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The Monitored Retrievable Storage Facility: Scoping the Environmental Assessment Process

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ABSTRACT

Reaching negotiated agreement with a state or Indian tribe and preparing of the environmental assessment (EA) required by Section 404 of the Nuclear Waste Policy Act, as amended (NWPAA), are the first steps in a process intended to result in the acceptance of radioactive waste at a monitored retrievable storage (MRS) facility starting in 1998. This paper examines requirements for the EA, the first environmental document to be prepared for siting an MRS facility, and discusses the process used to develop that document. The EA process can be conducted in an efficient manner to produce a high-quality product, with full public involvement, that meets all Department of Energy (DOE) objectives and schedules for the civilian high-level radioactive waste management program.

1 INTRODUCTION

The NWPAA provides for the establishment of an Office of the Nuclear Waste Negotiator (NWN). The negotiator has the mandate to develop agreements with a state or Indian tribe willing to host a high-level radioactive waste repository or a monitored retrievable storage facility. The negotiator was appointed by the President and approved by the Senate on August 4, 1990. At this time, the Office of Civilian Radioactive Waste Management (OCRWM) believes that external non-DOE efforts, such as those of the Office of Nuclear Waste Negotiator, offer the best opportunities to solicit interest in the MRS facility and negotiate an agreement to site an MRS facility with a volunteer host.

The negotiator has stated in a letter to the Secretary of Energy dated November 15, 1990, that the negotiation process will be conducted within a framework of full public disclosure and interaction. The process will include an active program of public meetings, comment and response periods, and consensus-building among government agencies, public groups, private entities, and all interested individuals. If the negotiator is successful in finding one or more willing hosts for

the MRS facility, he will then request that the Secretary prepare a statutory environmental assessment (EA) for those sites. The negotiator must submit to Congress any proposed agreements, along with the EA for the proposed sites. The EA must contain the information needed to assist Congress in deciding the merits of any submitted agreements.

The purpose of this paper is to analyze substantive issues relevant to DOE's preparation of an EA for negotiated MRS sites, develop options and scenarios based on that analysis, and provide recommendations on procedures for the preparation of the EA. The substantive issues include requirements imposed upon the Department by legislation, regulations and DOE Orders; the scope and content of the EA; and internal Department schedules developed in the context of timely waste acceptance. The goal of this analysis is to bound the EA process, so that decisions can be made on scope and content, and to reconcile or make explicit areas of conflict in scheduling or scope of the EA.

The MRS EA will differ from other EAs that are produced to satisfy National Environmental Policy Act (NEPA) requirements. While it is recognized that the MRS EA is a statutory document, Council on Environmental Quality (CEQ) regulations, DOE guidelines, and SEN-15-90 (a Secretary of Energy Notice that was issued to assure NEPA compliance) provisions are also used to provide guidance in EA preparation. These guidelines will be followed for the statutory EA.

2 ENVIRONMENTAL ASSESSMENT ISSUES

The purpose of the MRS statutory EA is to describe the probable impacts of an MRS facility at the proposed site. In addition, the EA should document, based on available data, the extent to which the site meets the licensing requirements of 10 CFR Part 72(Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste) for a License Application. The EA for a negotiated site represents only the first step in an overall environmental

program mandated under the NWPAA. In addition to the EA, the Department will produce an environmental impact statement (EIS) as part of the license application to the Nuclear Regulatory Commission (NRC). Although the need and alternative design criteria for the MRS facility will not be part of the EIS, the EIS will provide a detailed examination of impacts associated with the construction and operation of an MRS facility and other alternatives, such as, designs and sites, including the no-action alternative. The EIS will be prepared under regulations and requirements of NEPA, NWPAA, and the Department. In addition, the license application and approval process will require the Department to meet all NRC requirements for an MRS facility.

Placed in the context of negotiations and extensive environmental compliance, several concerns that directly affect EA include preparation (1) the extent of public participation and internal reviews; (2) sufficiency of geologic, environmental, and socioeconomic data; (3) facility design; and (4) quality assurance requirements. Decisions relative to these issues will shape the type of EA prepared by the Department.

2.1 Extent of Public Participation

A central issue in the EA process for an MRS facility is whether optional public participation and public comment on a draft EA is useful. Since the Department is currently relying on the efforts of the negotiator for MRS site selection, public participation is already a planned component of MRS siting. Irrespective of the scope of the EA process chosen, the negotiation process is expected to result in considerable public, local, state, and Indian tribe involvement as various proposals are discussed.

NEPA and the implementing regulations of the Council on Environmental Quality (CEQ) do not require public involvement during EA development. The NWPAA, however, stipulates that a public hearing be held in the vicinity of any negotiated site, when preparing an EA to inform

residents of the area and receive their comments and recommendations with respect to the issues that should be addressed in the EA. Two public hearings should be sufficient, one in the vicinity of the site and one in the state capital. Any additional hearings will only increase the effort, cost and time required to prepare the EA. Secretary of Energy Notice SEN-15-90 requires that the host state (and Indian tribe, if applicable) and, as appropriate, adjacent states be provided a 14- to 30-day comment period before final approval of the EA by the DOE Office of Environment Safety and Health (EH) and by the Secretary. All public participation (i.e., review and comment) beyond those requirements is discretionary.

Public interaction (comment and review) provided in the negotiation process and subsequent EIS development will afford a number of opportunities for involvement before the siting of the MRS facility. Discretionary public comment on a draft EA could significantly increase the effort and cost associated with producing the final EA and thus lengthen the MRS schedule. If the Department implements discretionary public comment, the decision must include a clear set of goals and objectives that will enhance the final EA and provide the negotiator and Congress with information not obtainable from the mandated public comment periods.

