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FOR THE ENVIRONMENT



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Attn: Catherine Bohan
EIS Document Manager
West Valley Demonstration Project, U.S. Department of Energy
P.O. Box 2368
Germantown, MD 20874

**RE: Draft Decommissioning and/or Long Term Stewardship EIS at West Valley
Demonstration Project and Western New York Nuclear Service Center**
Comments by Citizens Campaign for the Environment

Dear Ms. Bohan:

CCE is an 80,000 member, non-profit, non-partisan advocacy organization working to protect public health and the natural environment in NYS and Connecticut. CCE appreciates the opportunity to comment, and thanks the Department of Energy for extending the public comment period for an additional 90 days so that the public could have more time to weigh in on this important issue.

The West Valley nuclear waste site is located in the Town of Ashford, about 30 miles south of Buffalo. The site contains vast amounts of nuclear and hazardous waste, which threaten public health, our environment, economy, and quality of life. The safest, most responsible, and cost effective solution presented in the DEIS is the “*Sitewide Removal*” option, which will comprehensively clean up and excavate the entire waste site as soon as possible, leaving a safer site within 64 years. CCE strongly opposes the U.S. Department of Energy (DOE) and New York State Energy and Research Development Authority (NYSERDA) “preferred alternative” of phased decision-making, which will clean up only about 1% of the radioactivity now, and wait up to thirty years to decide what to do with the remaining 99% of dangerous radioactivity on site.

Erosion is a powerful and fast moving force at the West Valley site, as it sits on a geologically young, and continuously changing landscape. Scientists estimate that erosion could cause the disposal areas to be breached in less than 1000 years, and as quickly as 150 years. Flooding in West Valley in August of 2009 has demonstrated how quickly erosion can impact the landscape, with substantial erosion occurring in just one day. The DEIS fails to recognize that global climate change will lead to more frequent and intense rain events, further hastening erosion at West Valley.

Leaving nuclear waste buried on site is dangerous, threatens our Great Lakes, and passes on even greater costs to future generations.

Leaving nuclear waste on site threatens the Great Lakes

The Great Lakes contain 20% of the world's fresh water, over 90% of the U.S. supply, and provide drinking water to over 40 million people. They hold the key to our economy, recreational opportunities, and irreplaceable family experiences. The Great Lakes generate more than \$50 billion in economic activity to the regional economy annually from fishing, wildlife viewing, and tourism.

The West Valley nuclear waste site sits in the Great Lakes watershed, with tributaries running adjacent to the site. A breach at the site would be a catastrophic failure, leaking high concentrations of radioactive waste into the watershed and then quickly into Lake Erie. Currently, there is a large plume of contaminated groundwater moving towards Buttermilk Creek adjacent to the site. Top scientists agree that the lakes are currently on the tipping point of ecological collapse, and further toxic contamination to the lakes would be extremely detrimental to the ecosystem.

The New York State Ocean and Great Lakes Conservation Council - composed of several state agencies - is working to implement ecosystem-based management (EBM) to protect our coastal resources in New York State. EBM is a cutting edge program that looks at managing our coastal resources from a holistic approach. A recent Council report highlighted that a critical component of protecting our treasured coastal resources is to virtually eliminate persistent toxic substances from entering the lakes. Leaving waste on site and risking a breach is not consistent with the goals of the EBM plan. In addition, leaving waste on site contradicts other efforts to protect and restore the Great Lakes. Both the Great Lakes Water Quality Agreement and Great Lakes Regional Collaboration Strategy stress the need to eliminate the introduction of toxic substances into the Great Lakes as a critical component of protecting and restoring our Great Lakes.

Leaving radioactive waste on site is expensive

The Sitewide Removal option provides the most cost-effective approach over the long term, according to a recent study. An independent, state-funded study, *The Real Costs of Cleaning Up Nuclear Waste: A Full Cost Accounting of Cleanup Options for the West Valley Nuclear Waste Site (FCA study)*, revealed leaving buried waste at the site is both high risk and expensive while a waste excavation cleanup presents the least risk to a large population and the lowest cost. Over 1000 years, waste excavation costs \$9.9 billion while onsite buried waste costs \$13 billion, and \$27 billion if a catastrophic release occurred.

Protection and restoration of the Great Lakes is paramount to our region's economy. A recent report by the Brookings Institution indicated that an investment in Great Lakes restoration would yield \$80-100 billion in short and long term economic gains, including \$1.1 billion to the City of Buffalo alone. Radioactive contamination of the lakes from a breach at West Valley would not only cost billions of dollars to clean up, but would also thwart economic recovery and development from ongoing and future restoration efforts.

President Obama is supporting unprecedented funding for Great Lakes protection and restoration in the \$475 million Great Lakes Restoration Initiative in his annual budget proposal, which is currently being considered by Congress. Leaving waste on site, and risking catastrophic contamination of the Great Lakes, works against this effort and the billions of dollars that have been spent and that will be spent at the local, state, and federal level on Great Lakes protection and restoration.

Leaving waste onsite is dangerous

According to the FCA study, there is no safe level of exposure to radioactive waste – every exposure increases the risk of serious adverse health impacts, including cancer, reproductive disorders, and neurological effects. We must not pass along this burden to future generations. It is irresponsible, immoral, and costly.

Every day that we wait, the risk of human and environmental exposure increases, and the solutions become more costly. CCE strongly supports the safest, most cost effective solution to the West Valley nuclear waste site- the Sitewide Removal option, which will ensure comprehensive cleanup and excavation of the entire site as soon as possible.

Thank you for your thoughtful consideration of our comments.

Sincerely,

Brian P. Smith
WNY Program Director
Citizens Campaign for the Environment