE TO COMMENT
COMMENTOR NO. 424: ANDERSON, J.H.

Response to Comment No. 424-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 425: DUARTE, HANNAH

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I myself am only 14 years of age. And I know people wonder how I could have an opion on whats going on well I do. The fact is that what ever we decide on doing today is what myself and other people my age are gonna have to deal with (more on back.)

Name and Address: Hannah Duarte
4419 Elwood Dr. W.
Tacoma Wa, 98466

in the future. The "grown-ups" of these days should be focusing on how this is gonna affect the kids in the future. I do know that the shipping / handeling of nuclear waste of any kind is very messy & dangerous job. All I want to know is why take the chance to ruin our beautiful state. There are always possiabilities of any thing happening. 425-1

RESPONSE TO COMMENT
COMMENTOR NO. 425: DUARTE, HANNAH

Response to Comment No. 425-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 426: HEALEY, BARBARA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

As a 3rd generation, registered voter and tax payer, I am fully opposed to any nuclear waste coming through Tacoma or through our state. There can be no guarantee of safety from accidents - hundreds of lives will be lost. We don't need this added to our environment 426-1

Name and Address: Barbara Healey
6822 84th St. SW.
Tacoma, Wa. 98498

more on other side

As a member of Edgewood Grange, Pierce County Grange, Washington State Grange and United States National Grange - I feel I can speak as a representative of several hundred Grangers who will be opposed to nuclear waste entering any port or coming into our state. We love our country - let's NOT make it a world wide dumping ground.

B. Healey

Send me petition, I'll get them up

RESPONSE TO COMMENT
COMMENTOR NO. 426: HEALEY, BARBARA

Response to Comment No. 426-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 427: CLAYTON, P. MARC

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I do not feel nuclear waste should come through our area because of the high risk on the waters of Puget Sound, the remote mountain areas as well as the plains of Eastern Washington. Puget Sound and the highways (particularly the highways) are ~~a~~ dangerous passages that provide high risk for accident and exposure. Rail transportation is risky because of the frequent delays and generally ~~the~~ low maintenance of the tracks. There are too many ~~and~~ derailments to risk transporting this material now.

427-1

427-2

427-3

Name and Address: P. Marc Clayton
115 McKenzie Ct. Apt A
Enumclaw, WA
98022

RESPONSE TO COMMENT
COMMENTOR NO. 427: CLAYTON, P. MARC

Response to Comment No. 427-1

The commentor's opposition to the use of the Port of Tacoma for receipt of foreign research reactor spent nuclear fuel is noted. However, the analysis in the EIS indicates that the risks associated with an accident at the port are low (Sections 4.2.2.3 and 4.5) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel at the port are also low (Section 4.2.2.2), and would pose no significant risk to port personnel, the local population, or the environment.

Response to Comment No. 427-2

The commentor's view that transport of the foreign research reactor spent nuclear fuel through Puget Sound and on the highways would be dangerous is noted. Sections 4.2.1 and 4.2.3 of the EIS, however, demonstrate that the risks would be low.

Response to Comment No. 427-3

The commentor's view that transport of the foreign research reactor spent nuclear fuel by rail would also be dangerous is noted. Section 4.2.3 of the EIS, however, demonstrates that the risks would likewise be low.

COMMENTOR NO. 428: KELLY, M.L.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

A poorly conceived idea that has no place in any one's backyard! The minimalization of a threat is good enough 428-1
If there is ANY hint of threat, our government should not jeopardize the welfare of any segment of our population. It is such strange foolishness to bring in a

Name and Address:
M. L. Kelly
811 N Sheridan
Tacoma WA 98403-1419

strangers spent fuel when we've yet to embrace a safe policy for the storage of spent fuel generated in our own country

RESPONSE TO COMMENT
COMMENTOR NO. 428: KELLY, M.L.

Response to Comment No. 428-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

The impacts of ultimate disposition of spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed quantitative discussion of these impacts would have to be the subject of future NEPA documentation.

COMMENTOR NO. 429: KELLER, BEVERLY

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

As a mother of two small children, I worry about what every mother worries about. But now I am being told that spent nuclear fuel will be coming by my home and children. This to me is my worst nightmare. I may be ignorant to all the facts about transporting it but all it takes is one accident and it could be my children, my home that is affected for the next 30,000 years. I think the communities will not benefit from this. This to me is a human issue. We need to stop making such dangerous products! Humanity first!! People don't need it!

over →

Name and Address: Beverly Keller
21721 130th ST. E
Sumner, WA. 98390

429-1

RESPONSE TO COMMENT
COMMENTOR NO. 429: KELLER, BEVERLY

Response to Comment No. 429-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 430: LUND, STEPHANIE

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

I think that the dEIS does not do a complete job assessing the nuclear waste issue. Tacoma is not properly staffed, equipt, + educated to deal with nuclear waste. Where would funding come from to ensure proper training, storage, and security measures. Commencement Bay is one of the most polluted hazardous waste/Superfund sites in the U.S. Shipments of nuclear fuel would further degrade → 430-1

Name and Address: Stephanie Lund 14905 262nd Ave SE
Issaquah, WA 98024

-devastated landscape.

RESPONSE TO COMMENT
COMMENTOR NO. 430: LUND, STEPHANIE

Response to Comment No. 430-1

DOE considers that the port selection criteria identify ports that could safely handle foreign research reactor spent nuclear fuel. DOE further considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3 of the EIS) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2 of the EIS).

Funding for training, security, and storage is not necessary. Spent nuclear fuel from foreign research reactors would be shipped in standard ISO containers, and would not require special training of workers (Section 2.6.3.2.2 of the EIS); experience handling of ISO containers is all that is necessary. The security provided for the spent nuclear fuel shipments is required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or Management Alternative 3), there would be no storage of this material in the Port of Tacoma, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

Shipment of foreign research reactor spent nuclear fuel would not jeopardize the significant cleanup effort undertaken in the area of Commencement Bay and the Port of Tacoma as noted by the commentor. The analysis in the EIS indicates that there would be no significant adverse impacts to any of the ports or bays, or the quality of water or air (Section 4.2.1.1 and Appendix C, Section C.2 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. Based on over 30 years of experience shipping spent nuclear fuel, DOE considers that transportation casks passing through the Port of Tacoma, Commencement Bay, or any other port or waterway would not affect air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

COMMENTOR NO. 431: WILHITE, MELODY R.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

This is A ludicrious Plan! Instead of Spending the money involved - put it into Perfecting MIT's Glassification and Helping the Countries that produce the waste develop ways of Dealing with their own Waste - for the most part these are not Countries that pose a risk 431-1

Name and Address:

Melody R. Wilhite
4307 So 30th Ave #1
Everett, WA 98203 431-2

and if we take their garbage what is the motivation to change their Practices?

Please use some sense and Solve the Problem!
Lets Quit Playing "musical" waste!

RESPONSE TO COMMENT
COMMENTOR NO. 431: WILHITE, MELODY R.

Response to Comment No. 431-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 431-2

DOE is funding efforts to perfect waste classification technologies, but these are outside the scope of this EIS.

The commentor's preference for Management Alternative 2 is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

As discussed in the EIS, with the exception of Implementation Subalternative 2b to Management Alternative 1, none of the management alternatives would involve accepting foreign research reactor spent nuclear fuel indefinitely. At the end of the policy period, each nation that operates research reactors would be responsible for its own nuclear waste disposal. Thus, the foreign research reactor operators would have a motivation to change their practices under any of the alternatives.

Commentor No. 432: Ryan, Poukie

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE'S EIS DOES NOT TAKE INTO ACCOUNT THAT THE PUGET SOUND HAS 2000 COSTAL MILES INLAND AND IS ADJACENT TO SEVERAL LARGE AND HIGHLY POPULATED CITIES, SEATTLE, EVERETT, BREMERTON, VANCOUVER B.C. MGMNT ALT #2 IS THE ONLY SOLUTION THAT SHOULD BE CONSIDERED.

432-1

432-2

Name and Address: POUKIE RYAN
3535 55TH AVENUE
TACOMA WA 98422-3123

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE EIS DOES NOT ADEQUATELY ADDRESS SECURITY OF HEU DURING TRANSPORTATION AND SHIPMENT.

432-3

Name and Address: POUKIE RYAN
3535 55TH AVE NE
TACOMA WA 98422

Response to Comment
Commentor No. 432: Ryan, Poukie

Response to Comment No. 432-1

The fact that Puget Sound has an extensive inland shoreline is not relevant to the acceptance of foreign research reactor spent nuclear fuel. The spent nuclear fuel that might be brought into the United States through the Port of Tacoma is a solid metal, shipped in a dry cask, thus there is no spill potential to impact the shoreline.

In evaluating the impact of accidents, the EIS considered the population included in a 50-mile radius around the Port of Tacoma, and around the shipping channel at its nearest point to Seattle. The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel through the Puget Sound to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. Also, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS).

Response to Comment No. 432-2

The commentor's preference for Management Alternative 2, Subalternative 1a is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

Response to Comment No. 432-3

Appendix H has been added to the final EIS in response to public comments, to better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

COMMENTOR NO. 432: RYAN, POUKIE (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE EIS DOES NOT ADEQUATELY CONSIDER EXPOSURE TIME OF LONGSHOREMAN WORKING IN THE VICINITY OF THE CASKS 432-4

Name and Address: POUKIE RYAN
3535 55TH AVE NE
TACOMA WA 98422

RESPONSE TO COMMENT
COMMENTOR NO. 432: RYAN, POUKIE (CONT'D.)

Response to Comment No. 432-4

There is a maximum allowable radiation dose rate of 200 mrem per hour, however, this limit is on the dose rate at the surface of the transportation cask, which would be inside of the container. The maximum radiation dose rate limit of interest to those that would be near the container, such as longshoremen, is 20 mrem per hour at a distance of 2 meters from the surface of the container (both dose rate limits come from regulation 49 CFR Part 173). The actual total dose that a longshoreman would get handling a cask is quite small due to the fact that the person is not at the surface of the container for long and the total time near the cask is quite short. Appendix D, Section D.4.3.2.1 of the EIS provides the time/distance analysis of cask handling, Appendix D, Section D.4.5 presents the resulting doses and risks, and Appendix F, Section F.5 presents an evaluation of the dose rates from a transportation cask containing research reactor spent nuclear fuel. The maximum allowable exposure for port workers would be 200 mrem per year, the same radiation dose limit established by the NRC to protect individual members of the public (Section 4.2.2.2 of the EIS). As the EIS demonstrates, both the dose and dose rate for the port workers would be low.

COMMENTOR NO. 433: RYAN, LAURA

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

YOUR EIS DOES NOT CONSIDER POPULATION AREAS WHEN HEU IS SHIPPED BY RAIL OR SEA. THE PORT OF TACOMA IS LOCATED 10 HOURS BY SEA (PUGET SOUND) FROM OPEN WATER (CAPE FLATTERY) THE VESSELS WOULD HAVE TO PASS MANY HIGHLY POPULATED AREAS IE SEATTLE, ~~TA~~ BREMERTON, TACOMA, EVERETT

Name and Address: LAURA RYAN NETACOMA HOMEOWNER
3535 55TH AVE NE
TACOMA WA 98422-3123

433-1

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOES EIS DOES NOT ADEQUATELY ADDRESS THE MANAGEMENT ALT #2. BUT IT IS CLEAR THAT THIS MANAGEMENT ALT 2 IS THE MOST ECONOMICAL CHOICE.

Name and Address: LAURA RYAN
3535 55TH AVE NE
TACOMA WA 98422

433-2

RESPONSE TO COMMENT
COMMENTOR NO. 433: RYAN, LAURA

Response to Comment No. 433-1

The port selection process that determined that the Port of Tacoma was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS provides an explanation of the "population" criterion. The passage through Puget Sound meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items of importance include population along the route to the management site, port experience with handling containers, and port facilities. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

Rail transport is discussed in Appendix E and Section 4.2.3 of the EIS, and the populations along the rail routes have been taken into account. In all cases, the risks were found to be low.

Response to Comment No. 433-2

Management Alternative 2 is discussed in Sections 2.3 and 4.4 of the EIS. Since the commentor did not mention any specific inadequacy in the analysis, DOE cannot respond in specific terms.

COMMENTOR NO. 434: RYAN, RICHARD P.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

HOW WILL THE DOE QUALIFY LOCAL GOV'TS TO RESPOND TO HAZARDOUS SPILLS INCLUDING ALL COMMUNITIES ALONG THEIR TRANSPORTATION ROUTES, CONCERNS. 434-1

Name and Address: RICHARD P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

ANY VESSELS SHIPPING HERE SHOULD BE U.S. FLAG CARRIERS, CERTIFIED UNDER U.S.C.G. BY U.S. MERCHANT MARINE OFFICERS 434-2

Name and Address: RICHARD P RYAN
3535 55TH AVE NE
TACOMA WA 98422-7123

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P.

Response to Comment No. 434-1

As discussed in Section 2.7.3.2 of the EIS, DOE provides funding to States and Tribes through the Office of Environmental Management and the Office of Civilian Radioactive Waste Management to assist with transportation related issues. This funding has been used in the past to enhance a jurisdiction's emergency management and response capabilities. Besides funding, much of DOE's assistance is provided in the form of technical assistance, for which DOE bears the cost. Assistance may be provided through DOE's Radiological Assistance Program and under the National Contingency Plan, as well as through training, DOE sponsored meetings, informal discussions, and informational materials.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provision include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

Response to Comment No. 434-2

If foreign research reactor spent nuclear fuel is accepted into the United States, the responsibility for arranging the shipping would be in the hands of the shippers of the material, that is, the operators of the foreign research reactors. Therefore, the selection of the carrier, U.S. flag ship or otherwise, would be the responsibility of the current owners of the foreign research reactor spent nuclear fuel. However, DOE could and would require in the contract with the foreign research reactor operators, that only well-equipped, well-maintained ships be used. This cannot guarantee the use of U.S. flag vessels, but it would ensure the safety of the foreign research reactor spent nuclear fuel, which is the primary concern. It should also be pointed out that any ship entering U.S. territorial waters must meet U.S. safety regulations, which ensures that any ship carrying foreign research reactor spent nuclear fuel meets the minimum U.S. safety requirements.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

COUNTRIES INVOLVED IN THE USE OF HEU SHOULD BE HELD ACCOUNTABLE FOR THE SAFE STORAGE OF THE SPENT FUEL. THESE COUNTRIES WILLINGLY ACCEPTED TO ENTER THE NUCLEAR AGE, WELL MAINTAINING THE SPENT FUEL IS A BY-PRODUCT OF THIS LUXURY. WE CAN NOT BE THEIR BABY SITTERS. LEAVE IT WHERE IT IS! 434-3

Name and Address: RICHARD RYAN NETACOMA HOMEOWNER
3535 55TH AVE NE
TACOMA WA 98422-3123

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE EIS DOESNOT ADDRESS CLEARLY THE PROCESS PORTS WHERE SELECTED. IF POPULATION IS A CONSIDERATION FOR THE VICINITY OF THE PORT - HOW CAN THE DOE STRESS THAT ~~THES~~ THESE SHIPMENTS ARE SAFE, IF IN FACT THEY ARE USING POPULATION CONSIDERATIONS. 434-4

Name and Address: RICHARD P. RYAN
3535 55TH AVE NE
TACOMA WA 98422-3123

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-3

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

Response to Comment No. 434-4

The port selection process is documented in Appendix D of the EIS. To evaluate and select acceptable ports of entry, the EIS developed five evaluation criteria which are discussed in Appendix D, Section D.1.9. One of the criteria (Criterion 5) evaluates the population in and around the port, and along the routes from the port to the management sites. Criterion 5 identifies ports that can safely handle foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9) with the least risk to populations near the port. By seeking to minimize the risk to populations surrounding the ports of entry, the analysis in the EIS further diminishes the low risks associated with an accident (Section 4.2.2.3). DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

FLAWS IN THE CASKS USED TO SHIP HERE WILL HAVE PROBLEMS HANDLING DEPTHS AS LOW AS 50'. AND ARE NOT ADEQUATE FOR SHIPPING THROUGH THE PUGET SOUND. 434-5

Name and Address: R.P. RYAN
3535 58TH AVE NE
TACOMA WA 98422-3123

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE SHOULD WORK WITH THE 42 NATIONS THAT ARE INVOLVED TO DEVELOP A PROGRAM WHERE ALL INVOLVED SHOULD CONTRIBUTE TO THE SOLUTION. NOT JUST THE USA! 434-6

Name and Address: R.P. RYAN
3535 58TH AVE NE
TACOMA WA 98422

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-5

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. After construction, every transportation cask is radiographed to ensure that no significant flaws exist. Transportation casks for spent nuclear fuel transport within the United States are designed, fabricated, and maintained under NRC requirements found in 10 CFR Part 71 (Appendix B, Section B.2.1.3 of the EIS). Under these requirements, spent nuclear fuel transportation casks must be able to withstand a series of accident conditions, including water immersion in 50 feet of water for eight hours. Transportation casks have demonstrated their ability to maintain integrity at much greater depths (Section 4.2.1.3 of the EIS)

In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in any U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1000 feet). Appendix C, Section C.5.5 of the EIS presents information on the probability of a cask sinking in coastal and deep ocean waters.

Response to Comment No. 434-6

The EIS evaluates the potential for implementing the proposed action overseas (Management Alternative 2, Section 2.3 of the EIS). It is unrealistic, however, to assume that all 41 foreign countries are capable of managing this spent nuclear fuel without risks to our national security and United States nuclear weapons nonproliferation policy.

Sections 2.2.1.2 and 2.2.2.3 of the EIS provide evaluations of several alternatives for financing the proposed action. These alternatives cover the range of options from having the United States pay all costs to having foreign countries pay all costs.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

TRANSPORTATION SAFETY VIA RAIL OR HIGHWAY HAS NOT BEEN ADEQUATELY RESEARCHED IN THE DOE EIS. 434-7

Name and Address: RICHARD P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE SHOULD LEAVE THE HELL IN PLACE AND TRAIN SPECIAL FORCES TO RETRACT THE FUELS IN THE EVENT OF THREAT BY HOSTILE NATIONS. 434-8

Name and Address: R. P. RYAN
3535 55TH AVE NE
TACOMA WA 98422-3123

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-7

Ground transport risks are discussed in Section 4.2.3 and Appendix E of the EIS. Since the commentor did not mention any specific inadequacy in the analysis, DOE cannot respond in specific terms.

Response to Comment No. 434-8

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

PLEASE LEAVE THE HEU ON SIGHT OVERSEAS.

434-8 (Cont'd.)

Name and Address: RICHARD P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE MAJORITY OF THE COUNTRIES THAT HEU WILL BE SHIPPED FROM ARE NON-HOSTILE. THREATS OF HEU IN THESE COUNTRIES IS LOW. IT SHOULD REMAIN IN THESE COUNTRIES UNTIL A TIME WHEN THEIR STATUS CHANGE.

434-9

Name and Address: R. P. RYAN
3535 55TH AVE NE
TACOMA WA 98422-3123

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-9

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). If the United States does not include its stable, developed allies in this program, then many of the research reactors in these countries are likely to switch back to (or continue) the use of HEU as fuel, or they would have to shut down.

As stated in the EIS, the U.S. has an obligation under the Treaty on the Non-Proliferation of Nuclear Weapons (NPT) to assist nonnuclear weapons states with peaceful applications of nuclear energy. Actions which compel a country to shut down a peaceful nuclear research program, or to seek reprocessing, could cast doubt on U.S. commitment to NPT principles. Any perception that the U.S. does not support the NPT, which is the foundation of the entire international nuclear nonproliferation regime, would make it that much harder to negotiate further nuclear nonproliferation agreements.

If the research reactors are forced to shut down, the United States is likely to be accused, rightly or wrongly, of failing to live up to its obligations under the Treaty on the Non-Proliferation of Nuclear Weapons to assist nonnuclear weapons states with peaceful applications of nuclear technology.

If the reactors switch back to (or continue) the use of HEU as fuel, the move towards elimination of the civil use of HEU will be severely diminished.

While it is true that these countries do not pose a threat of nuclear weapons proliferation themselves, they serve as examples for other countries. Furthermore, several of them manufacture and sell research reactors to other countries, including third world countries. If our stable allies continue to use HEU as fuel for their research reactors, then the countries which buy reactors from them will demand reactors fueled in the same manner.

Finally, the United States is currently attempting to persuade Russia and China to implement programs, similar to that of the United States, to convince their client states to switch their research reactors to LEU. If, through action or inaction, the United States is unable to persuade its allies to discontinue the use of HEU as fuel, then the U.S. would be unlikely to convince Russia and China to cooperate in this effort.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

DOE'S METHOD OF SELF REGULATION IS NOT AN EFFECTIVE MANAGEMENT PROCESS WHEN NUCLEAR SAFETY IS TO BE CONSIDERED. THE DOE WILL NOT ACT AS AN EFFECTIVE WATCH DOG TO REPORT THEM ON PAST TRANSGRESSIONS ON REPORT. 434-10

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE'S EIS DOES NOT REPORT RADIATION EXPOSURE ADEQUATELY. BUT USES WATERED DOWN POPULATION RISKS 434-11

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-10

DOE is a self regulating agency as established by the Atomic Energy Act of 1954, as amended (Section 5.3 of the EIS). DOE must comply with the same regulations as the public, unless specifically excluded. With respect to receipt, transport and management of foreign research reactor spent nuclear fuel, various NRC and U.S. Department of Transportation regulations would apply to these activities.

Response to Comment No. 434-11

DOE's estimates of radiation exposure are presented throughout Section 4 of the EIS. Since the commentor did not mention any specific inadequacy in the analysis, DOE cannot respond in specific terms.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE'S EIS DOES NOT ADEQUATELY ADDRESS LONGSHOREMAN EXPOSURE TO HLW CASKS. THE MANAGEMENT OPTIONS WOULD NOT REQUIRE FURTHER INVESTIGATION OF EXPOSURE

434-12

Name and Address: R. P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE'S EIS DOES NOT TAKE INTO CONSIDERATION IF A SPILL OCCURES IN PUGET SOUND, THE TIDAL MOVEMENT WOULD TAKE MUCH LONGER TO DISPERSE THE NUCLEAR CONTAMINATION.

434-13

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422-5223

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-12

The potential environmental impacts (including radiation exposure) to port workers is discussed in Section 4 of the EIS. Although the foreign research reactor spent nuclear fuel is radioactive material, the dose rates from the transportation casks would be low. Appendix D, Section D.4 of the EIS demonstrates that the radiation dose that anyone would receive handling or being near a cask is less than the limit that is allowed to the public in an unrestricted area by NRC regulations (10 CFR Part 20). As discussed in Section 4.2.2.5 of the EIS, to avoid radiation doses which may exceed public dose limits, DOE would establish administrative procedures and maintain records to track individual exposures. Otherwise, no special handling or loading/unloading procedures would be required for the foreign research reactor spent nuclear fuel when it is contained in standard shipping containers.

Response to Comment No. 434-13

The EIS did not address marine spills in Puget Sound or elsewhere because the metal fuel is transported dry inside a transportation cask, so there is nothing to spill. However, the maximum impacts of a sunken cask, both recovered and unrecovered, are evaluated in Section 4.2.1.3 of the EIS. Should an accident occur in Puget Sound that resulted in a cask, containing foreign research reactor spent nuclear fuel, sinking in U.S. coastal waters it would be recovered, regardless of depth, including Puget Sound, which reaches 305 meters (1000 feet) in depth.

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radiative contents have ever been released from a transportation cask, nor has a transportation cask ever been punctured, even as a result of an accident.

COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

THE DOE'S EIS DOES NOT PROPERLY ADDRESS SECURITY OF HEU SHIPMENTS. SECURITY IS A KEY ISSUE IN THE HEU SHIPMENTS. COMMERCIAL PORTS SHOULD BE REMOVED FROM THE TOP TEN LIST AND SUBSTITUTED WITH MILITARY CONTROLLED PORTS. 434-14 434-15

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422.

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

MANAGEMENT ACT #1 ONLY COVERS A PERIOD OF 40 YEARS. WHAT HAPPENS THEN? DOES THE PROCESS BEGIN AGAIN. STOP WHILE YOU'RE AHEAD CHOOSE ACT #2 434-16

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422-3123

RESPONSE TO COMMENT
COMMENTOR NO. 434: RYAN, RICHARD P. (CONT'D.)

Response to Comment No. 434-14

The commentor's concern regarding port security is noted. The security provided for the foreign research reactor spent nuclear fuel shipments would be required to meet or exceed all of the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. The general security provisions are provided in the new Appendix H that has been added to the final EIS. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify details of the transportation process, including security provisions in port and during transit.

Response to Comment No. 434-15

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security that might be present at military bases. The analyses of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, demonstrate that commercial ports and facilities represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation).

Response to Comment No. 434-16

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons nonproliferation policy requires DOE and the Department of State to consider other means of dealing with the foreign research reactor spent nuclear fuel (Section 1.1. of the EIS). As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

TACOMA IS A SUPERFUND PORT AND SHOULD BE TAKEN OFF OF THE ~~40~~ TOP TEN PORT LIST.

434-17

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

MANAGEMENT ALT #2 IS THE ONLY CLEAR CHOICE, BUT THE EIS DOES NOT GO INTO ANY DETAIL OF THIS PROGRAM. THIS I BELIEVE ~~[illegible]~~ MAKES THIS EIS OBSOLETE.

434-18

Name and Address: R.P. RYAN
3535 55TH AVE NE
TACOMA WA 98422

Response to Comment No. 434-17

A sentence has been added to Appendix D, Section D.2.1.9 of the EIS regarding Commencement Bay being a Superfund Site. The analysis of impacts in Section 4.2.2 of the EIS demonstrates that there would be no significant adverse impacts on the ports, people, or natural environment from shipments of foreign research reactor spent nuclear fuel and the overall impacts to Commencement Bay would be unchanged by the various management alternatives.

Response to Comment No. 434-18

The commentor's preference for Management Alternative 2 is noted. The commentor is correct that the EIS does not contain detailed, comprehensive analyses of the environmental impacts of Management Alternative 2. Most of the impacts under this alternative would occur overseas, so they are outside the scope of this EIS. The EIS does present the potential impacts of this alternative within the United States in Section 4.4.

COMMENTOR NO. 435: BENOY, BOB

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

Act. It is the only Way 435-1

Name and Address:
Bob Benoy
670 Fir Park Ln.
Fircrest, Wa. 98466

RESPONSE TO COMMENT
COMMENTOR NO. 435: BENOY, BOB

Response to Comment No. 435-1

The commentor's preference for the alternative of overseas management is noted. This is Management Alternative 2, which is discussed in Sections 2.3 and 4.4. of the EIS.

COMMENTOR NO. 436: ANONYMOUS

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

No to Nuclear ~~waste~~ wastes being shipped through Tacoma. 436-1

The government can not protect these shipments from acts of terrorism ~~[illegible]~~ such as happened in Oklahoma 436-2

Name and Address: An

RESPONSE TO COMMENT
COMMENTOR NO. 436: ANONYMOUS

Response to Comment No. 436-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 436-2

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures greatly reduce the risk. All shipments of foreign research reactor spent nuclear fuel would be conducted meeting or exceeding all the security requirements in the Code of Federal Regulations (10 CFR Part 73). To better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel, Appendix H has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site. In addition, Section 2.8 has been added in the EIS to address security measures.

COMMENTOR NO. 437: ANONYMOUS

Tell the Department of Energy what you think about nuclear waste coming through Tacoma.

There are other countries that have facilities to deal with this type of hazardous better than we can - such as France - there are also military facilities such as North Carolina that can deal with this much better than we can - they are trained in these matters. Look at all the illness Hanford has caused + the tests they did without people knowing of. 437-1 437-2 437-3

Name and Address:

RESPONSE TO COMMENT
COMMENTOR NO. 437: ANONYMOUS

Response to Comment No. 437-1

The commentor's preference for the overseas management alternative is noted. This is Management Alternative 2, which is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 437-2

The commentor's preference to use military ports to receive foreign research reactor spent nuclear fuel for safety and security reasons is noted. Safety was one of the main considerations in developing the port selection criteria (Appendix D, Section D.1.9) of the EIS, so that any port selected by these criteria would be able to safely receive the foreign research reactor spent nuclear fuel. Spent nuclear fuel from foreign research reactors would be shipped in standard ISO containers, and would not require special training of workers (Section 2.6.3.2.2 of the EIS); experience in handling of ISO containers, is all that is necessary.

Response to Comment No. 437-3

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 438: ELLIOTT, MRS. ELEANOR

1809 Pillar Rock Road
Rosburg, Wa - 98643
June 14/95

Dear Mr Head:

I am writing to urge you to please do all that you can to prevent the importation of nuclear waste from foreign countries. 438-1

I live on the bank of the Columbia River and there is a very high incidence of cancer in this area. My daughter and my son died have it.

There is so much pollution in our country it seems a shame to import more.

Please do what you can to protect us.

Yours sincerely,
(Mrs) Eleanor Elliott

RESPONSE TO COMMENT
COMMENTOR NO. 438: ELLIOTT, MRS. ELEANOR

Response to Comment No. 438-1

The commentor's opposition to accepting foreign research reactor spent nuclear fuel into the United States is noted. Section 2.3 of the EIS describes other alternatives under consideration.

COMMENTOR NO. 441: EASTWOOD, SUSAN D.

Susan Drummond Eastwood
152 3rd Avenue S., #101
Edmonds, WA 98020
206-517-4048

June 19, 1995

U.S. Department of Energy
Patrick J. Wells
Office of Spent Fuel Management
1000 Independence Avenue SW
Washington D.C., 20585

RE: Prospective Nuclear Waste Transport Stations

Dear Mr. Wells,

Tacoma is not a good city to transport large amounts of nuclear waste through. Reasons against transport through Tacoma include:

1) Tacoma /Seattle area is long over due for a massive earthquake; occasional tremors are not uncommon. 441-1
2) The area has a large population base, which includes the Seattle area.
3) The Pacific Northwest is an area of active volcanos: Mount Rainier has a history of major mud flows every 500 years and Mt. St. Helens could be a potential problem.

I am concerned that federal laws governing notice upon people affected by this "significant" action have been breached. These include APA and NEPA. Notice in the Tacoma News Tribune alone does not constitute sufficient notice. This action has potentially disastrous effects upon all those who live in western Washington. As such, notice should be given in all major newspapers and through local television stations. 441-2

It also concerns me that the U.S. is willing to dispose of nuclear waste generated by other countries on its own soil. That country that chooses to partake in activity which results in nuclear waste brings upon itself a duty to dispose of the waste upon its own soil. It is not right to spread the contamination upon others. 441-3

I have been unable to attend the public hearings as I did not hear about them until there were only two meetings left. As a student on limited funds and work schedule I was unable to travel to Tacoma for these last two meetings.

Thank you for your time and attention to this matter.

Sincerely yours,

Susan D. Eastwood

RESPONSE TO COMMENT
COMMENTOR NO. 441: EASTWOOD, SUSAN D.

Response to Comment No. 441-1

All population within a 50-mile radius of the Port of Tacoma was considered when analyzing the impact of a range of hypothetical port accidents. The risks were found to be quite low (Section 4.2.2.3 of the EIS). Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

Response to Comment No. 441-2

DOE complied with NEPA and other applicable laws and regulations in advertising for the public hearings. Specifically, advertising included sending public service announcements to local radio stations and to local cable access television and placing advertisements in major newspapers in each of the meeting locations. Newspaper advertisements were published one week before each meeting and again one day before each meeting. Also in accordance with NEPA, announcements of the hearings were published in the Federal Register.

Response to Comment No. 441-3

The commentor's preference for overseas storage and disposal is noted. This is Management Alternative 2, which is discussed in Sections 2.3 and 4.4 of the EIS. As explained in Section 1.2 of the EIS, DOE and the Department of State have developed the proposed action as a means of supporting U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons grade) uranium in civil programs worldwide. This action is motivated by a desire to serve the interests of the U.S., not those of other countries (although they also benefit from a more stable world that is less likely to be the victim of a nuclear attack).

COMMENTOR NO. 447: CONCORD AREA CITIZENS

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca. 447-1

	Print Name	Signiture	Address	Zip
1.	Candice Johnston	Candice Johnston	1271 Apple Dr. Concord Ca.	94518
2.	Colette Taylor	Colette Taylor	1271 Apple Dr. Concord	94518
3.	Kenneth Taylor	Kenneth Taylor	1566 Glacier Dr. Concord	94521
4.	Jena Garcia	Jena Garcia	2544 Brazil Ct. Antioch, CA	94509
5.	GELERINO G. BONASFRE	Gelerino G. Bonasfre	20 COVINGTON DR. PITTSBURG, CA	94565
6.	Dori's Saeed	Dori's Saeed	1014 Power Pittsburg CA	9456
7.	Lucille Davis	Lucille Davis	53 LORRAINE AVE. Pittsburg	
8.	[illegible]	[illegible]	113 [illegible] St Clyde CA	94520 94565
9.	MYRIAM ESCARCEGA	Myriam Escarcega	2222 LynBrook DR	94565
10.	Rose J. Dale	ROSE J. DALE	36 BAY VIEW AVE BAY POINT	94
11.	[illegible]	[illegible]	2520 Forty Niner Way Antioch CA	945
12.	LOWELL CERVANTES	[illegible]	7605 MARIN AV. SAC.	95820
13.	Terry Dort	[illegible]	4884 Sunset Terr. Sacramento CA	
14.	Martha Gomez	Martha Gomez	1501 Monument Bl. Concord Ca	94520
15.	KATHRYN J. LAVNIK	Kathryn J. Lavnik	550 Patterson Blvd. Pleasant Hill	
16.	Angela Ramirez	Angela Ramirez	201 Patricia Ave. Pittsburg	94520
17.	Sonia C. Alido	171 Clipper Dr	Pittsburg CA	94565
18.	Marjorie Merz	M. Merz	405 Northampton Drive Ana	
19.	[illegible]	[illegible]	1500 Apple Drive CA	94518

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS

Response to Comment No. 447-1

Although the applicable NEPA regulations only require DOE to hold a single public hearing on a draft EIS, DOE held seventeen public hearings on the draft of this EIS, including one in the area of Concord NWS. In addition, several means were provided through which written comments could be provided on the draft EIS, and the acceptance period for written comments was extended from June 20 to July 20, 1995. Written comments are given the same weight as comments received during public hearings. As a result, DOE considers that an additional public hearing in the area of the Concord NWS is not required.