2.2 DOE Internal Review Procedures

The purpose of an internal review is to ensure quality, consistency, coverage of all issues, regulatory compliance, and the meeting of all program objectives. Because different offices within the Department bring different perspectives to the review process, explicit direction to be provided by OCRWM will increase the efficiency of the review process. The review process established for the EA will be critical in terms of the number of internal reviews, length of time devoted to each review, the need for quality assurance (QA) mandated reviews, and SEN-15-90 requirements.

Internal review procedures are entirely within the control of the Department. Reviewing organizations must be held accountable for completing their documented reviews. Internal reviews and subsequent revisions to the EA can have not only significant impact on the quality of the assessment, but also on the time and effort devoted to the EA process. An efficient internal review process, using established procedures, should improve the quality of the EA and significantly decrease the time required for preparation.

2.3 Analytical and Data Requirements

The NWPAA specifies that the EA should include a detailed statement of the probable impacts of construction and operation of an MRS facility. Data collection and analyses can begin once negotiated agreements are reached for a potential site(s) and the negotiator requests that the Secretary prepare an EA.

The NWPAA limits the evaluation of sites to available data and prohibits site-disturbing activities unless they were already in progress or the Secretary certifies that such information is necessary to satisfy the requirements of NWPAA. The Department should determine soon after the identification of a site by the negotiator if the site appears to be technically suitable (10 CFR Part 72 and June 1990 Draft "Preliminary Site Requirements and Considerations for a Monitored Retrievable Storage Facility") and if further data will be necessary so that the Secretary can certify that the information is required. However, such a request would be expected only for a site for which there was little or no data available concerning geologic and hydrologic characteristics.

Since an EIS will also be prepared for the MRS facility, and preparation of the EA is part of the negotiation process, considerable flexibility exists in the scope of the analysis. For example, CEQ states that an EA can be used to support the preparation of an EIS. In the EA, the detailed statement of the probable impacts of characterizing the site and the construction and operation of an

MRS facility at the site, required by NWPAA, is not necessarily an extensive, quantitative analysis of all issues (e.g., transportation and radiological safety), and may not require the application of formal QA procedures. However, formal QA procedures will be required for the EIS. An in-depth analysis for the EA, similar to that required for the EIS, would greatly increase the time and effort for data collection, modeling, review, and document preparation. In addition, detailed design layout at the site would be required for such an extensive analysis of all impacts.

If the in-depth analysis of impacts is relegated to the EIS, the EA can address criteria applicable to siting an MRS facility, identifying any serious flaws that would obviously eliminate the site. The EA would thus provide Congress with sufficient information on the feasibility of siting and ease of licensing the potential MRS facility at the negotiated site.

Considerable time and effort could be saved if the statutory EA would address only site requirements and considerations related to the environment, public health, and safety. In addition, this approach is in agreement with the CEQ recommendation that an EA support preparation of the EIS. All detailed analytical work would be deferred to the EIS stage.

2.4 Conceptual Design Requirements

Environmental analyses require a conceptual design layout at the site. Without specific information on building locations, storage areas, and roads, site-specific analyses cannot be finalized. Therefore, the preparation of the MRS EA will be based on the availability and utilization of this conceptual design.

2.5 Quality Assurance Requirements

Quality Assurance (QA) requirements are an integral part of the MRS program. Adequate QA

implementation requires detailed, verifiable, and defensible analyses of environmental impacts and potential mitigation strategies related to safety and waste isolation. For example, an analysis of potential radiological exposure requires a detailed layout of the MRS design at each negotiated site. This level of detail may not be available for the EA analysis. In addition, a formal QA process for any portion of the EA will increase the time and effort required to complete the document. A more appropriate time for formal QA is at the EIS stage of the environmental program. By deferring most analyses subject to the OCRWM QA program to the EIS, the effort, cost, and time of EA preparation could be decreased without compromising the siting, construction, operation, or decommissioning of an MRS.

3 TASKS FOR ENVIRONMENTAL ASSESSMENT PREPARATION

Sound environmental compliance planning is expected in implementation of Department programs. Such planning must assure that all appropriate regulations are considered in the decision-making process. Certain basic tasks are necessary for preparing the MRS EA. An additional set of tasks, not specifically required by any regulations, are presented that address discretionary areas within the scope of the MRS EA preparation. For example, the OCRWM strategic principles document and options contained in SEN-15-90 call for openness and public involvement in Department decision making. Options for EA preparation can be defined by evaluating these required and discretionary tasks.

3.1 Required Tasks

The EA process begins with a request from the negotiator to prepare an EA. The tasks enumerated in this section are those required by NWPAA or by the Secretary as provided in SEN-15-90. These include notice of preparation, public hearings, data collection, preapproval and final environmental assessments, and notice of availability of final environmental

assessment.

3.1.1 Notice of Preparation

The Notice of Preparation (NOP) is the official notification to federal, state, Indian tribal, and local agencies and the public that an EA will be prepared and that public hearings will be held in the vicinity of the site. CEQ regulations state that in the case of an action of national concern, notice shall include publication in the Federal Register and by mail to national organizations reasonably expected to be interested in the matter.

3.1.2 Public Hearings

A public hearing is required to inform the residents of the area that a site is being considered for the MRS facility and to receive their comments and recommendations. No regulations specify the number of hearings that must be held, nor where they must be held, other than in the vicinity of the site. As mentioned previously, two public hearings should be sufficient, one in the vicinity of the site and one in the state capital. However, OCRWM would retain flexibility in determining if additional hearings would be necessary as the program matures.

The DOE's proposed regulations for NEPA implementing procedures (10 CFR 1021) require that public scoping meetings not be held for at least 15 days following public notification of preparation of an EIS. This is also a good rule-of-thumb that could be applied to the EA public hearings.

3.1.3 Data Collection

The NWPAA specifies that only available data be used for preparation of an MRS EA. Site-disturbing activities are prohibited unless these activities are already in progress or if the Secretary certifies that geological site investigation activities are required in order to provide information "that will not be available to satisfy the requirements of this Act or any other law." Data collection should begin as soon as the negotiator requests the Secretary to prepare an EA for a given site.

