No health effects are anticipated for routine operation of any facilities under the new storage alternative.

No Action Alternative

This alternative would not construct any new tanks, tank retrieval systems, or cross-site transfer systems. The flammable gas safety issue in Tank 101–SY would be managed through continued operation of the existing mixer pump. The remaining supernatant in Tank 102–SY, SWLs from interim stabilization of SSTs, and liquid waste from 200 West Area facilities would be transported from the 200 West Area to the 200 East Area via the ECSTS.

Impacts. There are no environmental impacts associated with normal operations of the no action alternative. However, due to lack of secondary containment and poor leak detection capabilities of the aging ECSTS, leaks to the environment are considered more likely than under the other alternatives evaluated in the SIS EIS. To avoid environmental impacts from a failure of the ECSTS during waste transfer, operational controls prior to waste transfers such as, pressure testing at levels in excess of operational pressures, would be used to confirm the integrity of the ECSTS before waste is introduced into the system.

Environmentally Preferred Alternative

Normal operations under the no action alternative would not result in the loss of State-designated Priority Habitat, would not result in the generation of additional contaminated materials requiring decommissioning and disposal, and would not cause additional worker exposures over existing levels, as would occur under the preferred, truck transfer, rail transfer, and new storage alternatives. Therefore, the no action alternative is considered the environmentally preferred alternative under normal operating conditions.

However, because the existing crosssite transfer system is over 40 years old, there is a higher probability of system failure or an accident than under the other transfer alternatives evaluated in the Final SIS EIS. Additionally, because the existing transfer system is not compliant with current engineering standards requiring double containment and leak detection systems, there is a higher likelihood of a release to the environment under accident conditions than would be anticipated under the other transfer alternatives.

Other Considerations

In addition to the assessment of environmental impacts provided by the

SIS EIS, DOE and Ecology considered costs, comments on the Final SIS EIS, and nuclear criticality safety in determining a course of action to meet the need for interim management of Hanford tank wastes.

Costs

Comparative analysis of construction, operation, and decommissioning costs among the alternatives was generated for an interim period of five years and lifecycle operations till 2028. The analysis was based on a comparable set of baseline assumptions regarding waste volumes and transfer schedules, and accurately reflects relative costs among alternatives. However, the estimates may not accurately represent the true cost of implementing a specific alternative once final decisions are reached on waste transfers. Based on the unresolved criticality safety issues described below, retrieval costs for solids removal from Tank 102-SY have been excluded from the preferred and new storage alternatives. The results of the analysis are as follows:

Alternative	Interim costs (1995 dol- lars in mil- lions)	Lifecycle costs ^b (1995 dol- lars in mil- lions)
Preferred Truck transfer Rail transfer New storage No action	^a \$105.2 125.9 113.7 ^a 328.1 48.9	\$243 632.8 491.8 589.6 NA

^a Excludes costs for retrieval of solids from Tank 102–SY as proposed in the SIS EIS.
^b Includes costs for retrieval of solids from Tank 102–SY under all alternatives.

The lifecycle costs for the no action alternative were not estimated because the ECSTS could not meet waste transfer requirements beyond the interim time period. All alternatives include a \$36 million decontamination and decommissioning cost for the ECSTS.

Comments Received

DOE and Ecology received comments from two individuals on the Final SIS EIS.

Comment. One individual agreed with continued operation of the mixer pump in Tank 101–SY to mitigate flammable gas accumulation.

Response. DOE will continue the operation of the mixer pump in Tank 101–SY.

Comment. "The fundamental assumption is that the best way to maintain Safe storage is to suck liquid waste out of single shell tanks and then move it to a safer double shell tank. Why is that safer? A lot of things can go

wrong when you pressurize the waste and move it that can't happen if you leave it in the single shell tanks. Look at the spray leaks from your ITRS and PPSS that can kill hundreds of people. Compare that to the lack of impacts to people if you leave the waste in the single shell tanks as laid out in the Hanford EIS that produced the empty grout vaults and the unbuilt vitrification plant. [Assumed DOE/EIS-0113] Those facilities weren't needed either and the Department rushed to the wrong decision spending millions of dollars unnecessarily."

Response. In the Record of Decision based on the Final Environmental Impact Statement for the Disposal of Hanford Defense High-Level, Transuranic, and Tank Wastes (HDW-EIS) (53 FR 12449), and again in the Finding of No Significant Impact for an environmental assessment for the Waste Tank Safety Program (DOE/EA-0915), DOE decided to continue to safely store the SST waste prior to making a decision on the disposal of this waste. The decision on the final disposition of the SST waste will be made by the Department in the TWRS EIS. The SST interim stabilization program is an ongoing program initiated in late 1970s to reduce the potential for release of high-level wastes into the environment and allow continued safe storage of the high-level sludge, salt cake, and nonpumpable liquid waste. Although no adverse radiological impacts were postulated by the HDW-EIS for leaking SSTs, including the ultraconservative 40,000 m³ (10.5 million gallons) release scenario evaluated, DOE policy is to reduce the potential for any liquid release whenever practicable [DOE/EIS-0113]. Further, all retrievals and waste transfers will occur at subcritical levels in accordance with existing procedures. There are currently 67 SSTs which have been declared confirmed or assumed leakers. These SSTs have released 2.3 to 3.4 million liters (600,000 to 900,000 gallons) of waste to the environment. Therefore, it is DOE's policy that the continued safe storage of the SST waste pending a final disposal decision requires the continuation of the SST interim stabilization program, which is scheduled to be completed by the year 2000.

The postulated spray releases from Initial Tank Retrieval System (ITRS) and Past Practice Sluicing System (PPSS) evaluated in the Final SIS EIS have a probability of extremely unlikely to incredible or 10-5 to 10-7 per year. When compared to the almost certain release to the environment if liquid wastes are left in SSTs, DOE has determined that the risks of transfer are