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy - Washington, DC.
Mr. Frank Coe and
Mr. Charles Head,

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Candice Johnston	Candice Johnston	1271 Apple Dr.	Concord Ca. 94518
2.	Colette Taylor	Colette Taylor	1271 Apple Dr.	Concord 94518
3.	Kenneth Taylor	Kenneth Taylor	1566 Glacier Dr.	Concord 94521
4.	Jena Garcia	Jena Garcia	2544 Braxis Ct.	Antioch, CA 94509
5.	GELERINO G. GONASFRE	[illegible]	30 COVINGTON DR.	PITTSBURG, CA 94565
6.	Dori's Saeed	Dori's Saeed	1014 Power	Pittsburg CA 9456
7.	Lucille Davis	Lucille Davis	53 LORRAINE AVE.	Pittsburg
8.	[illegible]	[illegible]	113 [illegible] ST	Clyde CA 94520 94565
9.	MYRIAM ESCORCEGA	[illegible]	2222 LYNBROOK DR	94565
10.	Rose J. Dale	ROSE J. DALE	36 BAY VIEW AVE	BAY POINT 9
11.	[illegible]	[illegible]	2520 Forty Niner Way	Antioch CA. 94
12.	LOWELL CERVANTES	[illegible]	7605 MARIN AV.	SAC. 95820
13.	Terry Dart	[illegible]	4884 Sunset Terr.	Sacramento CA
14.	Martha Gomez	[illegible]	1501 [illegible] Pl.	Concord Ca. 94523
15.	KATHRYN J. LAVNIN	Kathryn J. Lavnin	550 Patterson Blvd.	Pleasant Hill
16.	Angela Ramirez	[illegible]	20 Patricia Ave.	Pittsburg 94565
17.	Sonia C. Alido	171 Clipper Dr.	Pittsburg CA	94565.
18.	Marjorie Marz	[illegible]	405 Northampton	Drive Anc
19.	[illegible]	[illegible]	[illegible] Apple Drive	Ca 94518

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy - Washington D.C.
Mr Frank Coe and Mr. Charles Head

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signature's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	HEIDY BALDIZON	Heidy Baldizon	3337 BENNETT WY	Concord 94[illegible]
2.	ANA M. HEREDIA	Ana M. Heredia	110 nautilus pl pittsburg	
3.	CHESTER DALE	Chester Dale	36 Bay View Ave Bay Point Ca	94565
4.	Carol Del Prado	60 Lindsly Drive Antioch Ca		
5.	SHANNON DEL PRADO	Shannon Del Prado	36 BAYVIEW AVE BAY POINT CA	94565
6.	Elvira [illegible]		550 Patterson Blvd P.H.	94523
7.	JOSIE ESTIGOY	139 CYPRESS AVE. VALLEJO, CA.		94590
8.	Beatriz Somoza	Beatriz Somoza	1235 Quandt Rd Lafayette Ca	94549
9.	Silvia Lapitan	Shapitan	550 Patterson Blvd Pleasant Hill, Ca.	94523
10.	Paul Malte	Paul Malte	267 Santa Fe	94598
11.	Elfrieda K Malte	Elfrieda K Malte	267 Santa Fe	94598
12.	Angela Johnston	Angela Johnston	1271 Apple Dr Concord, CA	94518
13.	Mercedes Pilares	[illegible]	418 Templeway Vallejo	94591
14.	Catherine A. Beecher	Catherine A. Beecher	525 [illegible] Ct Concord Ca	94528
15.	Delma Hone	Delma Hone	15 Sunnyhill Way Pittsburg Ca	94565
16.	Gretchen Cruz	Gretchen Cruz	550 Patterson Blvd. P.H.	94523
17.	[illegible]		16711 Marsh Creek Rd #190 Clayton CA	94517
18.	Sheila Reed	3777 Willow Pass Rd #58 Bayport, CA.		94565
19.	Veronica MacLean	213 Patterson Blvd. P.H. Ca.		94523
20.	Charan Hyzee	1280 Apple Drive, Concord, CA		94518

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy
Washington D.C.

Mr. Frank Coe and Mr. Charles Head, May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signature's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Nuclear Waste to Concord, Ca.

	Print Name	Signature	Address	Zip
1.	James R Peterson	[illegible]	1300 Apple Dr Concord	94518
2.	[illegible]		834 [illegible]	94553
3.	Lance Keller	Lance Keller	780 Oak Grove Rd #C319	94518
4.	Karen Blank	Karen Blank	3024 11th St SE	94806
5.	Kenneth J Solari	[illegible]	1247 Krona	94520
6.	Tom Solari	Tom Solari	1247 Krona	94521
7.	MARIAN FRAZIER	M Frazier	1321 [illegible]	94518
8.	Joseph Dillus	Joseph Dillus	3693 San Michele Concord	94561
9.	Kathy Willis	Kathy Willis	31 Mori Ct Oakley	
10.	STEVE THOMPSON	[illegible]	635 SANTA BAY, OAKLAND	94610
11.	Marilyn Wong	[illegible]	348 SHEFFIELD PL. CONCORD	94518
12.	Nicole Lake	Nicole Lake	2601 CELAYA CIRCLE	94583
13.	Edward L Dauer		1856 Yolanda Cir Clayton	94517
14.	Natalya Silvanms		1990 Edgewood Ln Walnut Creek	94598
15.	Lillian [illegible]		239 Thomas Way Pittsburg Ca	94565
16.	[illegible]		1231 Apple Drive Concord,	94518
17.	[illegible]		" " "	"
18.	Ryan Schuetze		1655 LA BONITA WAY Concord	94519
19.	[illegible]		308 Meredith Ct. Clayton	94517
20.	Theresa Tsimos	Theresa Tsimos	3330 Sweet Dr. Lafayette	94549

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy - Washington, D.C.
Mr. Frank Coe and Mr. Charles Head,

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signature's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signature	Address	Zip
1.	Don Francis	Don Francis	550 Patterson Blvd	Pleasant Hill Ca 94523
2.	Jacqueline LaBrie	Jacqueline LaBrie	550 Patterson Blvd	Pleasant Hill, Ca.
3.	DANITZA COOKS	Danitza Cooks	"	"
4.	Joyce Cornill	Joyce Cornill	"	"
5.	Joann Mitchell	Joann Mitchell	"	"
6.	Janice Parker	Janice Parker	"	"
7.	Rita Boone	Rita Boone	"	" 94523
8.	EUGENIA F. BELTRAN	Eugenia F. Beltran	3434 CHANDLER CIRCLE BAY POINT, CA.	94565
9.	Lucy Aitana	290 Lexington Close P.H.		
10.	Carol Taylor	898 Liberty Dr., Concord		94518
11.	Valerie Thyne	1161 Peach St.	Concord CA	94518
12.	[illegible]	2330 Cassiopeia W.C.	CA	94598
13.	[illegible]	[illegible]	Pleasant Hill	94523
14.	Doris Dahl	DORIS DAHL	2261 HICKORY DR	CONC. 945
15.	Nancy Wolf	NANCY WOLF	193 Oak Park Lane	P.H. 945
16.	Clarence Wolf	CLARENCE WOLF	193 Oak Park Lane	P.H. 945
17.	Melanie Wilkinson	MELANIE WILKINSON	4041 Hirondelle	Concord 945
18.	Linda Brinkman	Linda Brinkman	#7 Plato Ct.	P.H. 945
19.	William Brinkman	William Brinkman	"	"
20.	Diana Peterson	Diana Peterson	1300 Apple Dr.	Concord 945

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy
Washington DC
Mr. Frank Coe & Mr. Charles Head, May 28, 1995

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We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signature's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Nuclear Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Desiree Dumas	[illegible]	2030 Walnut Shadows Ct.	94518
2.	[illegible]	[illegible]	[illegible] CIR	94519
3.	Lauren [illegible]	[illegible]	[illegible] Wisdom Lane	94596
4.	Nicholas Alvarez	[illegible]	[illegible] Willowood Ct	94521
5.	Tina Heffernan	Tina Heffernan	1340 Apple Dr Concord CA	94518
6.	[illegible]	1380 Apple Dr	Concord, CA	94518
7.	Barbara Mare	[illegible] Apple Dr	Concord CA	94518
8.	[illegible]	1411 Apple Dr	Concord	94518
9.	Martha Casaveda	1460 APPLE DR	CONCORD	94518
10.	Elizabeth K. Ferguson	1531 Apple Dr	Concord	94518
11.	Dale H. Ferguson	1531 Apple Dr	Concord	94518
12.	Raymond J. [illegible]	[illegible]	[illegible] CA	94565
13.	Camila J. Sayer	1917 Risdon Rd,	Concord, CA	94518
14.	[illegible]	1626 Bay [illegible] Cir	P.H. Ca.	94523
15.	Bob Mounsberg	2520 Ryan Rd #74	Concord	94518
16.	PATRICK TOM	2047 Morse Dr #70	P.H. Ca.	94523
17.	Lorena Miles	610 Azores Cir.	Bay Point, CA	94565
18.	Edita Lamott	Edita Lamott	1444 Creekside #3078	Walnut Creek 94596
19.	Alice Ebb	780 Oak Grove Rd		94518
20.	Nimrod Ebb	780 Oak Grove Rd		94518

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy - Washington D.C.
Frank Coe &
Mr Charles Head,

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to ~~Nuclear~~ Nuclear Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Deborah Baptiste	[illegible]	1715 Sixth St. Concord	94519
2.	Howard Hewitt	[illegible]	" " "	"
3.	Jennepher Barnes	[illegible]	2430 Erie Dr. Concord	94519
4.	[illegible]	[illegible]	942 Via Montgomery Concord	94520
5.	Mary E. Kunz	[illegible]	1039 Ridge Park Ct Concord	94520
6.	William O. Kunz	William O. Kunz	1039 Ridge Park Ct. Concord	94520
7.	Sara Shaffer	[illegible]	4650 Springwood Way Concord	94521
8.	Suzanne Perry Page	[illegible]	4650 Springwood Way Concord	94521
9.	Ben Rosenblitt	Dennis Rosenblitt	2331 River Park Dr. Concord	94522
10.	Graciela Guerrero-Reynoso	[illegible]	840 McElroy Court	94518
11.	Henry J Reynoso	[illegible]	840 McElroy Ct. Concord	94518
12.	Shawn H. Young	[illegible]	844 McElroy Ct Concord	94518
13.	Kathy Lafferty		1344 Sherwood Dr Concord	94520
14.	Marvin Rood	3024 Wildewood Dr. Concord		94518
15.	Peter Rood	3024 Wildewood Dr Concord		94518
16.	Tom Bridges	308 Meredith Ct	Clayton	94517
17.	Phyllis W. McAfee	1986 Marion Ct	Lafayette	94549
18.	Dennis Thomas	147 St. Germain	Pleasant Hill	94523
19.	Rian Schulze	1655 La Bonita	Concord	94519
20.	Zachary Itano	1889 Carlotta dr	Concord	94519

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy - Washington D.C.
Frank Coe &
Mr. Charles Head,

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Nuclear Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Jane Aguilar	[illegible]	43 Redsentance	94596
2.	CATHERINE FULLER	[illegible]	1516 NUNEN	94518 Concord
3.	[illegible]	[illegible]	[illegible]	Kelan, CA
4.	Steve Russell	[illegible]	1161 [illegible] Dr.	Concord 94520
5.	Autumn Russell	[illegible]	1161 [illegible] Dr.	Concord 94520
6.	Michael	[illegible]	[illegible]	Concord 94518
7.	Nancy Hartman	Nancy Hartman	193 Twinview Dr	P.H. 94523
8.	Julia Hartman	Julia Hartman	193 Twinview Dr	P.H. 94523
9.	[illegible]	[illegible]	[illegible]	Pleasant Hill
10.	Diane Hayhurst	Diane Hayhurst	2000 Gorgias Dr. Hill	P.H. 94523
11.	Summer Adams	Summer Adams	78 Kittiwake Dr	P.H. 94523
12.	Valerie Abad	[illegible]	4206 Sherwood Ct	Concord
13.	Megan Ordway	Megan Ordway	1437 [illegible] Ct	[illegible]
14.	Jennifer Miller	Jennifer Miller	999 Royal Oaks Dr	Concord
15.	Paul Kocian	[illegible]	1259 Apple Dr	Concord 94518
16.	Jeremy Coleman	Jeremy Coleman	1311 Apple Dr	
17.	Zack Dilgard	Zack Dilgard	1211 Apple Dr	
18.	Jamie D'gard	[illegible]	1211 Apple Dr	
19.	Steve Sweek	[illegible]	1211 Apple Dr	
20.	Mike Seung	[illegible]	1260 Apple Dr	

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Dept of Energy - Washington, D.C.
Frank Coe & Mr. Charles Head

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Navel Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	E Wright	[illegible]	—	
2.	TERESA CAST	Teresa Cast	2200 Westwood St	94565
3.	Rose Anthony		1301 - Acacia St	
4.	LEO Anthony		" "	
5.	Mary Bertoni	Mary Bertoni	840 Central	Pitts 945
6.	[illegible]		160 Acacia St	Pitts 94
7.	Randy Trueman	Randy	1344 Acacia St.	Pitts. 945
8.	Tabitha Trueman		1344 Acacia St	Pitts. 9456
9.	Virginia Hendie		1360 Acacia St.	Pitts 94565
10.	Ana Figueroa		1391 Acacia ST	Pitt 94565
11.	Lysette Figueroa		1391 Acacia ST	Pitt 9456.
12.	Avelina Figueroa		1391 Acacia St	Pitt 94565
13.	Richard G Fletcher		1383 Acacia St	Pitt 94565
14.	Florence C Fletcher		1383 " "	"
15.	Lydia Vincent		1375 Acacia	Pitts 94565
16.	Carrie M. Conrad		1357 Acacia St	Pitts
17.	Richard Dale Poor		1445 Aster drive #29	9456 [illegible]
18.	Shalom George		1345 Acacia Ave	Pitts. 94565
19.	[illegible]		1314 Acacia St.	Pittsburg 94565
20.	Michael A [illegible]		1260 Apple Ln Cov.	94518

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Dept of Energy - Frank Coe and Charles Head
Washington, D.C.

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to ~~Nuclear~~ Nuclear Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Joseph Pia	[illegible]	Pitt.	94240
2.	Maria White	Maria White	140 Evenington Ct.	Pitts. 94565
3.	Rosmarie d. Te	Rosmarie d. Te	2 Hammond Court	Pitt. 94565
4.	Marianne Stanek	Marianne Stanek	143 Castle Rock Rd.	94598
5.	David Moniz	David Moniz	956 Chandler Ct.	Concord 94518
6.	Craig Radbolm	Craig Radbolm	1240 Apple Dr.	94518
7.	Debra A. Fedalco	Debra Fedalco	1240 Apple	94518
8.	Dennis Flores	[illegible]	418 Temple Wm	CO CA 94598
9.	T Marcroft	T Marcroft	1449 Seneca Dr. Valley	Q 94598
10.	Dwayne Baird	Dwayne Baird	8943 Burns Pl.	Yucaipa 92399
11.	Paul Yamamoto	Paul Yamamoto	1770 Hemlock St	Mpa 94559
12.	Lloyd Redman	[illegible]	3207 Raleigh Dr.	Concord, 94519
13.	Jim Colwell	[illegible]	4191 Quail Run	Antioch 94509
14.	Kirk Jensen	Kirk Jensen	1400 Contra Costa Blvd.	#13 Pleasant Hill 94523
15.	Bob Russell	Bob Russell	1626 Barnett Circle	P.H. 94523
16.	Greg Getty	Greg Getty	PO Box 1637	Pittsburg, Ca. 94565
17.	Cathy Williams	Cathy Williams	2875 Euclid Ave	Concord, Ca 945[illegible]
18.	Minnie Gaster	Minnie Gaster	1321 Acacia	Pittsburg 94565
19.	Calvin T Strickland	Calvin T Strickland	1321 Acacia	Pittsburg 94565
20.	N. Sultan	N. Sultan	1630 Shirley Dr.	Pleasant Hill CA 94523

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Dept of Energy - Washington, DC.
Mr. Frank Coe and Mr. Charles Head, May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signature's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	MARIA VILLANUEVA	[illegible]	4179 Woodbridge Way Antioch	94509
2.	[illegible]	[illegible]	1061 Shilwbridge Ct Brentwood	94513
3.	Gail Swatley	G Swatley	1254 New Hampshire A. Concord	94521
4.	[illegible]	[illegible]	2201 Sycamore A. 278 Antioch	94509
5.	Natalie Sanchez	Natalie Sanchez	1100 E. 13th St. Antioch	94509
6.	Mika Li	[illegible]	367 Columbia Circle Benicia CA	94510
7.	LETICIA BANDE	Bande	3621 Hudson ct #78 ANTIOCH	94509
8.	GUADALUPE Esparza	[illegible]	3276 Betty Ann Oakley Ca	94561
9.	Mary Jane Mello	Mary Jane Mello	4525 Hogan Lane Oakley Ca	94561
10.	Diana Albritton	Diana Albritton	721 Almond Dr Oakley Ca	94561
11.	MARITA SIXON	[illegible]	2753 CARPINTERIA DR. ANTIOCH CA	94531
12.	ERELINDA D. PARMONTHON	[illegible]	093 LOVEMOSE CIR PITT. CA	9
13.	ARDINA JACKSON	[illegible]	4416 Meadowlake St Antioch CA	
14.	[illegible]	[illegible]	[illegible]	
15.	Eddie Comage	Eddie Comage	40 Sandalwood ct	
16.	MERANIA U. SOGARD	[illegible]	4203 WOLVERINE WAY ANTIOCH	
17.	Zeny M. Ramirez	[illegible]	103 Peppertree Way, Pittsburg, Ca	94
18.	[illegible]	[illegible]	1098 [illegible]	94565
19.	M. [illegible]	[illegible]	950 E. Leland Rd Pitts	94565
20	Ernestine Watts	[illegible]	1712 Mahogany Way Antioch CA	94509

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

Department of Energy - Washington, D.C.
Mr. Frank Cox and Mr. Charles Head,

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to ~~Nuclear~~ Nuclear Waste to Concord, Ca.

	Print Name	Signature	Address	Zip
1.	TARA NEU	[illegible]	1455 Arnold Dr. #31	Mtz 94553
2.	Stone, Betty	Betty Stone	1818 Boxwood Dr	Concord 94517
3.	Stephanie Ofsted	Stephanie Ofsted	1309 Del Rio #C	Concord 94518
4.	Virginia James	Virginia James	2311 Sunshine Dr.	Concord 94520
5.	[illegible]	[illegible]	[illegible]	[illegible]
6.	Tyler Snorton-Phelps		1211 Orange ST.	Concord 94518
7.	Lisa Snorton-Phelps	[illegible]	1211 Orange St	Conc. 94518
8.	Christy Gale	[illegible]	2215 Charlotte Avenue	Concord 94518
9.	Jaquline Clemo		1030 - 45th St. Apt #5	Emeryville, CA 94608
10.	Yolanda Muller		100 Azores Circle	Bay Point CA 94565
11.	Anthony Didrich	[illegible]	POB 730	Mtz CA 94553
12.	Jeff Bocker		68 Cavelback Ct.	Pleasant Hill, Ca. 94523
13.	Bob Mannelong		2520 Ryan Rd	Concord 94518
14.	Wes Nicholson		4810 Maple Dr	Concord 94521
15.	John Crim	"	" "	" "
16.	Michelle Hofland		124 Sherwood Ct.	Walnut Creek CA 945
17.	Nestor Carlon		275 Contra Costa Dr.	Martinez Ca 94509
18.	Josephine Estrin		219 Clearpoint Dr.	Vallejo CA 94591
19.	Sue Chavez		1430 Leach Pl.	Concord 94518
20.	Cassy Chavez		1430 Leach Pl.	CONCORD 94518

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Anthony Fiorelli	Anthony Fiorelli	Conc	94518
2.	D Creve	D Creve	Conc	94520
3.	L. de Boer	L. de Boer	Pleasant Hill	94523
	[illegible]			
4.	Tanya Johnson	Tanya John	Concord	94520
6.	Kia Williams	Kia Williams	Concord	94519
6.	Sandra Veley	Sandra Veley	Concord	94518
7.	[illegible]	Joan Holzinger	Concord	94518
8.	Kelly Hickerson	Kelly Hickerson	Walnut Creek	945[illegible]
9.	[illegible]	[illegible]	Antioch	94509
10.	Terry Gomez	[illegible]	Pittsburg	94565
11.	Scott Dunning	[illegible]	Concord	94519
12.	Sue Kyle	Sue Kyle	Concord	94518
13.	Cheryl Franklin	Cheryl Franklin	Concord	94521
14.	Carrie Jones	[illegible]		9458
15.	Tina Simpson	[illegible]	Concord	94521
16.	Mary Vakili	[illegible]	Concord	94518
17.	Helen Rike	Helen Rike	Concord	94521
18.	Elizabeth Benavente	Elizabeth Benavente	Concord	94520
19.	Elizabeth Blohm	Elizabeth K. Blohm	Concord	94521
20.	Cheryl Kurpieski	Cheryl Kurpieski	"	94518
21.	[illegible]	[illegible]	Antioch	94509

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Nuclear Waste to Concord, Ca.

	Print Name	Signature	Address	Zip
1.	Beverly L Frazie	[illegible]	6400 Silverado	94503
2.	E. SULTAN	[illegible]	1630 Shirley Dr. P.H.	CA. 94523
3.	Mat Milin	[illegible]	1797 Ladiana Dr.	94519
4.	J. Kincaid	[illegible]	1796 Dakota Ln	94519
5.	JOHN MURRAY	[illegible]	314 Adelaide	MARTINEZ CA
6.	PAUL NELSON	[illegible]	[illegible]	94521
7.	Christine A Pfotzer	[illegible]	2351 Maple Ave	Concord CA 94520
8.	Judy Quinlan	[illegible]	3909 Manzanita Ct	Concord 94
9.	Terhune	[illegible]	3028 windmill Cyn	Clayton CA
10.	Bernie Hvezda	[illegible]	1939 Lawrence Dr.	Concord 94519
11.	Dorine Von Zahn	[illegible]	[illegible] 331 Mount W.	Pleasant CA 94556
12.	Edward J. Reisner	[illegible]	2581 [illegible] Grove	94596
13.	Barbara A Chase	BARBARA CHASE	435 Sunset Rd Walnut Creek	Ca. 94596
14.	Gracedon Fons	[illegible]	4672 North Larwin Ave Concord	CA 94521
15.	Gayle Salter	Gayle Salter	502 Mt. Diablo Place Clayton, CA	94517
Commentor	[illegible]	[illegible]	1897 Lynwood Dr.	94519
17.	VIRGINIA CALLING	[illegible]	1897 Lynwood Dr	Concord 94519
18.	Fern Seeley	[illegible]	1780 Sunshine	Cove. 94520
19.	Michael Seeley	[illegible]	1780 Sunshine	Cove. 94520
20.	~~[illegible] + MARY KIBAYA~~	~~[illegible]~~	~~4001 Harlan Dr~~	~~CA C 94521~~

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signiture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Scott Whitworth	Scott Whitworth	5021 Laurel	94521
2.	Ryan Carini	Ryan Carini	1821 Roberts ct	94521
3.	Eric Whitworth	Eric Whitworth	5021 Laurel Dr.	94521
4.	Ann McCollough	A.T. McCollough	1371 Apple Dr	94518 94518
5.	G. Robert McCollough	G. Robert McCollough	1371 Apple Dr.	
6.	Amanda Vilez	685-7532	1360 Apple DR Concord	
7.	James Bowden	685-7532	1360 Apple DR	94158
8.	Alexandra Vilez	1360 Apple DR Concord	94518	685-7509
9.	Lucille Yeagerson	1391 Apple D	94518	
10.	Francis J Yeagerson	Francis J Yeagerson	1391 Apple Dr	94518 94518
11.	Geo. F. Loving	1451 Apple Dr	Concord Ca	
12.	Ed Nolten	1471 Apple Dr.	Concord, CA	94518
13.	Sven Vingo	1500 APPLE DR	Concord CA	94518
14.	Gail Vingo	"	"	
15.	[illegible]	1500 APPLE DR	CONCORD CA	94518
16.	[illegible]	1511 APPLE DR		
17.	Kelly Stiller	1540 Apple Dr.	Concord	94518
18.	[illegible]	" " "	"	"
19.	Connie Kirkham	2564 Walnut Blvd. #105	W.C.	94596
20.	[illegible]	117 Loveridge Rd.	Pittsburg	

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

May 28, 1993

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The sign&ture's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Necular Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	Nancy Stanley	Nancy J. Stanley	2107 Gyll Conc	94520
2.	Catherine Aubert	Catherine Aubert	277 Mc Leod Pl	94518
3.	Dawn Pence	Dawn Pence	106 Summerwood Pl. Con.	94518
4.	Phyllis Gibson	Phyllis	1894 Gainsborough Con	94521
5.	Becky Lea	Becky Lea	2330 Gillcort Ln	94518
6.	Angelina Casillas	Angelina Casillas	1311 Apple Dr	94518
7.	Glenda Casillas	"		
8.	Manuel Casillas	"		
9.	Ron Somers	Ron Somers	1331 Apple Dr	
10.	Kristin Holtwick	Kristin Holtwick	1320 Apple Dr	
11.	Jacklyn White	Jacklyn White	940 Terry Ct	Pittsburg, CA. 94
12.	Deborah Dodson		2737 Benedona Lane	Antioch, Ca
P.C. 13.	Jeanette Washington		70 Marcia Ct.	Bay Point, CA 94565
14.	[illegible]		8030 Wisteria Dr	Pac
15.	Nancy Peterson	Nancy N. Peterson	550 Patterson Blvd	P.H. 9452
16.	Lolita Cummins		508 1/2 W 5th	Antioch
17.	Triskra Cagnera		1426 Ryder	Vallejo Ca 94590
18.	Rebecca Leonhardt		1472 Rice Ct.	Apt. E Walnut Creek 94
19.	Mary A. Hall	Mary Anne Hall	2036 W. Hobart St. Concord Ca 94520	
20.	[illegible]		436 W 10th st.	Pittsburg, Ca 94

RESPONSE TO COMMENT
COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Necular Waste at the Concord Navel Weapon s Station, Concord, Ca. The signiture s on this petition are in agreement for postponement of transporting Necular Waste to Concord, Ca. No to Necular waste to Concord, Ca..

Print Name	Signiture	Address	Zip
Joleen Schmid		5 Brookshire	94565 Pitts. Ca
Cheryl Narez		1348 Enea Dr	94565 Pitts. Ca
Regina Narez		1348 Enea Dr	94565 Pitts. Ca
Joe Narez		1348 Enea Dr	94565 Pittsburg C
Tracy Narez		1348 Enea Dr	94565 Pittsburg C
Desiree Lee		50 Nalilili	Concord Ca 94518
Esther Baker		231 Nalilili	Concord Ca 94518
Jack Marshall		1010 Crestview	
Betty White		1023 Crestview	94565
Mary Cantaberry		180 Northstar Dr.	94565
Hugh Willson		130 Northstar Dr.	94565 Pittsburg.
Jennifer Jackson		160 Northstar Dr	94565 Pittsburg Ca
Cindy Ward		1880 Barrus Av.	Pittsburgh
[illegible]		2017 [illegible] Av. 94565	Pittsburg Ca
Athena McCoy		928 Blackdiamond St	94565 Pitts C
[illegible]		3319 [illegible]	94518

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

May 28, 1995

We request another hearing with the Federal Government regarding the shipment of Nuclear Waste at the Concord Naval Weapons Station, Concord, Ca. The signature's on this petition are in agreement for postponement of transporting Nuclear Waste to Concord, Ca. NO to Nuclear Waste to Concord, Ca.

	Print Name	Signiture	Address	Zip
1.	[illegible]		1491 Apple Dr.	
2.	TOM FORBES	Tom Forbes	3530 Monterey Blvd Oak, 94619	
3.	Jerry FORBES	[illegible]	107 BEGONIA CT WC 94509.	
4.	Diana M Forbes	Diana M Forbes	107 Begonia Ct WC 94596	
5.	DIANA GARNER	[illegible]	4240 CLAYTON RD #28 94521	
6.	Betty Skiles	Betty Skiles	1933 Wordman Ct Co 94578	
7.	[illegible]	[illegible]	Concord	
8.	DEBBIE BOON	Debbie L. Boon	Concord	
9.	Ruth Sitzmann	RUTH SITZMANN	Concord	
10.	[illegible]	VICTORIA H INFANTE	Concord	
11.	[illegible]		Concord	
12.	Marcella Carleton	Marcella Carleton	3231 Alfonso Dr. Concord 94518	
13.	Carmen L. Castaneda	826 Oak Grove Rd #11 Concord 94518		
14.	Barbara L Moore	1017 Pinehurst Ct Concord 94521		
15.	Ruth Paris	1232 Lef S Kycrest Dr., W.C.		
16.	Darby Moore	3055 Treat Blvd #4 Concord CA. 94518		
17.	[illegible] Moore	SAME AS ABOVE		
18.	Alice Ricosse	780 Oak Grove Rd Concord		
19.	Sharon Fonseca	744 Grayson Cr. Concord		
20.	Candice Johnston	1271 Apple Dr. Concord 94518		

RESPONSE TO COMMENT

COMMENTOR NO. 447: CONCORD AREA CITIZENS (CONT'D.)

COMMENTOR NO. 448: COONEY, JERRY W.

655 Chapman Road
Castle Rock, WA 98611
12 June 1995

Department of Energy
% Charles R. Head
Office of Spent Fuel Mangement
EM-37
1000 Independence Ave, SW
Washington, D.C. 20585-0001

Dear Mr. Head,

This letter, that recently was in the Longview, WA, Daily News, speaks for itself, and also me. The US government still has not solved the problem of the nuclear waste at Hanford left over from the Cold War. Now the present administration wishes to import more. Do we want to see that portion of the State of Washington nothing but a glowing heap of nuclear waste? How long will we commit ourselves to being a dumping ground for such waste? What about the possible contamination of the entire Columbia River downstream from Hanford? Isn't the necessity of keeping that river clean just as important as the spotted owl? Or is this administration's concern for ecology just for show? I consider this to be one of the stupidest, most dangerous proposals to come out of Washington, D. C., for a long time. 448-1

Sincerely,

Jerry W. Cooney

Jerry W. Cooney

RESPONSE TO COMMENT
COMMENTOR NO. 448: COONEY, JERRY W.

Response to Comment No. 448-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 449: WONG, TAMMY

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: TAMMY WONG **Phone:** 510-687-3760

Title and Organization:

Address: P.O. BOX 5143

City: WALNUT CREEK **State** CA **Zip** 94596

*** COMMENTS ***

As a Concord homeowner and resident, I am deeply concerned about the DOE's proposal to use the Concord Naval Weapon Station for transporting this highly dangerous ~~waste~~ nuclear waste. I oppose this plan, and strongly urge DOE to extend the public comment period so that all people of the Bay Area can express their concerns. Please remove the Concord Naval Weapons Station / SF Bay Area from this toxic waste transport route. 449-1 449-2 449-1 (Cont'd.)

Sincerely

Tammy Wong

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 449: WONG, TAMMY

Response to Comment No. 449-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 449-2

The deadline for submission of comments in response to the draft EIS was extended from June 20 to July 20, 1995. DOE considers the comment period (90 days total) to be sufficient for public comment.

COMMENTOR NO. 452: HANSON, JANESS R.

June 10, 1995

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Indipendence Avenue, SW
Washington, DC 20585-0001

RE: Handling Spent Nuclear Fuel
Concord Naval Weapons Station

Dear Mr. Head:

I am a resident of Bay Point, the community on the east border of the Concord Naval Weapons Station in Concord, California. In fact, I reside just 1/2 block from that boundary, very near the Port Chicago Highway eastern entrance to CNWS, and only a few hundred feet from the railroad tracks serving CNWS. I also currently serve as chairperson of the East Contra Costa County Planning Commission, representing the Bay Point community on land use issues.

I am opposed to the handling of spent nuclear fuel--or any nuclear material--at the Concord Naval Weapons Station for a number of reasons. Following are my comments regarding transportation, transfer and storage of nuclear waste, in Concord or any other location:

1. The Concord Naval Weapons Station is located near the Concord faultline, and thus is very vulnerable in case of earthquake. Hundreds of thousands of residents and dozen of toxic-based industries are nearby, also extremely vulnerable to earthquake damage. The combination nearby of dense population and industries handling toxic materials, with nuclear material at CNWS, could be deadly to the entire San Francisco Bay area if an earthquake were centered locally. 452-1

2. Transportation from the Pacific Ocean to the port of the Concord Naval Weapons Station is subject to many potential hazards. The ship channel from the Golden Gate Bridge to Stockton is acknowledged to be inadequate and unsafe for existing ship traffic and a draft Environmental Impact Report is now in process to study possible improvement plans. A ship docking at CNWS must safely negotiate under six bridges across the Bay, and pass by a number of oil refinery and chemical plant dock facilities, competing with ships headed for these facilities, and also loaded with potentially toxic materials. Thus a serious safety factor exists, just to arrive at the CNWS docks. 452-2

3. Personnel handling the large containers of spent nuclear waste for unloading and re-loading to alternate transport at CNWS should be specially trained in nuclear waste handling in order to safeguard against accidents in process. 452-3

4. Transportation from CNWS to the final storage destination will be a special problem, whether by rail or truck transport. Local residents know from experience that railroad derailment accidents have occurred frequently in our neighborhoods, often involving toxic materials going to or from a local industry. These accidents sometimes require notifying local residents about existing environmental problems and halting rail traffic in both directions until danger from toxic materials is contained and remedied. 452-4

RESPONSE TO COMMENT
COMMENTOR NO. 452: HANSON, JANESS R.

Response to Comment No. 452-1

Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation cask. Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes. The port selection criteria do not consider the existence of land-based facilities such as refineries because they have no direct impact on the risk associated with the shipment of foreign research reactor spent nuclear fuel.

Response to Comment No. 452-2

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process. The passage does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). The volume or size of the local marine traffic (present or future) was not considered in the calculation of risk associated with the shipment of foreign research reactor spent nuclear fuel. In general, the number of ship mishaps is not proportional to the amount of ship traffic because port ship traffic is slow, and even when heavy, is normally a small number of ships per hour. Historically, increasing the volume does not significantly increase the probability of an accident. Rather, the number of ship mishaps is associated with navigational hazards and distances from the port to the open ocean or a large bay (port selection Criterion 2; Appendix D, Section D.1.9.2 of the EIS). Appendix D, Section D.5.3.1.3 of the EIS presents a discussion of the determination of the probability of ship accidents used in the EIS. In regard to the size of vessels, increased volumes of hazardous cargos, say gasoline, would not change the accident consequences because the most severe accidents analyzed already assumed a collision with tanker and that the resulting fire was not limited by quantity of fuel available (Attachment D5 to Appendix D). Also, the port selection criteria do not consider the existence of land-based facilities such as refineries because they have no direct impact on the risk associated with the shipment of spent nuclear fuel from foreign research reactors.