3.1.4 Pre-Approval Environmental Assessment

Neither NEPA nor NWPAA require the issuance of a draft EA. SEN-15-90 does require that any EA for a proposed DOE project be provided to the host state and, as appropriate, to adjacent states prior to EH or Secretarial approval. SEN-15-90 allows a 14- to 30-day comment period for the states to review this pre-approval Final EA (FEA). There is no requirement to issue this document for public comment.

3.1.5 Final Environmental Assessment

The pre-approval FEA can be modified, as appropriate, by the Department in response to any state comments. There is no requirement to prepare a comment response document or to include the comments in the FEA.

3.1.6 Notice of Availability of Final Environmental Assessment

The CEQ Regulations require agencies to provide public notice of the availability of EAs and EISs. The NWPAA also requires that EAs be made available to the public. Again, since this is an action of national concern, notice of the EA's availability should include publication in the Federal

Register.

3.2 Optional Tasks

The tasks enumerated below, including Notice of Availability of Draft EA, public hearings on the Draft EA and preparation of a comment response document, are those that are not required by any regulations, but would maximize public involvement in the spirit of openness and full disclosure of Department actions.

3.2.1 Notice of Availability of Draft Environmental Assessment

SEN-15-90 allows, but does not require, DOE to circulate an EA for public review and comment. For DOE programs of national interest, for which an EIS is not subsequently prepared, public review and comment are sometimes incorporated into the process. The Interim Procedural Guidance for Implementation of SEN-15-90 requires that if DOE intends to circulate an EA for public review and comment, the state(s) must be offered the opportunity for advanced review for 14-30 days before the public comment period. As with the Notice of Preparation, the Notice of Availability should be published in the Federal Register.

3.2.2 Public Hearings on the Draft Environmental Assessment

The CEQ regulations allow agencies to hold public hearings whenever appropriate. In the spirit of openness and full disclosure, such hearings can be scheduled to allow input from the public, federal, state, and Indian tribal and local agencies. In such a case, two hearings per site should be held, one at a location near the site and one in the state capital.

3.2.3 Comment and Response

Although there are no requirements to respond to comments on an EA, this could be included as part of this EA process. The comments could be published in an appendix to the EA along with the responses to the comments.

4 PROCESS FOR PREPARATION OF THE MRS ENVIRONMENTAL ASSESSMENT

Preparation of the EA represents only the first step in the overall environmental program for an MRS facility. An EIS must also be prepared as part of the license application. The EIS will contain a detailed examination of impacts associated with construction and operation of the MRS facility. The EIS process always includes full public participation from the initial scoping through the public hearings and comment period on the Draft EIS.

The EA should be viewed as an aid in the entire decision-making process, not as a document with the scope of an EIS. The EA should be a short document that permits anyone to consider the proposed sites and decide if there are any serious flaws that would obviously eliminate a site during the EIS process. The public will be allowed to provide input to the process soon after the site is proposed and again throughout the EIS preparation.

Two optional processes are considered. Option 1 is a process that provides for greatly expanded public participation, whereas Option 2 provides for that extent of public participation required by NWPAA and SEN-15-90. Both options are based on the following assumptions:

1. The preferred conceptual design for the MRS has been completed and site layout is completed early in the EA process.
2. No additional field studies are required to support the EA.
3. Most QA-affecting analyses will be included in the EIS, and only the minimal necessary analyses will be contained in the EA.
4. The EA will be a relatively short document, the primary purpose of which is to ensure that the proposed site for the MRS facility meets technical, statutory, and regulatory requirements.
5. The detailed environmental analyses to support the license application will be contained in the EIS to be prepared after the issuance of the EA.

Option 1 would include extensive public participation, including public hearings on a Draft EA and an appended comment response document. Under this scenario, the time required for the 24 activities needed to produce the FEA would be approximately 80 weeks (Figure 1). For example, if the request to prepare an EA was received on the first of September 1991 the FEA could be expected to be issued by the middle of April 1993.

Option 2 provides for only two public hearings -- one near the site and one in the state capital. No Draft EA would be issued for public comment, and no comment response document would be prepared. The time required for the 16 activities needed to produce the FEA under this option is 36 weeks (Figure 1). If the request to prepare an EA was received on the first of September 1991, the FEA could be expected to be issued before the middle of May 1992.

5 CONCLUSIONS

Preparation of the EA is the initial step in a program designed to result in the construction of an MRS facility with initial waste acceptance by 1998. The planning basis of OCRWM indicates that to achieve this goal, the EA must be completed and submitted to Congress by the end of June 1992. Two potential processes have been examined in this paper. Option 1, which provides generously for public participation in the process, will not allow for submittal of the EA to Congress by the required date. Option 2 utilizes a process that meets all regulatory requirements, including those of SEN-15-90, but limits public participation to that required by the NWPA, while fully acknowledging that negotiations and EIS scoping will involve the public. This subsequent EIS will be prepared to present the detailed environmental analyses necessary to comply with NEPA and support the license application. In either option, sufficient public participation will occur within the negotiation process. Thus Option 2 is recommended and has the potential to meet the schedule if (1) the negotiator requests the EA be prepared for a site early in the process, (2) all milestones are strictly complied with, and (3) internal and external pressures are not allowed to impede the progress of EA preparation.

