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From: [REDACTED]
Sent: Tuesday, January 04, 2011 12:22 AM
To: Fusrap, LRB
Subject: Waste Disposal Options and Fernald Lessons Learned Technical Memorandum

Please accept the following comments regarding the Waste Disposal Options and Fernald Lessons Learned Technical Memorandum.

The K65 residues should be regarded as high level radioactive waste; as such the treatment of similar residues at Fernald was not appropriate. Residues of such high activity require encapsulation in a glass medium before being placed in a remote underground repository. Mixing the residues with fly ash, followed by disposal as low level radioactive waste is not appropriate and does not provide the required protection of the environment.

There is a growing body of evidence that the Interim Waste Containment Structure at the NFSS is leaking, which necessitates the urgent removal of these dangerous residues. The NFSS has long been recognized as a totally unsuitable location to store radioactive waste: the wet conditions, high water table, close proximity to local populations and the Great Lakes all preclude the continued storage of K65 residues at the site. The residues should be removed from the NFSS as soon as possible, vitrified at a remote location and stored at a remote location to await placement in an appropriate repository.

[REDACTED],
[REDACTED],
[REDACTED]

Classification: UNCLASSIFIED
Caveats: NONE