Response to Comment No. 452-3

The experience criterion used in the port selection process evaluates the port's experience in handling containerized cargo. Although the foreign research reactor spent nuclear fuel is radioactive material, the dose rates from the casks used to transport it would be low. No

COMMENTOR NO. 452: HANSON, JANESS R. (CONT'D.)

U. S. Department of Energy -2- June 10, 1995

5. Highway transportation is even more subject to problems. State Highway 4, on which CNWS is located, is known locally as "Blood Alley" because of accident frequency. This highway regularly operates at commute time at Grade Level F in volume of traffic--sheer gridlock. If truck transport involved Highway I-80 going east, weather would be a severe problem. Donner Summit is frequently closed for extended periods due to ice or snow storms. If proceeding north on Highway I-5, the route through the Siskiyou Mountains in northern California is also subject to winter delays and accidents. Thus weather conditions could cause the nuclear material to be delayed in its journey to safe storage, waiting either at CNWS, or along the route subject to hazardous roads -- further safety problems for the surrounding public. 452-5

6. The community of Bay Point, with a population of over 20,000, receives its water supply via pipeline crossing through CNWS from Concord along Port Chicago Highway near the docking area. The addition of nuclear waste to CNWS, even temporarily, is just one more safety problem for our drinking water. 452-6

7. The possibility of decreased property values for homeowners in the CNWS, while not a safety factor in itself, is certainly pertinent in the over-all picture. In case of property changing hands, it would be necessary to disclose that one of the activities on nearby CNWS is long-term transportation and handling of nuclear waste. This could be a factor in potential home sales in the future.

8. A paramount concern for all of us is that no local agencies in our area--nor probably in any other area--have the expertise or facilities to respond in the event of a nuclear accident. It is utterly irresponsible of the U.S. government to expect that local law enforcement or environmental personnel would be able to respond adequately ito a problem in any or every area through which this material would be transported to its final storage place. 452-7

9. I suggest that in the event that nuclear materials are transported from a foreign country to the United States, a heavy armed military escort, trained for safety and environmental response, be required to accompany each shipment from portal to portal, i.e., from its point of origin to its final storage place. This team should be able to respond, both in case of attack from outside forces, or in case of accident, to contain and minimize the devastation of a nuclear accident. 452-8

10. And finally, no permanent site has yet been establisted for the final storage of this nuclear material in the United States. A site should first be established, and only later, a study made regarding the safest entry and unloading port. This would insure that the shortest possible in-country route be involved in transporting the waste, and reduce potential additonal hazards involved in long-distance transport. 452-9

RESPONSE TO COMMENT
COMMENTOR NO. 452: HANSON, JANESS R. (CONT'D.)

special handling or loading/unloading procedures would be required; experience with handling containers is sufficient. Therefore, no special training of longshoremen is required.

Response to Comment No. 452-4

The commentor's view that transport by rail would be dangerous is noted. Section 4.2.3 of the EIS, however, demonstrates that the risks would be low.

Response to Comment No. 452-5

The commentor's view that transport on highways would also be dangerous is likewise noted. Section 4.2.3 of the EIS, however, demonstrates that the risks would also be low.

For the likely local routes around Concord, see the response to Comment 22-11. In case of delays due to severe weather, DOE has arranged through Memoranda of Agreement with other Federal agencies for the commercial carrier to divert to any Federal installation (e.g., a DOE site or military base) and request "SAFE PARKING" at that facility. (Section 2.7.5).

Response to Comment No. 452-6

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, after more than 40 years of spent nuclear fuel shipments, no radioactive contents have ever been released from a spent nuclear fuel transportation cask, nor has a spent nuclear fuel transportation cask ever been punctured, even as the result of an accident. Based on this experience, DOE considers that spent nuclear fuel transportation casks passing through the Concord NWS would not release their contents, and thus would not affect the quality of the water supply for Contra Costa Water District via Mallard Reservoir or any other path. Analysis of a severe accident involving a ship at Concord NWS (Section 4.2.2.3) indicates that the resultant contamination would be so small that no cleanup would be required other than possibly in the immediate vicinity of the accident.

In regard to a possible reduction in property values as a result of the receipt of foreign research reactor spent nuclear fuel at Concord NWS, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result form the worst plausible accident.

Response to Comment No. 452-7

As discussed in Section 2.7.3.2 of the EIS, DOE provides funding to States and Tribes through the Office of Environmental Management and the Office of Civilian Radioactive

In summary, I strongly urge that the Concord Naval Weapons Station be dropped as a possible entry site for spent nuclear rods. Please keep me informed as to the subject proposal's resolution.

Sincerely,

Janess R Hanson

Janess R. Hanson

431 Levee Road
Bay Point, CA 94565
(510) 458-0860

Waste Management to assist with transportation related issues. This funding has been used in the past to enhance a jurisdiction's emergency management and response capabilities. Besides funding, much of DOE's assistance is provided in the form of technical assistance, for which DOE bears the cost. Assistance may be provided through DOE's Radiological Assistance Program and under the National Contingency Plan, as well as through training, DOE sponsored meetings, informal discussions, and informational materials.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

Response to Comment No. 452-8

DOE considers that the foreign research reactor spent nuclear fuel can safely be received at ports and transported to DOE management sites using the security arrangements that have been successful for over 30 years and without additional security such as might be provided by a special military escort. The requirements for physical protection of spent nuclear fuel shipments are specified in the Code of Federal Regulations (10 CFR Part 73). The principal points are: 1) cooperation with local law enforcement agencies, 2) armed escorts, and 3) communications with a communications center that is staffed 24 hours per day. Section 5.4.2 of the EIS provides more information on this issue.

As stated in the response to Comment 452-7, above, Appendix H has been added to the EIS to describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

Response to Comment No. 452-9

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation.

COMMENTOR NO. 453: SCHLOSSTEIN, LEROY & ANNA

June 14/95
1425 N. Shirley St
Tacoma, Wash
98406

Charles Head Program Manager
Office of Spent Nuclear Fuel Management
U.S. Department of Energy
1000 Independence Ave S.W.
Washington D.C. 20585

Dear Sir:

We the people of the City of Tacoma, including my wife & me wish to protest the shipping & bringing the Nuclear waste through Our Port. 453-1

There are other ports but we like to keep Our Port clean. We highly oppose the use of Our Port for nuclear waste handling.

Yours Truly
LeRoy & Anna Schlosstein

RESPONSE TO COMMENT
COMMENTOR NO. 453: SCHLOSSTEIN, LEROY & ANNA

Response to Comment No. 453-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any port analyzed in the EIS, is low.

COMMENTOR NO. 454: COHEN, ELLEN

3612 N. 33rd Street
Tacoma, WA 98407
June 15, 1995

Mr. Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Head,

As I will be unable to attend the upcoming public hearing in Tacoma, Washington regarding bringing nuclear waste through Tacoma, I am writing to you to express my strong opinion that an alternative port of entry MUST be found.

The citizens and government of the City of Tacoma have been working extremely hard to clean up Commencement Bay, a site of much industrial pollution and toxic waste (part of which is a Super Fund site). To now present the citizens with the potential disaster that the shipment of nuclear waste brings, would be a major setback to the economic, cultural and environmental renewal that the city has begun.

454-1

In addition, as the parent of a young child, I am especially concerned about the health and safety issues involved in the shipment of nuclear waste through our port and then through city streets and state roads in our area. This is a densely populated community and our streets and roads are heavily traveled, with daily reports of highway accidents. No one can absolutely guarantee the safe shipment of nuclear waste. Even our "job hungry" unions are opposed to this idea because of the health and safety issues.

I strongly urge you to look elsewhere: to an area that is not as densely populated, which does not already have the environmental clean-up problems that Tacoma has, and to an area that expresses interest in providing a port of entry for nuclear waste.

Yours truly,

Ellen Cohen

Ellen Cohen

RESPONSE TO COMMENT
COMMENTOR NO. 454: COHEN, ELLEN

Response to Comment No. 454-1

The commentor's opposition to the use of the Port of Tacoma to receive foreign research reactor spent nuclear fuel is noted. The port selection criteria discussed in Appendix D, Section D.1.9 of the EIS identify those ports that can safely handle foreign research reactor spent nuclear fuel. The analyses provided in the EIS indicate that the use of any of the ports indicated by the port selection process, including Tacoma or Portland, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3 of the EIS) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2 of the EIS).

Shipment of foreign research reactor spent nuclear fuel would not jeopardize the significant cleanup effort undertaken in the area of Commencement Bay and the Port of Tacoma as noted by the commentor. The analysis in the EIS indicates that there would be no significant adverse impacts to any of the ports or bays, or the quality of water or air (Section 4.2.1.1 and Appendix C, Section C.2 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. Based on over 30 years of spent nuclear fuel shipping experience, DOE considers that spent nuclear fuel transportation casks passing through the Port of Tacoma, or any other port or waterway would not affect air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

COMMENTOR NO. 460: LAMBERT, DAVID & MARTI

June 17, 1995

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
U.S. Dept. of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Head:

We are opposed to the potential for high level nuclear waste being shipped through our community here in Tacoma, WA. We think there is too much risk in shipping such material through a major metropolitan area like ours. We do not want our children, our friends, our neighbors and other community members to be exposed to this. 460-1

Thank you.

Sincerely,
David Lambert, Marti Lambert
2915 N. 10th.
Tacoma, WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 460: LAMBERT, DAVID & MARTI

Response to Comment No. 460-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 462: TARANOFF, IRENE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: PETE - IRENE TARANOFF Phone: 510/932-4164

Title and Organization:

Address: 3435 BAYBERRY DR.

City: WALNUT CREEK, CA. State CA Zip 94598

*** COMMENTS ***

TO ARRIVE BY SHIP TO CONCORD NAVAL WEAPONS BY SHIP YOU MUST PASS UNDER AT LEAST 5 BRIDGES — THE ONE AT CONCORD - BENICIA IS THE ONLY EVACUATION ROUTE DIRECTLY NORTH — THIS IS A VERY POPULOUS AREA AND NO WHERE TO GO. 462-1

I ALSO AGREE WITH CONGRESSMAN GEORGE MILLER, 7TH DISTRICT, CALIFORNIA JUNE 2, 1995, CALLING FOR "A FULL SCALE REVIEW" OF THE PROPOSAL TO BRING SPENT RODS FROM OVERSEAS. 462-2

Irene Taranoff

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 462: TARANOFF, IRENE

Response to Comment No. 462-1

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process, and the passage was determined to meet the requirements of Criteri,kon 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). As discussed in Appendix D, Section D.1.9 of the EIS, other considerations such as port population, population along the route to the management site, port experience with handling containers, and port facilities have also been considered in making the final selection of ports of entry. Regarding the commentor's concern about the population of the San Francisco Bay area, the port selection process that determined that Concord NWS was an acceptable port, did consider the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS presents an explanation of the "population" criterion.

Response to Comment No. 462-2

The EIS, and the NEPA process of which it is part, constitute a full scale review of the proposed action concerning foreign research reactor spent nuclear fuel.

COMMENTOR NO. 462: TARANOFF, IRENE (CONT'D.)

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: MR. PETE TARANOFF Phone: 510/933-4164
Title and Organization: SONS IN RETIREMENT
Address: 3435 BAYBERRY DR.
City: WALNUT CREEK State CA Zip 94598

*** COMMENTS ***

MR HEAD –

I. You missed the Boat in Concord, Calif. only because you showed no sympathy + no understanding of the dangers to the 6 million persons living here 462-3

II. You gave no routes to carry nuclear waste and gave the audience doubt that you know the exits are few + really no secret. Short ways out are over vulnerable bridges! 462-4

III. Would you Sir move to this area with your family when this project takes place. Why the rush. The nations that accept our millions free don't deserve our exposure – or is it that with all this spent waste we have the monopoly on Nuclear Weapons still to be made? Come on! 462-5

Pete Taranoff

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 462: TARANOFF, IRENE (CONT'D.)

Response to Comment No. 462-3

Health and safety were primary considerations during the evaluation of environmental effects for the proposed action and its management alternatives. Conservative estimates of radiological and nonradiological impacts show that risks to the population and workers are low (Sections 4.2.2 and 4.5 of the EIS). Section 4.10 describes risks associated with U.S. acceptance of the spent nuclear fuel to the proposed action and compares these risks with those due to the natural background radiation and other common risks.

Response to Comment No. 462-4

DOE has not yet selected ports, routes, or transport modes for the foreign research reactor spent nuclear fuel. If Concord NWS is selected, then DOE would choose the best route to I-680 in accordance with Department of Transportation regulations (49 CFR 397.101 (a)(2)). That route could use Route 4, Route 24, and/or Waterfront Road. The State of California routing agency can designate a preferred route, which the shipments would be required to follow, in accordance with 49 CFR Part 397.103.

Response to Comment No. 462-5

As demonstrated by the analysis in Section 4 of the EIS, the risks associated with implementation of the proposed action to human health or the environment would be low. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

COMMENTOR NO. 467: NELSON, LINDEN C. & DIANE L.

Linden C. and Diane L. Nelson
414 North "J" Street
Tacoma WA 98403
(206) 627 2071

June 16, 1995

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management
U.S. Department of Energy
1000 Independence Ave SW
Washington DC 20585

We say "NO" to Tacoma becoming a port of entry for worldwide nuclear waste.

The Port of Tacoma is a vital part of the economic renewal of the City of Tacoma and should not be used as a port of entry for worldwide nuclear waste. This would only jeopardize the City's potential for continued economic and cultural development that the people of Tacoma have spent considerable time and money to achieve. Nuclear waste is potentially dangerous and would portray a negative image for the City of Tacoma. 467-1

As natives of the Tacoma area, we are delighted with the visual improvements and vitality of Tacoma, a city again beginning to blossom. Tacoma has so much to offer and needs only positive influence to succeed at what so many have set out to accomplish.

We ask that you support our opposition.

Respectfully,
Linden C. Nelson
Diane L. Nelson
Linden C. Nelson
Diane L. Nelson

RESPONSE TO COMMENT
COMMENTOR NO. 467: NELSON, LINDEN C. & DIANE L.

Response to Comment No. 467-1

DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not impact normal commercial operations, and therefore would not endanger the ports' economic development. Nor should it contribute to any stigma, based on the EIS analyses which indicate that there would be no significant adverse impacts to any of the ports or bays, or the quality of water or air (Section 4.2.1.1 and Appendix C, Section C.2 of the EIS). This is based on the fact that the foreign research reactor spent nuclear fuel would be accepted into the United States in standard shipping containers that would require no special handling or precautions. As such, there should be no adverse cultural or economic reaction to the use of the port. Historically, there were no adverse economic or cultural impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years during which it was received in the past.

COMMENTOR NO. 471: LEUNG, EDMUND

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: EDMUND LEUNG Phone: (510) 680-8668

Title and Organization: HOMEOWNER

Address: 2621 TRAFALGAR CT.

City: CLYDE State CA Zip 94520

*** COMMENTS ***

Nuclear waste is hazardous to our health safety, environment, nature & almost everything. Why do we have to live with it and has no right to refuse such waste from other countries. Naval Weapons station in Concord is particularly not a good place for this kind of waste. It stands in the border of four heavily populated cities, Martinez, Pittsburg, Clyde & Concord, in the center of four overly-crowded highways, Hwy. 24, 4, 242 and 680. These highways are jammed up in the morning, noon, afternoon and early evening. 471-1

I don't think anyone of us would like to receive one more headache additional to traffic in our daily life. Please re-consider. Thanks.

To Mail in Comments/Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 471: LEUNG, EDMUND

Response to Comment No. 471-1

The port selection process is described in detail in Appendix D, Section D.1.9 of the EIS. One of the criteria (Criterion 5) evaluates the population in and around the port, and along the routes from the port to the management site(s). DOE considers that the port selection criteria successfully indicate those ports that can safely handle foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9) with the least risk to populations near the port. DOE further considers that the use of any of the ports indicated by the port selection process, including the Concord NWS, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2). The specific population of the port area is included in the analysis of the impacts of accidents (Appendix D, Section D.5 of the EIS).

COMMENTOR NO. 473: TOLBERT, ROBERT N.

6209 N.W. 395th St.
Woodland, Wa 98674
June 14, 1995

Dept. of Energy % Charles R. Head
Office of Spent Fuel Management C.M-37
1000 Independence Ave. S.W.
Washington, D.C. 20585-0001

Dear Mr. Head,

We are opposed to the importation of high-level nuclear waste from anywhere in the world. 473-1

Our understanding is that our own nuclear waste has gone begging for a permanent waste storage. Why then should we be bringing in from foreign countries waste they have not been able to store either. Hanford, in our state, already has a leaking storage pool very close to the Columbia River.

I am not willing to spend my money on what appears to be a losing short and/or long term problem of this magnitude.

Sincerely

Robert N. Tolbert

Eileen M. Tolbert

RESPONSE TO COMMENT
COMMENTOR NO. 473: TOLBERT, ROBERT N.

Response to Comment No. 473-1

The commentor's opposition to management of spent nuclear fuel from foreign research reactors in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

COMMENTOR NO. 476: JACKSON, GEORGIA F.

29700 NE Healy Rd
Amboy, WA 98601
June 15, 1995

Dept. of Energy
c/o Charles R. Head
Office of Spent Fuel Management, EM 37,
1000 Independence Ave. SW
Washington, D.C. 20585-0001

Dear Mr. Head:

I recently read in our newspaper that much of the world's nuclear waste is scheduled to be dumped at the "K-Basin" area at Hanford near the Columbia River in the State of Washington. If this information is correct, I request that you do all in your power to put a stop to this planned dumping of high-level nuclear waste in the State of Washington or anywhere in the United States. 476-1

RESPONSE TO COMMENT
COMMENTOR NO. 476: JACKSON, GEORGIA F.

Response to Comment No. 476-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Page 2

It would seem this country has become the dumping ground of the world. We have enough problems cleaning up our own messes. We don't need the responsibility of cleaning up all the problems of every other nation, too.

Respectfully,
Georgia F. Jackson

COMMENTOR NO. 478: HANEWALD, KARL

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: KARL HANEWALD Phone: (510) 687-0459

Title and Organization: NONE

Address: 1831 ELKWOOD DRIVE

City: CONCORD State: CA Zip: 94519-1142

*** COMMENTS ***

I CANNOT UNDERSTAND WHY (DOE) IS NOT OBLIGATED TO ADVISE LOCAL GOV'T (CITY OF CONCORD) IN THE FIRST PLACE. THE SO CALLED CONCORD NAVAL WEAPONS STATION IS NOT PART & PARCEL OF CITY OF CONCORD. — RATHER, IT IS UNINCORPORATED FEDERAL LAND. — THE EXECUTIVE BRANCH OF THE FEDERAL GOV'T HAS A MANDATE FROM LEGISLATIVE BRANCH: THE U.S. CONGRESS, TO DO JUST THAT. PURSUE A NUCLEAR WEAPONS NONPROLIFERATION POLICY. IT'S THAT SIMPLE. 478-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

K. Hanewald

JUNE 6TH, 1995

CC: THE CONTRA COSTA BOARD OF SUPERVISORS
THE CONCORD CITY COUNCIL.

RESPONSE TO COMMENT
COMMENTOR NO. 478: HANEWALD, KARL

Response to Comment No. 478-1

NEPA requires that federal agencies prepare environmental impact statements on proposed major federal actions that significantly affect the environment. Therefore, as part of the NEPA process, the public must receive notice of the proposed action, and opportunities to comment on the proposed action and on the draft EIS. DOE must hold a scoping meeting (it held nine on this spent nuclear fuel proposed policy) and at least one public hearing (DOE held 17). Public input is critical to the NEPA decisionmaking process.

COMMENTOR NO. 478: HANEWALD, KARL (CONT'D.)

—"SHIPS MAY COME
SHIPS MAY GO
WE DON'T WANT THE ONES
THAT GLOW." —
HOW IGNORANT!

SPENT NUCLEAR FUEL RODS
DO NOT GLOW; NOR DO THEY
BLOW UP INTO YOUR FACE. —
WHENEVER THERE IS A NUCLEAR
POWERED AIRCRAFT CARRIER,
A NUCLEAR POWERED SUBMARINE,
COMES ABOUT, THRU THE GOLDEN
GATE, WITH ALL THE THAT LETHAL
STUFF ABOARD, THE UNITED STATES
NAVY DOES NOT FILE AN
ENVIORNMENTAL IMPACT STATEMENT.
NOR SHOULD THEY, - IT IS NOT REQUIRED. -
IT IS MATTER OF NATIONAL SECURITY. —

RESPONSE TO COMMENT
COMMENTOR NO. 478: HANEWALD, KARL (CONT'D.)

COMMENTOR NO. 479: CROOKS, GREGORY W.

June 15, 1995

Charles Head
Program Manager
Office of Spent Nuclear Fuel Management
U.S. Dept. of Energy
1000 Independent Ave. S.W.
Washington D.C. 20585

Mr. Head:

I am writing to voice my strong opposition to the use of the port of Tacoma, Washington as an entry port for nuclear waste.

If it is necessary to transport this material by way of commercial shipping lines only, thereby requiring passage through a U.S. port and handling by it's residents, I am extremely surprised that a city located at a far inland point of the fragile Puget Sound has been given serious consideration by your department. 479-1

Since there are obvious concerns about potential danger to the local population center and the ecosystem, I cannot believe that the government is seemingly willing to package and ship this material with no monitoring or assistance to the handlers.

I realize that non-proliferation of nuclear weapons is an important policy for our country to adopt. If, however, the logistics of this government decision cannot be carried out without passing off the burden of safety and security to the general public, I feel it is unduiful.

Yours,

Gregory W. Crooks
Lifetime Tacoma resident

Gregory Crooks
7702 N. Lawrence
Tacoma, Wa. 98407

RESPONSE TO COMMENT
COMMENTOR NO. 479: CROOKS, GREGORY W.

Response to Comment No. 479-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel through the Puget Sound to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. The analysis in the EIS indicates that the use of the Port of Tacoma would not pose any significant risk to either the port personnel, the population near the port, or Puget Sound. The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS). The physical constraints of the marine passage to the Port of Tacoma do not alter the determination that it meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2).

COMMENTOR NO. 480:
EMPLOYEE OWNERS OF FORT VANCOUVER PLYWOOD COMPANY

DOE
C@O Charles E. Head
Office of Spent Fuel Management
EM, 37
1000 Independence Avenue S.W.
Washington, D.C. 20585-0001

Subject: Nuclear Waste Storage from other Countries

Exposing the whole West Coast to possible, and most likely, hazardous accidents, is inhuman, as well as poor judgement on our government's part, for keeping America clean and beautiful. 480-1

Right now we (the Northwest) are already exposed by Hanford's Nuclear waste storage. Why do we wish to import more for us, the people to pay for? In health, birth defects, and animal deformities, not to speak of, the tax payers' money. The U. S. can not clean up or contain our own waste from nuclear generation.

The irresponsibility of our government to even propose such a plan, is absurd.

PLEASE, DO NOT CONSIDER SUCH A PLAN.

Our company has worked hard to comply with the environmental laws for clean air and water. Now the DOE wants to contaminate every living thing with other nations' nuclear waste!

Please, for future generations; Do not import nuclear waste to our beautiful northwest.

Thank you,

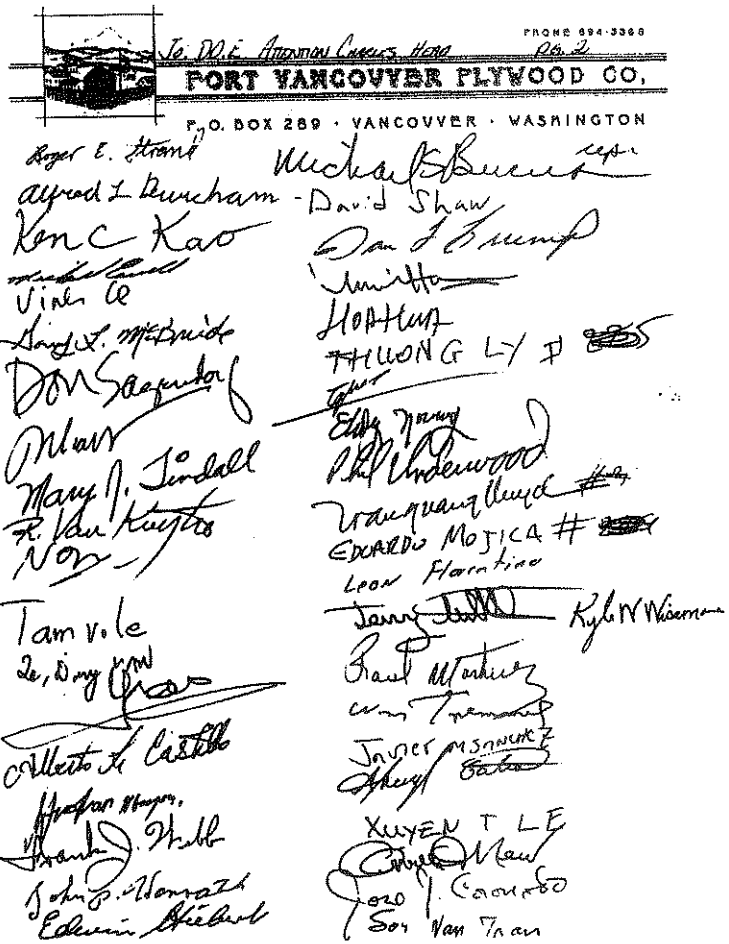
Employee owners of Fort Vancouver Plywood Company, and all of their families.

RESPONSE TO COMMENT
COMMENTOR NO. 480:
EMPLOYEE OWNERS OF FORT VANCOUVER PLYWOOD COMPANY

Response to Comment No. 480-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel to the Pacific Northwest is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to any of the ports analyzed in the EIS, including the Port of Tacoma, is low. Section 4.2.4 of the EIS evaluates the risk of storage of the spent nuclear fuel and concludes that it is low.

COMMENTOR NO. 480:
EMPLOYEE OWNERS OF FORT VANCOUVER PLYWOOD COMPANY (CONT'D.)



RESPONSE TO COMMENT
COMMENTOR NO. 480: EMPLOYEE OWNERS OF FORT VANCOUVER PLYWOOD COMPANY (CONT'D.)

COMMENTOR NO. 486: MATLOCK, FREDA

NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: Despite the fact that the spent fuel rods are low level radioactive, Tacoma is not a suitable transit point for the planned shipments. The Port is simply not equipped to deal with any accidents that may occur. As a resident of Tacoma, I protest the addition of any further dangers to my environment. I am sure there are other, more appropriate facilities on your list and strongly urge you to remove the Port of Tacoma as a possible matter.

Name: Freda Matlock Telephone: 206-564-7269

Address: 1002 S. Cassad[illegible] City/State/Zip: Tacoma, WA 98465

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. SW, Washington, DC 20585

DEADLINE: JUNE 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau; Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

486-1

RESPONSE TO COMMENT
COMMENTOR NO. 486: MATLOCK, FREDA

Response to Comment No. 486-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 488: BENJAMIN, RICHARD W.

Comments on the Draft Environmental Impact Statement on Foreign Research Reactor Spent Nuclear Fuel

Richard W. Benjamin
805 Hammond Drive
North Augusta, SC 29841
Phone: (803) 279-2560

From the Draft EIS: "The proposed action in this EIS is to adopt a policy to manage foreign research reactor spent nuclear fuel, in 41 foreign countries, to promote United States nuclear weapons nonproliferation policy objectives".

The policy should be aimed at removing this Highly Enriched (HEU) Spent Nuclear Fuel (SNF) from any possibility of malevolent use as quickly and as permanently as possible. This suggests that the fuel should be placed as quickly as possible under IAEA or US safeguards, particularly that fuel stored at present in the less-well-controlled and less-stable parts of the world. While the fuel stored in Europe is important, it is not the most "at risk". After this fuel is safeguarded, it should be rendered unsuitable for weapons use as quickly as possible through blending the HEU with natural or depleted uranium until it contains less than 20% U-235.

488-1

The best solution to these problems is a strategy that offers a technically, politically, and economically sound approach for disposing permanently of aluminum-based, HEU SNF. It depends upon using both the US processing facilities at the Savannah River Site (SRS) and the smaller UK processing facilities at Dounreay, Scotland to process and blend HEU-aluminum fuels to commercial-grade Low Enriched Uranium (LEU) under IAEA safeguards. **This ends the proliferation risk and substantially reduces accidental criticality risks of HEU SNF** and puts the recovered uranium and the high level waste into acceptable forms for commercial utilization and geologic disposal, respectively.

I suggest the following integrated approach for HEU-Aluminum SNF disposition:

488-2

1. The US Government establishes agreements and protocols with the foreign and domestic research reactor operators, the European Community, and the British Processing Facility at Dounreay which will:

   (a) return most existing HEU fuels to the US for disposal by the year 2003.

   (b) make arrangements for the future (post 2003) supply and disposal of reduced enrichment fuels (non-weapons grade uranium), for both domestic and foreign reactors, through US and European nuclear fuel service organizations.

   (c) arrange for the processing at Dounreay (under IAEA safeguards) of some of the foreign research reactor HEU spent nuclear fuel. Separated HEU would be blended to commercial-grade LEU in the facility so that it would no longer present a proliferation risk and could be used in current commercial reactors. The primary reason for this is to keep the small Dounreay processing facility open beyond the time when SRS processing facilities shut down.

2. Use existing DOE processing and waste treatment facilities at SRS to treat all aluminum-based enriched uranium spent fuels stored at DOE sites and returned

RESPONSE TO COMMENT
COMMENTOR NO. 488: BENJAMIN, RICHARD W.

Response to Comment No. 488-1

The commentor's support for removal of HEU from potential diversion to use in nuclear weapons is noted. The commentor's preference for blending down HEU is likewise noted (Section 2.2.2.6 of the EIS). The commentor's preference for Management Alternative 3 (management partly in the United States and partly overseas, Section 2.4 of the EIS) is noted.

Response to Comment No. 488-2

The commentor's suggestion for an effective implementation of the proposed action is noted. The suggestion supports Management Alternative 3 described in Section 2.4 of the EIS characterized by some reprocessing of foreign research reactor fuel in Europe and chemical separation of aluminum-based fuel at the Savannah River Site.

from research/test reactors. Assurance that HEU would not be used for weapons would be made an inherent part of the chemical processing operations by blending HEU solution with natural or depleted uranium to create a low enriched uranium (LEU) product. The relatively small high level waste (HLW) stream would be treated in existing waste processing facilities with the existing 30 million gallons of high level waste (HLW) at SRS and converted into stainless steel encapsulated borosilicate glass waste forms for geologic disposal. When the backlog of HEU spent fuel is completed, SRS processing facilities would be shut down and the remaining small annual quantity of research reactor HEU SNF processed at Dounreay (Dounreay is much smaller than the SRS facility and can treat the small annual throughput more economically). 488-2 (Cont'd.)

Benefits

If this integrated approach were implemented, it would:

- dispose of the waste products and weapons-capable uranium in the spent fuel using existing technologies now and eliminate prolonged storage with no established method for final disposal.
- treat highly radioactive fission products with existing high level SRS waste and vitrify it into borosilicate glass waste forms in DWPF.
- isotopically dilute highly enriched uranium during processing, creating LEU for use in power or research reactor fuels.
- comply with US non-proliferation goals.

Advantages

This approach has several advantages over other alternatives for disposing of enriched uranium-aluminum spent fuels, including:

- significantly reduces uncertainties relative to other alternatives, for it is the quickest route to an already acceptable waste form for geologic disposal and commercial re-use of the uranium. In addition there is currently no assurance that HEU spent fuel will ever be acceptable for geologic disposal.
- provides the smallest number of HLW canisters for geologic disposal.
- carries the lowest capital investment.
- probably provides the lowest net (total) cost.
- provides no additional significant safety, health or environmental impacts.

COMMENTOR NO. 497: JOHNSTON, CANDICE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Candice Johnston Phone: 510 827-0553
Title and Organization: LVN - resident - citizen
Address: 1271 Apple Dr.
City: Concord State Ca Zip 94518

This can contaminate all this county's drinking water
The canal run's through the Weapons Station

*** COMMENTS ***

No Nuclear Waste to be sent to Concord
Accident's: Concord Naval Weapon's Station train derailment's with 13 sent to the hospital with radiation poisoning 1944 - Explosion at Port Chicago Earthquake's - Concord fault is active This is a Health hazard to all of us. It will cause Depreciation value of land & property in Concord, Ca.

497-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

Keep the nuclear waste in each country that used it
Quit making nuclear product's
Candice Johnston LVN

RESPONSE TO COMMENT
COMMENTOR NO. 497: JOHNSTON, CANDICE

Response to Comment No. 497-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, after more than 40 years of spent nuclear fuel shipments, no radioactive contents have ever been released from a spent nuclear fuel transportation cask, nor has a spent nuclear fuel transportation cask ever been punctured, even as the result of an accident. Based on this experience, DOE considers that spent nuclear fuel transportation casks passing through the Concord NWS would not release their radioactive contents, and would not affect the quality of the water supply for Contra Costa Water District via Mallard reservoir or any other path. Analysis of a severe accident involving a ship at Concord NWS (Section 4.2.2.3 of the EIS) indicates that the resultant contamination would be so small that no cleanup would be required, other than possibly in the immediate vicinity of the accident. Therefore, contamination of Mallard Reservoir would be minimal. To insure this was the case, if such a severe accident were to occur, all water supplies in the area, as well as food and air, would be tested for contamination.

As a result of the television report the commentor cites, the Contra Costa County Board of Supervisors initiated an investigation of the allegations. Their report on the subject, "Safety at the Concord Naval Weapons Station" dated November 2, 1993, concluded in part, "There were no incidents involving explosions or radiation exposure," and that "Many of the reported incidents were not accidents caused by Weapons Station employees but, rather, were discoveries by employees that materials being received had been damaged during loading or transit. In some cases the shipments had not been properly blocked, braced or banded."

In fact, the safety record at Concord NWS is significantly better than that of similar activities in ports in the private sector. According to the Department of Labor statistics, for the category of marine cargo handling, the number of lost workday cases per 100 full-time workers for 1993 was 7.1 nationwide (1994 data not available), which is typical. The number of lost workday cases per 100 workers at Concord NWS for the first three quarters of fiscal year 1995 was 5.3, which is also typical for Concord.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Spent nuclear fuel transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation

cask. Further, the analyses of impacts associated with accidents involving foreign research reactor spent nuclear fuel presented in Section 4.2.2.3 of the EIS demonstrate that the use of any of the selected ports would not pose any significant risk to the port personnel or the population near the ports.

In regard to a possible reduction in property values as a result of the receipt of foreign research reactor spent nuclear fuel at Concord NWS, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident.