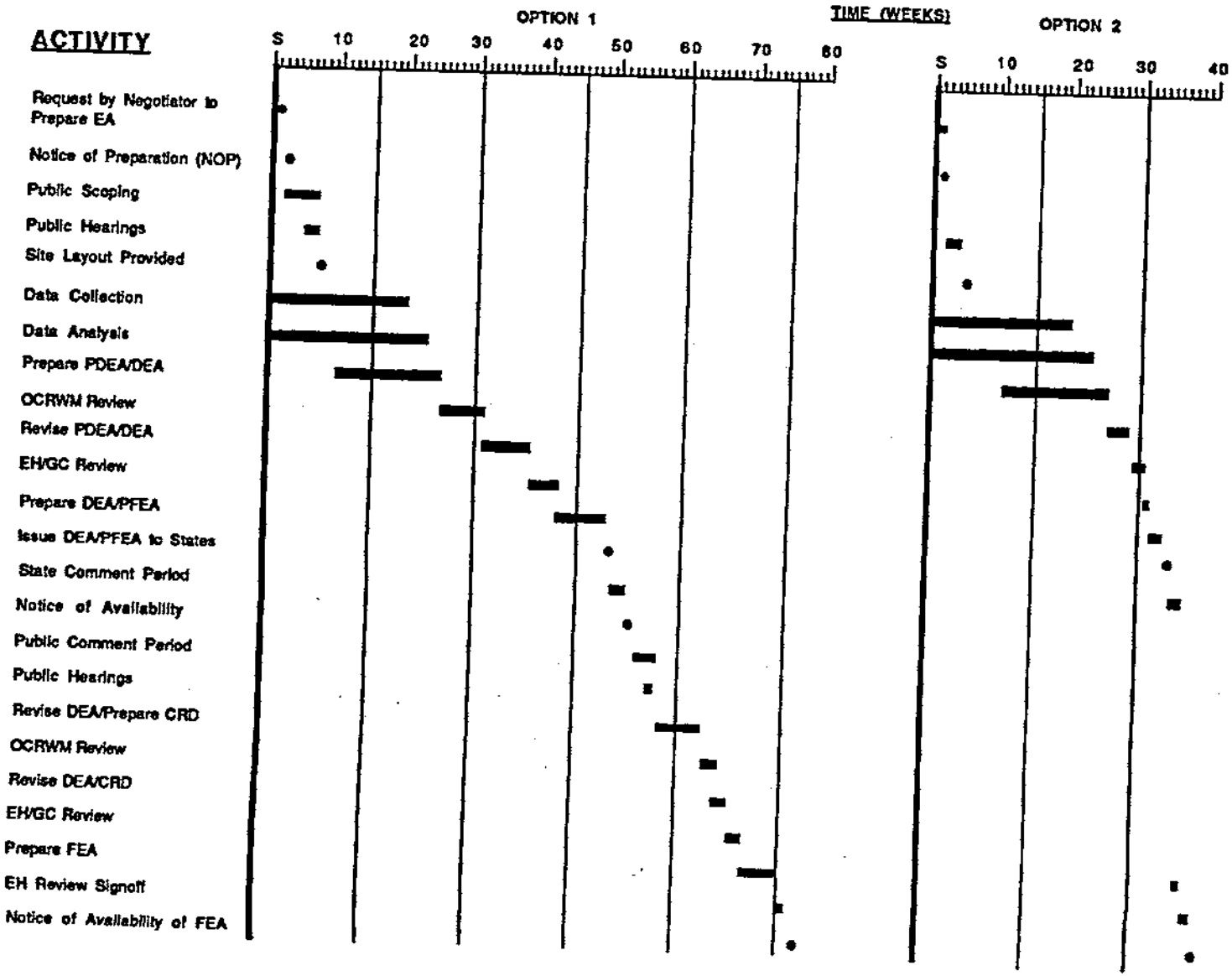

Figure 1. Comparison of Environmental Assessment activities and schedules under two options

● = milestone

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Comment Response Document

Number	Comment	Response	Comment Source
1	In all instances when reference is made to "MRS", please change to "MRS facility".	Change made, where appropriate.	WESTON
2	This paper should be revised to consistently indicate that the EA is not being prepared as a NEPA EA. See page 2, paragraph 3, line 1; page 6, paragraph 2, line 2; page 7, paragraph 3, line 2.	Change made, where appropriate.	WESTON
3	The abstract should clearly state that the EA process being discussed in the paper is one that will be conducted through the Negotiator under Section 404 of the NWPA, as amended; the EA process under section 145 for a DOE sited facility may be different.	Abstract modified to include this statement.	WESTON
4	The development of the EA is to assess site suitability; the EIS on the other hand is developed long after the site has been selected. The EIS, which accompanies the License Application, assesses, among other things, the impacts on the environment due to construction (NWPAA, Section 148(a)(1)), and operation.	Paper in agreement; no response required.	WESTON

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5	Statements about public participation are weak throughout. What is really recommended as the appropriate role for the public? A recommendation at the end of the paper, along with some justification would greatly improve this document.	Statements concerning public participation were added to the conclusion of the paper.	WESTON
6	The pros and cons of the two options are not really analyzed beyond references made to the schedule issue.	We disagree, pros and cons have been discussed in Section 4.0. Section 4.0 uses the discussion presented in Section 2.0.	WESTON
7	Page 2, paragraph 2, states that this paper will provide recommendations on the preparation of the EA; this paper does not provide recommendations. Either delete these statements from the paragraph or provide recommendations.	Statements deleted.	WESTON
8	Page 1, paragraph 1, line 2 It should be stated that the development of a negotiated agreement with a State or Indian Tribe and the preparation of an EA represent the first steps in a process that will result in the acceptance of waste, as soon as practicable (instead of 1998), in order to obtain the system development and operational benefits that have been identified for an MRS facility.	1998 is in the NWPA. All schedules developed incorporate this statutory deadline.	WESTON

