

IDEAS FOR TALKING POINTS

West Valley Nuclear Waste Facility Scoping Hearings

These hearings and written comments will be used to determine what will be analyzed in the Environmental Impact Statement process and will form the scientific basis for Final Decisions about whether or not Major Radioactive (RAD) Waste Facilities will be adequately cleaned up in Phase 2 decisions. The Scope or Outline for the Supplemental Environmental Impact Statement (SEIS) should include the scientific basis for final decisions.

Phase 2 facilities that must be address: The Waste Tank Farm, the NRC Disposal Area, the Strontium-90 Plume (the non-source area), the Construction & Demolition Debris landfill, the Cesium Prong (from an accidental air release), contaminated stream sediments, the State Disposal area and the Balance of the NY owned property.

ARGUMENTS FOR FULL CLEAN UP

- The West Valley Demonstration Project Act requires that DOE containerize and dispose of radioactive waste elsewhere. DIG IT ALL UP!
- Complete RAD Waste Cleanup represents the best action—Public Health Protection & Prevention of Disease & Disability
- West Valley cannot be a permanent disposal site. It is too vulnerable to erosion and extreme weather events.
- Extreme weather events have affected the entire US. In the Northeast extreme rainfall (the top 1% of 24 hr. rainfall) has increase by 74%. Climate change is indeed affecting the nation and must be evaluated appropriately in the modeling. Probable maximum flood and Probable maximum precipitation must be incorporated into the model.
- Any Interim storage (if there is no other choice) at West Valley must be secure, monitored and retrievable and meet 10 CFR 191 regulations. High level rad waste, Transuranics and Greater than Class C waste should be evaluated in the EIS to ensure that this rad waste is meeting regulations.
- Protecting Public Health and Preventing Disease requires the Agencies to Dig It Up and secure the waste for long term storage with multiple safety precautions - until it can be moved for permanent Disposal. Plan for future disposal elsewhere. Full Cleanup is Essential to protecting Public Health and the Great Lakes for Future Generations.

DANGERS OF RADIOACTIVE WASTE (RAD WASTE)

- Radioactive materials are known to cause cancer and birth defects, in addition to many non-cancer health effects.
- Strontium-90, the radioactive form of Strontium, acts like calcium in the body and is readily incorporated into bones, where it can cause cancers of the bone and bone marrow, where blood is formed, causing leukemia.
- Radioactive Waste should not be in our waterways, the Great Lakes or our Drinking Water
- RAD Waste should not be in our Bodies

- RAD Waste should not be in our Children or Grandchildren - impacting their future
- Some RAD Waste is Forever--- thousands to millions of years, longer than recorded history.

DANGER OF WEST VALLEY SITE

- A key goal of nuclear waste facilities is Containment of Radioactive Waste so it does not discharge to the environment. The West Valley Site is particularly vulnerable to the loss of containment via multiple natural phenomena including earthquakes, landslides, erosion and extreme weather events.
- The West Valley Site was unsuitable for any sort of hazardous operation, much less the processing and storage of high level nuclear waste.
- The West Valley Site lies over a federally designated “sole source aquifer” meaning there is no other source of drinking water.
- West Valley site cannot safely contain large quantities of radionuclides. The nuclear waste is not SECURE in its current state and the “Close in Place” alternative risks losing large quantities of Rad Waste to our waterways and Great Lakes.
- West Valley drains large drainage areas leading to narrow valleys and potential raging floods. Flooding WV creeks increases site erosion and can cause landslides as we saw in 2009 with the removal of 15 feet of soil from the Buttermilk Valley Wall.

PROCESS CONCERNS AND CHANGES THAT MUST OCCUR IN SDEIS

- The Study area or Region of Interest must include Lakes Erie and Ontario. The Great Lakes are now known to largely recycle long lived contaminants in the hydrological cycle. The same water that evaporates and forms clouds is the next rain storm. As a result radionuclides released to the Great Lakes will be there for many future generations.
- All worst case scenarios of events that could affect a loss of radioactive containment should be evaluated in the Performance Assessment and the SEIS. We don’t believe a site intruder is the worst case scenario at West Valley.
- The West Valley Site cannot meet current minimal standards for even Low Level Rad Disposal facilities. The EIS analysis should not merely assume that the two disposal sites- State Disposal Area and NRC Disposal Area- were properly sited and permitted.
- According to the Scoping Notice the Agencies are committed to providing robust and meaningful opportunities for public participation during decommissioning. We have seen little evidence of this commitment.
 - All Studies should be made more publicly accessible in a digital format with an explanatory index. This includes the Probabilistic Performance Assessment, PPA
 - We expect a Comprehensive Review of Phase I progress to date with expected start & completion dates for various projects.
 - A report on all the characterization of contamination that has been done. For Example, How can we talk about remediation of sediments without this information?

- The EIS should evaluate the health and environmental impacts of the project delays we have already experienced since 2010, such as the increasing concentrations of Strontium-90 leaving the site. It should also evaluate the expected additional health and environmental impacts that will occur before Phase 1 is finished.