The commentor's preference for keeping this waste in each country that used it, is noted. Many foreign research reactor operators have no immediate means of disposing of their spent nuclear fuel. (Section 1.2 of the EIS). Management Alternative 1 or 3, if implemented, would provide foreign research reactor operators with a limited time period to develop arrangements for disposition of their spent nuclear fuel outside of the United States, while avoiding reactor shutdowns and conversions from LEU fuel to HEU fuel (Section 1.2 of the EIS).

COMMENTOR NO. 499: MOO, DENICE

Dear Mr. Head,

Nuclear Fuel is one of the most
ing- ous and deadly elements on earth.
Would you let your children or your
, live on it? Me either. Please
Keep it out of Port of Tacoma. Thanks
Denice

499-1

RESPONSE TO COMMENT
COMMENTOR NO. 499: MOO, DENICE

Response to Comment No. 499-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 501: JACOBSMEYER, ELIZABETH

June 14, 1995

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-0001

Dear Mr. Head:

I attended the D.O.E. public hearing in Concord, California on May 22, 1995. My husband (who also attended the hearing) and I are homeowners in Concord. Our subdivision borders on the Concord Naval Weapons Station.

I am very much opposed to the transportation of spent nuclear fuel out through the "host countries'" ports, in through United States' ports, and overland across our nation to temporary processing and storage facilities. This action poses considerable risks in the case of an accident to millions of people living on and near the shipping paths in the host countries and the United States, and to all points in between, as well as to people directly involved with the handling of the toxic materials. 501-1

The only rational course of action is to minimize the distance spent nuclear waste must travel between reactor and reprocessing and/or storage, which action is Management Alternative 2 (S.4.6., Draft Environmental Impact Statement, pg. 44). As for the "drawbacks" to Management Alternative 2 as summarized in the D.E.I.S., Subsection S.4.6.1.:

1. Cost of U.S. assistance to help countries set up a secure area, purchase storage casks, etc..

If the United States does not spend the money overseas to set up secure storage areas for the nuclear waste we will spend it here for the same purpose. Also, where is it written that the U.S. must totally bankroll this operation? Most of the host countries involved are "first-world", developed nations that can darn well afford to build containment facilities and accept responsibility for their own nuclear waste products. 501-2

2. "The accumulation overseas of ever larger amounts of spent nuclear fuel containing HEU poses a risk that such weapons-usable material might be illicitly diverted to a weapons program."

Because "Only spent nuclear fuel containing uranium enriched in the United States would be covered by the proposed (D.O.E.) policy" (Cover Sheet, D.E.I.S.), the obvious solution is for the United States to totally withhold highly-enriched uranium from host countries. The incentive for host countries to expend funds to build facilities using low-enriched uranium for their

RESPONSE TO COMMENT
COMMENTOR NO. 501: JACOBSMEYER, ELIZABETH

Response to Comment No. 501-1

The commentor's opposition to acceptance of foreign research reactor spent nuclear fuel into the United States is noted. The risks to the environment and the health and safety of the workers and the public that would result from acceptance of the foreign research reactor spent nuclear fuel into the U.S. were determined to be low as indicated in Section 4.2 of the EIS.

Response to Comment No. 501-2

The commentor's preference for Management Alternative 2, is noted. This alternative is discussed in Sections 2.3 and 4.4 of the EIS.

As discussed in Section 4.4.1 of the EIS, the cost of establishing storage facilities in the foreign countries would be much greater than building one or two storage facilities in the United States. Furthermore, the United States would not necessarily pay for the entire operation. Financing alternatives are discussed in Sections 2.2.1.2 and 2.2.2.3 of the EIS.

As discussed in Section 1.1 of the EIS, the United States has not supplied HEU to any foreign research reactors since 1992 and has no plans to resume this activity. There are, however, other possible suppliers, such as Russia and China, and there is a significant backlog of spent nuclear fuel containing U.S.-origin HEU abroad at this time.

COMMENTOR NO. 501: JACOBSMEYER, ELIZABETH (CONT'D.)

2

"peacetime" research and to refuse shipments of highly-enriched uranium from countries other than the United States is their participation in NPT. THE UNITED STATES MUST NOT, UNDER ANY CIRCUMSTANCES, PROVIDE URANIUM FUEL TO COUNTRIES THAT ARE NOT SIGNATORIES TO THE TREATY ON NON-PROLIFERATION OF NUCLEAR WEAPONS. 501-2 (Cont'd.)

Any host country that uses spent HEU to develop nuclear weapons or sells spent HEU to third-party nations for the purpose of developing nuclear weapons, or for any ostensible purpose, is by definition hostile to the goals of the NPT, the United States of America, and its allies. Because some, if not most, of the spent fuel concerned supplied to such host countries would be from the U.S., such countries would essentially be blackmailing the people of the United States with their own philanthropy, as the nuclear fuel in question is supposedly being used for the benefit of the host countries' medical and scientific research. 501-3

In summary, I feel the host countries must accept the lion's share of responsibility for their nuclear programs for the purposes of safety in the handling of spent nuclear fuel and to honor their ethical commitment as signatories of the NPT. U.S. management and technical assistance in the reprocessing and/or storage of spent nuclear waste in the host countries is both logical and desirable, and shoves up the United States' commitment to cooperate with other nations in the very serious business of decreasing the proliferation of nuclear weapons in our world.

Sincerely,

Elizabeth Jacobsmeyer

Elizabeth Jacobsmeyer
1930 Palo Verde Drive
Concord, CA 94519
(510) 682-6581

cc: Mayor Helen Allen
City of Concord
1950 Parkside Drive
Concord, CA 94519

Supervisor Mark DeSaulnier
2425 Bisso Lane, Suite 110
Concord, CA 94520

Gov. Pete Wilson
Constituent Affairs
State Capitol
Sacramento, CA 95814

Rep. George Miller
2205 Rayburn House Off. Bldg.
Washington, D.C. 20515-0507

Sen. Barbara Boxer
112 Hart Senate Off. Bldg.
Washington, D.C. 20510

Sen. Dianne Feinstein
367 Hart Senate Off. Bldg.
Washington, D.C. 20510

RESPONSE TO COMMENT
COMMENTOR NO. 501: JACOBSMEYER, ELIZABETH (CONT'D.)

Response to Comment No. 501-3

An objective of the proposed policy is to support the continuation of cooperative agreements with foreign nations in reducing the risks of nuclear weapons proliferation (Sections 1.1 and 1.2 of the EIS). Foreign research reactor operators purchase their fuel and bear the costs of reactor operations. It is inaccurate to characterize foreign research reactor operations as dependent on charity. Most of the radioisotopes used for medical analyses in the United States are produced in foreign research reactors.

COMMENTOR NO. 502: MABRY, DIANE C.

DIANE C. MABRY
11408 N.E. 98TH CIRCLE
VANCOUVER, WA. 98662
360-892-6325/360-694-8501

D.O.E.- CHARLES E. HEAD
OFFICE OF SPENT FUEL MANAGEMENT
EM-37, 1000 INDEPENDENCE AVE. SW
WASHINGTON, D.C. 20585-0001

DEAR MR. HEAD,
THIS LETTER IS IN RESPONSE TO THE PROPOSAL TO IMPORT HIGH-LEVEL NUCLEAR WASTE FROM OTHER COUNTRIES AND ROUTE THEM THROUGH OUR AREA TO HANFORD. I MUST SAY I STRONGLY PROTEST THIS PROPOSAL AS I HAVE TO LIVE HERE AND I AM RAISING MY CHILDREN HERE. I BELEIVE IF YOU PROCEED WITH THIS PROPOSAL YOU WILL BE PUTTING ALL OF US AT RISK OF GREAT DANGER , AND GREAT EXPENSE THAT WE SHOULD NOT HAVE TO TOLERATE. 502-1

HANFORD IS ALREADY A HIGH-RISK AREA WITH A LEAKING STORAGE POOL ALONGSIDE THE COLUMBIA RIVER AND IS NOT AN ACCEPTABLE STORAGE FACILITY FOR THE WASTE ALREADY STORED THERE, WASTE THAT WILL NOT GO AWAY. HOW CAN YOU POSSIBLY CONSIDER TAKING ON THIS RESPONSIBILITY? I IMPLORE YOU TO FIGHT THIS PROPOSAL AND PROTECT OUR COUNTRY BEFORE TAKING ON EVERYONE ELSE'S PROBLEMS. I WANT MY CHILDREN TO BE SAFE!

SINCERELY,

Diane Mabry

DIANE C. MABRY

RESPONSE TO COMMENT
COMMENTOR NO. 502: MABRY, DIANE C.

Response to Comment No. 502-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 503: MICKEY, STEPHEN

Stephen Mickey
19806 N.E. 224 Ave.
Brush Prairie, Washington
98606

Dear Mr. Head

I am opposed and ask you in my behalf as my appointed public official not to import more spent nuclear fuel to Hanford Washington. Our problem here is already serious beyond repair and we need no more contaminants in our death yard. 503-1

My wife and I both hold Masters degrees and have thought this issue through carefully. We both want no more spent fuel here. Please write to us and lets us know what your intentions are. Thank you

Stephen Mickey

Stephen Mickey

RESPONSE TO COMMENT
COMMENTOR NO. 503: MICKEY, STEPHEN

Response to Comment No. 503-1

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

COMMENTOR NO. 504: DEWEY, DAVID D.

June 14, 1995

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-0001

Dear Mr. Head:

I attended the D.O.E. public hearing in Concord, California on May 22, 1995. My wife and I own our home in Concord.

I am concerned about several of the conclusions in the Draft EIS about the use of the Concord Naval Weapons Station as a port for shipment of nuclear research reactor spent fuel. Specifically, I do not understand how Concord passed the six screening criteria for port selection.

Criteria 2 - Ports must provide a safe passageway for ships from the open ocean to the selected terminals.

Concord issue: The passageway to the Concord Naval Weapons Station passes through the Golden Gate Bridge, the Carquinez Strait, and the Delta to Concord. This is a narrow passageway and very heavily traveled due to the proliferation of oil refineries in the area. This does not qualify as a safe passageway.

Criteria 5 - Ports must have the lowest human populations to the extent economically feasible and maximum extent practicable.

Concord issue: Concord is part of the Bay Area with a population of 6.3 million people. This is not a low population area. The decision to choose Concord must have been made based on Concord's population of 113 thousand only. Oakland was taken out of consideration as a port because of the high population center in close proximity to the port. Concord should be withdrawn from the list for the same reason. 504-1

Criteria 6 - Ports must be reasonably close to potential storage sites so that foreign research reactor spent fuel can be quickly delivered to the storage site.

Concord issue: Concord is not reasonably close and fuel would not be quickly delivered. Any shipment would have to go over the Sierra which could be dangerous anytime of the year. Also freeways around the Weapons Station are very accident-prone.

RESPONSE TO COMMENT
COMMENTOR NO. 504: DEWEY, DAVID D.

Response to Comment No. 504-1

The physical constraints of the passage from the Pacific, through San Francisco Bay to Concord NWS were considered as part of the port selection process. This passage meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS).

The volume or size of the local marine traffic (present or future) was not considered in the calculation of risk associated with the shipment of foreign research reactor spent nuclear fuel. In general, the number of ship mishaps is not proportional to the amount of ship traffic because port ship traffic is slow, and even when heavy, is normally a small number of ships per hour. Historically, increasing the volume does not significantly increase the probability of an accident. Rather, the number of ship mishaps is associated with navigational hazards and distances from the port to the open ocean or a large bay (port selection Criterion 2; Appendix D, Section D.1.9.2 of the EIS). Appendix D, Section D.5.3.1.3 of the EIS presents a discussion of the determination of the probability of ship accidents used in the EIS.

The worst plausible accident associated with the shipment of foreign research reactor spent nuclear fuel is considered to be the collision of the ship carrying the spent nuclear fuel with a petroleum tanker. In this accident, which is evaluated in the EIS, the transportation cask is assumed to be damaged in the collision, then subjected to a fire that resulted from the collision (Appendix D, Section D.5). Section 4.2.2.3 of the EIS discusses the assumptions that went into the port accident analyses and the results of those analyses. The addition of a mishap at a land-based facility, although it might in some way be the precursor for a severe accident involving a spent nuclear fuel-carrying ship, would not add to the severity of the worst plausible accident discussed above. As a result, the existence of land-based facilities such as refineries have no direct impact on the risk associated with spent nuclear fuel shipments, and are not included in the port selection criteria.

The distance from the port to the management site is only one of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other considerations such as port population, route population, port experience with handling containers, and access to the ocean would also be considered in making the final selection of ports of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

COMMENTOR NO. 504: DEWEY, DAVID D. (CONT'D.)

Please rethink Concord's status in relation to the port screening criteria and for the safety of the Bay Area, please take Concord off the list of ports.

Sincerely,

David D. Dewey

David D. Dewey
1930 Palo Verde Drive
Concord, CA 94519
(510) 682-6581

cc: Mayor Helen Allen
City of Concord
1950 Parkside Drive
Concord, CA 94519

Supervisor Mark DeSaulnier
2425 Bisso Lane, Suite 110
Concord, CA 94520

Gov. Pete Wilson
Constituent Affairs
State Capitol
Sacramento, CA 95814

Rep. George Miller
2205 Rayburn House Off. Bldg.
Washington, D.C. 20515-0507

Sen. Barbara Boxer
112 Hart Senate Off. Bldg.
Washington, D.C. 20510

Sen. Dianne Feinstein
367 Hart Senate Off. Bldg.
Washington, D.C. 20510

RESPONSE TO COMMENT
COMMENTOR NO. 504: DEWEY, DAVID D. (CONT'D.)

COMMENTOR NO. 515: KOMAROMY, MARGI

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: MARGI KOMAROMY **Phone:** 510 680 4961
Title and Organization: EXECUTIVE-ADMINISTRATOR-SECRETARY
Address: 3135 CLAYTON RD #103A
City: CONCORD **State** CA **Zip** 94519-2712

*** COMMENTS ***

I live in Clyde with my fiancé and his family. It would make us all feel very uncomfortably scared to know that toxic nuclear waste would be in our backyards. Preferrably it would best serve this nation well to close down the Naval Weapons Station, and to utilize energies within the nation toward peace & alternate forms of research for electricity etc. 515-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 515: KOMAROMY, MARGI

Response to Comment No. 515-1

Concord NWS is a Department of Defense facility. Any decision to close it down would be undertaken as a separate action by the Department of Defense. In the foreseeable future, Concord NWS would be an operating facility.

COMMENTOR NO. 516: POE, W. LEE, JR.

June 19,1995
807 E. Rollingwood Rd.
Aiken, SC 29801

Foreign Research Reactor EIS
Office of Spent Nuclear Fuel Management (EM-37)
Office of Environmental Management
United States Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Sir:

Comments on Policy Concerning Foreign Research Reactor Spent Nuclear Fuel in DEIS

I would like to provide my comments on DOE/EIS-0218-D.

If, as the EIS says, there is a national benefit for the United States to receive foreign highly enriched fuel; then the U. S. should adopt a 10-year policy for receiving this fuel. The FRR SNF should be sent to either SRS or INEL for safe interim storage and/or processing. I feel strongly that DOE should not plan to store SNF indefinitely at SRS or INEL. As I state in the bulk of this letter, the scope of the management alternatives must be expanded to include all management activities for the SNF up to actual disposal.

Near-term plans should be made and demonstrated to be acceptable for disposal of these materials in a geologic repository out of the way of man. My present preference is reprocess the SNF, recover the HEU, dilute it to the 20% level that no longer presents a proliferation problem and reuse the enriched uranium. Both SRS and INEL have demonstrated that this can be accomplished in a safe, environmentally sound method using essentially available equipment and facilities. I strongly believe that this recovery and dilution should be DOE's selected alternative for HEU research reactor fuels. My major justification for this is that SRS has developed and is in the process of implementing means to dispose of low level waste, TRU waste and high level waste. Conditioning and disposal can be accomplished in an environmentally sound manner. Disposal requires DOE to complete and start-up the WIPP and high-level radioactive waste geologic repository. The suitability of these wastes for geologic disposal has been well demonstrated. I understand SRS is further along in demonstration of the high-level waste disposal than INEL; therefore, SRS is a better choice to receive this FRR SNF. 516-1 516-2

The DEIS seems to favor Alternative 1, safe interim storage of the FRR SNF, using for SRS, a two phased storage mode.

RESPONSE TO COMMENT
COMMENTOR NO. 516: POE, W. LEE, JR.

Response to Comment No. 516-1

The commentor's preference for domestic chemical separation is noted. This is Management Alternative 1, Implementation Alternative 6, which is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS. The commentor's preference for blending the HEU down to LEU would also be DOE's stated preference. It is also part of Management Alternative 3, which is discussed in Section 2.4 and 5.5 of the EIS.

Response to Comment No. 516-2

The commentor's preference for chemical separation at the Savannah River Site over the Idaho National Engineering Laboratory is noted. In the near future the chemical separation facilities at the Savannah River Site might resume operations for the foreign research reactor spent nuclear fuel or for another purpose. These options are discussed in Section 2.2.2.6 of the EIS.

DOE announced a Record of Decision on May 30, 1995 for the Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs EIS. Chemical separation at Idaho National Engineering Laboratory was not included in this Record of Decision, so additional site-specific NEPA documentation would be required to restart the chemical separation facilities at this management site.

- Phase I would be to store the SNF in RBOF and L-Reactor Basin. RBOF has a demonstrated corrosion-free environment and could be used for long-term interim storage. L-Reactor Basin was designed for short-term wet storage and has had corrosion problems storing aluminum clad SNF for long periods. There is a corrective action (underway or planned) to improve this environment, but my judgment is that it can never be made corrosion free. In addition, the basin has no containment. I question long-term storage in that basin. I was not convinced that safe interim storage could be accommodated in L-Reactor by the information included in the DEIS. 516-3
- Phase II considers construction of improved dry storage capability. The DEIS states that these facilities cannot be available for 10 years. This alternative goes on to say the SNF would be transferred to the new dry storage facilities (Phase II storage facilities) and could be used for approximately 30 years until ultimate disposal. The DEIS does not address what would be required for this disposal. DOE should demonstrate that aluminum-clad HEU research reactor fuel can be disposed of in a geologic repository without extensive reprocessing before disposal to stabilize the components of the SNF for disposal. In addition, DOE should beef up the information on the technology and facility requirements for conditioning the aluminum clad SNF for safe interim (30-50 years) dry storage. 516-4

It is clear, from reading the DEIS that dry storage offers a safe, efficient storage mode, if the SNF has been properly conditioned. It is also important, in comparing this alternative to Alternative 6, that the final conditioning of the SNF be included in the evaluation.

I feel the DEIS shows that the 10-year envelope for acceptance of the fuel under this policy is adequate for this nation and foreign nations to develop alternative plans to safeguard the nuclear materials from these reactors. 516-5

I also feel that the DEIS shows in sufficient detail that modes of ocean and land transport, ports of entry do not offer significant risk. I recognize that "not in my neighborhood" comments will be heard from people not understanding the risk. I understand the risk and am willing to have the SNF in my neighborhood for my lifetime and the lifetime of my children as long as the U. S. Government has sound technical plans for geologic disposal at some reasonable future time and can show the SNF to be safe until that time. I am unwilling to say receive the FRR SNF with no closure of this concern even though interim storage is shown to be safe. I am unwilling to have wet or dry storage at SRS become the defacto disposal mode. 516-6

Very truly yours,

W. Lee Poe

W. Lee Poe, Jr.

Response to Comment No. 516-3

The commentor's concern about corrosion issues associated with the storage of foreign research reactor spent nuclear fuel at the L-Reactor Disassembly basin at the Savannah River Site is noted. Appendix F, Section F.1.3.1.1 has been revised to include the upgrades planned for the L-Reactor basin and the reasons why DOE considers the basin appropriate for safe interim storage of foreign research reactor spent nuclear fuel.

Response to Comment No. 516-4

Ultimate disposition of spent nuclear fuel from foreign research reactors is beyond the scope of this EIS (Section 1.3 of the EIS). Section 4.2.7 of the EIS contains a summary description of expected environmental effects of ultimate disposition. As stated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms (generated due to chemical separation or other processing technology) DOE would continue to manage the material in exisiting facilities at the DOE management site(s).

Section 2.6.5.1 and Appendix F, Section F.2.9 of the EIS indicate that, based on the existing experience of dry storage of aluminum-based spent nuclear fuel, no special conditioning of the fuel would be needed for safe 30- to 50-year dry storage.

Response to Comment No. 516-5

The commentor's suggestion that the proposed 10-year policy period would give research reactor operators sufficient time to develop other alternatives for safeguarding the foreign research reactor spent nuclear fuel, is noted.

Response to Comment No. 516-6

The commentor's support for the risk analyses provided in the EIS for marine, port and ground transportation is noted. If the spent nuclear fuel is accepted into the United States, it would be stored in either wet or dry storage at one of the five DOE management sites (including the Savannah River Site) identified in this EIS for an interim period not to exceed 40 years. Ultimate disposition in a geologic site, such as the one under consideration at Yucca Mountain, would occur after that time.

COMMENTOR NO. 519: GOLDEN, SUE

Please listen to us,
we do not want
nuclear waste
shipped through
Port of Tacoma or
any of our Ports.

Sue Golden

519-1

RESPONSE TO COMMENT
COMMENTOR NO. 519: GOLDEN, SUE

Response to Comment No. 519-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 520: FORM LETTER E

June 23, 1995

Charles Head, Federal Project Manager
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, D.C. 20585
fax 202 586 5256

Re: Nuclear Waste being shipped through the port of Tacoma, WA.

Dear Mr. Head:

I would like to express my concern on this issue. Please do not ship "spent" nuclear fuel through Tacoma, WA. I am a registered voter and a copy of this letter is being sent to my member of Congress and my Senators. Feel free to contact me at the address below should you have any questions or responses to this letter. 520-1

Thank you for your prompt attention to this matter.

Sincerely,

Robert T. Werner
9513 Sunrise Beach Dr. NW
Gig Harbor, WA 98332

RESPONSE TO COMMENT
COMMENTOR NO. 520: FORM LETTER E

Response to Comment No. 520-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Commentor No. 520: Form Letter E (Cont'd.)

Individuals submitting this form letter:

Allen, Annette E
Bilow, Dennis
Bilow, Loretta E
DeShaw, Marjorie
Heath, Traci
Kelly, Donald
Kenefick, Virginia
Landree, Sheri
Lawrence, Robyn
Miller, Brent
Morrow, Lillian
Nordquist, Greg
Ottoson, Lisa M.
Sperling, Barbara E.
Wardlow, Karen
Werner, Robert T.
Wicker, Melanie
Wilcox, Willis

Response to Comment
Commentor No. 520: Form Letter E (Cont'd.)

COMMENTOR NO. 524: GENNOW, TERRY & SHELIA

08/23/95 05:36 FAX 12068469582 CSS 001

Send To:	Charles Head
Firm:	Office of Spent Nuclear Fuel Management (EM-37) U.S. Department of Energy
Receiving Fax Number:	202-586-5256
Sent From:	Terry & Shelia Gennow Federal Way, Washington
Sending Fax Number:	206-946-9582
Sending Phone Number:	206-927-6315

WE CARE ABOUT OUR CHILDREN'S FUTURE AND OUR QUALITY OF LIFE - PLEASE DO NOT ALLOW THE SHIPMENT OF HIGHLY RADIOACTIVE NUCLEAR WASTE THRU THE PORT OF TACOMA 524-1

Number of Pages Sent Including Cover Sheet: 1
June 23, 1995, 05:26 AM

*** * * CONFIDENTIAL MATERIAL * * ***

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CSS, Inc.
10900 N.E. 4th Street, Suite 900
Bellevue, WA 98004
1 - 800 - 843 - 2188

RESPONSE TO COMMENT
COMMENTOR NO. 524: GENNOW, TERRY & SHELIA

Response to Comment No. 524-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 525: DEVIK, BARBARA & RUDOLF

June 22, 1995 3:46 PM From: RUDOLF DEVIK Fax #: 2067526964 Page 2 of 3

FAX

June 22, 1995

TO: CHARLES HEAD
OFFICE OF SPENT NUCLEAR FUEL (EM37)
US DEPT. OF ENERGY
1000 INDEPENDENCE AVE. SW
WASHINGTON DC 20585

FAX NO. 202-586-5256

FROM: Barbara and Rudolf Devik

REF./No. Pages:

MESSAGE:

We were unable to attend the Tacoma meeting with reference to the scheme to consider Tacoma as a port of entry for nuclear waste.

We object to the plan.

We feel the use of this city for a site of this kind would be a great mistake.

Geographically the area is in the middle of a growing and expanding urban area of several million persons. Economically, it would stifle the growth which is taking place here and which offers promise of even greater expansion. Environmentally, it would jeopardize and area which is of great concern to the government and to the private sector. 525-1

RESPONSE TO COMMENT
COMMENTOR NO. 525: DEVIK, BARBARA & RUDOLF

Response to Comment No. 525-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. The analyses provided in Sections 4.2.2 and 4.5 of the EIS indicate that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port.

The population in the port, surrounding areas, and along the route to the management sites were considered during the analysis of potential ports of entry (Appendix D of the EIS). In the case of both incident-free transport of foreign research reactor spent nuclear fuel and accidents, impacts on these populations were shown by the analyses (Section 4 of the EIS) to be low.

DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not impact normal commercial operations, and therefore not endanger the ports' status with respect to their clients. This is based on the fact that the foreign research reactor spent nuclear fuel would be shipped to the United States in standard shipping containers that would require no special handling or precautions. As such, there should be no adverse commercial or economic reaction to the use of the port. Historically, there were no adverse commercial impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

COMMENTOR NO. 525: DEVIK, BARBARA & RUDOLF (CONT'D.)

June 22, 1995 3:45 PM From: RUDOLF DEVIK Fax #: 2067526964 Page 3 of 3

The Dept. of Energy and its forerunners have much to answer for in this State. We hope this will not be added to the list.

3615 No. Geve St., Tacoma, WA 98407 206 759 3534/3535

RESPONSE TO COMMENT
COMMENTOR NO. 525: DEVIK, BARBARA & RUDOLF (CONT'D.)

COMMENTOR NO. 526: WRIGHT, DARLA J.

23 June 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue S.W.
Washington, D.C. 20585

Dear Mr. Head,

I want to add my voice to those opposed to the transporting of any Nuclear waste through the Port of Tacoma. I am appalled to think of the catastrophic consequences this could create through any kind of accident that could possibly occur. 526-1

When Nuclear Reactor plants are built and used the disposal of the waste that is generated there should be part of the plan. Not an afterthought! And NOT transported anywhere. Disposal should be handled right on the site. 526-2

Our world is so fragile as it is. We have abused it far to long and it's time to stop and take care of it. This is not right and should not happen. Do not even think of this as a viable solution. It is not!

Sincerely,

Darla J. Wright

Darla J. Wright
1712 S.W. 347th Pl.
Federal Way, Washington 98023
(206) 838-1349

RESPONSE TO COMMENT
COMMENTOR NO. 526: WRIGHT, DARLA J.

Response to Comment No. 526-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 526-2

The commentor's opposition to the transportation of radioactive wastes is noted. The commentor's preference for disposal at the reactor site is likewise noted. This is Management Alternative 2, Subalternative 1a, which is described in Section 2.3 of the EIS.

As part of its nuclear weapons nonproliferation policy, the United States accepted spent nuclear fuel from foreign research reactors for over 30 years (Section 1.1 of the EIS). This policy of planned acceptance by the United States was intended to minimize risks that HEU would be diverted to the construction of nuclear weapons. As discussed in Section 1.2 of the EIS, many of the foreign research reactor operators cannot store their spent nuclear fuel at the reactor site due to a lack of facilities or regulatory constraints. Thus, the intent of the proposed policy is to remove as much U.S. -origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

COMMENTOR NO. 531: GIBELYOU, SHERRIE

Tom & Sherrie Gibelyou
8202 59th St. Ct. W.
Tacoma, WA 98467

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

June 22, 1995

Dear Mr. Head,

I cannot remember a time in my life when anything has concerned me as much as the proposal to ship high-level nuclear waste through the Port of Tacoma. My husband and I are the parents of two children. We were born and raised in Tacoma and have chosen to remain here because we are convinced that the Pacific Northwest offers unique beauty, opportunity, and a way of life that cannot be duplicated in other parts of the nation.

Until now, our children's futures appeared bright and promising. At 4 yrs. and 9 yrs. old, our daughter and son have had fears about natural disasters, most recently the threat of a large-scale earthquake. I've always told them not to worry, we have taken measures to be safe and are as prepared as we can be. Earthquakes are something we cannot control. Unfortunately, I cannot offer the same reassurances concerning this proposal. Should this become a reality for our city, there is no way to prepare, no way to feel safe. We become sitting ducks and pray that an accident never happens. But what if it does? 531-1

Unlike earthquakes, this doesn't have to be something that we live with. Our children have a right to grow up without this kind of threat hanging over their heads. You have the power to help restore our peace of mind. I implore you to please do everything possible to stop this from happening. You don't have to live here, Mr. Head. We do. Tacoma is our home, our life. Please, for our children, do not recommend the Port of Tacoma for this proposal.

Thank you for your consideration,

Sherrie Gibelyou

RESPONSE TO COMMENT
COMMENTOR NO. 531: GIBELYOU, SHERRIE

Response to Comment No. 531-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 532: REYNOLDS, GREGG

June 22, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
Washington, D.C. 20585
fax (202) 586-5256

Dear Mr. Head:

I urge that the Department of Energy scrap the horrendous proposal that high-level nuclear waste be shipped through the Port of Tacoma or any other port in Washington State. Such high-risk shenanigans obviously would endanger all who live or travel in this region, the wildlife, and natural, national treasures including Puget Sound, and Olympic National Park. This is a dumb idea whose time must never come! 532-1

I also wish to complain about the federal bureaucratic arrogance displayed in the so-called public hearings conducted in Western Washington. You and your associates should be ashamed of yourselves...more importantly you should become sensitized and genuinely responsive to the public with its genuine concerns about its remote, heavy-handed big government. 532-2

Sincerely,

Gregg Reynolds
4305 - 68th Ave. N.E.
Olympia, WA 98516

cc: U.S. Senator Slade Gorton
U.S. Senator Patty Murray

RESPONSE TO COMMENT
COMMENTOR NO. 532: REYNOLDS, GREGG

Response to Comment No. 532-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 532-2

DOE does not agree with the commentor's assertion of "federal arrogance" displayed at public meetings in Western Washington. DOE's responsiveness to the public is demonstrated by the seventeen public hearings which were held on the draft EIS in the locations determined to be most likely to be directly affected by the EIS alternatives, specifically in the ports of entry and at the potential management sites. In addition to accepting comments from the public during these hearings, written comments were also welcomed, and encouraged.

COMMENTOR NO. 533: SMITH, WILLIAM F., JR.

June 22, 1995

Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Mr. Charles Head:

Washington State has been trashed enough by nuclear waste problems that plague Hanford. I myself am a "Downwinder" and now you want to bring nuclear waste through a community with several hundred thousand people living nearby. I say NO! 533-1

I have already contacted my state and federal senators and representatives asking them to intervene.

Stay Away From The Puget Sound!

William F. Smith Jr.
622 175th St. S.
Spanaway, WA 98387

RESPONSE TO COMMENT
COMMENTOR NO. 533: SMITH, WILLIAM F., JR.

Response to Comment No. 533-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 536: LIU, DENISE

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: DENISE LIU Phone: 510-686-9386

Title and Organization:

Address: 2660 WELLINGTON CT.

City: CONCORD State CA Zip 94520

*** COMMENTS ***

I am writing to you to let you know I protest the use of the Concord Naval Weapon station as a port to receive weapons grade nuclear waste. You obviously have a current system you are using to transport the material to waste storage, and I don't see the advantage of changing the system. You are endangering people who live in the area, who did not buy their houses with the knowledge this was going to happen. You are lowering our property values on our homes and endangering all the people in the surrounding areas. 536-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 536: LIU, DENISE

Response to Comment No. 536-1

The commentor's opposition to the use of the Concord NWS to receive foreign research reactor spent nuclear fuel is noted. The port selection criteria discussed in Appendix D, Section D.1.9 of the EIS identify ports that can safely handle foreign research reactor spent nuclear fuel. The analyses provided in the EIS indicate that the use of any of the ports indicated by the port selection process, including Concord NWS, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2).

In regard to a possible reduction in property values as a result of the receipt of foreign research reactor spent nuclear fuel at Concord NWS, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Historically, there were no adverse commercial impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

No "system" currently exists in the United States for transporting foreign research reactor spent nuclear fuel to waste storage. The goal of this EIS is to evaluate the environmental impacts of reasonable alternatives for disposition of this spent nuclear fuel, so that policy makers can factor this knowledge into the decisionmaking process.

COMMENTOR NO. 538: CONRY, MARGARET

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Margaret Conry **Phone:**
Title and Organization: Green Party member / Student
Address: 1441 Creekside Dr., Apt # 1074
City: Walnut Creek **State** CA **Zip** 94596

*** COMMENTS ***

I feel that the proposed storage site for nuclear fuel rods in Concord would be a devastating and destructive situation: not only for the 300,000 citizens of the Concord area but the millions of people in any site on the planet. This planet is a gift of God which is on loan to us, and we have the responsibility of being good stewards of the planet. We have the responsibility as co-creators to protect and save it and all its inhabitants 538-1

Con't →

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 538: CONRY, MARGARET

Response to Comment No. 538-1

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or 3), there would be no storage of this material at the Concord NWS, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

COMMENTOR NO. 538: CONRY, MARGARET (CONT'D.)

Putting a nuclear storagesite in Concord is not a responsible action and will only bring further ruin and destruction to the planet. 538-1 (Cont'd.)

Margaret Conry

RESPONSE TO COMMENT
COMMENTOR NO. 538: CONRY, MARGARET (CONT'D.)

COMMENTOR NO. 540: MCTAGGART, FRANCIS & ROSALIE

June 16, 1995

Charles Head
Office of Spent Fuel Management, EM-37
U.S. Dept. of Energy
1000 Independence Ave. SW
Washington, D.C. 20585-0001

Dear Mr. Head:

Please be informed that we are totally opposed to any high level nuclear spent fuel rods being shipped through our communities in the Pacific Northwest as well as the storing of such waste. 540-1

Sincerely,

Francis & Rosalie McTaggart

Francis & Rosalie McTaggart
1202 N.W. 52nd Street
Vancouver, WA 98663

RESPONSE TO COMMENT
COMMENTOR NO. 540: MCTAGGART, FRANCIS & ROSALIE

Response to Comment No. 540-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through any ports in the Pacific Northwest is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 544: ADLE, DOROTHY R.