70309 1969

9	Page 2, paragraph 2, line 1-2 The first sentence in this paragraph can be misinterpreted to imply that one EA will be done for multiple sites. Please change this sentence from ". . .an EA for negotiated MRS sites. . . ." to ". . .an EA for a negotiated MRS facility site. . . ."	The NWPA does not state that multiple EAs are required.	WESTON
10	Page 2, paragraph 3, line 1 Explain how the MRS EA is different from other EAs. For example, state that this is not a NEPA EA but is instead a legislative EA prescribed by NWPA, as amended.	Change made.	WESTON
11	Page 2, paragraph 3, line 2 The purpose of the MRS EA is to describe the probable impacts of the construction of an MRS facility at the proposed site. In addition, the EA should document, based on available data, the extent to which the site complies with geoscience, socioeconomic, and environmental considerations required by 10 CFR Part 72 for a License Application. This language should replace the second sentence in paragraph 3.	The paragraph now begins "The purpose of the MRS statutory EA is to describe the probable impacts of an MRS facility at the proposed site. In addition, the EA should document, based on available data, the extent to which the site meets the licensing requirements of 10 CFR Part 72 for a License Application."	WESTON

7 0 3 9 6 1 9 7 0

1 2	Change page 2, paragraph 3, from ". . . .the Department will produce an Environmental Impact Statement (EIS) as part of the license application to the Nuclear Regulatory Commission (NRC). The EIS will provide a detailed examination of impacts associated with the construction and operation of an MRS and alternatives, including the no-action alternative. The EIS will be prepared under regulations and requirements of NEPA and according to guidelines of the Department of Energy. In addition, the license application and approval process will require the Department to meet all NRC requirements for an MRS facility." to ". . .the Department will prepare an Environmental Impact Statement (EIS) that will accompany the license application when it is submitted to the Nuclear Regulatory Commission (NRC). The EIS provide a detailed examination of impacts associated with the construction of the MRS facility, but would not address the need for an MRS facility, or any alternative design criteria set out in Section 141 of the NWPA. The EIS will be prepared under requirements of NEPA, DOE, and NRC. In addition, the Department will meet all applicable NRC requirements for an MRS facility."	Comment noted, suggested change not made. Excluding the need of design criteria, all alternatives must be addressed. The paragraph has been rewritten to clarify the issue of alternatives.	WESTON

7 0 3 8 9 1 9 7 1

13	Page 2, paragraph 3, line 8-9 Although the EIS requirements in the negotiator provisions do not provide a clear cut view of the EIS, the EIS provisions for a DOE sited facility in sections 148(a)(1) and (2) of the NWPAA do. The DOE does not have to discuss alternatives to the MRS facility.	Text modified to incorporate the comment. However, alternatives will be analyzed.	WESTON
14	Page 3, paragraph 1, line 1 The end of the first sentence in this paragraph should be changed from ". . ., a set of issues emerge that directly affect EA preparation." to . . ., several concerns directly affect EA preparation." Then the following sentence should be changed to, "Key concerns include: the extent of public participation and internal reviews; geologic, environmental and socioeconomic data; and facility design and quality assurance requirements."	Text modified to reflect comment.	WESTON
15	Page 3, paragraph 3, lines 6-10 NWPA requirements for public hearings differ from SEN-15-90 review requirements. NWPA states that a hearing should precede preparation of the EA while SEN-15-90 does not include a hearing requirement. SEN-15-90 includes only a requirement for State review. There should be a hearing before the EA is started (NWPA Section 145(e)(2)).	Change made in paragraph 3, line 3.	WESTON

7 0 3 3 9 1 9 7 2

16	Page 3, paragraph 3, line 13 This line discusses a subsequent memorandum of understanding (MOU), whereas, there has been no previous mention of the current MOU. The current MOU should be mentioned in the "Introduction" section of this paper.	Sentence deleted from text.	WESTON
17	Page 4, paragraph 2 This paragraph could be negatively interpreted by the State of Nevada, the press, and other interested parties. The EA process is the time for public involvement to take place before the negotiated agreement. •It is possible that a potential host State and community may request further participation and, as the siting process is a voluntary one, it is extremely important to build and sustain host government and public understanding and support. •There are precedents in the OCRWM program for additional participation in EA development: the first repository EAs were released in draft form for extensive public review and comment, including public hearings. Input received was incorporated into the final EAs, which included comment responses.	Paragraph redrafted.	WESTON

7 0 3 0 9 1 9 7 3

18	Page 4, paragraph 3, line 6 If the EA is used for site suitability, some data from it may be incorporated into the EIS portion related to radiological health and safety. Therefore, QA reviews may be required.	Comment noted. See page 4, paragraph 3 in revised draft.	WESTON
19	Page 5, Section 2.3 This section should focus on the environmental data needed to assess potential impacts and on the available data needed for design and siting as defined in 10 CFR Part 72. It should address DOE's Preliminary Draft Site Requirements and Considerations for an MRS facility.	10 CFR Part 72 incorporated.	WESTON
20	Page 5, paragraph 3, line 6 QA procedures are applicable to those portions of the EIS that deal with radiological health and safety. This should be specifically stated.	Sentence added in paragraph 3 to reflect comment.	WESTON
21	Page 5 The following paragraph should be inserted as paragraph 4 on this page: "During the public scoping hearings, citizens are invited to provide any recommendations with respect to issues that should be addressed in the EA. Therefore, it is possible that issues that the DOE has not foreseen may need to be addressed in the EA.	Comment noted. See page 3, paragraph 3, line 2.	WESTON

7 0 3 3 9 1 9 7 4

22	Page 6, paragraph 3 This section needs more thought and discussion. We could select "greastest impact" from the several options under consideration and relate to the site for the development of conceptual design.	Paragraph rewritten.	WESTON
23	Page 8, paragraph 2, line 2 A public hearing to inform the residents of the area that a site is being considered for the MRS facility and to receive their comments and recommendations. Please add this information to the first sentence of this paragraph.	Information added to the appropriate sentence.	WESTON
24	Page 9, paragraph 1, line 1 Neither NEPA nor NWPA, as amended, require the issuance of a draft EA.	Change made to reflect comment.	WESTON
25	Page 11, paragraph 4 The conceptual design of the facility should assess the ultimate configuration of the facility for the determination of maximum impacts to the environment.	Comment noted. No change made.	WESTON
26	Page 11, paragraph 3, line 3 Another assumption on which both options could be based is that only one site is identified for EA preparation.	Comment noted. The number of sites is not important to the schedule: All sites will be analyzed in parallel.	WESTON
27	Page 12, paragraph 1 It would be better to say that the primary purpose of the EA is to ensure that the site is technically sound.	Text modified to incorporate the comment.	WESTON

