

STATE OF SOUTH CAROLINA

Governor's Nuclear Advisory Council

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May 10, 2013

RE: FY 14 Funding Decrease for Liquid Waste Disposition Program at the Savannah River Site

Dear Senator Graham:

The South Carolina Governor's Nuclear Advisory Council (GNAC) was formed by statute to advise the Governor on issues relating to nuclear materials and activities in South Carolina.

As you may know, the President's Budget Request (PBR) for FY 14 eliminates \$106M from the Savannah River Site's (SRS) Liquid Waste Disposition Program, managed by Savannah River Remediation (SRR).

The GNAC strongly disagrees with this decrease in funding.

The adverse effect the PBR would have on liquid waste disposition is beyond significant, and not in the best interests of the citizens of South Carolina or Georgia. We ask that you to do what is necessary to ensure that Congress restores all requested funding to the Liquid Waste Disposition Program at SRS. South Carolinians and Georgians should not be subjected to the increased risk of waste tank failure such as will result from this slowdown in emptying tanks and vitrifying liquid waste.

If enacted, the budget cut will reduce the SRR workforce by 1/3, and decrease the amount of work that can be done by 2/3. The liquid waste poses the highest environmental risk in South Carolina, and is equally threatening to the Savannah River Basin in eastern Georgia. This funding cut will further increase the time the radioactive waste remains in tanks that are now well beyond their design life, increasing the likelihood of unmanageable leaks that will contaminate the groundwater, which ultimately, and quickly, flows to the Savannah River, the major source of drinking water for Savannah, its suburbs, and the South Carolina Low Country. In addition, delays always significantly increase life-cycle costs, so a decrease in funding now only increases required spending later.

Impacts of the proposed FY14 budget cut, include

- reducing vitrified liquid waste canister production by 2/3, from more than 300 canisters per year to a maximum of 100;

- maintaining the ARP/MCU (actinide removal/modular caustic side solvent extraction) process at a throughput of 1 Mgal/year, rather than increasing it to the planned 4 Mgal/year;
- halting the construction of saltstone disposal units, thus further slowing vitrification because no low-level waste disposal unit will be available before 2017;
- permanently cancelling the deployment of an in-tank salt waste treatment system, also further slowing the emptying of tanks and the vitrification throughput;
- eliminating funding for a third glass waste storage building in FY 14 (even if funding is restored in FY 15) which has the consequence of further limiting total canister production to no more than 750 canisters until additional storage is provided.

The Site Treatment Plan commitment to complete waste treatment by 2028 will be missed by 10 years, even if funding is restored in FY 15. Federal Facility Agreement commitments will be missed beginning in FY 15, and the schedule delays will never be recovered, so all future regulatory commitments are in jeopardy.

The funding decrease is unacceptable. The SRS and South Carolina regulators have worked diligently to ensure a timely, efficient, and safe clean-up of the Cold War legacy liquid waste at SRS. Any slow-down increases the time the waste remains in old, leaking tanks, some of which sit in the water table, and four of which are completely submerged. SRS has an excellent record of identifying leaking tanks, and managing the waste in them. However, because of the age of the tanks and their years of exposure to radiation, more tanks will develop leaks, and it may soon be impossible for SRS to avoid storing radioactive waste in leaking tanks. The costs to remediate radioactively-contaminated groundwater will be immediate, unavoidable, and astronomical.

DOE's Senior Advisor for Environmental Management characterized the decrease in the SRS liquid waste funding as "a tough choice" because "in order to deal with" Hanford's 53 million gallons of high level waste, and Idaho's TRU (transuranic) waste, and Oak Ridge, there was "only so much left for [SRS liquid waste]" (comments made on April 25 by Dave Huizenga to the Clean-up Caucus). **We believe that if DOE had based its funding decisions on an environmental risk analysis, SRS would be at the top of the funding priority list.** "Only so much [funding] left" is a ridiculous and indefensible reason to decrease SRS funding. We must point out that SRS has disposed of almost all of its transuranic waste, and has been successfully vitrifying liquid waste (equivalent in risk to Hanford's high level waste) since 1996. SRS is the only site making real progress, and while we doubt that DOE is punishing South Carolina and Georgia for SRS's stellar performance, it certainly feels that way. What is the logic for decreasing funding to the most successful program, and the one that is on track to meet or even exceed its clean-up commitments, while disproportionately funding programs that are fraught with technical issues, and challenged by the inability of DOE and the regulators to cooperate?

In summary, if funding is not restored to the SRS Liquid Waste Disposition Program, it will be impossible to meet regulatory commitments for the duration of the program; tanks will continue to leak, making the potential for radioactive contamination of the groundwater and

drinking water very high; costs will continue to escalate; and most importantly, the citizens of South Carolina and Georgia will incur unnecessary risks.

We urge you to visit the Savannah River Site and talk to the DOE managers, the managers of the SRR Liquid Waste Disposition Program, and the South Carolina environmental regulators. We cannot adequately express the urgency with which SRS needs to complete the vitrification of this waste, but a visit to the tank farms will, without doubt, convince you.

Sincerely,

A handwritten signature in cursive script that reads "Karen H. Patterson".

Karen Patterson, Chair
South Carolina GNAC

Cc: Governor Haley
Governor Deal
Members of South Carolina Congressional Delegation
Members of Georgia Congressional Delegation
Members of GNAC