2570 Walnut Bl. #23
Walnut Creek, CA
94596

Mr. Charles R. Head
U.S. Dept. of Energy
1000 Independence Ave. SW.
Washington, D.C. 20585-0001

Dear Mr. Head

The proposal to transport and store temporarily spent nuclear fuel to and at the Concord Naval Weapons Station, Concord, California is a terrible idea! Approaching Concord via San Francisco Bay entails sailing under several highly travelled bridges. San Francisco Bay has 544-1

544-2

RESPONSE TO COMMENT
COMMENTOR NO. 544: ADLE, DOROTHY R.

Response to Comment No. 544-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or 3) there would be no storage of this material at Concord NWS, any other port, or anyplace except for DOE management sites. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the spent nuclear fuel transportation cask.

Response to Comment No. 544-2

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process and found to meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS).

On the issue of air and water quality as it pertains to the proposed policy of managing foreign research reactor spent nuclear fuel, DOE is convinced that there would be no significant adverse impacts to any of the ports that might be used to receive the material. Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive material has ever been released from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

already been heavily polluted, the worst offenders being various branches of the armed services. Now we should risk the most dangerous pollution of all? 544-2 (Cont'd.)

In addition, this is an earthquake-prone area. Not only the well-known San Andreas Fault, but much closer to Concord the Hayward and Concord Fault are a constant worry. 544-1 (Cont'd.)

Someone in your department should listen to a few traffic reports 544-3

Response to Comment No. 544-3

The frequency of accidents on highways has been taken into account in all the ground transport risk estimates in the EIS. As discussed in Section 4.2.3 and Appendix E of the EIS, spent nuclear fuel has been transported along highways, railways, and waterways for over four decades without release of the radioactive contents from the spent nuclear fuel transportation cask.

COMMENTOR NO. 544: ADLE, DOROTHY R. (CONT'D.)

in this immediate area. Overturned "Semis" are all-too-frequent and traffic is really heavy near Concord. 544-3 (Cont'd.)

I am certainly in favor of "non-proliferation" but there must be a better way than this.

Very truly yours,

Dorothy R. Adle

RESPONSE TO COMMENT

COMMENTOR NO. 544: ADLE, DOROTHY R. (CONT'D.)

COMMENTOR NO. 546: DIVET, BETTY H.

June 19, 1995

Mr Charles Head
1000 Independence
Washington DC. 20585

Dear Mr Head,
We do not want nuclear waste transported into the United States or into the port of Tacoma Washington.

Sincerely
Betty H Divet
9225 S Fawcett
Tacoma WA 98444
[illegible]

546-1

RESPONSE TO COMMENT
COMMENTOR NO. 546: DIVET, BETTY H.

Response to Comment No. 546-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 547: MOWAT, GREG

GREG MOWAT

Telephone 206-759-9586

4108--28TH ST. NO.
TACOMA,WA.-98407

TO: Charles Head--Office of Spent Nuclear Fuel Management (EM-37)
U. S. Department of Energy
1000 Independence Ave.
Washington,D.C. 20585

RE: Potential Shipment of Highly Enriched Nuclear Fuel Though the Port of Tacoma
Puget Sound, and The Pacific Northwest

I am an activist in the Tacoma community,currently the elected chair of the Pierce County Democratic Party,a senior member of the United Way Board (second term),a member of the Citizen's Advisory Committee for the University of Washington branch campus in Tacoma,and also serve as an at-large member of the state-wide board of Washington Citizen Action--an affiliate of National Citizen Action.I am most concerned that the Department of Energy,an organization that I have respected for it's adroit decision -making ,would consider utilizing The Port of Tacoma for the trans-shipment of these highly unstable and toxic nuclear wastes.Apart from the negligent aspects of the draft environmental impact statement,I am most concerned that the Department has so little regard for the efforts and hard work of the Citizens of Tacoma as they labor to establish a City of which they can be proud.They have cleaned up a major environmental nightmare with the considerable effort expended in reclaiming the site of the Asarco copper smelter, absorbing job loss and facilitating major political co-operation in the process;They have worked to clean up Commencement Bay,and are laboring to convert a mill town economy to the 21st century,being at a very delicate stage of that evolution--This move to potentially make Tacoma a nuclear waste trans-shipment point will have a disastrous impact on the progress the City is about to make--several other proposed sites are much better established and are beyond the point where the impact will cripple their growth and potential.

It would be poor public policy if the Department decides to proceed with plans to designate Tacoma based on relative political clout--There are excellent objective reasons to choose another Port;there are compelling human reasons for allowing our community to proceed with its growth and development unfettered by the damaging stigma that would surely result from your designation of this City as the trans-shipment point.I trust that you will weigh your options carefully and make the right decision. 547-1

Thank you for your careful consideration of my concerns.I have fallen in love with this community and sincerely believe that its best interests are served as are those of this Nation by seeking another alternative for this purpose.

Sincerely Greg Mowat

RESPONSE TO COMMENT
COMMENTOR NO. 547: MOWAT, GREG

Response to Comment No. 547-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Based on the evaluation of impacts presented in Section 4 of the EIS, the risk associated with the shipments of foreign research reactor spent nuclear fuel through any of the ports identified is not greater than the risk associated with the handling of other hazardous cargos. DOE acknowledges that, in many instances, the perception by the public of the risks associated with spent nuclear fuel may be greater than the actual risk, or the risk from other even more hazardous activities. However, adverse impacts have not been observed during the 30 plus years foreign research reactor spent nuclear fuel was accepted into the United States in the past. Under NEPA regulations, the socioeconomic effects evaluated for this EIS do not include those associated with psychological fear of receiving spent nuclear fuel. Based on past experience DOE considers that shipping foreign research reactor spent nuclear fuel through the Port of Tacoma would have no adverse economic impacts on business within the port or the surrounding communities.

COMMENTOR NO. 549: AGNELLO, EVONNE

Evonne Agnello

June 22, 1995

Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Mr. Head:

I want to register my strong protest to the proposal for nuclear waste to be shipped through the Port of Tacoma. 549-1

I believe the people of Tacoma would rally to stop this proposal from going any further, should plans proceed. A heavily populated area of pristine natural beauty should be the antithesis of where these dangerous wastes should pass.

Sincerely,

Evonne Agnello

Evonne Agnello
913 N. Newton St.
Tacoma, WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 549: AGNELLO, EVONNE

Response to Comment No. 549-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 550: KNAGGS, CARRIE L.

June 22, 1995

Dear Mr. Head,
I am against the movement of nuclear waste through the Port of Tacoma not only because it indangers me and my children but because it is wrong to allow the nuclear industry to bury their waste in somebody else's back yard. If they are not made to deal with their own crud they will not be made to take precautions and use common sense. They will not be encouraged to look for better ways of doing things. If they want to use nuclear energy they should have to deal with the consequences. Dealing with it should not include making it someone elses problem. The question I have for you is...How would you like it if your neighbor to your right took his wheelbarrow full of dog poo across your backyard every day to dump it in the yard of your neighbor on your left? How would you like to walk out in your yard and step in some of the gick that fell off that wheelbarrow. Or, God forbid, your child found some. Please listen to the people of Tacoma. Please make all industry take responsibility for their own actions and their own waste. 550-1

Sincerely,
Carrie L. Knaggs
Carrie L. Knaggs

RESPONSE TO COMMENT
COMMENTOR NO. 550: KNAGGS, CARRIE L.

Response to Comment No. 550-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 555: HARRISON, SANDEE

NORTHWEST ENDOCRINE LABORATORIES
314 SOUTH K STREET, SUITE 405 • TACOMA, WASHINGTON 98405 • (206) 272-2300

The citizens of Tacoma Washington are telling you something, are you listening... 555-1

NO RADIOACTIVE NUCLEAR WASTE IN OUR PORT!!!

Sincerely,

Sandee H

Sandee Harrison
518-136th Ave. E.
Sumner, WA 98390

RESPONSE TO COMMENT
COMMENTOR NO. 555: HARRISON, SANDEE

Response to Comment No. 555-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 558: TATE, H.

To whom it may Concern,

Washington State does not want "Nuclear Waste" being shipped threw our ports. 558-1

No Nuclear Waste for Washington State!!

Sincerly H. TATE
806 15th Ave E.
~~WA~~ Puyallup WA.
98404

RESPONSE TO COMMENT
COMMENTOR NO. 558: TATE, H.

Response to Comment No. 558-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 559: ZWICKEL, ABRAHAM

DR & MRS ABRAHAM ZWICKEL
2199 GOFF AVE
PITTSBURG, CA 94565

4 P.M.
JUNE 20, 1995

Department of Energy
Wash., D.C.

We 3 sovereign citizens, Abraham 91, Jean 81 and Daniel Zwickel 47 are opposed to storing spent atomic waste fuel rods in Concord Naval Weapons Station, Concord, California, Temporary or permanent. Abrahame for 7 years has witnessed unsafe truck driving EXPLOSIVE cargoes. 2 times intentionally run over. Once spec stop signs in presence of sargent and deputy sheriffs at base entrance.

NCED proved @ construction of bomb bunkers, atomic.

559-1

RESPONSE TO COMMENT
COMMENTOR NO. 559: ZWICKEL, ABRAHAM

Response to Comment No. 559-1

The commentor's opposition to using Concord NWS is noted. However, DOE considers that the port selection criterion successfully identify ports that can safely handle foreign research reactor spent nuclear fuel. The analyses provided in Sections 4.2.2 and 4.5 of the EIS indicate that the use of any of the ports indicated by the port selection process, including Concord NWS, would not pose any significant risk to either the port personnel or the population near the port. Foreign research reactor spent nuclear fuel would only pass through Concord NWS and the State of California on its way to a DOE management site, but would not be stored there.

COMMENTOR NO. 559: ZWICKEL, ABRAHAM (CONT'D.)

Open flues of drinking water flowing through CNWS at mercy of microscopic atomic wastes fuel.

We three Zwickels, demand an end to all atomic power and atomic bombs. Leave uranium in the ground to spend itself over ages finally into lead according to DR. DAVID BRADLEY medical scientist of Bikini TEST. REFERENCE. NO PLACE TO HIDE

Respectfully
Abraham Zwickel

RESPONSE TO COMMENT
COMMENTOR NO. 559: ZWICKEL, ABRAHAM (CONT'D.)

COMMENTOR NO. 560: LEWIS, CORA

June 20, 1995

Charles Head, Program Manager
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue SW
Washington DC, 20585

Dear Mr. Head,

I was delighted to see an over-capacity crowd to comment on the D.O.E.'s proposition to bring spent nuclear waste from other countries through the Port of Tacoma. Unfortunately, I was one of those concerned citizens that could not get into the auditorium to express my disapproval, however, I hope my letter will be taken with the seriousness intended.

As I follow this issue, I can't seem to get the picture out of my mind...a map of the United States with a big red circle with a line through it over the glowing state of Washington. I have difficulty enough with the United States deciding to be the world's nuclear garbage dump. Bringing it through an inland port, transporting it through waters whose shores are heavily populated, shipping it on our freeways and railways, over our rivers and through our rich farmlands seems to be a definate effort to ruin the reputation of a state rich in beauty and natural resources. Washington has its share of nuclear substances, Washington doesn't need this, Tacoma doesn't need this.

I can't imagine any commercial port wanting this kind of cargo. As I watched the televised meeting between the Port of Tacoma and the D.O.E. a few weeks ago, I became greatly offended that the D.O.E. has the attitude that Tacoma's citizens lives and health were less important than those who live in Seattle. As was put by the representatives from the D.O.E., Tacoma has fewer people so its best to let them take the risks. You want our longshoremen to handle the waste, you want our port to be responsible for protecting the waste and although you seem to have the attitude that this cargo comes to us with no dangers (therefore should be safe for any port), you still think it is best to bring it through an area of less population. In case you were unaware, Tacoma is the second largest city in our state, we have over 150,00 citizens; a sizable population, by all means. 560-1

If you feel the United States must take this waste under our care, then bring it to a ocean port...a military port that has experience handling this type of cargo and the military equipment to protect it. Ship it along railways and roadways that are isolated from as much population as possible. At the meeting between the Port of Tacoma and the D.O.E., the D.O.E. stated it would be expensive to update a military port. I don't think the government can put a price tag on safety for it's citizens when the world's nuclear waste is being pushed down the throats of Tacoma's citizens, our beautiful state of Washington, and our country. 560-2

My impression is that the D.O.E. feels that if we take this nuclear waste, it will stay out of the hands of those less desirable that may use it to build weapons to be used against us. As we look back over the past few years, it is apparent that there are terrorists within our borders too. Will the United States be responsible if the spent nuclear waste gets in the wrong hands and is used against on of the world's countries. I can't think of anything that would bring down a great nation faster! 560-3

Tacoma is working hard and succeeding in building a positive image. Our theaters are restored, our superfund sites are clean, Universities are coming in to support the educational needs of our area, our artists are coming home. Please leave us alone and let us finally become a desirable destination.

Sincerely,
Cora Lewis
3917 - 47 Avenue NE
Tacoma, WA 98422

cc: Representative Randy Tate

RESPONSE TO COMMENT
COMMENTOR NO. 560: LEWIS, CORA

Response to Comment No. 560-1

In evaluating and selecting acceptable ports of entry, DOE has developed evaluation criteria. DOE considers that the port selection criteria successfully identify ports that can safely handle foreign research reactor spent nuclear fuel. DOE further considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel or the population near the port. The EIS shows that the risks associated with an accident are low (Section 4.2.2.3 of the EIS) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2 of the EIS).

Response to Comment No. 560-2

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without the additional security that might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all of the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ports is noted.

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures can greatly reduce the risk of such actions. Security would be provided for all shipments of foreign research reactor spent nuclear fuel, as required by the Code of Federal Regulations (10 CFR Part 73). The security provisions are summarized in the new Appendix H that has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify the details of the transportation process, including security provisions in port and during transit.

Response to Comment No. 560-3

The broad purpose of the proposed action is to support the nonproliferation of nuclear weapons (Section 1.2 of the EIS). It is unlikely that internal terrorists could steal spent nuclear fuel from foreign research reactors and construct a nuclear weapon from it based on the fact that this spent nuclear fuel requires sophisticated processing techniques to extract the uranium for use in the construction of a nuclear weapon (Section 1.2 of the EIS). A greater risk is that HEU available through international commerce could be diverted to a nation capable of extracting the uranium and whose intent is to develop nuclear weapons capability.

COMMENTOR NO. 561: GUTHRIE, ANNETTA

Charles Head
Office of Spent Nuclear Fuel
Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

June 22, 1995

Re: Nuclear Waste Shipment Through The Port of Tacoma, WA

Dear Mr. Head,

I definitely do not want shipments of high-level nuclear waste coming through the Port of Tacoma, Washington. No one can say that this would be 100% safe. There is always a chance for accident. Three Mile Island, the Exxon Valdez, Chernobyl, and the leaks at Hanford, Washington, were never supposed to happen--but they did. I do not want this nuclear waste coming through my community. I want my grandchildren to grow up safely in a healthy community and not have to worry about a nuclear waste accident. 561-1

Sincerely,

Annetta Guthrie

Annetta Guthrie
4901 Barbara Lane SE
P.O. Box 160
Olalla, WA 98359

206-851-4503

RESPONSE TO COMMENT
COMMENTOR NO. 561: GUTHRIE, ANNETTA

Response to Comment No. 561-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 562: WINNIE, SHIRLEY L.

June 23, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U. S. Dept. of Energy
1000 Independence AVE SW
Washington, D.C. 20585

Dear Sir:

This is in opposition to the government's proposal to ship highly radioactive nuclear waste through the Port of Tacoma. We take pride in our beautiful Northwest and do not want any threats to the environment. I do not believe there can be any assurances that something could not happen to cause an "accident" during such shipping--look at the oil spills etc. that were caused by human error. 562-1

Any spill here would be devestating. Please let the Department of Energy know we do not want the waste moved through our Port.

Sincerely
Shirley L Winnie
Shirley L. Winnie
Donald H. Winnie
Donald C. Winnie
3307 So. K St.
Tacoma, Wa. 98408-4021

RESPONSE TO COMMENT
COMMENTOR NO. 562: WINNIE, SHIRLEY L.

Response to Comment No. 562-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 563: TUCKER, GENEVIEVE

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: I strongly [illegible] shipping nuclear waste through Tacoma [illegible] even come to the United States [illegible] shipped to England or France where they are equipped to convert nuclear waste to usable energy. 563-1 563-2

Name: Genevieve Tucker Telep[illegible]

Address: 902 S. [illegible] Ave City/State [illegible] WA 98405

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, DC 20585

DEADLINE: JUNE 30, 1995

RESPONSE TO COMMENT
COMMENTOR NO. 563: TUCKER, GENEVIEVE

Response to Comment No. 563-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 563-2

The commentor's preference for overseas reprocessing is noted. This is Management Alternative 2, Subalternative 1b, which is discussed in Sections 2.3 and 4.4.2 of the EIS.

COMMENTOR NO. 564: MEYER, SHERRY

June 22, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel
Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, D.C. 20585

Dear Mr. Head:

I'm writing to you in regards to the possible shipments of high-level nuclear waste through the Port of Tacoma.

As a mother of young children, here's a question for you: Do you have children or even grandchildren living in Washington state? Probably not. This is an area, I'm sure, which is far enough away for all families of the Department of Energy to not have to feel threatened in any way.

There is no way you (or anyone else, for that matter) can guarantee there would never be a leak, spill, or contamination of this waste. If paid well enough, some will believe many things. But this is human life we're talking. Many generations of it. 564-1

Speaking for my family, find another way of dealing with this nuclear waste. It is unnecessary to risk lives. Certainly there are many other options — find them. Leave our lives, and our waters, alone.

Sincerely,

Sherry Meyer

Sherry Meyer
3619 91st Avenue Court East
Puyallup, Washington 98371

RESPONSE TO COMMENT
COMMENTOR NO. 564: MEYER, SHERRY

Response to Comment No. 564-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 565: ROBERTSON, CLAIRE MURPHY

June 23, 1995

Dear Mr. Head,

Please do not send that nuclear waste through the Port of Tacoma, for fear it should leak or spill. I have two young boys under the age of three and they deserve to be protected. Everyone says that nothing should go wrong, but in my experience, if anything can go wrong it will. 565-1

Thank-you,
Claire Murphy Robertson

RESPONSE TO COMMENT
COMMENTOR NO. 565: ROBERTSON, CLAIRE MURPHY

Response to Comment No. 565-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 566: HIATT, NORA

June 22, 1995

Mr Charles Hand
U S Dept. Of Energy
1000 Independence Ave SW
Washington DC 20505

Dear Mr Hand

I am writing to let you know how unhappy I am with the decision to bring spent nuclear fuel from foreign countries into the United States through the Port of Tacoma. **566-1**

I don't understand why the fuel can't remain where it is at now. Heaven knows that we have enough nuclear waste sites to clean up of our own, we don't need someone elses too. And IF its as safe as your department claims, why can't it be brought into the Port of Seattle? **566-2**

Here in Washington State, we were told by the U S Government how safe the activities going on at Hanford were. Now we are finding out about leaking tanks, releases of waste into the air and the rivers. Just today in the Seattle P I there is another article about how bodies were snatched and tested for effects of radiation. Those who were unfortunate enough to live downwind from the facilities have suffered miscarriages, cancers, & birth defects. All this from a "safe" facility. **566-3**

Mr Hand, find some other place to bring in the foreign waste. Find someplace who hasn't worked as hard as we have to clean up their environment. Someplace where there isn't appx 188,000 people living. Anyplace but The Port of Tacoma. Hey while your at it, maybe you could find someplace who would be willing to take our spent fuel?? **566-1 (Cont'd.)**

Sincerely yours

Nora Hiatt

Nora Hiatt

PS The next time you have a community meeting like the one here in Tacoma on June 19, please arrange for a larger facility. I was one of those that couldn't get in. **566-4**

RESPONSE TO COMMENT
COMMENTOR NO. 566: HIATT, NORA

Response to Comment No. 566-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 566-2

Many of the foreign research reactor operators cannot store their spent nuclear fuel at the reactor site due to a lack of facilities or regulatory constraints (See Section 1.2 of the EIS). Thus, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). The Port of Seattle was not selected among the proposed ports of entry based on the port selection process described in Appendix D of the EIS due to the application of the population criterion.

Response to Comment No. 566-3

DOE is committed to the Tri-party agreement for cleanup activities at the Hanford Site; however, the cleanup at the Hanford Site is beyond the scope of this EIS. Section 4.2.4 and Appendix F, Section F.4.3, discuss the impacts of foreign research reactor spent nuclear fuel management at the Hanford Site.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Response to Comment No. 566-4

DOE appreciates the commentor's frustration at not being able to personally attend the Tacoma meeting due to the overflow turnout. The facility for the June 19, 1995 meeting was selected by the City of Tacoma officials.

COMMENTOR NO. 567: RITZHAUPT, P.J.

Sir:
I protest the moving of nuclear waste thro the Port of Tacoma / Seattle area! We cannot deal with our own U.S. made radioactive waste properly (look at the Hanford mess) so why are we taking on waste from other countries! Are we going to keep all terrorist from making bombs by bringing it here ... I think not.
Do not subject our area to possible danger from this deadly waste.
P.J. Ritzhaupt
Sec. Teacher

567-1

RESPONSE TO COMMENT
COMMENTOR NO. 567: RITZHAUPT, P.J.

Response to Comment No. 567-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 568: DAVIS, RANDAL L.

June 22, 1995

Charles Head
Office of Spent Nuclear Fuel (EM-37)
U.S. Department of Energy
1000 Independence Ave S.W.
Washington, D.C. 20585

Dear Mr. Head:

As a citizen of the city of Tacoma I have followed with great concern the debate regarding the shipment of spent nuclear fuel through our city's port. I have listened as government officials and their paid representatives assure us that the risk of an accident is minimal and that the containers the fuels are stored in are extremely safe. I have listened as they tell us shipping spent fuel through our city will create jobs. To be frank with you, we don't believe the government has Tacoma's best interests at heart. Regardless of the amount of risk, the fact remains that accidents *do* happen. Chernobyl, Three Mile Island, leaks at Hanford, are all proof positive that the chance for disaster is quite possible. It may be true that the chance of an accident happening is quite minimal, but frankly Mr. Head, the citizens of Tacoma are not willing to take that risk. We are not willing to stake our children's future or the future of our city on government assurances. The government lies. The government covers up. The bottom line is, the government works *for the people*. The people of Tacoma shout a resounding NO!! to spent Nuclear fuel through our port. We will not allow this to happen. Our city's longshoremen have already said they would refuse to unload it. Other business' are concerned about the public perception of possible contamination to their own products. And what's more, we refuse to stake anyone's life on the government's assurances that the risk of an accident is minimal. We the citizens of Tacoma will fight this with all our will and might. We will do whatever is necessary to see that spent nuclear fuel does not pass through our port. The waters of Commencement Bay already sit high atop the list of superfund cleanup sites and we are *not* willing to jeopardize it further. The government will have to find some other port to ship the world's nuclear waste through because the citizens of Tacoma will not allow it to happen here. 568-1

Sincerely,

Randal L. Davis

RESPONSE TO COMMENT
COMMENTOR NO. 568: DAVIS, RANDAL L.

Response to Comment No. 568-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. DOE has added a sentence to (Appendix D, Section D.2.1.9 of the EIS) regarding Commencement Bay being a Superfund Site. The analysis of impacts in Section 4.2.2 of the EIS demonstrates that there would be no significant adverse impacts on the ports, people, or natural environment from shipments of foreign research reactor spent nuclear fuel and the overall impacts to Commencement Bay would be unchanged by the various management alternatives.

COMMENTOR NO. 570: TAYLOR, INEZ

June 22, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management
1000 Independent Ave. S.W
Washington D C 20585

Dear Mr. Head,

I, besides thousands of other Tacomans, do not want shipments of Nuclear waste going through the Port of Tacoma. 570-1

Accidents do happen and the thought of our beautiful Commencement Bay being contaminated is unacceptable.

Sincerely,

Inez Taylor
2220 East George St.
Tacoma, Wa 98404

RESPONSE TO COMMENT
COMMENTOR NO. 570: TAYLOR, INEZ

Response to Comment No. 570-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 571: BEACH, DONNA

June 22, 1995
4416 Elwood Dr. W.
Tacoma, Wa. 98466

Charles Head
Office of Spent Nuclear Fuel Mgmt.
U.S. Department of Engergy
1000 Independence Ave. SW.
Washington, D.C. 20585

Dear Mr. Head,

I and my immediate family of 7, want to let you know we do NOT want our Port of Tacoma to become the unloading spot for all the worlds' nuclear waste.

We don't care how supposedly safe it it, accidents happen. Our water and port are too important to the livelihood of many hundreds of people, besides the possible contamination of all the local residents. 571-1

Our commuinity does NOT want to have all the health problems connected to over exposure to radiation. Look at what happened to all those people in Russia when the reactor metled down. That was quite a few years ago and they are still having health problems.

Find some other low populated area to bring it into the country. Not IN OUR BACKYARD!

We always thought our government was looking out for the best interest of its' citizens but this plan sure leaves us wondering!

Sincerely,

Donna Beach

Donna Beach

RESPONSE TO COMMENT
COMMENTOR NO. 571: BEACH, DONNA

Response to Comment No. 571-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 572: ELEY, MRS. J.

June 22, 1995

Dear Mr. Head.

Altho we now reside in Arizona, we lived in the Sea Tac. area for many years. We have Children, grandchildren & great grandchildren in the Sea Tac area & altho the possibility of a mishap in transporting spent Nuclear Fuel thru the Tacoma Port is minute there is always a risk. Therefore Mr. Eley & myself are definitely against using the Port of Tacoma. 572-1

Thank you

Sincerely

Mrs J. Eley

RESPONSE TO COMMENT
COMMENTOR NO. 572: ELEY, MRS. J.

Response to Comment No. 572-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 573: SIMAC, JOHN & ANNICE A.

4908 No. 39th St.
Tacoma, WA. 98407
June 22, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management(EM-37)

U.S. Dept of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Sir:

I know that you are aware of the meeting in TAcoma, WA. June 20, 1995 concerning using our port for the receiving of spent nuclear fuel coming from countries other than our own.

Please be advised that we are emphatically opposed to having any of it proceed through our port. 573-1

We are just as emphatically opposed to having any of it coming into our country at all. 573-2

There is no way that the United States should be a dumping ground for any other countries spent fuel. Just because we let them have it is no good reason to store the left overs from it. Why would the United States let them have it in the first place if they are so unreliable that they cannot take care of their own. 573-3

Concerning the nations that are not reliable enough to be trusted to take care of their own, they will get it to use for whatever purpose they choose to use it for regardless of our efforts. There are many avenues open to them from even from those who are our supposed Allies.

Thank you for your consideration in this matter.

John Simac
Annice A. Simac

RESPONSE TO COMMENT
COMMENTOR NO. 573: SIMAC, JOHN & ANNICE A.

Response to Comment No. 573-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 573-2

The commentor's further opposition to management of spent nuclear fuel from foreign research reactors in the United States is also noted. Sections 2.3, 2.5, and 4.5 of the EIS describe other alternatives under consideration.

Response to Comment No. 573-3

Many of the foreign research reactor operators do not currently have means for storage or other disposition of their spent nuclear fuel (Section 1.2 of the EIS). This is a result of a longstanding policy of cooperation with the United States in the prevention of the proliferation of nuclear weaponry (Section 1.1 of the EIS). The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

The United States provides LEU fuel to research reactor operators who agree to cooperate in the prevention of the spread of nuclear weaponry (Section 1.1 of the EIS). A willingness to assume responsibility for spent nuclear fuel containing uranium enriched in the United States does not imply that our allies are untrustworthy. Since a relatively small amount of HEU can be used to construct a nuclear weapon, it is prudent to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide.

COMMENTOR NO. 575: WILSON, EDIE

917-A Village Drive, East
North Brunswick, N.J. 08902-2820

June 14, 1995

Charles Head, P.M.
Office SNFM (EM-37)
U.S.D.O.E.
1000 Independence Avenue, S.W.
Washington, D.C. 20585
Re:D.E.I.S. Nonproliferation Policy

Dear Sir:
Thank you for this opportunity of comment. They are as follows.

1- This program is too expensive.

2- I would believe that we could afford to provide maintenance and security with our own funding and troops much less expensively than the necessary process of returning and storing it here in the U.S. *575-1*

3- Yesterday France, one of our allies, announced they were going to start nuclear testing again. Probably to scare the Bosnians or whoever they think they are threatened by, or to try to influence us in our policy towards the Bosnians. Who knows? Any responsible gov't is not going to use nuclear bombs. I don't know if it is the new millenium, and the number 2 instead of 1 in the date of the year that has people acting strangely, or what. But I feel we have a policy that protects the U.S., and the last time France went to war it was VietNam and she left(France's history is it never stays) and the U.S. rushed in. I frankly don't worry much about France. *575-2*

4- I do not worry about Iraq, either, altho I feel we should have been more decisive in our action while engaged in Desert Storm. *575-3*

5- After the bombing of Oklahoma City, That I worry about. I think if any truly freaked out militia were to be able to secure the nuclear material I would worry, alot.

6- In N.Y.C. last week the F.B.I. found a cannister of spent waste that had come into this country undetected.Until it's arrival.It had none of the proper casings prescribed in this draft, so I must think anyone on that flight, and any oyhhers that came in contact should be tested. That worries me. *575-4*

7- Nuclear energy is too expensive. I would much prefer to see th money required for this proposal to be as stated in #2, and spend money saved on solar or wind energy, or maybe take a new look at water as a source. *575-5*

RESPONSE TO COMMENT
COMMENTOR NO. 575: WILSON, EDIE

Response to Comment No. 575-1

Safely transporting, receiving, storing or chemically separating, and finally disposing of spent nuclear fuel rods is expensive. Depending on decisions made in other programs, particularly high-level waste disposal, the foreign research reactor spent nuclear fuel program, could be very expensive. Indefinitely storing and guarding spent nuclear fuel all over the world is more expensive than any program that consolidates the fuel for the same purpose. Furthermore, as explained in Section 4.4.1 of the EIS, overseas storage of the spent nuclear fuel would not be compatible with U.S. nuclear weapons nonproliferation policy objectives. Spent nuclear fuel management, whether in the form of storage, chemical separation (i.e., reprocessing), or geologic disposal, benefits from very large economies-of-scale. Consolidating the spent nuclear fuel costs less per fuel element than handling them separately in dozens of countries.

Response to Comment No. 575-2

France's announcement that it will begin nuclear testing again is outside the scope of this EIS.

Response to Comment No. 575-3

U.S. involvement in Desert Storm is outside the scope of this EIS.

Section D.5.9 has been added to Appendix D of the EIS to address terrorism and sabotage. This section concludes that, while certain terrorist and sabotage attempts cannot be precluded, theft would be. DOE is confident that the foreign research reactor spent nuclear fuel can safely be transported to the management site(s), if the foreign research reactor spent nuclear fuel is accepted into the United States. The security measures employed would meet or exceed all the security requirements in the Code of Federal Regulations (10 CFR Part 73). DOE supports these regulations as being adequate to protect the foreign research reactor spent nuclear fuel. If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security.

To better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel, Appendix H has been added to the final EIS in response to public comments. This appendix presents the general provisions of the Transportation Plan, which is a document that provides details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

COMMENTOR NO. 575: WILSON, EDIE (CONT'D.)

-2-

8- If this policy does continue, the standards are all too low in all areas.

Thank you for this opportunity.

Very truly yours,

Edie Wilson

For any questions please call 908-246-2179, if I may be of assistance.

RESPONSE TO COMMENT
COMMENTOR NO. 575: WILSON, EDIE (CONT'D.)

Response to Comment No. 575-4

DOE intends to implement the proposed policy in a manner that is in accordance with all applicable laws and regulations. Therefore, the proposed action would be tightly regulated and the potential for diversion of foreign research reactor spent nuclear fuel by terrorists, or by nations seeking to develop nuclear weapons, would be minimized. DOE considers that proper implementation of the proposed action would prevent the type of occurrence the commentor has described.

Response to Comment No. 575-5

Consideration of alternative energy sources is outside the scope of this EIS. However, it is important to note that as part of its mission, DOE currently has ongoing programs that are seeking to develop and promote use of such alternatives, including solar, wind, and water resources.

COMMENTOR NO. 579: HERMANSON, SALLY

June 21, 1995

Charles Head
Office of Spent Nuclear Fuel Management (EM-31)
U.S. Dept of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Mr. Head,

I was unable to attend the meeting held Monday June 19 in Tacoma, Washington re: Shipment of nuclear waste through the Port of Tacoma. I do, however, want to make sure that my view is known.

I am totally against any such movement by any local, state or Federal Government agency using the Puget Sound region to transport nuclear waste to the West Coast of the United States. Additionally I don't agree that we need to accept any waste from other countries period! Let's spend the dollars developing the means to re-cycle our own nuclear materials instead. 579-1 579-2

RESPONSE TO COMMENT
COMMENTOR NO. 579: HERMANSON, SALLY

Response to Comment No. 579-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 579-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and ultimately eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. Pursuit of this goal would help to ensure that U.S. citizens may all benefit from the security and peace of mind associated with the curbing of the spread of nuclear weapons in the hands of terrorists and irresponsible nations.

I further would like you to know that if this mine becomes a reality for our area, I will personally join the fight against it. 579-1 (Cont'd.)

Please, this time do what is right - listen to me.

Sincerely,

Sally Hermanson
2611 Moorlands Ave NW
Sq. Harbor, Wa
98335

COMMENTOR NO. 580: STEFFENS, DONALD B.

6-23-95

Dear Mr. Head;
We are writing to express our objection to radioactive nuclear waste being shipped through the Port of Tacoma. Please explore other options. 580-1

Sincerely

Donald B. Steffens
Margaret C. Steffens

RESPONSE TO COMMENT
COMMENTOR NO. 580: STEFFENS, DONALD B.

Response to Comment No. 580-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. Sections 2.3, 2.5, and 4.4 describe other alternatives under consideration.

COMMENTOR NO. 581: SCOTT, FERN R.

2201 N. Bristol
Tacoma, Wa. 98407
June 23rd 1995

Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Dept. of Energy
1000 Independence Ave S.W.
Washington D.C. 20585.

Dear Sir:

I don't like the idea of radioactive nuclear waste being shipped through the Port of Tacoma. 581-1

I hope this letter will receive your attention.

Sincerely

Fern R. Scott.

RESPONSE TO COMMENT
COMMENTOR NO. 581: SCOTT, FERN R.

Response to Comment No. 581-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 582: MAST, LAWRENCE

4413 N. 27th St.
TACOMA, WA. 98407
JUNE 23, 1995

Mr. Charles Head:

Why should this country take nuclear waste from foreign countries when we have plenty of our own? Have you ever asked a foreign country to store our nuclear waste?

There is too much supposition about the shipping of our nuclear waste, we don't need more of that from other countries. Let them take care of their own. 582-1

One accident could ruin the welfare of whole cities and towns; killing or crippling hundreds of thousands innocent citizens, like those exposed to radiation years ago and are still suffering.