7 0 3 3 9 1 9 7 5

28	Page 12, paragraph 3, line 4 Even though this is just an example to show relative time frames, it would have been better to use the date of August 1991 (which is the date in our current schedule) for the beginning of the preparation of the EA.	Comment noted. MRS Strategy still in draft format. Analysis unaffected by specific dates.	
29	Capitalize 'S' and 'T' in . . .state or Indian tribe. . . See page 1, paragraph 1, line 1; page 1, paragraph 2, line 3; page 3, paragraph 2, line 5; page 3, paragraph 3, line 6, 8 and 12; page 9, paragraph 1, line 2; page 9, paragraph 2, line 2; page 9, paragraph 2, line 2; and page 10, paragraph 1, line 5.	According to NWPA, S is capitalized, t is not.	WESTON
30	Change page 1, paragraph 1, line 7 from ". . .civilian high-level nuclear waste program. . . ." to ". . .civilian high-level radioactive waste program. . . ."	Change made.	WESTON
31	Change page 1, paragraph 3, line 6 from ". . .he will then request the Secretary to prepare. . . .," to ". . .he will then request that the Secretary prepare. . . ."	Change made.	WESTON
32	Delete "(MRS)" from page 1, paragraph 2, line 4. The acronym is already defined in paragraph 1 of page 1.	"(MRS)" deleted.	WESTON

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33	Insert "David Leroy", which is the name of the "Negotiator" on page 1, paragraph 2, line 4.	Comment noted. No change made.	WESTON
34	Replace the sentence, "At this time, the U.S. Department of Energy (DOE) has decided to rely only on this negotiated process for siting the MRS." with "OCRWM believes that external, non-DOE efforts, such as those of the Office of Nuclear Waste Negotiator (NWN), offer the best opportunities to solicit interest in the MRS facility and negotiate an agreement to site an MRS facility with a volunteer host." on page 1, paragraph 2, line 5.	Change made.	WESTON
35	Change page 2, paragraph 1, line 1 from "The EA will assist Congress. . . ." to "The EA must contain the information needed to assist Congress. . . ."	Change made.	WESTON
36	Change page 2, paragraph 2, line 2 from ". . .EA for negotiated MRS sites. . . ." to ". . .EA for NWN negotiated MRS sites. . . ."	Comment noted. No change made.	WESTON
37	Change page 2, paragraph 2, line 4 from ". . .legislation and internal regulations. . . ." to ". . .legislation and DOE Orders. . . ."	Sentence revised.	WESTON
38	Change page 2, paragraph 3, line 1 from ". . .EA differs from other EAs produced. . . ." to ". . .EA differs from other EAs that are produced. . . ."	Change made.	WESTON

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39	Change page 3, paragraph 3, line 8 from ". . .host state and as appropriate, adjacent states. . . ." to ". . .host State (and Indian Tribe, if applicable) and as appropriate, adjacent States. . . ."	Changes made.	WESTON
40	Change page 3, paragraph 3, line 9 from "prior to EH and Secretarial approval of an EA." to ". . .prior to approval of the EA by the Office of Environmental Health and Safety and by the Secretary."	Change made.	WESTON
41	Change page 3, paragraph 3, line 12 from ". . .potential host state, the . . . ." to ". . .potential host State or Indian Tribe, the . . . ."	Sentence deleted.	WESTON
42	Change page 4, paragraph 3, line 3 from ". . .bring unique talents. . . ." to ". . .bring different perspectives. . . ."	Change made.	WESTON
43	Change page 4, paragraph 2, line 3 from ". . .as yet defined. . . ." to ". . .as yet undefined. . . ."	Change made.	WESTON
44	Change page 4, paragraph 3, line 4 from ". . .of any required revisions." to ". . .of the review process."	Change made.	WESTON

7 0 3 8 9 1 9 7 8

45	Change page 4, paragraph 4, line from "Thus, any increase in the efficiency of the internal review process should not only improve the quality of the EA, but also significantly decrease the time required for preparation." to "An efficient internal review process, using established procedures, should improve the quality of the EA and significantly decrease the time required for preparation."	Change made.	WESTON
46	Change page 5, paragraph 2, line 6 from ". . .by the Negotiator if further data will be required, so that the Secretary can make the request in such case." to ". . .by the Negotiator, if the site appears to be technically suitable and if further data will be required, so that the Secretary can make the request to Congress in such cases."	Change made according to the NWPA.	WESTON
47	Change page 5, paragraph 2, line 7 from ". . .a request would be expected only for a "greenfield" site, for which safety-related data was lacking." to ". . .a request would only be expected for a site with little or no available data concerning site geology and hydrology."	Suggested material incorporated.	WESTON

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48	Change page 5, paragraph 3, line 6 from ". . .application of formal QA procedures to applicable parts of the document." to ". . .and may not require the application of formal QA procedures."	Change made.	WESTON
49	Delete ". . .during the EA process." from page 6, paragraph 1, line 1. It is an unnecessary statement.	Suggested deletion completed.	WESTON
50	Change page 6, paragraph 1, line 1 from ". . .analyzing these siting considerations the EA would provide Congress and the Negotiator with sufficient data on the feasibility of sites for an MRS." to ". . .analyzing and documenting the MRS facility site considerations, the EA would provide Congress with sufficient data on the feasibility and ease of licensing potential MRS facility sites."	Sentence modified.	WESTON
51	Change page 6, paragraph 2, line 1-2 from ". . .siting requirements and constraints." to ". . .site requirements and considerations."	Sentence modified.	WESTON
52	Change page 7, paragraph 2, line 6 from ". . .the OCRWM Credo and options contained in SEN-15-90. . . ." to ". . .the OCRWM Strategic Principles document and options contained in SEN-15-90. . . ."	Change made.	WESTON

