May 15, 2017

Freedom of Information Office
Savannah River Operations Office
P.O. Box A
Aiken, SC 29802

FOIA Request for any Documents or Reports Related to Receipt, Off Loading and Handling of Canadian Liquid High-Level Waste at H-Canyon, Especially as it Applies to Radiological Shielding Problems

To Whom it Concerns:

This is a request filed under the Freedom of Information Act, as amended. Per the applicable law and Department of Energy regulations, I anticipate a response to this request within 20 days.

This request is being filed on behalf of Savannah River Site Watch (SRS Watch), a non-profit corporation registered with the State of South Carolina and a duly registered 501(c)(3) non-profit organization. While working for SRS Watch, I have filed many FOIA requests with DOE. I have also filed many requests on behalf of other non-profit organizations, including Friends of the Earth, the Alliance for Nuclear Accountability, Greenpeace and the Nuclear Control Institute.

I request that any fees that may be associated with this request be waived. Documents obtained for the organizations mentioned above I have never been charged a fee and expect the same standard to be applied to this request. The information obtained in response to this request will be used solely for non-profit purposes in South Carolina and the United States. The information will contribute to the public’s understanding of the manner in which DOE and the Savannah River Site (SRS) conducts its business and will specifically be used to inform the public about DOE’s management of SRS and import of nuclear waste for processing.

The information obtained via this request will be provided to not only the public but also the media, South Carolina state government officials and the Savannah River Site Citizens Advisory Board (a duly embodied federal advisory panel). Over the years, I have demonstrated an ability to use information gathered via FOIA requests in a manner so as to educate the public about DOE and issues it is addressing. To reiterate, I request that the fee-waiver standard that has been applied to my requests in the past be applied to this request.

If any claim is made that any portion of any located documents or photos are sensitive in nature or meet FOIA exclusions, I request that redacted copies of such documents be provided to me and that a full
explanation be provided as to the reasons for any redactions. If any document is marked “Official Use Only” I request that it be released in its entirety.

I request that documents and photos be provided to me as they become available to responsive staff and that the documents not be withheld until all pertinent documents are obtained.

Specific to this request is information publicly provided by the Defense Nuclear Facilities Safety Board (DNFSB). In its weekly report of April 21, 2017 (https://tinyurl.com/ksjpcf8), the DNFSB reports the following about receipt of that the Canadian liquid HLW at SRS and points out the radiological shielding problems that occurred:

**Target Residue Material (TRM):** H-Canyon personnel started processing the first shipment of liquid Highly Enriched Uranium (HEU) this week. Each container of HEU is pulled from the shipping cask into a shielded “pig” that provides radiological shielding for H-Canyon personnel. After loading a pig, radiological protection (RP) identified an unexpected hotspot on the side of the pig indicating that the pig was not providing adequate radiological shielding. RP labeled the hotspot before H-Canyon personnel relocated the pig so the hotspot would be facing the wall. H-Canyon personnel did not identify any similar issues on the other pigs and are planning to use the one spare pig for future evolutions. All of the containers have been removed from the cask and H-Canyon personnel have begun transferring the HEU into H-Canyon for processing.

Note that DOE uses the misleading, inaccurate term “target residue material” to couch that fact that the material in question involves the unprecedented shipment and handling of liquid high-level waste. The liquid is a byproduct of processing materials for medical isotope production and is not simply a residue but rather a toxic mix of fission products that have been produced via irradiation in a reactor at the Chalk River Laboratory in Ontario, Canada. The highly enriched uranium portion of material can be downblended with depleted uranyl nitrate and solidified and left in Canada for management, a process that has been deployed with similar material in Indonesia. DOE has staunchly refused to analyze this viable option, having done so as a payment of $60 million by Canada has been involved in the transport, processing and dumping of the waste at SRS.

I hereby request:

1. All records, including documents and reports, and attachments, pertaining to the initial receipt and off-loading of liquid high-level waste from Canada at the H-Canyon during the week of April 21, 2017 or on any other dates;

2. All records, including documents and reports, and attachments, pertaining to radiological shielding issues with a “pig” designed to shield workers from liquid HLW removed from the shipping cask during the week or April 21 or any other dates;

3. Photos of the cask, pig and off-loading of the pig used to receive the cans of liquid HLW.
Please get in touch if you have questions about this request. Thank you for your timely response.

Sincerely,

[Signature]

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