Even containers that are supposed to be unbreakable are like everything else, there are flaws.

Lawrence Mast
Lawrence J. Mast

RESPONSE TO COMMENT
COMMENTOR NO. 582: MAST, LAWRENCE

Response to Comment No. 582-1

Many of the foreign research reactor operators cannot store their spent nuclear fuel at the reactor site due to the lack of facilities or regulatory constraints (Section 1.2 of the EIS). The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Sections 2.3, 2.5, and 4.4 of the EIS describe other basic policy alternatives under consideration.

Radiological risks due to accidents at candidate ports, along transportation routes, and at interim management sites were analyzed in the EIS (Sections 4.2.2, 4.2.3, and 4.2.4, respectively, and Appendices B through F of the EIS). As demonstrated by the analysis, risks associated with implementation of the proposed action to human health or the environment would be low.

Transportation casks for spent nuclear fuel are built to withstand accidents (Section 2.6.2 and Appendix B of the EIS). During the past four decades spent nuclear fuel has been shipped along highway, rail, and barge routes in the United States. No transportation cask containing spent nuclear fuel has ever released its radioactive contents, nor has a transportation cask ever been punctured, including those involved in traffic accidents. (Section 4.2.3 of the EIS).

COMMENTOR NO. 583: ECKARD, DOROTHY H.

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: [illegible]

Name: Dorothy H. Eckard Telephone: [illegible] 472-6303

Address: 3534 [illegible] City/State: Tacoma Wa 98404

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, DC 20585

DEADLINE: June 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

583-1

RESPONSE TO COMMENT
COMMENTOR NO. 583: ECKARD, DOROTHY H.

Response to Comment No. 583-1

A national nuclear waste policy does not currently exist. Although such a policy would, no doubt, clarify and direct this country's efforts to address the nuclear waste issue, the question of managing foreign research reactor spent nuclear fuel that is addressed by this EIS cannot wait for a national nuclear waste policy to be developed. The main driver behind the proposed policy to manage foreign research reactor spent nuclear fuel is a concern to limit the possibilities of the proliferation of nuclear weapons. This issue cannot wait, especially since the amount of spent nuclear fuel involved here is so small compared to that elsewhere in the public and private sectors.

COMMENTOR NO. 584: WEISE, LESLIE

June 23, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Mr. Head,

This letter is regarding the issue of whether the Port of Tacoma (Washington State), will be the port of entry for shipments of high-level nuclear waste. I speak on behalf of a large number of individuals in Western Washington state. We are extremely angry at the ignorance of you and your office to not listen to the concerns of the people of this state. This issue does not affect only the Port of Tacoma, but all of Western Washington State, which as you are forgetting has a very large population of people and natural wildlife. The chance of even a small leak or spill is not only *inevitable, but probable* and a number of disasters are proof of this, such as the leaks at Hanford and Three Mile Island. I implore you to make the right decision and choose another route for this very dangerous substance. The Northwest, especially western Washington state is so beautiful, please help to keep it and all its inhabitants safe and healthy. 584-1

Sincerely,

Leslie Weise
Concerned Resident of Seattle, WA

RESPONSE TO COMMENT
COMMENTOR NO. 584: WEISE, LESLIE

Response to Comment No. 584-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Regulations concerning "Type B" cask leakage during normal operation are specified in 10 CFR Part 71.51, and the allowed leak rate is essentially zero. The spent nuclear fuel elements contained in a transportation cask are mechanically sound. The cask would not contain water, thus there would be no leakage of radioactivity during transport. The only hazard is a very small, allowable level of radiation that emanates from the cask. The regulations governing the acceptable radiation level (10 CFR Part 71.47) are documented in Section 5.4, and Appendix B, Section B.2 of the EIS. The radiation level allowed by the regulations would not place undue harm on the individual member of the public, or the general population as a whole. Historically, the radiation level associated with the transport of foreign research reactor spent nuclear fuel was one to two orders of magnitude less than that allowed by 10 CFR Part 71.47. The EIS evaluated the risk of transporting foreign research reactor spent nuclear fuel using the allowed limits and concluded that the overall risk would be negligible (Section 4 and Appendix E of the EIS).

Accidents do occur. That is why the spent nuclear fuel transportation casks are designed, constructed and tested by simulation to withstand a series of impact and fire tests (Appendix B, Section B.2 of the EIS). Representative transportation casks have been crash tested to confirm compliance with regulatory standards. Two actual crash tests one involving a locomotive and the other a tractor trailer carrying a spent nuclear fuel transportation cask have been performed. Both tests showed no failure of the casks, but the locomotives were destroyed. These tests concluded that the transportation casks built to the federal standard would protect and retain their contents in the most severe accidents. With regards to fire duration, real life tests have been conducted to determine the accuracy of the techniques used to demonstrate compliance with this regulatory requirement. Further, examinations of real life fires on land and at sea, and fire tests have demonstrated that high intensity fires are unlikely to be sustained for lengthy periods, and even then not in a single location.

Nevertheless, in spite of the improbability of such fires, the EIS contains the results of an analysis of such a fire (Section 4.2.1.3). The results of the analyses are given in Appendix D of the EIS.

COMMENTOR NO. 587: KENNEDY, STEVE

6-17-95

To Mr Charles Head,

Just a note to say, please don't let the U.S. become a dumping ground for nuclear waste. do what ever you can to end this terrible problem. Please fight all government waste, end all trade to countries that still Trap & kill Tigers, there are only a few thousand beautiful Bengal Tigers left, we need to protect them better. And get rid of that expensive & un-necessary Helium complex in Amarillo, Texas, your example of government waste. Lets have a strong, tough on crime, beautiful America,

587-1

587-2

Thank You
Steve Kennedy

RESPONSE TO COMMENT
COMMENTOR NO. 587: KENNEDY, STEVE

Response to Comment No. 587-1

The commentor's concern that the United States not become a dumping ground for nuclear waste is noted. If foreign research reactor spent nuclear fuel is accepted into the United States the policy would be of limited duration (Sections 2.2.1.1 and 2.2.2.2 of the EIS). The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Sections 2.3, 2.5, and 4.4 of the EIS describe other basic policy alternatives under consideration.

Response to Comment No. 587-2

The commentor's concern about the preservation of Bengal Tigers is noted. Although this matter falls outside the scope of this EIS (Section 1.3 of the EIS), policies of United States Government Agencies support efforts to preserve endangered species.

Facilities in Amarillo, Texas would not be used for management of spent nuclear fuel from foreign research reactors and are outside the scope of this EIS. Section 1.5 of the EIS describes environmental documentation related to this EIS.

COMMENTOR NO. 588: SNORTUM-PHELPS, TYLER

Written Comments on the Draft Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Tyler Snortum-Phelps **Phone:** (510) 689-4340
Title and Organization: Green Party of Contra Costa
Address: 1211 Orange St.
City: Concord **State** CA **Zip** 94518

*** COMMENTS ***

The DraFT EIS Does NOT address the many safety issues specific to this area. The ships passing through the Delta will pass by many hazards + sensitive sites. The risk of accident is great enough that this is a totally unacceptable plan. 588-1
The emergency response systems are not in place to deal with accidents, and there are far too many risks when transporting such hazardous material. Concord says NO! 588-2

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head
Office of Spent Fuel Management, EM-37
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RESPONSE TO COMMENT
COMMENTOR NO. 588: SNORTUM-PHELPS, TYLER

Response to Comment No. 588-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 588-2

DOE considers that there is adequate regulatory and emergency preparedness infrastructure to ensure the safe acceptance and transport to designated management sites if the foreign research reactor spent nuclear fuel is managed in the United States. Federal funding to State, Tribal, and local governments for maintaining emergency response programs is discussed in Section 2.7.1. There are three national emergency response plans under which DOE provides radiological monitoring and assessment assistance. Under these plans, DOE provides technical advise and assistance to the State, Tribal and local agencies involved with a radiological incident. Emergency preparedness, security, and coordination of DOE with local emergency response authorities, and security are discussed in general in Sections 2.7 and 2.8 of the EIS. Details would be contained in the Transportation Plan, that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments..

COMMENTOR NO. 590: DAUTEUR, ADELE

Tacoma, Washington
June 16, 1995

Dear Sirs:
I believe that your choice of Tacoma as the Port for the shipment of spent fuel is one more example of picking a town with a smaller population and therefore less support from the citizens. 590-1

We object to we have received the town before to action and will again. Do not use our port.

Sincerely,

Adele Dauteur

RESPONSE TO COMMENT
COMMENTOR NO. 590: DAUTEUR, ADELE

Response to Comment No. 590-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 591: SISTERS OF SAINT DOMINIC

Sisters of Saint Dominic
Tacoma Dominican Center

(206) 272-9688
FAX (206) 272-8790
935 Fawcett Avenue South
Tacoma, Washington 98402-5605

June 19, 1995

Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
US Department of Energy
1000 Independence Avenue
Washington, DC 20585

Dear Sir:

This letter is in response to the potential shipment of highly enriched nuclear fuel through the Port of Tacoma, Puget Sound and the Northwest. We, along with our port and local government officials, oppose these shipments.

We have reason to believe that the Draft Environmental Impact Statement used outdated, incorrect or incomplete information in forming its conclusions and that a number of issues were not adequately addressed, namely:

- The DEIS does not consider the potential harm to the environment and people in the affected area, if a release of nuclear fuel or high levels of radiation were to occur;

- The DEIS does not address the potential loss of business to Tacoma and the surrounding area that could result from a release of nuclear fuel or high levels of radiation; and

- The DEIS does not adequately address the life cycle costs, risks and benefits, and alternatives to handling this cargo at the Port.

591-1

We oppose the shipment of highly enriched nuclear fuel through the Port of Tacoma, and respectfully request that you look further into the above stated objections. Thank you for your attention to this matter.

Sincerely,
Administrative Staff, Sisters of Saint Dominic

Agnes Huck, OP — Patty Beattie, OP — Margaret Murphy, OP — Joyce Roach, OP

Marie Hollinshead — Steve Kirby — Christel Mason Gillespie

RESPONSE TO COMMENT
COMMENTOR NO. 591: SISTERS OF SAINT DOMINIC

Response to Comment No. 591-1

Updated information on the Port of Tacoma has been incorporated into Appendix D, Section D.2.1.9 of the EIS. All of these errors have been corrected in the final EIS, so the final decision will be based on current information.

The commentor's opposition to the use of the Port of Tacoma to receive foreign research reactor spent nuclear fuel is noted. The port selection criteria discussed in Appendix D, Section D.1.9 of the EIS identify ports that can safely handle foreign research reactor spent nuclear fuel. The analyses provided in the EIS indicate that the use of any of the ports indicated by the port selection process, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2).

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive material has ever been released from a spent nuclear fuel transportation cask as a result of an accident. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments. The analysis of the consequences and risk associated with an accident in port involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS). Thus, businesses would not be adversely impacted by the presence of foreign research reactor spent nuclear fuel shipments.

Costs associated with this proposed action are discussed in Section 4.9 of the EIS. The benefit to the citizens of the United States from the proposed action, including those in potential ports of entry, along transportation routes, or near potential management sites, is less risk that weapons grade uranium from civil programs could be diverted into the production of nuclear weapons that might be used against us or our allies. Another benefit is the support for the U.S. position in regard to the Treaty on the Non-Proliferation of Nuclear Weapons. The analyses recorded in Section 4.2.2 of the EIS demonstrate that the risks from the proposed action are low. Various alternatives associated with the proposed policy are also discussed in Section 4 of the EIS.

COMMENTOR NO. 593: QUAINTANCE, JOE M.

JOE M. QUAINTANCE
ATTORNEY AT LAW
First Interstate Plaza
1201 Pacific Avenue, Suite 1502
Tacoma, Washington 98402

Admitted to practice
Washington
California
U.S. Supreme Court

Telephone
Seattle (206) 623-4541
Tacoma (206) 627-5056
Facsimile (206) 272-5515

June 20, 1995

ATTN: Charles Head
USDOE (EM-37)
1000 Independence Avenue
Washington, D.C. 20585

RE: Tacoma, Washington

Dear Mr. Head:

70% of the 20 metric tons of enriched nuclear fuel waste is generated by France, Britain, Germany, Japan, Sweden and Switzerland. A processing facility in Scotland has expressed a desire to upgrade its ability to handle all three types of nuclear waste. Your draft Environmental Impact Statement fails to adequately explore Alternative 2, which provides for the safe processing of this waste closer to where it is created. 593-1

Millions of dollars and years of civic effort have been successfully invested in cleaning the Puget Sound of pollution, as a Superfund Site, and improving the economic and social environment of the City of Tacoma. Shipping nuclear waste through the Port of Tacoma will result in narrow ship navigation and deep water safety problems for canisters, longshore union labor disruption and refusal to handle this dangerous cargo, congested freeway slowdowns and dense urban area population impact. 593-2

Do not underestimate the outrage in the entire Puget Sound area, from Seattle to Tacoma, that will result if you implement your plan. I assure you the attendance at your poorly publicized meeting in Tacoma on June 19, 1995 is only the beginning. I join the organized effort necessary to defeat the implementation of any plan to ship nuclear waste through Tacoma.

Sincerely,

JOE M. QUAINTANCE

RESPONSE TO COMMENT
COMMENTOR NO. 593: QUAINTANCE, JOE M.

Response to Comment No. 593-1

The commentor's preference for overseas reprocessing is noted. This is Management Alternative 2, Subalternative 1b, which is discussed in Sections 2.3 and 4.4.2 of the EIS. Since the commentor identified no specific inadequacy in the analysis, DOE is unable to respond specifically.

Response to Comment No. 593-2

Shipment of foreign research reactor spent nuclear fuel would not jeopardize the significant cleanup effort undertaken in the area of Commencement Bay and the Port of Tacoma as noted by the commentor. The analysis in the EIS indicates that there would be no significant adverse impacts to any of the ports or bays, or the quality of water or air (Section 4.2.1.1 and Appendix C, Section C.2 of the EIS). A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

DOE considers that the use of any of the ports indicated by the port selection process, including the Port of Tacoma, would not impact standard commercial operations, and therefore not endanger the ports' economic development, based on the fact that the foreign research reactor spent nuclear fuel would be accepted into the United States in standard shipping containers that would require no special handling or precautions. Historically, there were no adverse economic or cultural impacts to the ports that received foreign research reactor spent nuclear fuel for the 30 plus years it was received.

The passage through Puget Sound meets the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items of importance include population along the route to the management site, port experience with handling containers, and port facilities. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in any U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1,000 feet). Section 4.2.1.3 of the EIS has been modified to include this assurance of recovery in coastal waters. Appendix C, Section C.5.5 of the EIS presents information on the probability of

COMMENTOR NO. 593: QUAINTANCE, JOE M. (CONT'D.)

RESPONSE TO COMMENT
COMMENTOR NO. 593: QUAINTANCE, JOE M. (CONT'D.)

a cask sinking in coastal and deep ocean waters. The impacts of a foreign research reactor spent nuclear fuel transportation cask sinking in coastal and deep waters are estimated in the EIS (Appendix C, Section C.5). The results of this analysis show that both the consequences and the risk of these accidents are low (Appendix C, Sections C.5.4 and C.5.5).

The possibility of a longshoremen strike was not considered in the port selection process since that factor does not impact on the capability to safely receive containers carrying foreign research reactor spent nuclear fuel.

COMMENTOR NO. 594: VAN DOORNINCK, KITTY-ANN

June 19, 1995

Charles Head
Office of Spent Nuclear Fuel Management
U.S. Department of Energy
1000 Independence Ave. SW
Washington DC, 20585

Dear Mr. Head,

I am writing to express my concern that Tacoma is being considered as a possible port of entry for nuclear fuel shipments. 594-1

I am adamantly opposed to any nuclear fuel shipments coming through the Port of Tacoma. The beauty and the depth of Puget Sound is unique, and the potential for terrible destruction is great.

As a citizen of Tacoma, I am concerned that this new "stigma" will only add to Tacoma and Pierce County's woes. You may not be aware that we are struggling with increasing violence in our community; having the problems of inability to pay for basic services: police, fire, jail, while struggling as a community to deal with the increasing number of poor, homeless, and mentally ill.

Please reconsider your proposal.

Sincerely,

Kitty-Ann van Doorninck
1528 N.Fife
Tacoma, WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 594: VAN DOORNINCK, KITTY-ANN

Response to Comment No. 594-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 595: EISNER, NANCY

June 19, 1995

Dear Sirs —

Please don't allow ~~all~~ any spent fuel go thru the port a Tacoma — 595-1

It is a bad idea for many, many reasons —

Thank you.

Nancy Eisner
21 Lummi Key
Bellevue, WA
98006-1015

RESPONSE TO COMMENT
COMMENTOR NO. 595: EISNER, NANCY

Response to Comment No. 595-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 596: BRAUNGER, ROBERT M.

TO: Charles Head@FAX:202-586-5256
FROM: PlasmaBob
DATE: 95-06-23 20:41:57 EDT
SUBJ: A Tacoma citizen against NIMBY

Mail from America Online user "PlasmaBob":

To: Charles Head
Office of Spent Nuclear Fuel Management (EM-37)

Dear Mr. Head-

I recently read a rather antagonistic article in my local Tacoma paper about a meeting on 17 June that you had with local citizens about the possibility of moving waste through the area. I do not think the local papers have been fair to you or the issue and have done a disservice to our community. I am an officer in the military, and I know how hard it can be to serve a nation that often does not want to be served. Keep up the hard work; I know that the issue of radioactive waste is a "hot potato" that no-one wants to handle but *must* be dealt with responsibly for our nation's sake. 596-1

I sent the following letter to the writer in the local paper (C. R. Rogers at the Tacoma News Tribune (crr@p.tribnet.com)). I don't expect him to respond or to print any of it, but I wanted to speak my views against the "NIMBY" knee-jerk reaction that you apparently observed from my community.

Dear Mr. Roberts-

I read your 22 June article in the Tacoma News-Trib, "Enough Voices May Awaken Those Who 'Don't Have Time To Listen'" with some concern. Tacoma citizens seem to have let "Not in My Backyard" (NIMBY) fears of radioactive waste sway common sense and the needs of the nation.

I am a Federal (military) employee. I can somewhat empathise with Mr. Head, the DOE representative, as he sat and was heckled by angry Tacoma citizens irate at the possibility of radioactive waste moving through the Port of Tacoma.

Your paper has reported quotes from the people who drove in from all over the state, environmentally-concerned citizens fearful of the possible consequences. But how big is the "silent majority" on this issue? I have chosen not to be silent: I think that our Federal Government has a serious problem in trying to deal with radioactive waste, which is complicated by communities putting their desires above the needs of the nation.

Most of us approve of the submarines in the Navy roving the seas; a mission that could not happen without nuclear power. We approve of medical research and the use of radioisotope tracers to locate illnesses. And yet, no-one is willing to allow the wastes that will come from even the most essential uses to move through their community. The Federal Government has spent billions designing a safe permanent waste disposal site in the Southwest US, only to be stymied by the local population changing its mind and voting against the site. As a result, hundreds of tons of nuclear waste remains in substandard "temporary" holding sites, causing significant risk of contamination. NIMBY sentiment has caused a serious problem that will harm the entire nation; we need to get a handle

RESPONSE TO COMMENT
COMMENTOR NO. 596: BRAUNGER, ROBERT M.

Response to Comment No. 596-1

The commentor's concerns and views on these matters are noted. Section 4 of the EIS presents radiological and nonradiological health effects calculated for the proposed action and management alternatives. No significant adverse health risks were found to result from implementation of the proposed action. Section 4.10 of the EIS provides a perspective of health risks and other common radiological and nonradiological risks.

COMMENTOR NO. 596: BRAUNGER, ROBERT M. (CONT'D.)

on the radioactive waste problem, but a community like ours refusing to let the nation use its port is adding to the problem, not solving it.

I understand that local citizens are concerned about the chances of an accident; they *should* be concerned. They should be presented clear data by the DOE and must be convinced that there are sufficient safeguards and procedures to protect against leaks. But in all of the articles that the News-Trib published on the radioactive waste issue, I never saw data. You only cited examples like Chernobyl, the Challenger disaster, and the Exxon Valdez. Your article went on to bash "bureaucrats" and the Federal Government. This is not responsible reporting. Sure, technology has had and will have disasters. But let us compare apples with apples. How about discussing some *real* data, like, say, what environmental impact there has been on other ports that had radioactive waste moving through them. I have no idea what data was presented at the meeting by Mr. Head, since your paper decided not to report it, merely to deride it.

I fear that the citizens of Tacoma are somewhat overreacting; yes, there is a finite probability of a serious accident. This probability needs to be lowered as much as possible, and safeguards and plans must be made to deal with the risk. But we are dealing with a min-max problem here: a very small probability of a very bad thing, much like the very small probability of an big asteroid slamming into the earth and causing mass extinctions. Low-probability disasters must have the probability weighted against the danger. I would contend that an earthquake or volcano eruption is a much larger *weighted* danger to the Puget Sound community than any nuclear waste moving through the port.

I apologize if this letter has become long-winded, but I feel that your column really did not present a balanced view of a complicated issue. If every community let NIMBY sentiments rule policy, then our nation would be unable to perform necessary, but unpleasant tasks, such as garbage disposal, waste disposal, or military weapon tests. Our community is binding the hands of the Federal Government as it attempts to cope with a nationwide problem. Tacoma needs to take a balanced view at the real risks of radioactive waste and make an informed decision.

Yours,

Robert M Braunger
Tacoma Resident

RESPONSE TO COMMENT
COMMENTOR NO. 596: BRAUNGER, ROBERT M. (CONT'D.)

COMMENTOR NO. 597: FORDE, PHIL & COLLEEN

6/25/95

CHARLES HEAD
OFFICE OF SPENT FUEL MANAGEMENT (EM-37)
OFFICE OF ENVIRONMENTAL MANAGEMENT
US DEPT OF ENERGY
1000 INDEPENDANCE AVE SW
WASH. D.C. 20585
FAX 202 586 5256

DEAR MR HEAD:

WE VIGOUROUSLY ASK YOU TO NOT USE THE PORT OF TACOMA TO SHIP OR TO RECEIVE SHIPMENTS OF NUCLEAR MATERIAL. 597-1

THE RISK IS TOO HIGH; THE BENEFITS VERY SMALL AS COMPARED TO THE RISK.

WE WERE NOT AWARE OF THE PUBLIC MEETING HELD HERE - IF WE HAD BEEN AWARE OF IT WE CERTAINLY WOULD HAVE ATTENDED TO CONVEY OUR OBJECTIONS IN PERSON

WE APPRECIATE YOUR LISTENING TO OUR VOICES OF UTMOST CONCERN.

c: SENATOR GORTON
SENATOR MURRAY

Phil & Colleen Forde
1377 SKYLINE DR
TACOMA, WA 98406

RESPONSE TO COMMENT
COMMENTOR NO. 597: FORDE, PHIL & COLLEEN

Response to Comment No. 597-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 598: OWEN, DOUGLAS E.

DOUGLAS E. OWEN
P.O.Box 84043
Tacoma, WA 98464-0043

Telephone & FAX (206) 588-8734
e-mail: keo1st@aol.com

June 25, 1995

Mr. Charles Head
Office of Spent Nuclear
Fuel Management (EM-37)
1000 Independence Ave. S.W.
Washington, DC 20585

FAX (202) 586-5256

By this letter, I join hundreds of other Tacoma residents who object to the very idea of importing foreign nuclear waste to the U.S. via the Port of Tacoma. 598-1

Obviously, this idea was not very well thought out from the beginning – among other problems I see (in addition to the possibility of an 'accident' in this area) is the enormous handling/transportation expense of moving this material across the country to its ultimate destination. 598-2

Why not select a port nearer to the ultimate dump destination for this material and for once, save the taxpayers considerable money? Even though this is foreign generated material, there is no doubt that the U.S. Government will be picking up the tab on this one.

I will appreciate your consideration of the facts.

Sincerely,

RESPONSE TO COMMENT
COMMENTOR NO. 598: OWEN, DOUGLAS E.

Response to Comment No. 598-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, Section 4.2.2 demonstrates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 598-2

The concept that the United States has a responsibility to manage the foreign research reactor spent nuclear fuel has received a great deal of attention, as is partly exemplified by the preparation of this EIS. Handling and disposing of this nuclear material is a task that should be done to reduce the risk associated with the proliferation of nuclear weapons.

The accident risks, which were found to be low, are evaluated in Sections 4.2.2.3 and 4.5 of the EIS. The costs associated with the various alternatives are also evaluated (Section 4.9 of the EIS) as are the various financing arrangements (Section 2.2.1.2 of the EIS). The port selection process is discussed in detail in Appendix D, Section D.1.9 of the EIS. Distance from the management site(s) is only one of five port selection criteria.

COMMENTOR NO. 599: SMITH, HELEN

22 June 1995

Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Sir:

Please add my name to the already long list of Tacomans who are opposed to having spent nuclear fuel shipped through my port and town from other countries. I live here, my 81 year old father and 72 year old stepmother, my brother and sister-in-law, my grown son and my granddaughter, and my four cats live here and on behalf of all of them, I object most strenuously to this plan. 599-1

I thought the days of having to protest such things were in the past, but to paraphrase someone else's words, "The price of freedom is eternal vigilance!" I would like to continue the freedom of myself, my family, friends and neighbors from fear of some stupid accident making us all not only glow in the dark but just plain dead.

Since these other countries were "smart" enough to figure out how to make and use this material, let them figure out how to dispose of it in their own country instead of shipping it here to mine!

Sincerely,

Helen Smith

Helen Smith
818 S. 118th St.
Tacoma, WA 98444

RESPONSE TO COMMENT
COMMENTOR NO. 599: SMITH, HELEN

Response to Comment No. 599-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 605: TAYLOR, NANCY

June 23, '95

Dear Sir,
We are very very much against any radioactive nuclear material being shipped thru Tacoma or any other US city for that matter. The health and welfare of our generation and future generations are at risk. Accidents do happen. Oil spills, hazardous waste leakages in other parts of the world including Hanford, WA.

605-1

Accidents do happen - an accident on the West Coast could and would affect as far as the East Coast. Washington DC won't be immune.

605-2

Nancy Taylor
26904 Ravensdale Way SE
Ravensdale, WA. 98051

RESPONSE TO COMMENT
COMMENTOR NO. 605: TAYLOR, NANCY

Response to Comment No. 605-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 605-2

DOE agrees that accidents do occur. That is why the spent nuclear fuel transportation casks are designed, constructed and tested by simulation to withstand a series of impact and fire tests (See EIS Appendix B, Section B.2). Representative transportation casks have been crash tested to confirm compliance with simulation process. Two actual crash tests involving a locomotive and a tractor trailer carrying a transportation cask have been performed. Both tests showed no failure of the casks but the locomotive and tractor trailer were destroyed. These tests demonstrated that a spent nuclear fuel transportation cask built to the federal standard would protect and retain its contents in all credible accidents. Nevertheless, the EIS evaluated the consequences of accidents involving a spent nuclear fuel transportation cask where the cask is considered failed with a certain probability. The accidents ranged from no cask failure to that of cask failure combined with a high intensity fire. Section 4 of the EIS provides a summary of impacts, both the risks and consequences, resulting from accidents involving a spent nuclear fuel transportation cask. The results indicate that the risk associated with the transport of the spent nuclear fuel is low.

Also, the spent nuclear fuel is solid metal and it is transported dry inside the transportation casks. As a result, the radioactivity within the spent nuclear fuel cannot "leak" from the transportation casks.

COMMENTOR NO. 606: GRIESSEL, ALAN E.

THE DOOR STORE, INC.
3110 Ruston Way – Tacoma, Washington 98402 – (206) 752-1900 or 1-800-624-4402

Mr. Head —
Add my voice & my wife's
& children's to

NO NUCLEAR Waste
IN Puget Sound,
Period. —

Alan E. Griessel

606-1

RESPONSE TO COMMENT
COMMENTOR NO. 606: GRIESSEL, ALAN E.

Response to Comment No. 606-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 607: LARSEN, CAROL

Dear Mr. Hand,

I, and my family do not want nuclear waste shipped through the Port of Tacoma. There is always a chance of the accident that can't happen actually happening in spite of all our precautions. Remember Thre Mile Island, Exxon Valdez + Chernobyl to name just a few. 607-1

At worst, it should be brought through a military port by trained military personnel. At best, it should be kept in the countries that already have nuclear dump sites in place. They can + do use it to generate electricity to meet their country needs. 607-2 607-3

Carol Larsen
6007 N. 35 St.
Tacoma, WA 98407

RESPONSE TO COMMENT
COMMENTOR NO. 607: LARSEN, CAROL

Response to Comment No. 607-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 607-2

DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present at military bases. The security provided for the spent nuclear fuel shipments would be required to meet or exceed all the applicable security requirements in the Code of Federal Regulations (10 CFR Part 73). If any port did not already provide security sufficient to satisfy these requirements, it would be the responsibility of the shipper to provide the required additional security. Nevertheless, the commentor's preference for the use of military ports is noted.

Response to Comment No. 607-3

There are no countries that have disposal sites for spent nuclear fuel in operation today, so the option suggested by the commentor is not feasible. Nevertheless, options for management of the foreign research reactor spent nuclear fuel overseas are evaluated in the EIS, as Management Alternative 2, in Sections 2.3 and 4.4 of the EIS.

COMMENTOR NO. 608: JOWDERS, JULIA E.

June 22, 1995

Charles Head,

No nuclear waste through the Port of Tacoma. 608-1

Julia E. Jowders
Victor R. Jowders
9101-106 Steilacoom Rd
Olympia, WA 98513

RESPONSE TO COMMENT
COMMENTOR NO. 608: JOWDERS, JULIA E.

Response to Comment No. 608-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 609: HANSEN, GERTRUDE C.

June 22, 1995

Attention: Mr. Hoak,

Please do not allow nuclear waste to be shipped through our Port of Tacoma.

Please! Please! Please!

It would be a terrible mistake to endanger our wonderful Northwest in such a way.

Please dont allow this to happen!

Sincerely,

Gertrude C. Hansen
6345 So. Montgomery
Tacoma, Wa.
98409

P.S. First of all, Puget Sound should be protected above everything else.

609-1

RESPONSE TO COMMENT
COMMENTOR NO. 609: HANSEN, GERTRUDE C.

Response to Comment No. 609-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 610: NICHOLS, DEBI R.

June 22, 1995

Dear Mr. Head,

My family and I are terrified of the idea of having nuclear waste shipped into our area through the Port of Tacoma. 610-1

Please don't dump on us !!!

Sincerely yours
Debi R Nichols

RESPONSE TO COMMENT
COMMENTOR NO. 610: NICHOLS, DEBI R.

Response to Comment No. 610-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 611: OLSEN, DIANE

June 21, 1995

Dear Mr. Head,

As a lifelong resident of Tacoma, Washington, it is with great urgency that I request that you re-think your shocking plan to use Tacoma's Commencement bay for nuclear waste transport. This is a highly populated area, and obvious safety problems could occur. We strongly protest this unfair plan. We will do everything in our power to fight this faulty plan. 611-1

Sincerely,

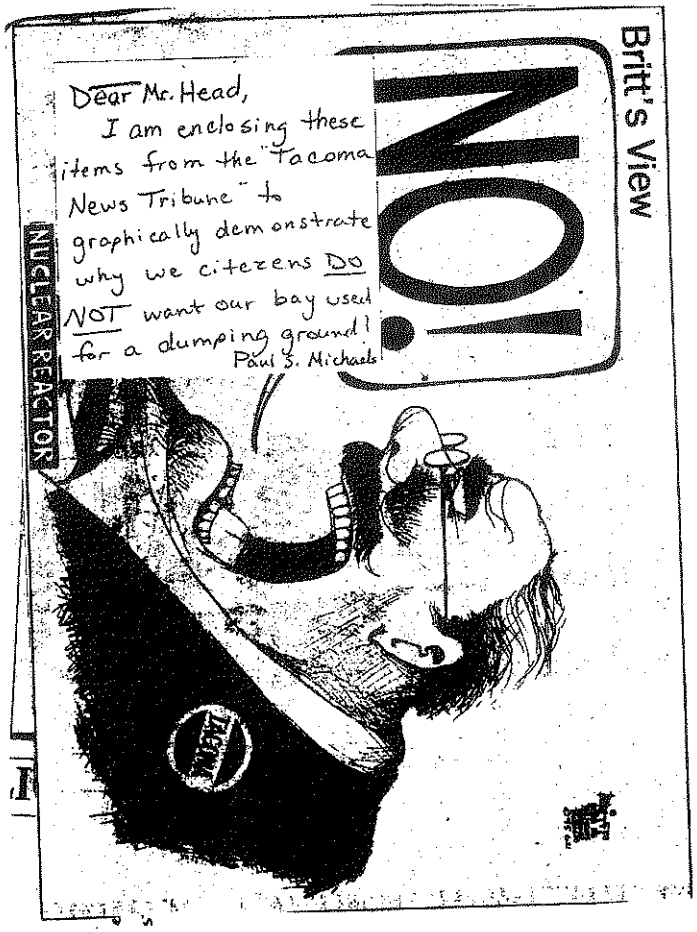
Diane Olsen
322 Berkeley Ave.
Tacoma, WA. 98466

RESPONSE TO COMMENT
COMMENTOR NO. 611: OLSEN, DIANE

Response to Comment No. 611-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 612: MICHAELS, PAUL S.



612-1

RESPONSE TO COMMENT
COMMENTOR NO. 612: MICHAELS, PAUL S.

Response to Comment No. 612-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 613: OSBORNE, JUDY C.

Dear Mr. Head,

My name is Judy Osborne. I was born and raised here in Tacoma, Washington. It is with great surprise and disappointment that I was informed (while presently on vacation) that the D.O.E is considering using our dynamic area as a dumping ground for nuclear waste, some from other countries. 613-1

I implore you to select other ways to deal with this issue rather than endanger innocent people in a highly populated area.

Sincerely, Judy C. Osborne
4219 N. Alki St.
Tacoma, WA. 98407

RESPONSE TO COMMENT
COMMENTOR NO. 613: OSBORNE, JUDY C.

Response to Comment No. 613-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States, there would be no storage of this material in the Port of Tacoma, or any other port. Under normal circumstances, it would remain at the port for a few hours. In the event of a major disruption of ground transportation systems, due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination.

COMMENTOR NO. 614: HOKENSON, PAUL

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: No! We don't want Nuclear Waste shipped through Tacoma, Wa. Our health and our Grand Children's health is too precious for that Unnessary danger. Don't bring it into any Port in the U.S.A.