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5 3	Change page 7, paragraph 4, line 1 from ". . .State, local agencies and . . . ." to ". . .State, Indian Tribal and local agencies, and . . . ."	Sentence modified.	
5 4	Change page 7, paragraph 4, line 3 from "CEQ Regulations" to "CEQ regulations".	Change made.	WESTON
5 5	Change page 8, paragraph 4, line 1 from ". . .used to prepare the MRS EA." to ". . .used for preparation of an MRS EA under Section 404 of the NWPA, as amended."	Change made.	WESTON
5 6	Change page 8, paragraph 4, line 3 from " . . .that geotechnical activities that are required in order to provide information critical to design and operation safety requirements." to ". . .that geological site investigation activities are required in order to provide information "that will not be available to satisfy the requirements of this Act or any other law.""	Change made.	WESTON
5 7	Add "Final Environmental Assessment" before (FEA) on page 9, paragraph 1, line 1 to define acronym.	Change made.	WESTON
5 8	Change page 9, paragraph 4, line 1 from ". . .below, to include Notice. . ." to ". . .below, including Notice. . . ."	Change made.	WESTON

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59	Change page 10, paragraph 2, line 3 from ". . .State and local agencies." to ". . .State , Indian Tribal, and local agencies."	Sentence modified.	WESTON
60	Change "DOE" to "anyone" on page 11, paragraph 2, line 2.	Change made.	WESTON
61	Change "relegated to" to "included in" on page 11, paragraph 6. Join paragraphs 4 and 5 on page 12.	Change made. The paragraphs were not joined.	WESTON
62	Change page 13, paragraph 1, line 4 from "acknowledging that an EIS will be . . . ." to ". . .acknowledging that negotiations and EIS scoping will involve the public. An EIS will be . . . ."	Change made.	WESTON
63	Change "immediately" to "as soon as possible" on page 13, paragraph 1, line 9.	Change made.	WESTON
64	Section 2.1, First paragraph-public participation is a planned component of MRS siting, not an implicit component. Also, the statement in the last sentence should be changed to say that the negotiated process "is expected to" result in considerable public participation, not that it "will" since the siting process could proceed without public participation.	Suggested changes made.	PARKER

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65	Section 2.1, Second paragraph, second sentence-The sentence should convey that the hearings required for the EA are essentially scoping hearings.	Comment noted. Current wording taken from NWPA.	PARKER.
66	Section 2.1, Second paragraph, third sentence-This sentence refers to "past experience" but does not indicate whose experience or experience with what types of projects. Without this information, the statement is only personal views of the authors. Support for the statement is needed.	Reference to past experience deleted.	PARKER
67	Section 2.1, Second paragraph, fifth sentence-SEN-15-90 was issued to ensure "NEPA" compliance, not "environmental" compliance as stated.	"Environmental" replaced with "NEPA" at Section 1.0.	PARKER
68	Section 2.1, Second paragraph, last sentence-The purpose or scope of the proposed memorandum of understanding with the Negotiator is not clear. This sentence should be made into a separate paragraph that addresses the issue raised here.	Sentence removed.	PARKER

7 0 3 3 9 1 9 8 3

69	Section 2.1, Last paragraph-The purpose and content of this paragraph should be reevaluated. It contains unsupported opinions that appear to contradict the basis for other arguments presented in the paper. For example: •The first sentence makes a statement that public comment on the draft EA could "interfere with the negotiation process." However, full public disclosure and interaction is the theme attributed to the Negotiator for the negotiation process. There is no basis for the negotiation process. •The second sentence declares that public comment on a draft EA "will not add significant "value" to the final document". Most Environmental Professionals would disagree with this statement both in theory and in actual practice. This statement has no basis in fact. •The last sentence asserts that the negotiation process will afford ample opportunity for public involvement. This is only an assumption based on the Negotiator's plans for the process. However, there are potential situations where public interaction may be limited during the process.	Paragraph revised.	PARKER

7 0 3 8 9 1 9 8 4

70	Section 2.2, Second paragraph-An increase in efficiency of the internal review process does not necessarily result in an improved EA. Efficiency improvements should decrease preparation time as stated. Improvements in the EA may result from a more "effective" internal review.	Change made.	PARKER
71	Section 2.3, Second paragraph, last two sentences-These two sentences imply that site-disturbing activities can only occur if the Secretary makes a "request" to some unnamed authority. In reality, the Secretary only needs to "certify" that the information to be gathered is needed to satisfy the NWPA requirements.	Sentence revised.	PARKER
72	Section 2.3, Second paragraph, last sentence-It is not clear why site-disturbing activities would only be undertaken if safety data was lacking. It is possible that they would be undertaken if key data to assess environmental effects was missing. Also, the slang expression "greenfield" site should be defined or rewritten using common terminology.	Sentence with "greenfield" deleted. Other comment incorporated.	PARKER
73	Section 2.3, Third paragraph-The phrase "this level of detail" used in the last two sentences should be clarified. It appears that this is referring to an "extensive" analysis, but it is not clear.	Sentence revised to incorporate comment.	PARKER

