



January 25, 2016

Ms. Joanne Hameister Coalition on West Valley Nuclear Wastes PO Box 603 Springville, NY 14141 jhameister@roadrunner.com

SUBJECT: Exhumation Study Plans

REFERENCE: Email (366459), J. Hameister to M. Maloney and L. Gordon, "Exhumation

Study Plans," dated October 5, 2015

Dear Ms. Hameister:

The U.S. Department of Energy (DOE) and the New York State Energy Research and Development Authority (NYSERDA) thank you for your continued interest and participation in the Phase 1 Studies (P1S) process being performed at the West Valley Demonstration Project (WVDP) and the Western New York Nuclear Service Center (WNYNSC) as expressed in your October 5, 2015 email to Moira Maloney and Lee Gordon (Reference).

After a careful review of your email, the DOE and NYSERDA (the agencies) agree that the exhumation activities that were performed in 1985 and 1986 at Special Holes (SH) SH-10 and SH-11 at the U.S. Nuclear Regulatory Commission-Licensed Disposal Area (NDA) are an appropriate precedent project to be evaluated as part of the Exhumation Working Group's (EXWG) Study 3, Review of Precedent Projects. During 1985 and 1986, the DOE-WVDP successfully exhumed and packaged eight (8) 1,000-gallon tanks and approximately 9,000 ft³ of associated contaminated soils and absorbent material from SH-10 and SH-11. These tanks were originally used by Nuclear Fuel Services, Inc. (NFS) to dispose of a degraded solvent mixture containing n-dodecane and tributyl phosphate that was used in the solvent extraction process of the NFS irradiated fuel reprocessing operation. The agencies will recommend that the EXWG include the exhumation work performed at SH-10 and SH-11 in the *Review of Precedent Projects of the Phase 1 Exhumation Study Plan*, *Rev. 2*, July 2015. The agencies will also provide the EXWG with all available records on the exhumation, packaging, and disposal activities that were performed during the removal of the tanks and contaminated soil and absorbent from SH-10 and SH-11.

The agencies understand your concern for an accounting of the plutonium inventory in the NDA. However, it should be understood that a full accounting may not be achievable considering that uncertainty exists in the amount of plutonium received by NFS, and the uncertainty in plutonium losses due to process holdup in the NFS reprocessing facility, operational losses, and disposals to the waste tank farm and the NDA. The document referenced in your email, *Plutonium & Uranium Recovery from Spent Fuel Reprocessing by Nuclear Fuel Services at West Valley, New*

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York from 1966 to 1972, acknowledged that the estimates of plutonium received by NFS were based on the "imprecise theoretical calculation of plutonium produced in reactors."

Should you have any questions or comments regarding this letter, please contact Moira Maloney at (716) 942-4255 or Lee Gordon at (716) 942-9960, extension 4963.

Sincerely,

Bryan C. Bower, Director U.S. Department of Energy

West Valley Demonstration Project

Bryan.Bower@doe.wv.gov

Paul J. Bembia, Director

West Valley Site Management Program

New York State Energy Research &

Development Authority

Paul.Bembia@nyserda.ny.gov

BB/PJB/amd

cc: M. N. Maloney, DOE-WVDP, AC-DOE, Moira.Maloney@wv.doe.gov

Z. Z. Zadins, DOE-WVDP, AC-DOE, Zintars.Zadins@wv.doe.gov

B. M. Frank, NYSERDA-WV, Brad.Frank@nyserda.ny.gov

L. M. Gordon, NYSERDA-WV, Lee.Gordon@nyserda.ny.gov

B. Logue, The Logue Group, Bill@Loguegroup.com

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