Name: Paul Hokenson Telephone: (206) 535-2713

Address: 1615 So. 84th St. City/State/Zip: Tacoma, WA 98444

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave., S.W., Washington, DC 20585

DEADLINE: JUNE 30, 1995

614-1

RESPONSE TO COMMENT
COMMENTOR NO. 614: HOKENSON, PAUL

Response to Comment No. 614-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma, or any United States port, is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 615: EINERT, DAVID & SUSAN

June 22, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Mr. Head,

We adamantly oppose the transfer of high level nuclear wastes through the Port of Tacoma. We have read in the newspaper the plans to ship the spent nuclear wastes will be relatively safe and need little extra security. What about Three Mile Island, the Exxon Valdez, Chernobyl, the leaks at Hanford? As for security, what of the terrorists that plague our world? 615-1

Mr. Head, you are quoted as saying that (the department of Energy) "They don't have time to listen." We expect that you take the time necessary for them to understand that Washington is an unacceptable choice.

Sincerely,

David Einert
Susan Einert

David and Susan Einert
4006 206th Street Court East
Spanaway, Washington 98387
(206) 846-3316

RESPONSE TO COMMENT
COMMENTOR NO. 615: EINERT, DAVID & SUSAN

Response to Comment No. 615-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Section 2.8 of the EIS addresses the security measures that would be taken to ensure that there would be no unacceptable risks of terrorism or theft of materials. DOE considers that foreign research reactor spent nuclear fuel could safely be received at commercial ports, as it has in the past, without additional security such as might be present at military bases. The security measures employed at any port would meet or exceed all the security requirements in the Code of Federal Regulations (10 CFR Part 73). DOE supports these regulations as being adequate to protect the foreign research reactor spent nuclear fuel in any commercial port.

Appendix H has been added to the final EIS in response to public comments to better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

COMMENTOR NO. 616: RANDLE, DR. NEIL

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping [illegible] Waste Through Tacoma.

Comments: [illegible] should be kept [illegible] in the country in [illegible] it was used. We don't want it in the country and especially not coming [illegible] part of [illegible] Tacoma

616-1

616-2

Name: [illegible] Telephone: [illegible]

Address: [illegible] City/State [illegible]

DR. NEIL RANDLE
[illegible] Schuster Pkwy #301
Tacoma, WA 98402
[illegible]

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management.
U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, DC 20585
DEADLINE: June 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

RESPONSE TO COMMENT
COMMENTOR NO. 616: RANDLE, DR. NEIL

Response to Comment No. 616-1

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

Response to Comment No. 616-2

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 617: THARP, JENNY

June 22, 1995
1524 so Madison
Tacoma, Wa. 98405

Charles Head
Office of Spent Nuclear Fuel Mgmt.
U.S. Department of Engergy
1000 Independence Ave. SW.
Washington, D.C. 20585

Dear Mr. Head,

I and my immediate family of 2 want to let you know we do NOT want our Port of Tacoma to become the unloading spot for all the worlds' nuclear waste.

We don't care how supposedly safe it it, accidents happen. Our water and port are too important to the livelihood of many hundreds of people, besides the possible contamination of all the local residents. 617-1

Our commuinity does NOT want to have all the health problems connected to over exposure to radiation. Look at what happened to all those people in Russia when the reactor metled down. That was quite a few years ago and they are still having health problems.

Find some other low populated area to bring it into the country. Not IN OUR BACKYARD!

We always thought our government was looking out for the best interest of its' citizens but this plan sure leaves us wondering!

Sincerely,
Jenny Tharp

RESPONSE TO COMMENT
COMMENTOR NO. 617: THARP, JENNY

Response to Comment No. 617-1

The commentor's opposition to the use of the Port of Tacoma to receive foreign research reactor spent nuclear fuel is noted. The analyses provided in the EIS indicate that the use of any of the ports, including Tacoma, would not pose any significant risk to either the port personnel, local environment, or the population near the port. The analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3) and that the risks associated with incident-free handling of the foreign research reactor spent nuclear fuel casks are also low (Section 4.2.2.2).

COMMENTOR NO. 618: CUMMINGS, MRS. VIKKI

3819 South Park Avenue
Tacoma, WA 98408
June 22, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Head:

Thank you for listening to Tacoma's concerns about becoming a receiving port for spent nuclear waste. As you have noted, "There's certainly a strong undercurrent of public opinion that is negative to this." You have also indicated that even before meeting with Tacoma's citizens, you had a fairly good idea what your recommendation would be in your report to the director of the Office of Spent Nuclear Fuel Management.

As you know, our public officials have strongly condemned this purposed shipment of nuclear waste into our town. As a concerned citizen who has lived in Tacoma most of my life, I also urge you not to allow our town to become a port of entry for nuclear waste.

No matter how many safety precautions are made, accidents happen. To think of the "what ifs" is beyond comprehension--Three Mile Island, the Exxon Valdez, Chernobyl, the leaks at Hanford. These were all accidents that shouldn't have happened. The potential for spent nuclear waste to contaminate our area is real. I agree with Harold Moss, Tacoma's Mayor, "This is a major threat."

Please recommend Tacoma not become a nuclear waste port. Thank you for listening. 618-1

Sincerely,

Mrs. Vikki Cummings

Mrs. Vikki Cummings

RESPONSE TO COMMENT
COMMENTOR NO. 618: CUMMINGS, MRS. VIKKI

Response to Comment No. 618-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 619: LARSON, IVAN & ELEANOR

Mr. Charles Head
Office of Spent Nuclear Fuel Mgmt (EM-37)
U.S. Dept of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

June 23, 1995

RE:Radioactive nuclear waste

Dear Mr. Head:

There are other places in this world to dump radioactive nuclear waste than shipping it thru the Port of Tacoma. 619-1

You know this is a highly populated part of the State of Washington and of the country and you can find other places in the world that you could ship it thru other than the Port of Tacoma.

I just want to register our complaint loud and clear as 2 registered voters in the state.

Sincerely,

Eleanor Larson

Ivan and Eleanor Larson

RESPONSE TO COMMENT
COMMENTOR NO. 619: LARSON, IVAN & ELEANOR

Response to Comment No. 619-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 620: JEWART, JACK E.

24508-38th Ave Ct E
Spanaway, Washington, 98387
21 June 1995

Charles Head, Program Manager
Office Of Spent Nuclear Fuel Management (EM-37)
US Department Of Energy
1000 Independence Ave SW, Washington, DC 20585

Dear Sir:

I'm writing with regards to plans for movement of nuclear materials through Port of Tacoma, Washington. To begin with, I represent NO Agency, Group, or Affiliation but am speaking only as a citizen living in Pierce County, Washington. To demonstrate my knowledge of nuclear material, I'm including with this letter several diplomas and certificates I've been awarded. In particular, I would draw your attention to certificate awarding "The Meritorious Service Medal" by US Army which was given to me upon my retirement from US Army. It reads in part "Of particular importance was a completely rewritten Nuclear Accident/Incident Control Plan for Fort Lewis and the Northern United States Army SDX Sector" (Pacific Northwest). 620-1

Fully realizing this was some 20 years ago and procedures and equipment may have changed somewhat over these years, I will draw your attention to a couple problems that existed prior, without going into classified information. Army nuclear cargo in past was shipped by air. Aircraft routes included Pacific Northwest. Sixth US Army was responsible as long as planes were airborne. It suddenly became Fort Lewis's responsibility if a plane would crash into ground carrying nuclear cargo. Here are some limitations that I'm aware of.

One piece of safety monitoring equipment, used by emergency teams, was a gas proportional meter. Once calibrated, requiring various standards, this meter would NOT function when elevation varied by several thousand feet. Being calibrated at Fort Lewis location gave it a range of 0-3,000 feet. Unfortunately, many areas of Pacific Cascades, as well as Mount Rainier, exceed these elevations. In short, should accident occur by a plane hitting Mount Rainier at a high elevation, meter necessary for safety of emergency crews, would not function unless recalibrated (a lengthy procedure) at elevation in which accident occured. I realize that Tacoma Tideflats would not be a problem in this case.

Another piece of monitoring equipment used had a different specification. It's operational range was from 0-90% relative humidity. At humidity ABOVE 90%, meter did NOT function. Areas of Pacific Northwest DO, at sometimes, have a relative humidity in excess of 90%. I again realize it would be a once in a blue moon shot that an accident would occur as safety is stressed in entire program. I also realize that should an accident occur, there might only be a slim possibility relative humidity would be in excess of 90% on that particular day.

Again, it's been some 20 years and I realize safety equipment necessary may be changed. I would ASSUME a complete review of enviromental limitations of safety equipment will be checked prior to approval of Tacoma as a receiving site. Other areas, such as a location in California may NOT have climatic conditions of Seattle/Tacoma area and may not present problems.

In summary, and passing, I'll give you an actual account of an unloading situation of hazardous cargo I was given once. Necessary monitoring equipment for off loading a Merchant Marine ship was not available. Instructions given me were monitoring device was not needed as hazardous cargo would smell like fish if leaking. My reply to my superior was, "Do you realize that everything around docks in port town we're unloading in smells like fish!" Needless to say, correct monitoring equipment was positioned prior to unloading.

Yours Truly,

Jack E. Jewart (206) 847-1281
cc: Deputy Mayor Evans, City Of Tacoma

RESPONSE TO COMMENT
COMMENTOR NO. 620: JEWART, JACK E.

Response to Comment No. 620-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 621: CECCANTI, MARGHERIT

June 22, 1995

Charles Head

Dear Sir,

I do not want nuclear waste being shipped through the Port of Tacoma. My suggestion would be to put in your back yard. 621-1

Sincerely

Margherit Ceccanti

2433 Day St.

Tacoma Wa 98466

RESPONSE TO COMMENT
COMMENTOR NO. 621: CECCANTI, MARGHERIT

Response to Comment No. 621-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 622: RIDENOUR, MARGARET A.

June 22, 1995

Dear Sir,
My husband and I are
residents of Tacoma, WA,
We are in our late 70's.
For the sake of all people and
especially our young people
and eventually their children
We DO not repeat DO not
want highly radioactive nuclear
waste shipped thru the Port
of Tacoma - For that matter
nuclear waste from a
foreign country should not
repeat not be shipped to
the U.S. Sometime, somewhere
there is bound to be an
accident. It matters whether
the accident is this year or
100 or 200 years from now -
It is a major threat.
Margaret A. Ridenour
Charles E. Ridenour
8006 75th St. S.W
Tacoma, WA. 98498

622-1

622-2

622-3

RESPONSE TO COMMENT
COMMENTOR NO. 622: RIDENOUR, MARGARET A.

Response to Comment No. 622-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 622-2

The commentor's opposition to management of spent nuclear fuel from foreign research reactors in the United States is noted (Management Alternative 1 or 3, Sections 2.2 and 2.4 of the EIS). Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

Response to Comment No. 622-3

DOE agrees that accidents do occur. That is why the spent nuclear fuel transportation casks are designed, constructed and tested by simulation to withstand a series of impact and fire tests (Appendix B, Section B.2 of the EIS). Representative spent nuclear fuel transportation casks have been crash tested to confirm compliance with the simulation process. Two actual crash tests involving a locomotive and a tractor trailer carrying a transportation cask have been performed. Both tests showed no failure of the casks, but the locomotive and tractor trailer were destroyed. These tests demonstrated that a spent nuclear fuel transportation cask built to the federal standard would protect and retain its contents in all credible accidents. Nevertheless, the EIS evaluated the consequences of accidents involving a spent nuclear fuel transportation cask where the cask is considered failed with a certain probability. The accidents ranged from no cask failure to that of cask failure combined with a high intensity fire. Section 4.2.3 of the EIS provides a summary of impacts, both the risks and consequences, resulting from accidents involving a spent nuclear fuel transportation cask. The results indicate that the risk associated with the transport of the spent nuclear fuel is low.

Also, the spent nuclear fuel is solid metal and it is transported dry inside the transportation casks. As a result, the radioactivity within the spent nuclear fuel cannot "leak" from the transportation casks.

COMMENTOR NO. 623: DUNKIN, EVELYN

Tacoma Wa
June 22 - 95

Dear Charles Head:

I do not wick to have Nuclear fuel Waste dumped into Port of Tacoma also my family and all the People living here in Tacoma, do not want it dumped here. In Washington D.C. at Dept of Energy. The Bureaucrats dont care about the People here. So they say dump the Nuclear Waste here. they dont live here. They can just dump it in their own area. We dont want that Nuclear wast dumped here. Our Commencement Bay in Tacoma, does not need Nuclear fuel here to Leak and Kill our wild life fish. We are humans Not Rabits. we dont want any Part of Nuclear fuel here, there are lot of Place in this World to dump it. But Please Not here. Who wants to Dump it here. Please dump it in your own Area We Are people here, Keeping Our city Clean from Nuclear Waste we dont Need it here. I know I Served in Military. why pick Tacoma of all Place. Some one is Putting. Money in their Packet from Such Arrangements. I know talk is Big. But money goes in to their Packet. I been around and said things Happen. Please Dont Dump Nuclear fuel here. We dont Need it.

Evelyn Dunkin

623-1

RESPONSE TO COMMENT
COMMENTOR NO. 623: DUNKIN, EVELYN

Response to Comment No. 623-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 624: KOSKI, WILLIAM A.

William A. Koski
1001 No. Huson ST
TACOMA, WA., 98406-3125

22 JUNE 1995

MR. CHARLES HEAD
OFFICE OF SPENT NUCLEAR FUEL MANAGEMENT (EH 37)
U.S. DEPT. OF ENERGY
1000 INDEPENDENCE AVE., S.W.
WASHINGTON, D.C. 20585

REFERENCE THE SHIPMENT OF SPENT NUCLEAR FUEL THROUGH TACOMA.

PUGET SOUND IS KNOWN FOR ITS PRISTENE BEAUTY, AND TO ENDANGER IT AND ITS INHABITANTS WOULD BE TANTAMOUNT TO HAVING A CHILD HOLD A LOADED GUN IN A CROWDED ROOM. EVENTUALLY SOMEONE IS GOING TO BE HURT.

I IMPLORE YOU TO RECONSIDER SIR, - NO NUCLEAR FUEL THROUGH TACOMA! 624-1

William A. Koski

P.S. TAKE TIME TO READ C.R. ROBERT'S ARTICLE, INCLOSED. TAKE TIME

RESPONSE TO COMMENT
COMMENTOR NO. 624: KOSKI, WILLIAM A.

Response to Comment No. 624-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 625: KENDALL, RAYMOND

Please donot send us waste

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: why ship [illegible] to a populated area?
why is Tacoma [illegible] place to ship waste?
Who determined [illegible] needed the business?
Who do I call to [illegible] this?
How can Dept. of Energy say Tacoma is the best
place [illegible] this?
The Port of Tacoma is one of the most
Pristeen areas in the U.S.A. Why take
The chance of distroying

Name: Raymond [illegible] Kendall Telephone: 206-[illegible]-1273

Address: P.O. Box [illegible] Tacoma City/State/Zip: Wa. 98401

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, DC 20585

DEADLINE: JUNE 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

625-1

RESPONSE TO COMMENT
COMMENTOR NO. 625: KENDALL, RAYMOND

Response to Comment No. 625-1

The port selection process, described in Appendix D, Section D.1.9 of the EIS, identifies ports that are acceptable for the receipt and handling of foreign research reactor spent nuclear fuel; it does not determine which port is best. The decision as to which port or ports would be used in the case that foreign research reactor spent nuclear fuel is accepted into the United States, will be in the Record of Decision. The population in the port, surrounding areas, and along the transportation route to the management site are some of the many factors that must be considered in determining the best port. Section 4.2.2 of the EIS discusses the impacts on ports of the proposed action.

COMMENTOR NO. 626: MASSETTI, GUY

1418-68th Avenue West
Tacoma, Wa 98466
June 22, 1995

Charles Head
Office of Spent Nuclear Fuel Mgmt (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Sir:
No! – No! – No! to the shipment of nuclear waste being shipped through the Port of Tacoma.
We can not take the chance of an accident. Our Children and our Children's Children deserve more from us. We must protect them.

Sincerely –
Theresa M. Massetti
Guy Massetti

626-1

RESPONSE TO COMMENT
COMMENTOR NO. 626: MASSETTI, GUY

Response to Comment No. 626-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 627: ZMUDA, MICHAEL

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: We have enough problems. We don't need any more with nuclear waste in our town. NO NUCLEAR WASTE! We shouldn't even be [redacted] alone this nuclear waste in our country.

Name: Michael Zmuda Telephone: (206) 627-2074

Address: 3420 So Proctor #A City/State/Zip: Tacoma WA 98409

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave., SW, Washington, DC 20585

DEADLINE: JUNE 30, 1995

627-1

RESPONSE TO COMMENT
COMMENTOR NO. 627: ZMUDA, MICHAEL

Response to Comment No. 627-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 628: BODENHUFER, PAUL J.

318 HARVARD AVE.
TACOMA, WA. 98466-4305
20 JUNE 1995

CHARLES HEAD, PROGRAM MANAGER
OFFICE OF SPENT NUCLEAR FUEL MANAGEMENT (EM-37)
U.S. DEPT OF ENERGY
1000 INDEPENDENCE AVE SW
WASHINGTON D.C., 20585

DEAR MR. HEAD:
WE ARE OPPOSED TO NUCLEAR FUEL SHIPMENTS THROUGH THE PORT OF TACOMA.
THE MEETING ROOM LAST NIGHT HOLDING 300 PERSONS TO DISCUSS THIS ISSUE WITH DOE WAS NOT LARGE ENOUGH TO HOLD ALL THE PERSONS WHO WANTED TO ATTEND INCLUDING US. PROBABLY ABOUT 500 PEOPLE WANTED TO ATTEND TO VOICE THEIR OPINIONS.
THE DOE USED OUTDATED INFORMATION ON THE PORT OF TACOMA. THE DEIS LISTS ONLY ONE TERMINAL THROUGH WHERE THESE SHIPMENTS WOULD POTENTIALLY BE SHIPPED. THE PORT OF TACOMA HAS 6 CONTAINER TERMINALS. THE CONFIGURATION OF THESE TERMINALS IS SHOWN IN STATE IN EXISTENCE IN YEAR 1980 OR BEFORE. ON-DOCK RAIL YARD CONFIGURATIONS ARE NOT SHOWN AND WATERWAYS ARE SHOWN INCORRECTLY. GIVEN THESE ERRORS IN ANALYZING FACILITIES FOR HANDLING THESE SHIPMENTS THERE IS NO GUARANTEE THAT NEARBY POPULATION CENTERS WERE SHOWN CORRECTLY AND EVALUATED CORRECTLY.
THERE ARE SEVERAL AREAS IN THE PUGET SOUND REGION SHOWING WATER DEPTH OVER 200 METERS IN MAJOR SHIPPING LANES TO AND FROM THE PORT OF TACOMA. DOE DESCRIBED IN THE DEIS THAT IT WOULD BE VERY DIFFICULT OR IMPOSSIBLE TO RECOVER FUEL CASKS FROM DEPTHS GREATER THAN 800 METERS. DOE DID NOT CONSIDER THE DEEP WATER DEPTH IN PUGET SOUND

628-1

RESPONSE TO COMMENT
COMMENTOR NO. 628: BODENHUFER, PAUL J.

Response to Comment No. 628-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

In regard to the EIS being based on outdated and inaccurate information, updated information on the Port of Tacoma has been incorporated into Appendix D, Section D.2.1.9 of the EIS. The errors identified by the commentator have been corrected in the final EIS, so the final decision will be based on current information. In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in any U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1,000 feet). Section 4.2.1.3 of the EIS has been modified to include this assurance of recovery in coastal waters. Appendix C, Section C.5.5 of the EIS presents information on the probability of a cask sinking in coastal and deep ocean waters. The impacts of a foreign research reactor spent nuclear fuel transportation cask sinking in coastal and deep waters are estimated in the EIS (Appendix C, Section C.5). The results of this analysis show that both the consequences and the risk of these accidents are low (Appendix C, Sections C.5.4 and C.5.5).

COMMENTOR NO. 628: BODENHUFER, PAUL J. (CONT'D.)

2

318 HARVARD AVE
TACOMA, WA. 98466-7305
20 JUNE 1995

COMMENCEMENT BAY AND THE PORT OF TACOMA ARE LOCATED IN FEDERALLY DESIGNATED SUPERFUND SITE ("DIRTY PORT"). DOE DID NOT RECOGNIZE THAT SHIPMENT OF NUCLEAR MATERIALS WOULD CONTRIBUTE TO THE "DIRTY PORT" STIGMA.

SEVERE FIRE OR EXPLOSION INVOLVING A SHIPPING CASK OF NUCLEAR SPENT FUEL WOULD CAUSE SEVERE DAMAGE AND HAVE LONG-TERM EFFECTS ON A LARGE AREA NEAR THE DISASTER SITE. IT WOULD HAVE CRIPPLING EFFECTS ON MANY BUSINESSES IN THE AREA. 628-1 (Cont'd.)

DOE DID NOT ADEQUATELY ADDRESS THE SECURITY REQUIREMENTS FOR THESE SHIPMENTS. THIS MATERIAL IS USEABLE IN NUCLEAR WEAPONS AND HIGHLY ATTRACTIVE TO TERRORISTS. PROPER SECURITY MEASURES TO COUNTER POSSIBLE ACTS BY TERRORISTS WERE NOT PROVIDED FOR IN DEIS.

THE ABOVE ARE SOME OF THE REASONS WE ARE OPPOSED TO NUCLEAR FUEL SHIPMENTS THROUGH OUR PORT.

SINCERELY YOURS,
Paul J. Bodenhofer
PAUL J. BODENHOFER
MARGARET BODENHOFER
Margaret Bodenhofer

RESPONSE TO COMMENT

COMMENTOR NO. 628: BODENHUFER, PAUL J. (CONT'D.)

COMMENTOR NO. 629: JACKSON, BILL

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About [illegible] Waste Through Tacoma.

Comments: I feel [illegible] not come through [illegible] potential for nuclear acc[illegible] Also, I think it would open the [illegible] push anything through the Port of Tacoma.

No [illegible] Tacoma.

Name: Bill J[illegible] Telep[illegible] 7-3537

Address: PO Box [illegible] City/Stat[illegible] WA 98395-0355

Send To: Charles Head, Off[illegible] Spent Fuel Management (EM-37), Off[illegible] Environmental Management, U.S. Department of [illegible] 1000 Independence Ave. [illegible] Washington, DC 20585

DEA[illegible] 1995

629-1

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995.** And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

RESPONSE TO COMMENT
COMMENTOR NO. 629: JACKSON, BILL

Response to Comment No. 629-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 630: JACKSON, TERESE

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About [illegible] Nuclear Waste Through Tacoma.

Comments: I [illegible] waste should be shipped [illegible] in Japan, France or [illegible] for reprocessing. I don't think [illegible] country [illegible] can afford to take a chance on harm[illegible] population with [illegible] accident [illegible] Tacoma [illegible] but [illegible] away [illegible]

Name: Teresa [illegible] Telep[illegible] 597-3137

Address: PO Box [illegible] City/State [illegible] WA 98395

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. SW, Washington, DC 20585

DEAD[illegible] JUNE 30, 1995

630-1

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
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Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

RESPONSE TO COMMENT
COMMENTOR NO. 630: JACKSON, TERESE

Response to Comment No. 630-1

The commentor's preference for overseas reprocessing is noted. This is Management Alternative 2, Subalternative 1b, which is discussed in Sections 2.3 and 4.4.2 of the EIS.

COMMENTOR NO. 631: MILLER, EUGENE J.

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: I very [illegible] the U.S. Department of Energy's plan to use the Port of [illegible] dumping Port for the world's nuclear waste.

No matter how safe "that so called packaging" is, with so many Cow "Crazies" around this world and also in our local areas, there is a chance for some [illegible] "Tacoma Port" is to important to [illegible] may or could happen ([illegible]

Name: Eugene [illegible] Telephone: [illegible] 564-3404

Address: 835 So. [illegible] St. City/State: Tacoma, WA 98465-1815

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, DC 20585

DEAD[illegible] 30, 1995

631-1

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by June 30, 1995. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

RESPONSE TO COMMENT
COMMENTOR NO. 631: MILLER, EUGENE J.

Response to Comment No. 631-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 632: REMILLARD, MICHELE

June 22, 1995

Mr. Charles Head
Program Manager
Office of Spent Nuclear Fuel Mgmt.
US Dept. of Energy
1000 Independence Ave.
SW Washington, D.C. 20585

Dear Mr. Head;

I oppose bringing nuclear waste to the Port of Tacoma from foreign countries. 632-1 I also oppose burying the ~~nuc~~ nuclear waste any where in the State of Washington or The United States of America. 632-2

Sincerely,
Michele ReMillard
9916 NW 3rd Ct.
Vancouver, Wa. 98685

RESPONSE TO COMMENT
COMMENTOR NO. 632: REMILLARD, MICHELE

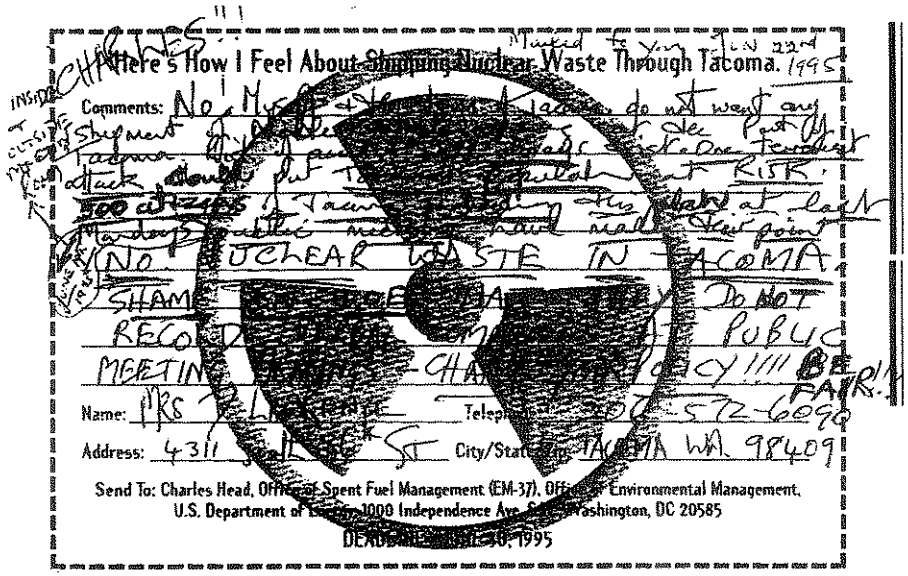
Response to Comment No. 632-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 632-2

The commentor's opposition to acceptance of foreign research reactor fuel into the United States (Management Alternatives 1 and 3, Sections 2.2 and 2.4 of the EIS) is noted. Under the basic implementation of Management Alternative 1, above ground dry cask storage would be used for the foreign research reactor spent nuclear fuel. Wet storage is also considered as an implementation alternative (Section 2.2.2.5 of the EIS). Underground burial would not be used, nor is it considered as an implementation alternative in the EIS.

COMMENTOR NO. 633: LAWRENCE, DOROTHY


Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: No! [illegible] do not want any shipment [illegible] the Port of Tacoma [illegible] RISK. [illegible] 500 citizens [illegible] at last Mondays public [illegible] their point

NO NUCLEAR WASTE IN TACOMA

SHAM[illegible] DO NOT RECO[illegible] PUBLIC MEETIN[illegible] CHA[illegible] POLICY!!!! BE FAIR!!

Name: MRS [illegible] Telep[illegible] 572-6090

Address: 4311 [illegible] ST City/State [illegible] TACOMA WA 98409

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. [illegible] Washington, DC 20585

DEADLINE [illegible] 30, 1995

633-1

633-2

RESPONSE TO COMMENT
COMMENTOR NO. 633: LAWRENCE, DOROTHY

Response to Comment No. 633-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 633-2

DOE did request that comments be submitted in writing, however, all oral comments presented at each hearing were summarized and have been addressed along with the written comments in Volume 3 of the EIS. All comments, written and oral, are part of the public record. The format adopted by DOE for the public hearings held on the draft EIS is fully in compliance with the requirements of NEPA regulations and DOE's requirements for conducting such hearings. In the large majority of cases, this public hearing format has been well received by the public. Nevertheless, in addition to the public hearings, several other avenues were also provided through which members of the public could make their comments on the draft EIS known.

COMMENTOR NO. 634: JENSEN, LAURA

Friday, June 23, 1995
Tacoma, Washington

Charles Head
Office of Spent Nuclear Fuel Management
(EM-37)
US Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

To Charles Head;

As a person who has always been a citizen of Tacoma but could only feel dumbfounded by the sound of the extraordinary plan to ship highly radioactive uranium through the Port of Tacoma, I could only feel so very sympathetic with the many comments I heard at the meeting Monday at the Untilities Building in Tacoma. I felt convinced by the speaker who was a Renton resident who was concerned that the second alternative, to leave the uranium where it is, was not considered. 634-1

He wondered if it could be fair to have the United States be the deposit of spent fuel for all these countries which have used the fuel themselves. 634-2 He added that there was concern for wildlife in the event of a spill like an oilspill. 634-3 I felt convinced by the speaker from the company that does deep water research that insisted that the described casks could not take the deep water pressure, that they were designed for shallower water. 634-4 He insisted that the casks were not safe for shipping. I felt convinced by the speaker who believes the information from the report about the Port is out of date. This speaker argued that cask recovery would be difficult. He also argued that the Commencement Bay is a superfund site - much effort has gone toward clearing the contamination. He also urges that Tacoma not be used because operational plans are not adequate for safety. 634-3 (Cont'd.)

Again, I felt shocked by the plan and felt sympathy for the intelligent comments of the speaker.

Truly,

Laura Jensen
302 North Yakima C3
Tacoma, WA 98403-2213

RESPONSE TO COMMENT
COMMENTOR NO. 634: JENSEN, LAURA

Response to Comment No. 634-1

The commentor's preference for the overseas management alternative is noted. This is Management Alternative 2, which is discussed in Sections 2.3 and 4.4 of the EIS.

Response to Comment No. 634-2

The intent of the proposed action is to support U.S nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. The intent of the resultant proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

If foreign research reactor spent nuclear fuel were accepted into the United States, the policy would be of limited duration (Section 2.2.1.1 and 2.2.2.2 of the EIS).

Response to Comment No. 634-3

The EIS did not address marine spills in Puget Sound or elsewhere because the metal fuel is shipped dry inside a transportation cask, thus there is nothing to spill. In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in any U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1,000 feet). Section 4.2.1.3 of the EIS has been modified to include this assurance of recovery in coastal waters. Appendix C, Section C.5.5 of the EIS presents information on the probability of a cask sinking in coastal and deep ocean waters. The impacts of a foreign research reactor spent nuclear fuel transportation cask sinking in coastal and deep waters are estimated in the EIS (Appendix C, Section C.5). The results of this analysis show that both the consequences and the risk of these accidents are low (Appendix C, Sections C.5.4 and C.5.5).

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. To date, no radioactive contents have ever been released from a spent nuclear fuel transportation cask, nor has a spent nuclear fuel transportation cask ever been punctured, even as a result of an accident.

Updated information on the terminals at the Port of Tacoma has been incorporated into Appendix D, Section D.2.1.9 of the EIS.

DOE has added a sentence to Appendix D, Section D.2.1.9 of the EIS regarding Commencement Bay being a Superfund Site. The analysis of impacts, as documented in Section 4 of the EIS, demonstrates that there would be no significant adverse impacts on the ports, people, or natural environment from shipments of foreign research reactor spent nuclear fuel and the overall impacts to Commencement Bay would be unchanged by the various management alternatives.

Foreign research reactor spent nuclear fuel has been accepted at ports in the United States without incident for over 30 years (Sections 1.1 and 1.2 of the EIS). If a policy to accept foreign research reactor spent nuclear fuel into the United States is adopted, this spent nuclear fuel would be shipped in standard transportation containers which are routinely handled at all of the candidate ports (Section 2.6.3.2 of the EIS).

Response to Comment No. 634-4

The commentor's reference to an individual who claimed that the spent nuclear fuel transportation casks are designed only for shallow water is noted. It is true that the regulations governing the design and construction of spent nuclear fuel transportation casks require a series of tests including immersion test to a depth of 50 meters, but this does not mean that the cask would buckle if it were to sink in deeper water. The pressure test resulting from the immersion test is a means to determine the tightness of cask seals, and it is not a structural integrity test. If a cask were to sink in a deep ocean, the cask seals would fail and the seawater would enter the cask. The seawater in-leakage would eventually equalize the pressure inside the cask to that of the outside. At that point, only the seawater corrosion would damage the cask structural integrity. If there is no seal failure the cask would not buckle at depths of less than 305 meters (1000 feet). The EIS evaluated scenarios involving sinking of a spent nuclear fuel transportation cask in the deep ocean and in the continental shelf (Section 4 and Appendix C of the EIS). If a cask were to sink in U.S. coastal waters it would be recovered.

COMMENTOR NO. 635: KAATTARI, OSCAR

June 23, 1995

Mr. Charles Head
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Head,

I have never written to protest anything but I am now in hopes that my small voice might add to those you have already heard from and will hear from. Mine is on two counts:

1. The entry of "nuclear scrap" into this country through the Port of Tacoma, Washington. 635-1

2. The fact of the entry of foreign nuclear scrap to add to our own that we have to contend with already.

In 1963 I became a journeyman machinist following a four year apprenticeship at Puget Sound Naval Shipyard. It was apparent to me at that time that to be involved in nuclear was to be "on the fast track" to advancement.

I chose not to because it looked to me that, in spite of all the "advantages" for it's use, it is too involved and makes too much too long term mess. You have a job now because of that mess, but I wouldn't want it.

I don't see that people living on Puget Sound, Washington, especially Tacoma, in this day should have to contend with scrap entering this country that belongs to someone else. More, I don't see that generations in the future should have to contend with the mess we have made in this country, and then to add to it bringing in foreign material.

We don't want Washington to be a dumping ground, either by accident (Tacoma), or by design (Hanford).

