



THE WEST VALLEY CITIZEN TASK FORCE

July 27, 2015

Amy M. Snyder, Senior Project Manager
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Decommissioning, Uranium Recovery, and Waste Programs
Mail Stop T-8F5
11555 Rockville Pike, Rockville, MD 20852

RE: Incorporating Climate Change into West Valley Demonstration Project Decisionmaking

Dear Ms. Snyder,

For almost two decades the West Valley Citizen Task Force (CTF) has advocated for the safe, responsible and timely cleanup of the nuclear wastes at the West Valley Demonstration Project and Western New York Nuclear Service Center. Substantial progress has been made at the site by the U.S. Department of Energy (DOE) and New York State Energy Research and Development Authority (NYSERDA), but much work remains to be done and important decisions about site cleanup have not yet been made.

Erosion at the West Valley site will be a crucial factor in these ongoing cleanup decisions. The site is vulnerable to severe future erosion that would release wastes in a catastrophic manner into Cattaraugus Creek with devastating impact on downstream communities and Lake Erie, contaminating waterfront resources and affecting drinking water supplies for more than one million people. Erosion has been and continues to be studied at the site. With climate change the frequency and severity of extreme weather events will increase. Recent events near the site such as the 2009 rain-induced landslide in Buttermilk Creek demonstrate the severity of potential erosion. Engineered barriers, no matter how robust, are short-term in comparison to the duration of the on-site radionuclides. Funding and budget difficulties will only extend the cleanup process.

Deliberative planning and preparation for climate change is occurring in many places at the local, state and national level, in response to federal Executive Orders and the Community Risk and Resiliency Act. However, at the West Valley site, the Citizen Task Force is very concerned that the decommissioning planning has not sufficiently incorporated climate change planning and that this lack of attention to climate impacts will skew agency assessments of the risk of leaving wastes in a place where there can be no successful long-term containment of the unlined burial grounds over a period of 1,000 years or longer.

We encourage DOE and NYSERDA to engage with local government, the community and others in a deliberative, open and timely planning process for climate preparedness and community resilience that can be incorporated into the planned 2019 Supplemental EIS for the West Valley site. If this is not done the public will be left to comment only after a decision has been arrived at and released in draft form as part of the Supplemental EIS.


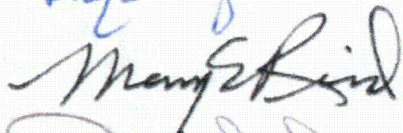
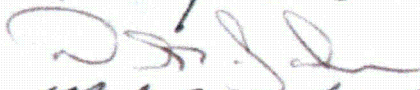
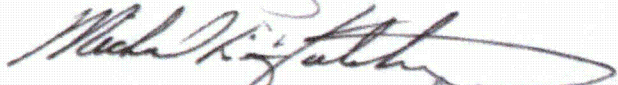




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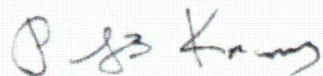
The attached memo provides our detailed thinking on this. In our conclusions we recommend:

- A climate vulnerability assessment and climate resiliency plan, directed toward waste removal, be prepared by DOE and NYSDERDA for the West Valley nuclear waste site. This should start in early 2016 to facilitate an iterative Phase 1 study process that includes substantial participation and feedback from CTF and others and integration with the "performance assessment" currently planned as part of the Supplemental
- All assessments that are prepared, including but not limited to exposure and health, erosion, climate vulnerability and performance, be completely transparent, with all factors, assumptions and steps detailed and explained for the public in advance of the draft Supplemental EIS.
- Some local government entities may decide to work individually or in collaboration with other government entities to assess the vulnerability of the nuclear wastes at West Valley to severe weather events associated with climate change, by seeking available grants in order to provide an independent review.

We are sending this information to you as an official who either has specific interest in the West Valley site or represents areas that are downstream from the site along Cattaraugus Creek or the Lake Erie shoreline. Feel free to pass this information on to others, and please let us know if you have any questions or would like additional information.

Sincerely,

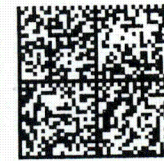









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