

February 27, 2013

To: Ms. Carol Borgstrom
Director of NEPA Policy and Compliance
U.S. Department of Energy
Washington, DC
carol.borgstrom@hq.doe.gov

Re: Need for New Environmental Impact Statement (EIS) on the Unprecedented Import from Canada to the Savannah River Site of Liquid High-Level Waste Containing Highly Enriched Uranium (HEU); Possible Programmatic EIS Needed if Shipments from Other countries are being Eyed

The groups below hereby request that DOE prepare a Supplemental Environmental Impact Statement (SEIS) or a new EIS on the proposed import of HEU-bearing liquid radioactive waste from Canada's Chalk River Laboratories to the Department of Energy's Savannah River Site (SRS). Dr. Dave Moody, SRS site manager, confirmed at the SRS Citizens Advisory Board meeting in Augusta, Georgia on January 29 that planning for such shipment is underway.

News reports in Canada and in Augusta, Georgia have confirmed the shipment is being considered.

Given the unique nature of this shipment of liquid HEU-bearing high-level radioactive waste (HLW) and the precedent it would present, a new EIS analysis is required which would look at such things as:

- origin of the HEU-bearing waste at Chalk River (waste stream from HEU target processing to recover medical isotopes);
- applicable regulations for transporting and importing liquid radioactive waste;
- packaging of liquid radioactive waste for transport;
- proliferation implications of transport, storage and processing of HEU-bearing liquid waste;

- disposal options in Canada, including disposal of similar materials at Chalk River;
- licensing process before the Nuclear Regulatory Commission (NRC) concerning HLW shipment packages by NAC International or other companies;
- impact of accidents along transport routes, including total loss of contents of a shipping container during transport;
- risk of terrorist acts and their impact;
- storage at the Savannah River Site, including possibility of long-term storage of unprocessed liquid waste;
- accidents involving storage of containers or in handling at the Savannah River Site, including loss of the total volume of a container at SRS;
- processing of the waste in the H-Canyon and possible accidents;
- status of the H-Canyon, its condition and upgrades that may be needed;
- remediation of possible accidents in storage or processing;

- criticality risk during processing and transport;
- security requirements at SRS;
- radiation exposure along transport routes and at SRS to workers and the public;
- length of processing campaign at SRS;
- processing of recovered HEU, blending down, fabrication into fuel and shipment to nuclear reactors operated by the Tennessee Valley Authority (or other reactors);
- impact of new waste streams into the SRS tank waste system and other disposal systems;
- return of any portion of the waste to Canada, and
- total cost to DOE of the program, including payment from Canada and costs at SRS.

As this shipment could be the first of a kind that has not been analyzed before, it is of national significance and demands a thorough EIS.

Additionally, we are starting to learn more about consideration by DOE of a shipment to the US of high-level waste that may contain US-origin HEU from a German experimental power reactor. Given the unusual form of this waste material, also not analyzed in earlier NEPA documents, it appears that a Programmatic EIS (PEIS) may well be needed to analyze all possible shipment of HEU-bearing materials which have not been covered by earlier NEPA documents and which might be considered to be shipped due to waste-management considerations in the country of origin. To analyze any new shipments that are being considered one at a time rather than programmatically may constitute segmentation under NEPA.

Thank you for your consideration of and response to this request. We all request to be promptly notified about the status of any shipments and about any plans for preparation of any NEPA documents related to the shipment, processing and import of the HEU-bearing high-level waste.

Sincerely,

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