

WEST VALLEY WASTEWATCH

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The West Valley Nuclear Waste Site “Phase 1” Studies

These will affect the decision in 2020 on whether to fully clean up the site.

What is being studied with what goals?

Who is doing the studies?

How can the public give input?

DOE and NYSERDA make the rules.

The Department of Energy (DOE) and New York State Energy Research and Development Authority (NYSERDA) decided in 2010 to study the West Valley nuclear waste site for 10 years (during “Phase 1”) and THEN decide, based on the scientific studies, whether to excavate the buried waste—whether to do a Phase 2. In January 2012 they produced a “**Guidance Document**” outlining the process for the studies.

The link to it is <http://www.nyserda.ny.gov/en/Programs/West-Valley/~/media/Files/EE/West%20Valley/Environmental%20Impact%20Statement%20Documents/phase1-study-guide.ashx>

DOE and NYSERDA have differing views on the various dangers of the West Valley site and what waste must be removed. The public views are often different from both agencies.

Enviro Compliance Solutions (ECS) hired to carry out the rules.

The agencies hired a company, Enviro Compliance Solutions (ECS), to manage the West Valley Phase 1 Studies. ECS will hire of experts that DOE and NYSERDA choose to do the studies and will provide some of their own expertise. ***The public must maintain vigilance over the Phase 1 Studies, watching DOE, NYSERDA, ECS, the study teams and oversight panel closely.***

DOE/NYSERDA set up a **Panel** (‘independent scientific panel’ or ISP) **to oversee the study work and to serve as mediator between DOE and NYSERDA.** The proposed Panel was completely industry dominated. The agencies refused to replace their candidates with more balanced public recommendations, but did add one member with a history more compatible with the public perspective. More public interest members are needed for any hope of “balance” on this influential Oversight Panel.

What is being studied with what goals?

The NYSERDA DOE Guidance Document lists of Potential Areas Of Study [which could change]:

- Soil erosion (*Study Underway- 7 experts; 1 was added at request of public interest organizations; 3 at request of DOE; 3 at request of NYSERDA; scope has not been made public*)
- Groundwater flow and contaminant transport
- Catastrophic release of contamination and impact on Lake Erie
- Slope stability and slope failure
- Seismic hazard
- Probabilistic versus deterministic dose and risk analysis
- Alternate approaches to, costs of, and risks associated with complete waste and tank exhumation **
- Viability, cost, and benefit of partial exhumation of waste and removal of contamination **

- Exhumation uncertainties and benefit of pilot exhumation activities**
- In-place closure containment technologies **
- Engineered barrier performance **
- Additional characterization needs
- Cost discounting and cost benefit analyses over long time periods.

Who is doing the studies?

DOE, NYSERDA and ECS will pick the experts for the studies. Two teams will be hired to do 5 new studies ** (highlighted above) to begin soon. One will study the 3 excavation options and one will study leaving the waste in place, using engineering to prevent offsite migration. ECS could do this itself too.

What is being studied with what goals?

Since the Study Teams design the studies with DOE, NYSERDA, ECS and the Panel's input, the Study Team Membership really matters! This is a frustrating set-up because those who do not share the same public protection goals are in the driver's seat, choosing experts THEY consider qualified. At best the public might get one or two (outnumbered) independent expert(s). Public access to the teams is limited.

- **How can public give input? Contact:LMG@nyserda.org & MOIRA.N.MALONEY@WV.DOE.GOV
AND OUR ELECTED OFFICIALS STATE AND FEDERAL**

We in the public must scrutinize the experts chosen and find competent experts to be on the teams. The right questions must be asked and realistic, precautionary assumptions made. EX:

- 1) **the future costs of damage and remediation work must not be “discounted” (a financial technique of reducing the future value of money thus reducing the apparent cost of future routine work and disasters).** Even though “cost discounting” is a potential future study area the assumption is pivotal in the 5 studies beginning now.
- 2) **all the in-place burial and remediation costs must be extended out for 10 -20 times the half life of the longest lasting buried waste.** Thus since plutonium (hazardous a quarter to half million years) is present the teams cannot assume 100 years of care are all that are needed.

The 2008 independent *Real Costs of Cleaning Up Nuclear Waste: A Full Cost Accounting of Cleanup Options for the West Valley Nuclear Waste Site* needs to be included in the study team analysis.

<http://www.nirs.org/radwaste/decommissioning/wvfcareport1108.pdf>

If we don't weigh in now on the whom the experts are—what their experience and biases are and on the scope, how can we hope the teams will look at the costs for as long as the waste is hazardous? We must know HOW LONG they will assume there will be institutional controls and active placement of barriers to ever-changing waste flows.

There are currently no publicly-revealed plans for replacement of the Permeable Treatment Wall which is already in place to filter the known migrating radioactive plume, but it is only expected to last 20 years. The futility and reality of the constant need for more and more barriers on the rapidly eroding plateaus must be incorporated into the studies.

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