Comments on TRU waste issues in the draft LANL SWEIS
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1. The draft LANL SWEIS is fundamentally inadequate and extremely misleading about transuranic waste generation and storage. There is no disposal path for most of the transuranic waste proposed to be generated by the Expanded Operations Alternative. Can we format this to look like the rest of the document.

A. LANL's preferred Expanded Operations Alternative will turn the site into a permanent, large-scale transuranic (TRU) waste dump, a fact that is not mentioned in the document.

Buried on page 5-196 (Table 5-79), the draft LANL SWEIS estimates that the Expanded Operations Alternative from 2007 to 2016 would generate more than 25,000 cubic meters of TRU waste and the Modern Pit Facility would generate an additional almost 11,500 cubic meters of TRU waste during the same 10 years. The only TRU waste disposal site is the Waste Isolation Pilot Plant (WIPP), which in its most recent regulatory document (the Environmental Protection Agency Recertification Application) provides for 17,130 cubic meters of disposal capacity for LANL. Thus, the majority of the TRU waste that LANL would generate would not go to WIPP, but rather would very likely stay at LANL. The draft LANL SWEIS merely states: "Transuranic waste would be stored onsite until additional disposal capacity, at WIPP or elsewhere, was [sic] identified." P. 5-197. Of course, all of the TRU waste generation from continuing operations after 2017 would further add to the waste with "no disposal path" that would stay at LANL.

The draft LANL SWEIS is misleading in that it repeatedly does not fully report the amount of TRU waste that would be generated under the Expanded Operations Alternative. For example, Table 3-17 on pages 3-51 to 3-53, shows much smaller amounts of TRU waste transport, receipt and acceptance than 36,500 cubic meters. The table shows 8,400 cubic meters of legacy TRU, 2,000 cubic meters of newly generated TRU (200 cubic meters x 10 years), 190 cubic meters of additional TRU and 100 cubic meters of remote-handled TRU, for a total of 10,690 cubic meters. The table also states that an unspecified amount of TRU waste from DD&D and remediation activities would go to WIPP. Page 3-54 states that TRU wastes "are prepared for disposal and shipped to WIPP." There is no indication that any TRU waste, let alone most of it, could not go to WIPP.

Table 5-37 on page 5-128, entitled "Summary of Total …Waste Generation Projections" (emphasis added) shows that the total amount of TRU was for the Expanded Operations Alternative would be 25,230 cubic meters. The large amounts of additional TRU waste from the Modern Pit Facility is not included.

Table 5-49 on page 5-143 includes the same misleading underestimate of the amount of TRU waste. Table 5-50 on page 5-147 showing offsite TRU waste shipments also does not include Modern Pit Facility TRU wastes. That same misleading shipment information is shown on Table K-5, page K-25.

B. The draft SWEIS provides no analysis of the impacts of some of the TRU waste that is proposed for LANL, specifically the sealed sources.

One element of the Expanded Operations Alternative is to increase the type and quantity of sealed sources brought from other sites to LANL. However, the draft SWEIS does not include all of the off-site sealed sources as TRU waste even under the largest waste estimates. On page J-47, the draft LANL SWEIS states: "At this point, sufficient information is not available to predict the total number of [actinide-bearing] sources to be managed." Thus, the draft LANL SWEIS proposes unlimited amounts of TRU waste in those sealed sources could come to LANL with no adequate analysis of their environmental impacts. And since those actinide-bearing sources are legally barred from being disposed at WIPP because they are not defense TRU wastes, those sources have no disposal path and would likely stay at LANL.

2. <u>The draft SWEIS does not acknowledge that LANL is already storing increasing amounts of TRU waste, nor does it adequately analyze their impacts</u>.

Since the issuance of the 1999 LANL SWEIS, WIPP has opened. The draft LANL SWEIS does not include any information about the amounts of TRU waste shipped to WIPP from LANL. Table 4-52 on page 4-149 shows that LANL made 47 shipments of TRU waste to WIPP from 2002 to 2004 but includes no information about the amounts of TRU waste (which was 344 cubic meters). Information from WIPP shows that from 1999 through 2004, LANL shipped 598 cubic meters of TRU waste to WIPP. Table 4-40 on page 4-134 of the draft SWEIS shows that during that same time period, LANL generated about 1,440 cubic meters of TRU and TRU mixed waste. Thus, even though TRU waste was being shipped from LANL, it was generating and receiving substantially larger amounts of TRU waste. Thus, LANL's mission is increasingly one of being a long-term TRU waste site, a fact that is not acknowledged in the draft LANL SWEIS and there is no adequate analysis of the impacts of that mission.

3. <u>The draft LANL SWEIS does not describe the substantial problems that have occurred in managing TRU waste and preparing it for shipment to WIPP.</u>

According to the draft LANL SWEIS under any of the three alternatives, LANL will ship its legacy TRU waste (8,400 cubic meters) as well as 2,000 cubic meters of newly generated TRU waste (200 cubic meters per year) to WIPP.

Table 3-17, page 3-51. However, as already noted, the draft SWEIS does not acknowledge that in six years LANL shipped less than 600 cubic meters of waste to WIPP. During some of that period, LANL was prohibited from shipping TRU wastes because it did not comply with characterization procedures. The document describe the major changes that would need to be made in its operations in order to increase characterization and shipments of TRU waste by more than 10 times -- from an average of less than 100 cubic meters per year from 1999 to 2004 to more than 1,000 cubic meters per year from 2007 through 2016.

In fact, its past history shows that LANL does not have the capability to ship all of its legacy TRU waste to WIPP, so the draft LANL SWEIS statement that all legacy TRU will have been shipped to WIPP "by the end of 2015" (page 5-99) cannot be supported. Instead, the draft LANL SWEIS must analyze the impacts of further increasing amounts of TRU waste being managed at LANL.