acceptable and that the risks to the environment from suspension of the interim stabilization program are unacceptable. *Comment.* "What are the true impacts

Comment. "What are the true impacts of leaving the waste in the single shell tanks? Are they any greater now than they were in the old EIS?"

Response. The SIS EIS is an interim action EIS which considers only near term actions required to safely manage tank wastes until disposal decisions are made through the TWRS ROD. Leaving waste in the SSTs is beyond the scope of the SIS EIS. The TWRS EIS is currently re-evaluating the consequences which would result from leaving wastes in single shell tanks.

Comment. "How much money will you waste this time on an action that isn't needed?"

Response. The costs of the alternative actions are specified above. DOE believes that the action is needed and the costs are justified.

Comment. "Your purpose and need statement basically says you need it because the State told you to do it in the TPA. So you already made the decision in a fundamentally flawed way without regard to NEPA. Once again the NEPA process at DOE is a sham . . . The bottom line is that the DOE NEPA process is a sham, and now the State is a part of it. You make decisions and then try to justify them with EISs."

Response. This EIS was prepared to comply with the requirements of NEPA. An EIS document identifies and evaluates the environmental impacts of the proposed action and reasonable alternatives. The Tri Party Agreement defines the schedules and milestones for taking certain cleanup actions at the Hanford Site. The Tri Party Agreement is annually revisited and can be changed if new information arises or situations change. For example, the Tri Party Agreement had milestones for the six new double shell tanks which were identified in Draft SIS EIS. Public comments received on the Draft SIS EIS as part of the NEPA process and new studies indicated that six new double shell tanks were not needed. As a result, an adjustment to DOE's preferred alternative was made in the Final SIS EIS and the Tri Party Agreement was modified to delete the milestones for construction of new double shell tanks.

Comment. "Even if you absolutely had to move some waste you already have an existing pipeline system that can move liquids. This year you moved over 400,000 gallons of waste through it. Why can't you use it for more transfers? In fact your EIS says you plan to do just that. For this EIS most of the waste is planned to go through the existing pipelines. Why can't you send a few more transfers through the existing lines? This would undoubtedly be cheaper and less damaging to the environment. Before the last transfer the line was pressured tested to make sure it would be safe. Why not just do that every time? You could take very little risk by doing this and you'd save the people of this country tens of millions of dollars."

Response. The existing lines are planned to be used for liquid waste transfers as indicated in the comment. However, due to the age of the lines and likelihood of failure of these lines, DOE believes it is prudent to replace these lines with a modern, safe, reliable and compliant waste transfer system. This will provide DOE with a more certain ability to meet its need for cross-site waste transfers.

Comment. "A new line isn't needed just to move the amount of liquid waste specified in this EIS. The State is making DOE build this line to service the TWRS planned mission of vitrifying all the waste in the tanks. If that's the true need, then this action needs to be covered in the TWRS EIS where there might be a real need. Building it for this trumped up need will prejudice the TWRS decision (which already seems to have been made.)"

Response. DOE has a need to move waste cross-site prior to implementing decisions based on the TWRS EIS. This need exists independent of the decisions that may be reached based on the TWRS EIS. The replacement cross site transfer system could become a component of the TWRS, but DOE does not believe that its existence would be prejudicial to any of the alternatives being considered within the TWRS EIS.

Comment. "How in the world can you be privatizing TWRS if you haven't already made the decision?"

Response. Privatization of TWRS is not an action that was considered in this EIS.

Tank Farm Criticality Control

Through an ongoing safety evaluation process, DOE recently revisited its operational assumptions regarding the potential for the occurrence of a nuclear criticality event during waste storage and transfers. Changes to the Tank Farm Authorization Basis for Criticality that were approved in September 1995, were rescinded by DOE in October 1995, pending the outcome of a criticality safety evaluation process outlined for the Defense Nuclear Facilities Safety Board (DNFSB) on November 8, 1995. Until these criticality safety evaluations are completed, Hanford will operate under the historic limits which

maintain reasonable assurance of subcritical conditions during tank farm storage and transfer operations. Of the actions evaluated in the Final SIS EIS, only the retrieval of solids from Tank 102-SY is affected by the technical uncertainties regarding criticality. Based on the quantities of plutonium in Tank 102-SY sludge, retrieval of the solids falls within the scope of the criticality safety issues which will be evaluated over the next few months. As a result, a decision on retrieval of solids from Tank 102-SY is being deferred in this ROD. Tank 101-SY mixer pump operations, interim operation of the ECSTS, operation of the RCSTS, SWL retrievals, and 200 West Area Facility waste generation, would all occur within the applicable criticality limits and would be subcritical.

Decision

Based on the consideration of environmental impacts, cost, engineering standards, criticality safety, and comments received on the Final SIS EIS, DOE will construct and operate the RCSTS on the proposed route identified in the Final SIS EIS, continue operating the mixer pump in Tank 101-SY, and transfer waste from the interim stabilization program and other facility waste in the 200 West Area. During construction of the RCSTS, SWLs and 200 West Area facility wastes will be transferred through the ECSTS to DST storage in the 200 East Area. These actions will provide safe, compliant, and reliable high-level waste transfer capabilities and will operate with wastes at subcritical levels under the existing Hanford Tank Farm Interim Safety Basis, until final disposal decisions are made under the TWRS EIS.

The RCSTS will provide Hanford with a waste transfer capability that meets current engineering standards for double containment and leak detection. As compared to other transfer alternatives, the RCSTS will:

• More effectively minimize worker exposures and meet ALARA requirements through remote operations and underground transfers;

• Cost less during both the interim time period and less over a lifecycle operation than the other action alternatives;

• Provide greater operational flexibility by conducting transfers that are independent of weather or site traffic;

• More efficiently manage the transfer of millions of gallons of wastes required in the near term and potentially required in the future.