



CITY OF
PORTLAND, OREGON

Sam Adams, Mayor
Amanda Fritz, Commissioner
Nick Fish, Commissioner
Dan Saltzman, Commissioner
Randy Leonard, Commissioner

May 19, 2011

Arnold Edelman
Document Manager, Office of Technical and Regulatory Support (EM-43)
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0119

RE: Greater-Than-Class C Low-Level Radioactive Waste EIS

Thank you for the opportunity to comment on the Draft Greater-Than-Class C Low-Level Radioactive Waste Environmental Impact Statement (GTCC EIS). We appreciate the complexity that the USDOE faces in proposing alternatives for the safe disposal of Greater-Than-Class-C radioactive waste.

The Portland City Council opposes the transportation of nuclear waste through our region to the Hanford site and supports the alternatives in the GTCC EIS which are most protective of the long-term health of the Columbia River and our citizens.

As you know, Portland sits at the confluence of the Columbia and Willamette Rivers, the health of which are vital to the success of this city. The Hanford Site, the most contaminated site in the Western Hemisphere, currently has documented leakage of strontium-90 in the Columbia River at concentrations of 1200 times the EPA standard. We understand that on December 18, 2009, the DOE adopted a preferred alternative in the Draft Tank Closure and Waste Management (TC&WM) EIS, which proposes not shipping additional GTCC LLRW to Hanford at least until the Waste Treatment Plant is operational. While we appreciate that decision, it has come to our attention that a number of the proposed alternatives in this draft EIS pose serious threats to regional human and environmental health.

In addition to the downstream impacts of the on-site mitigation and clean-up activity at Hanford, we are significantly dismayed by Alternatives 3-5 in the draft EIS, which propose the construction of facilities at Hanford for the receipt, treatment, and storage of nuclear waste from other US nuclear facilities. Despite the 2009 action by DOE limiting receipt of nuclear waste at that facility until the Waste Treatment Plan is operational, future receipt of off-site waste at Hanford is projected to have significant adverse long-term impacts on the groundwater, which ultimately impacts the Columbia River. Moreover, the transfer of nuclear waste through Oregon on its way to Hanford poses an unacceptable risk to the health of Portland citizens.

As stated in the Mayor's testimony on the Hanford TC&WM EIS last year, the USDOE estimated 816 cancer deaths to residents along shipping routes, and to people in traffic near the trucks, from a similar 2008 proposal for nuclear waste shipment. That estimate is based on radiation doses for an adult male and does not account for the possibility of traffic accidents, leakages, or acts of terror along the transfer route. The City of Portland adamantly opposes any alternative in the GTCC EIS that poses such incalculably high risk to the health of our citizens and surrounding environment.

Given that there are already many barriers to quickly and adequately cleaning up the existing nuclear waste at Hanford, it is plainly unacceptable to consider importing additional waste from other sites.

We recognize that the treatment of nuclear waste is a regional and national issue that requires the collaboration of all levels of government to develop practical and safe solutions. In objecting to the transport of nuclear waste through this region, we offer this city's support in developing a plan for the on-site treatment of nuclear waste to either mitigate the health risks of the waste in transport or to eliminate the need for transport altogether. Treating nuclear waste on-site – proposed Alternative #1 – is the best opportunity for our communities to avoid further health and environmental impacts from waste produced from other regional, decommissioned nuclear facilities.

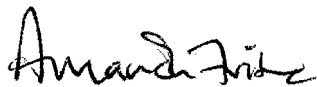
The City of Portland urges the USDOE to follow through on the agency's fourth strategic theme: Environmental Responsibility: Protecting the environment by providing a responsible resolution to the environmental legacy of nuclear weapons production.

The Portland City Council opposes the transportation of nuclear waste through our region and supports the alternatives in the GTCC EIS which are most protective of the long-term health of the Columbia River and our citizens.

Sincerely,



Sam Adams
Mayor



Amanda Fritz
Commissioner



Nick Fish
Commissioner



Dan Saltzman
Commissioner



Randy Leonard
Commissioner