Oscar Kaattari

Oscar Kaattari
E30 Park Place,
Shelton, Washington
98584

RESPONSE TO COMMENT
COMMENTOR NO. 635: KAATTARI, OSCAR

Response to Comment No. 635-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 636: OSTMANN, HEATHER

Heather Ostmann
906 Manor Dr.
Fircrest, WA 98466
June 22, 1995

Charles Head, Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585

Dear Charles Head:

I am writing you this letter in regards to the plan to ship toxic nuclear waste through the Port of Tacoma. You must be well aware of the fact that the people of Western Washington strongly oppose this idea since your attendance at the meeting on June 19, 1995. I understand that this must be a difficult problem to solve (nobody wants boat loads of nuclear waste I am sure). Yet, I feel it is very unprofessional and disrespectful of not only you and your staff but also the entire Department of Energy to show so little concern for the people of Western Washington. It is us who will have to live with this stuff and the results of any accidents that may occur. Western Washington is a densely populated area and is continuing to grow at a rapid rate. I find it very callous on your part to disrespect our opinions on the matter and to not report our opinions to your bosses. I see no reason why your bosses should not listen to our opinions. As officials it is their job to represent the people of the United States. Yet, they do not have the time to listen to a large chunk of those people express their opinions on something as important as nuclear waste. With all due respect it is going to be shipped into our front yard. I think you and your bosses need to reevaluate not only your decision but, also your responsibilities to the American people. I think everyone in Washington D.C. who is a part of this decision should seriously consider every aspect of this situation (including the opinions of the public) before making a final decision. I feel that you at least owe us that. Thank you for your time. 636-1

Sincerely yours,

Heather Ostmann

Heather Ostmann
Tacoma Resident

RESPONSE TO COMMENT
COMMENTOR NO. 636: OSTMANN, HEATHER

Response to Comment No. 636-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. As a part of the overall evaluation of impacts, the EIS identifies ports of entry in the United States that are acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. The Port of Tacoma is identified in the EIS as acceptable. The analysis in the EIS indicates that the use of any of the ports identified by the port selection process would not pose any significant risk to either the port personnel or the population near the port (Section 4.2.2.3 of the EIS).

Consistent with its responsibilities under NEPA, DOE has solicited comments and has encouraged public participation in preparing the final Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel. DOE has considered public comments in this process. The comment response document of the Final EIS (Volume 3) identifies public comments and the DOE responses. The decision on the implementation of the proposed action will be contained in the Record of Decision.

COMMENTOR NO. 638: PATRICK, JOHN

JUNE '95

TO WHOM IT MAY CONCERN, EACH & ALL:

WITH THE DEPARTMENT OF ENERGY, LIFE COULD BE O.K., LIFE COULD BE BETTER, IT COULD BE ENHANCED, AND AT THE LEAST, LIFE COULD BE AFFIRMED

THE D.O.E.'S CONCERNS ARE CONSTRUCTIVE-LIFE'S CONCERNS. THE D.O.E'S CONCERNS ARE PEOPLE'S CONCERNS. THE D.O.E.'S CONCERNS ARE LARGER THAN THE UNITED STATES CONCERNS AS A NATION STATE. THERE ARE CONCERNS OF THE EARTH, CONCERNS OF ANY COMMUNITY, CONCERNS OF THE ADULTS & ELDERS AND CONCERNS OF THE YOUNGER ARRIVING-AT-ADULTS, CONTINUING THE SEQUENCE & CYCLE OF LIFE. PERVASIVE IS THE CONCERNS OF THE SPIRIT OF LIFE ITSELF. THESE CONCERNS ARE "BITS THAT WILL ADD UP", MR. HEAD, ARE PARTS OF THE WHOLE WITH WHICH TO BE CONCERNED. THE MORE PARTS, THE MORE DEPTH, THE MORE COMPREHENSIVE, THEN THE GREATER THE POLICY. . . EXAMINATION OF NUCLEAR ANNIHILATION IS ESSENTIAL, OF NUCLEAR POWER IS 638-1

RESPONSE TO COMMENT
COMMENTOR NO. 638: PATRICK, JOHN

Response to Comment No. 638-1

The commentor's support for nuclear weapons nonproliferation and other concerns are noted.

COMMENTOR NO. 638: PATRICK, JOHN (CONT'D.)

EVER-IMPORTANT, OF NUCLEAR RESEARCH & DEVELOPMENT & FINALITY PARAMOUNT. ALL THIS EXAMINATING, THIS DISCUSSION IS TO BE DONE INDIVIDUALLY AND WITH EACH & ALL OTHERS, CO-OPERATIVELY ARRIVING AT A SHARED RESPONSIBILITY TO LIVING

SINCE THE BEGINNINGS OF IT, IN ITS DARK DELIVERANCE WITH PROMISES OF LIGHT, THE ~~AGGRESS~~ SCIENTIFIC-NEUTRAL NUCLEAR ERA, THIS AGE OF ATOMIZATION, THE RADIOACTIVE RESPONSIBILITY IS COMPROMISING BETTER JUDGEMENT. CERTAINLY, FOLKS, THROUGHOUT THE MANY YEARS, THE MULTIPLE GENERATIONS, THE LIFE-TIMES EXPERIENCING THESE BROKEN-ATOME MOMENTS WE LEARN. CONCIOUSNESS IS EVER-EXPANDING. WE ARE SEEING WHAT WE ARE DOING, WE SEE WHAT WE CAN DO. WE ARE SHOWN ITS DEVASTATION TO LIFE, ITS REFUSAL TO BE CONTAINED, ITS BREAK WITH HUMANITY... SO WE MANAGE, WE MANAGE IT ALL. WE MUST, EACH & EVERYONE. WE ARE OBLIGED COLLECTIVELY AND CONSTRUCTIVELY TO MANAGE THE ENORMITY OF THE ALREADY-ACCUMULATED ATOMIC RADIOACTIVE LEFT-OVER WORLD-WIDE WASTE FOR NUMEROUS

638-1 (Cont'd)

RESPONSE TO COMMENT
COMMENTOR NO. 638: PATRICK, JOHN (CONT'D.)

COMMENTOR NO. 638: PATRICK, JOHN (CONT'D.)

CENTURIES OF CENTURIES, JUST AS IT STANDS NOW. WE CAN DO THIS HUMANELY, IN TRUTHFULNESS, IN THE SPIRIT AND RESPECTFULNESS AND HUMILITY OF RECONCILIATION. WE CAN DO THIS WITH THE BEST IN HUMANITY, THE SHARED AND SHARING HUMANITY. LET THAT WHICH BRINGS OUT THE WORST OF HUMANITY BE DISCONTINUED. HANDS ARE FULL HANDLING THIS RADIOACTIVE MOMENT AND CARRYING IT FORTH. . . MAY THESE HANDS BE MANY, AS WELL AS LOVING 638-1 (Cont'd.)

John Patrick
9250 PLEASE DRIVE
DESERT HOT SPGS
CALIFORNIA
U. S. of A
Citoyen du le monde

EXTEND PUBLIC REVIEW PERIOD & PUBLIC FORMATION OF POLICY. 638-2

- ENOUGH (TWO TOO MANY) WAR BOMBS — NEVER AGAIN.
- ENOUGH (MUCH TOO MANY) WEAPONS TESTING — COMPREHENSIVE TEST BAN
- ENOUGH (TCHERNOBYL, 3-MILE ISLAND, ANY STORAGE SITE) ATOMIC ENERGY NUCLEAR WASTE — BEGIN ENCASEMENT, CLEAN-UP, AND FUTURE CARETAKING PROCESS

638-3

HALT THE CONTINUATION OF NUCLEAR PROLIFERATION, BEGIN THE EXAMINATION FOR NON-PROLIFERATION TO DEVELOP INTO REVERSING CONTINUATION. IT SEEMS LIKE NOTHING LESS WILL DO. . . 638-4

RESPONSE TO COMMENT
COMMENTOR NO. 638: PATRICK, JOHN (CONT'D.)

Response to Comment No. 638-2

The deadline for submission of comments in response to the draft EIS was extended from June 20 to July 20, 1995. DOE considers the comment period (90 days total) to be sufficient for public comment.

Response to Comment No. 638-3

An objective of the proposed policy is to safely manage the U.S.-origin HEU from foreign research reactors. Safe management of this material, which may include acceptance into the United States, is critical to the success of the U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapon-grade) uranium contained in spent nuclear fuel in civil programs worldwide. Both the management of the existing spent nuclear fuel and the reduction in the future use of HEU are aimed at reducing the risk of nuclear weapons proliferation. Nothing in the proposed action relates to military use of nuclear materials, weapons testing, or power reactor operation (e.g., Chernobyl, TMI-2). The proposed action is entirely related to civilian use of enriched uranium, particularly HEU.

Response to Comment No. 638-4

Regarding the commentor's general opposition to nuclear proliferation associated with nuclear activities of any type, it is essential to distinguish research reactors from other nuclear reactors and activities. Research reactors are used for many important commercial purposes, the most well-known of which is the production of medical radioisotopes and pharmaceuticals. They are not used to produce power or material for weapons. While some people might prefer to abandon the important commercial purposes of research reactors, the reality is that U.S. abandonment of the industry would only lead to the rest of the world continuing without the United States. Any safeguards against nuclear weapons proliferation the United States could hope to implement would be lost. Civilian research reactor operations would continue and weapons-grade uranium (fresh HEU) would be the fuel of choice in many cases.

COMMENTOR NO. 639: HALL, TIM

FROM: TIM HALL
P.O. BOX 709
WINTA, WA. 98390-0709
(206) 858-8487

TUESDAY 6/20/95

MR HEAD,

I'M A TRUCK DRIVER LIVING IN GIG HARBOR, WASHINGTON STATE WITH MY WIFE AND TWO CHILDREN, NOT FAR FROM TACOMA (JUST ACROSS THE NARROWS BRIDGE IN FACT.) BRING THE NUCLEAR WASTE TO TACOMA. 639-1

FOR MANY REASONS IT WOULD BE A GOOD THING.

1. IT WILL CREATE JOBS
2. IT WILL BE A WAY TO PROTECT THE NUCLEAR SECURITY OF THE UNITED STATES AND THE WORLD IN GENERAL.
3. IT WOULD SOLVE YOUR PROBLEM OF WHERE TO RECEIVE THE SHIPMENTS.

THESE ARE JUST A FEW OF THE GOOD REASONS. THE ARGUMENTS AGAINST BRINGING IT HERE ARE NUMEROUS AND BASED ON FEAR AND MISINFORMATION, PERPETRATED BY PEOPLE CONDITIONED TO REACT NEGATIVELY TO ANY THING ASSOCIATED WITH THE WORD NUCLEAR AND I WON'T DISCUSS THEM HERE.

THE CHANCES OF BEING EXPOSED TO DANGEROUS LEVELS OF RADIOACTIVITY FROM A DAMAGED IN AN ACCIDENT CASK (BUILT AS GOOD AS THEY ARE) IS A FRACTION OF 1%.

RESPONSE TO COMMENT
COMMENTOR NO. 639: HALL, TIM

Response to Comment No. 639-1

The commentor's support of the U.S. nuclear weapons nonproliferation policy and Management Alternative 1 of the EIS and reasons for encouraging the DOE to bring foreign research reactor spent nuclear fuel through the Port of Tacoma are noted.

COMMENTOR NO. 639: HALL, TIM (CONT'D.)

I TAKE MORE CHANCES WITH MY LIFE AND THE LIFE OF MY FAMILY WHEN I GET OUT ON THE FREEWAY AND CROSS THE NARROWS BRIDGE TO GO TO A MOVIE. SAME THING HAPPENS WHEN I GO TO WORK AND DRIVE MY TRUCK. LIFE IS A RISK AND IN THESE CYNICAL TIMES I STILL DON'T BELIEVE THAT MY GOVERNMENT OR A GOVERNMENT AGENCY WOULD GAMBLE WITH MY LIFE, THE LIVES OF MY FAMILY, OR THEIR OWN LIVES WHEN IT COMES TO NUCLEAR ENERGY OR THE WASTE IT PRODUCES.

WELL THERES MY STATEMENT; I'M MORE AFRAID OF THE HAZMAT CONTAINERS BEING BROUGHT INTO AND OUT OF THE SEAHAWK TERMINAL THAN NUCLEAR WASTE CASKS.

KEEP UP THE GOOD WORK HOPE YOU PICK TACOMA.

SINCERELY

TIM HALL

P.S.
DIXIE LEE RAY WAS RIGHT COMMON SENSE AND GOOD SCIENCE MUST PREVAIL.

RESPONSE TO COMMENT
COMMENTOR NO. 639: HALL, TIM (CONT'D.)

COMMENTOR NO. 641: OWENS, IRENE

523 South 52 Street
Tacoma, WA 98408
June 22, 1995

Mr. Charles Head
U.S. Department of Energy
1000 Independence Avenue S.W.
Washington, D.C. 20585

Dear Mr. Head:

Please do all you can to prevent the shipment of nuclear waste through the Port of Tacoma. The people of this area are depending upon you as a representative of our Government to protect us from the possibility of a terrible accident. 641-1

Don't let us down.

Sincerely,

Irene Owens

Irene Owens

RESPONSE TO COMMENT
COMMENTOR NO. 641: OWENS, IRENE

Response to Comment No. 641-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 642: PUTZ, MARLENE M.

Marlene M. Putz
7605 S. C St. Apt. I
Tacoma, WA 98408

Dear Head,

I am against shipment of nuclear waste through the Port of Tacoma. 642-1

It is said that the containers are perfectly safe. I have a feeling that when Hanford was being built, the word SAFE was being used as well, & look at the mess now. Wouldn't the State have enough environmental problems! 642-2

Who made us nuclear waste policemen of the world? I believe all Governments should be held responsible for their own messes, cleanups & storage.

Sincerely,
Marlene M. Putz

RESPONSE TO COMMENT
COMMENTOR NO. 642: PUTZ, MARLENE M.

Response to Comment No. 642-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 642-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). Prior to 1989, it was United States policy to accept spent nuclear fuel containing uranium enriched in the United States (Section 1.1 of the EIS). Thus the intent of the resultant proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

* This is the best available copy of this comment document.

COMMENTOR NO. 643: KIMBALL, GLENN W.

Here's How I Feel About [illegible] Waste Through Tacoma.

Comments: It is [illegible] a facility to store & dispose of [illegible] hazardous materials & weapons in a [illegible] accessible and remote from populated areas. Johnston Atoll in the Pacific Ocean is secure, under total military control, has port facilities [illegible] political impact [illegible] minimal.

Name: Glenn W. Kimball Telephone: 206 564 8617

Address: 1518 [illegible] Highland City/State/Zip: Tacoma Wa 98465

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, DC 20585

DEAD[illegible] 1995

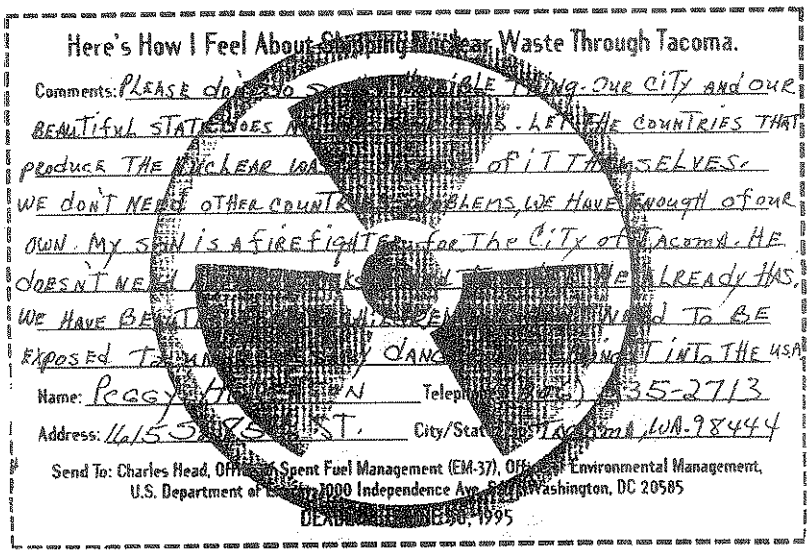
643-1

RESPONSE TO COMMENT
COMMENTOR NO. 643: KIMBALL, GLENN W.

Response to Comment No. 643-1

A discussion has been inserted into Section 2.2.1.8 to explain why this option (storage on Johnston Atoll) is not feasible.

COMMENTOR NO. 644: HOKENSON, PEGGY


Here's How I Feel About [illegible] Waste Through Tacoma.

Comments: PLEASE do[illegible] [illegible]IBLE [illegible]ING. OUR CITY AND OUR BEAUTIFUL STATE DOES [illegible]. LET THE COUNTRIES THAT PRODUCE THE NUCLEAR WA[illegible] OF IT THEMSELVES. WE DON'T NEED OTHER COUNTR[illegible]BLEMS, WE HAVE ENOUGH OF OUR OWN. MY SON IS A FIREFIGHTER FOR THE CITY OF TACOMA. HE DOESN'T NEED [illegible] ALREADY HAS. WE HAVE BE[illegible] NEED TO BE EXPOSED T[illegible] DANG[illegible] INTO THE USA

Name: PEGGY [illegible] Telep[illegible] 35-2713

Address: 16155 [illegible] ST. City/Stat[illegible] TACOMA, WA. 98444

Send To: Charles Head, Off[illegible] Spent Fuel Management (EM-37), Off[illegible] Environmental Management, U.S. Department of [illegible] 1000 Independence Ave. [illegible] Washington, DC 20585

DEAD[illegible], 1995

644-1

644-2

RESPONSE TO COMMENT
COMMENTOR NO. 644: HOKENSON, PEGGY

Response to Comment No. 644-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 644-2

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

COMMENTOR NO. 645: RIDENOUR, MARGARET

Enough voices may awaken those who 'don't have time to listen'

C.R. Roberts

The News Tribune columnist

"They don't have time to listen."

Charles Head, federal project manager for the environmental impact statement concerning shipments of high-level nuclear waste through the Port of Tacoma, sat patiently through the meeting Monday night.

Head sat, his face parked in objectivity. People spoke – more than 50 people – all against the proposed shipments.

A tape recorder heard it all. A facilitator made notes with multi-colored pens upon sheets of paper large enough for everyone to see. Hundreds in the audience watched politely. Speakers spoke their hearts.

Head sat, and when the meeting was over he talked about what happens next. He will offer a report to the director of the Office of Spent Nuclear Fuel Management. But the director will not see the colorful notes, nor will he hear the five hours of tape.

"They don't have time to listen," Head said.

In Washington, D.C., at the Department of Energy, talking about Charles Head, "We've given him pretty much to chew on. I hope he gets indigestion."

Legislators, port commissioners and members of the City Council spoke. Mothers and fathers – some angry enough to swear – spoke.

And it's too bad the bureaucrats have better ways to spend their time, rather than listening to what those people had to say. How easy it will be for them to ignore the comments – the anger, the fear and the anguish – of the people who were there on Monday night.

"When I was a kid, everybody told me Russia was going to drop the bomb. Now, it's the U.S. that's threatening me," said Melody Wilhite, who drove down from Everett.

"I see this as a major threat," Tacoma Mayor Harold Moss said.

A citizen asked, "Do we really trust the federal government to do the right thing? We'll fight you. We the people say no. We will not stop."

"I take with a grain of salt the statistics and information you gave us," Lawrence Roth said.

"We will fight you. It won't happen," state Sen. Marilyn Rasmussen (D-Eatonville) said. "I think you have heard from the people."

the people who will decide whether Tacoma becomes the port of entry for one of this planet's most dangerous substances will hear only from Head. He said he already has a fairly good idea what he'll say, but he's not yet ready to announce his decision.

He said of what he heard in Tacoma, "There's certainly a strong undercurrent of public opinion that is negative to this."

And it's too bad the public servants back at headquarters don't have time to hear how strong that undercurrent really is.

Too bad they won't hear from the speaker who said, "We have the right to be free from fear."

Too bad they won't hear what Alice Orchell, a Tacoma great-grandmother, had to say: "I want to leave a decent legacy for my kids. They have the right to have a decent chance in life."

That chance would be less decent by far should some of the spent nuclear fuel somehow leak, or spill, or otherwise contaminate Commencement Bay, Tacoma, Pierce County and much of Western Washington.

People spoke of Three Mile Island, the Exxon Valdez, Chernobyl, the leaks at Hanford, the O-rings on the Space Shuttle Challenger – of many accidents that could never happen, but did.

"They think we're not smart enough. They think they can put this over on us," said the gray-haired Washington, D.C.

Hundreds of people came. People spoke. Charles Head sat through it all, and when it was over, when asked what he thought of what the people said, he replied with a weary sir, "I was more impressed by the number of public officials."

But perhaps Head and his bosses would take time to listen if the rest of us spoke a bit louder.

If you don't like the idea of highly radioactive nuclear waste being shipped through the Port of Tacoma, write, before June 30, to Charles Head, Office of Spent Nuclear Fuel Management (EM-37), U.S. Department of Energy, 1000 Independence Ave. S.W., Washington, D.C. 20585. Or fax to (202) 586-5258.

If you don't care one way or the other, do nothing. If you haven't got the time to write a letter, then sit back and wait. Just you wait and see what happens next.

Your silence will be of great benefit to those who would rather not be bothered by whatever it is you have to say.

C.R. Roberts' column appears Sundays, Tuesdays and Thursdays. He can be reached at 597-8535, or by fax at 597-8274. Address TRIBnet e-mail to CR Roberts and Internet e-mail to cr@p.tribnet.com

Dear Mr Director. Please read this.
How the people are as against it.
Hell Mr Head really tell it as it has.
Margaret Ridenour. 8086 75th St. S.W.
Tacoma, WA 98498

645-1

RESPONSE TO COMMENT
COMMENTOR NO. 645: RIDENOUR, MARGARET

Response to Comment No. 645-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 647: GRAY, TERESA M.

Teresa M Gray
233 So 55th ST
Tacoma, WA. 98408 6402
6/23/95

Mr Head,

I am very much against the radioactive waste being shipped through the Port of Tacoma. 647-1

I am sure that every precaution would be taken against having an accident while handling this but needless to say accidents do happen sooner or later.

The Port of Tacoma has been working very hard to increase productivity and so far has done very well, not to mention all the improvements that are in proccess in the down town area.

I also feel very strongly that our children and grandchildren have the right to have a decent chance in life.

I see this as a major threat to our area.

And I say no.

Sincerely

Teresa M Gray

RESPONSE TO COMMENT
COMMENTOR NO. 647: GRAY, TERESA M.

Response to Comment No. 647-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS).

COMMENTOR NO. 648: BOUCHER, RICHARD & MARTHA

June 23, 1995

Charles Head
Office of Spent Nuclear Fuel Mgmt. (EM-37)
U.S. Dept. of Energy
1000 Independence Ave. S.W.
Wash. D.C. 20585

I am one of the many, together with my husband, who saw the hundreds of people who couldn't even fit into the packed meeting in Tacoma — all violently opposed to shipping highly radioactive nuclear waste through the Port of Tacoma. Had there been enough space, I know thousands would have been inside that room!

The feeling that was predominant after the meeting was that you were not very moved by the flood of opposition.

I speak for everyone I know: do not allow this in Tacoma. People are opposed to it. Indeed, the majority. And if democracy means anything, it means the people's choice must be the deciding factor.

Richard & Martha Boucher
704 E. 85th St.
Tacoma, WA 98445

648-1

RESPONSE TO COMMENT
COMMENTOR NO. 648: BOUCHER, RICHARD & MARTHA

Response to Comment No. 648-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 650: NYUGEN, LYNN

AMAZINGLY, YOU CAN STOP NUCLEAR WASTE FROM COMING HERE WITH JUST ONE HAND.

Here's How I Feel About Shipping Nuclear Waste Through Tacoma.

Comments: I am anti- nuclear waste in any comment. Please stop this deadly "stuff" from coming to this community.

650-1

Name: Lynn Nyugen Telephone: 596-2814

Address: P[illegible] City/State/Zip: Tac. 98499

Send To: Charles Head, Office of Spent Fuel Management (EM-37), Office of Environmental Management, U.S. Department of Energy, 1000 Independence Ave., S.W., Washington, DC 20585

DEADLINE: JUNE 30, 1995

The strongest weapon against nuclear waste is right at your fingertips.
Here's your chance to let the Department of Energy know how you feel about their possible plan to ship 19.2 tons of weapons-grade nuclear waste through the Port of Tacoma over the next 13 years. So, pick up a pen, fill out this form and send it to the address above by **June 30, 1995**. And let them know that Tacoma is not a place for nuclear waste.
For more information call the Port of Tacoma Hot Line at 597-7575.

Co-sponsored by Port of Tacoma; Port of Seattle; Longshore Local #23; Puyallup Tribe; Citizens for a Healthy Bay; Cities of Tacoma, Fife, Milton, Ruston, Federal Way; Tacoma–Pierce County Visitor & Convention Bureau, Tacoma–Pierce County Chamber of Commerce; Pierce County Central Labor Council and Pierce County.

RESPONSE TO COMMENT
COMMENTOR NO. 650: NYUGEN, LYNN

Response to Comment No. 650-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 651: HALLBERG, STEPHANIE L.

June 22, 1995

Charles Head, Federal Project Manager
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, D.C. 20585
FAX # 202-586-5256

Re: Nuclear Waste being shipped through the Port of Tacoma in Washington State

Dear Mr. Head:

I would like to express my concern on this issue as I am not prepared to risk my families health and safety to provide relief to foreign countries. I have heard that there has never been a shipping container leak in history, yet a leak is not impossible and I am absolutely *not* interested in having the first leak occur in my back yard. Please do *not* ship "spent" nuclear fuel through Washington State's Port of Tacoma. 651-1 651-2

I am a United States citizen and a registered voter in the State of Washington. I will be forwarding a copy of this letter to my Senatorial and Congressional representatives so that they too will hear the voice of the people.

Thank you for your attention to this matter. I hope that you will be compelled to make the right decision for the people of Washington State.

Sincerely,

Stephanie L. Hallberg
4415 Harbor Country Drive NW #E-7
Gig Harbor, WA 98335

RESPONSE TO COMMENT
COMMENTOR NO. 651: HALLBERG, STEPHANIE L.

Response to Comment No. 651-1

DOE agrees that accidents do occur. That is why the spent nuclear fuel transportation casks are designed, constructed and tested by simulation to withstand a series of impact and fire tests (Appendix B, Section B.2 of the EIS). Representative transportation casks have been crash tested to confirm compliance with simulation process. Two actual crash tests, one involving a locomotive and the other a tractor trailer carrying a transportation cask, have been performed. Both tests showed no failure of the casks but the locomotive and tractor trailer were destroyed. These tests demonstrated that a spent nuclear fuel transportation cask built to the federal standard would protect and retain its contents in all credible accidents. Nevertheless, the EIS evaluated the consequences of accidents involving a spent nuclear fuel transportation cask where the cask is considered failed with a certain probability. The accidents ranged from no cask failure to that of cask failure combined with a high intensity fire. Section 4 of the EIS provides a summary of impacts, both the risks and consequences, resulting from accidents involving a spent nuclear fuel transportation cask. The results indicate that the risk associated with the transport of the spent nuclear fuel is low.

Also, the spent nuclear fuel is solid metal and it is transported dry inside the spent nuclear fuel transportation casks. As a result, the radioactivity within the spent nuclear fuel cannot "leak" from the transportation cask.

Response to Comment No. 651-2

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 652: MCLEOD, LOUVEL

Charles Head
Office of Spent Nuclear Fuel
Management (em-37)
U.S. Department of Energy,
1000 Independence Ave. S.W.,
Washington, D.C. 20585

To Mr. Head

I sincerely hope that you make it a priority to listen to what the people of the North West think of the proposal to make the Port of Tacoma the port for shipments of nuclear waste. Who but us can tell you of our areas quirks and nuances? It is so vitally important to take the time to listen to our objections. There is no way that we should be considered as "The Port" for such hazardous waste shipments. It it ludicrous to consider such an arrangement. We have spent lots of time and effort in cleaning up our waters and land and we still have not come anywhere near getting it as clean as it was 25 years ago. 652-1

There is no indication of where you stand or what you are thinking of, but i can not stress enough the fact that our environment is critical to the sanctity of marine life, both in the Puget Sound and for our Oceans that I just can not imagine that there can be any reasonable reason or justification that you can give to support using this area for these shipments. You must not allow the endangerment of these unique, life supporting waters. There must and have to be other options that are more viable and of a less global impact.

Thank you. Sincerely

LouVel McLeod

RESPONSE TO COMMENT
COMMENTOR NO. 652: MCLEOD, LOUVEL

Response to Comment No. 652-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 653: WERNER, ROBERT T.

June 23, 1995

Charles Head, Federal Project Manager
Office of Spent Nuclear Fuel Management (EM-37)
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, D.C. 20585
fax 202 586 5256

Re: Nuclear Waste being shipped through the port of Tacoma, WA.

Dear Mr. Head:

I would like to express my concern on this issue. Please do not ship "spent" nuclear fuel through Tacoma, WA. I am a registered voter and a copy of this letter is being sent to my member of Congress and my Senators. Feel free to contact me at the address below should you have any questions or responses to this letter. *653-1*

Thank you for your prompt attention to this matter.

Sincerely,

Robert T. Werner
9513 Sunrise Beach Dr. NW
Gig Harbor, WA 98332

RESPONSE TO COMMENT
COMMENTOR NO. 653: WERNER, ROBERT T.

Response to Comment No. 653-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 654: LOPEZ, L.

TO CHARLES HEAD,

NO NUCLEOR WASTE IN TACOMA OR ANYWHERE ELSE IN WASHINGTON STATE! 654-1

NO SHIPPING FOREIGN **WASTE!!**

L. LOPEZ
TACOMA, WA.

RESPONSE TO COMMENT
COMMENTOR NO. 654: LOPEZ, L.

Response to Comment No. 654-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 655: RUE, SHARON M.

22 July 1995

~~Dear~~ Mr. Head,

I wish to register my strong opposition to any plans to ship nuclear waste through the Port of Tacoma. 655-1

We in Tacoma are working very hard to clean up our city and to foster a strong economy. The shipment of nuclear waste goes against all we are doing.

My primary reason for opposition is my 5½ month old daughter. I want her to grow up in a safe world — and so I'm doing all I can to make her world safer.

Please take Tacoma off your list of possible sites.

Thanks,

Sharon M. Rue
3319 N. Adams
Tacoma, WA 98407

RESPONSE TO COMMENT
COMMENTOR NO. 655: RUE, SHARON M.

Response to Comment No. 655-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 656: SCHMIDT, ROB

Dear Mr. Head, June 20_95

I was very distressed when I heard that it was possable that "Foreign Nucleor Waste" may be shipped threw the Port of Tacoma.

TACOMA and it's citizens Do Not want this.

I also would like to know why this possability has not been made public!

The citizens of TACOMA and of the State have every right to know about this And fight it!

We will not stand for this. We do not want our lives endangered by these shipments! 656-1

No Nucleor Waste in Washington State or Waste Shipments going through our ports!!

Sincerly Rob Schmidt
of TACOMA

RESPONSE TO COMMENT
COMMENTOR NO. 656: SCHMIDT, ROB

Response to Comment No. 656-1

The draft EIS was mailed to more than 1,500 people and an official DOE announcement of the meeting location and purpose was advertised in local newspapers. Public service announcements were also provided to local radio stations and to cable-access television. The meeting was included in the Federal Register Announcement concerning the EIS. In addition, 1-800 numbers were provided for preregistration and for requesting copies of the draft EIS.

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma or in the State of Washington is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low. Likewise, Section 4.2.3.3 of the EIS demonstrates that the risks associated with land transportation are low and Section 4.2.4 of the EIS demonstrates that the handling and storage risks at any of the DOE management sites are low.

COMMENTOR NO. 657: JURICH, GEORGE M.

7231 S. 15th St.
Tacoma, WA 984[illegible]
June 22, 1995

Charles Head
Office of Spent Nuclear Fuel Management
EM 37
U.S.D.O.E.
1000 Independence Ave. S.W.
Washington D.C. 20585

Dear Mr. Head:
The fact that Tacoma was chosen because it has "fewer inhabitants" proves there is a risk!!!
We say: "NO TO Shipping NUCLEAR WASTE through our Port!"

"No to making WASH. STATE A DUMPING Ground for World's Waste!"

Bureaucrats, put it in Your back yard!!!

Sincerely
Marie H. Jurich
George M. Jurich

P.S. Surely, in a Govt. of, by, & for the people, someone would listen to tapes of our citizens protests.

657-1

RESPONSE TO COMMENT
COMMENTOR NO. 657: JURICH, GEORGE M.

Response to Comment No. 657-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 658: LOVELL, MRS. WALTER R.

June 23, 1995
Puyallup, Wa
98371

Charles Head
Office of Spent Nuclear Fuel Management (EH-37)
U. S. Dept. of Energy
1000 Independence Ave. S.W.
Washington, D.C.
20585

Sir:

I am writing in regard to the proposed possibility of sending nuclear waste from other countries into our ports for transportation and storage -

I am against such an outrageous possibility of endangering our states with this harmful waste. It is wrong to contaminate our nation with harmful products.

I will fight this proposal in every way I can to see that this proposal does not come to fruition - We don't need mismanagement, we need protection from do-gooders who would destroy our country with their pie-in-the-sky proposals.

Sincerely,
Mrs. Walter L. Lovell
6916 87th St E.
Puyallup, Wa
98371

658-1

RESPONSE TO COMMENT
COMMENTOR NO. 658: LOVELL, MRS. WALTER R.

Response to Comment No. 658-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

COMMENTOR NO. 659: ARNESTAD, CAROL

6/12/95

TO: US Dept of Energy

RE: Proposed Site for Transportation of Nuclear Waste at Port of Tacoma, WA

I am a voting resident of Pierce County Washington whose husband has been a Longshoreman at the Port of Tacoma for 20 years. We depend on the activity and volume in the Port for our income. 659-1

However, we do not want the Port of Tacoma to Accept and transport nuclear waste from other countries or store it in our country.

What possible benefit would we (the USA) have from such a dangerous endeavor. Theres so much wasted space in other countries where spent nuclear rods could be stored but NOT IN THE USA. 659-2

I urge the Dept of Energy to re-evaluate this situation and to explore every avenue before you place the lives of our Children parents, friends and neighbors in any type of uncertain or needless danger 659-3

This is typical of our 659-2 (Cont'd.)

RESPONSE TO COMMENT
COMMENTOR NO. 659: ARNESTAD, CAROL

Response to Comment No. 659-1

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

Response to Comment No. 659-2

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). Pursuit of this goal will help insure that citizens of the United States may all benefit from the security and peace of mind associated curbing the possible spread of nuclear weapons to terrorists and irresponsible nations.

Response to Comment No. 659-3

The EIS evaluates a wide range of reasonable alternatives, including overseas management (Management Alternative 2, Section 2.3). Sections 4.2.2 and 4.5 of the EIS demonstrate that the risks to workers and the public at and near the Port of Tacoma would be low if the foreign research reactor spent nuclear fuel were received there.

COMMENTOR NO. 659: ARNESTAD, CAROL (CONT'D.)

Goverment to step in and save the world so to speak at the expense of millions of Americans. 659-2 (Cont'd)

I Know I dont want my tax dollars supporting such a foolish Acqusition. 659-1 (Cont'd)

I strongly opposed this and want to go on record for it.

Sincerely
Carol Arnestad
PO Box 688
Eatonville WA 98328

P.S. I would have attended the meeting in TACOMA on June 19 1998 but I was serving on A Planning Commission meeting in my town that conflicted with it.

RESPONSE TO COMMENT
COMMENTOR NO. 659: ARNESTAD, CAROL (CONT'D.)