7 0 3 9 1 9 8 5

74	Section 2.3, Last paragraph-Limiting the EA to only considering the siting requirements and constraints may not help identify important environmental effect issues. This should be acknowledged as a trade-off that must be made if the EA is limited in scope. Also the second sentence is incorrect. The stated approach does not support EIS preparation. It defers analysis to the EIS. CEQ's recommendation is that the EA be used to establish a basis from which an EIS can be prepared. The approach presented in this paragraph is to use the EA as a screening tool rather than to build a framework for an EIS.	First sentence changed. We believe that an EA looks at siting requirements, will address critical environmental areas and support EIS preparation. It is not necessary to write two EISs, one disguised as an EA, the other formally called an EIS.	PARKER
75	Section 2.4, Last sentence-It is not clear if the information referred to in this sentence would be provided by the conceptual design layout or some other design step.	Paragraph revised.	PARKER

7 0 3 3 9 1 9 8 6

76	Section 2.5-This section should be rewritten to better reflect the issue of QA applicability to the EA and to accurately reflect QA requirements. The QA program was developed to ensure that the appropriate management, policy, training, inspection and audit controls are in place for verification by the Nuclear Regulatory Commission that the structures, systems and components under postulated accident conditions will not adversely impact the waste isolation capabilities of the site, not cause undue risk to the health and safety of workers or the public. The issue whether the EA analyses could result in design changes to any of these structures, systems or components.	Comment noted. No change made. The paper notes the possibility of QA in EA preparation.	PARKER
77	Section 2.5, Second sentence-QA does not require any type or level of environmental impact analysis nor development of mitigation strategies. Most environmental analyses are exempt from the QA requirements. This sentence should be revised to say what activities are subject to QA controls and what that means (e.g. verifiable analyses). References to "this level of analysis" in the paragraph should be deleted since QA implementation does not require the detailed analysis as stated in the second sentence.	Sentence deleted.	PARKER

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78	Section 2.5, Last sentence-The approach presented here would not work if a site could have an effect on waste isolation or radiological safety. In this case, the EA should address these potential impacts, not defer their consideration to the EIS. The beginning of the sentence should read: "By deferring most analyses subject to the OCRWM QA program to the EIS. . . ."	Sentence changed.	PARKER
79	Section 3.1.4, and 4-The acronym "FEA" is not defined. Apparently, it is the Final EA. However, on page 12, two different paragraphs have sentences referring to the Final EA and to the FEA. If they are the same consistent terminology should be used.	Acronym defined on page 9, paragraph 1, line 4. Terminology corrected on page 12.	PARKER
80	Section 3.2-The options in this section are presented to "maximize public involvement" but, as indicated earlier, Section 2.1 already indicates that this would interfere with the negotiation process and has essentially indicated that maximization of public involvement should be ruled out. These options should not be ruled out without a fair evaluation.	Neither option has been ruled out. Options are a DOE management decision. Earlier discussion of public involvement addressed pros and cons. Changes made to Section 2.1.	PARKER

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8 1	Section 3.2.2-This section should address the issue of how the public review and the State review periods would relate to each other. Should the public review be before, after or simultaneous with the State review? Also, if the public review results in EA modifications, would DOE need to be given another review opportunity?	See Section 3.2.1 and Figure 1.	PARKER
8 2	Section 4, Item number 4-An explanation is needed for what constitutes a serious flaw.	"Serious flaw" deleted from text.	PARKER
8 3	Section 5, Last paragraph, penultimate sentence-The phrase "This process" should be changed to "Option 2".	"This process" changed to "Option 2".	PARKER
8 4	Section 5, Figure 1-The activities list public scoping and public hearings prior to developing the EA. The NWPA requirement for public hearings is a scoping process. There is no need for two separate activities.	Hearings are part of the scoping process, thus these are shown on the schedule. No change made.	PARKER
8 5	Section 5, Figure 1-Vertical lines would be helpful to give readers an idea of time for activities that are low on the page.	Vertical lines added.	PARKER

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8 6	In defining the scope of the Environmental Assessment (EA) to be prepared by DOE at the request of the Negotiator to support an MRS siting decision is Argonne National Laboratory's (ANL) premise that "the EA should be a short document that permits DOE to look at the proposed sites and decide if there are any serious flaws that would obviously eliminate the site during the EIS process" (The Monitored Retrievable Storage Facility: Scoping the Environmental Assessment Process, ANL, p. 11).	Comment noted.	M&O
8 7	ANL's rationale that the EA focus on serious flaws of the site is that a more detailed environmental impact statement (EIS) will be prepared for the same site after the siting decision to support the license application for construction authorization from NRC. ANL's approach is logical; however, it may not be what the law requires. There is a basis for concern, discussed in the following paragraph, that ANL's approach may not lead to a legally adequate EA pursuant to the requirements of the Nuclear Waste Policy Act Amendments (NWPAA), 42 U.S.C. 10244(b)(2) and the National Environmental Policy Act (NEPA), 42 U.S.C. 4321 et. seq.	Comment noted.	M&O

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8 8	To satisfy NWPAA, the EA must include a detailed statement on the probable impacts of construction and operation of the MRS at the proposed site. 42 U.S.C. 10244(b)(2). To satisfy NEPA, the EA must identify any significant impacts that may result from such construction and operations. 40 CFR 1508.9(a)(1). NEPA also requires that the EA evaluate the impacts of reasonable alternative facility designs (storage alternatives). 40 CFR 1502.14. NEPA also requires that the EA include transportation impacts associated with the movement of SNF and HLW by rail and highway from their present locations to the proposed MRS site and from the site to a repository because transportation is an aspect of operations. 40 CFR 1508.25. The EA must also address the no action alternative of storing the SNF and HLW at existing locations until a repository is constructed and able to accept the waste. DOE's proposed NEPA rule, 10 CFR 1021.321(c).	We agree that a detailed "statement" is needed. However, statement does not imply detailed analysis. This is not a NEPA EA, but a statutory EA. Some of the quoted sections refer to EIS preparation. Comment noted on no-action alternative, see page 2, paragraph 3.	M&O

7 0 3 8 9 1 9 9 1

8 9	Thus, it can be argued that the scope of the EA should be broader than that proposed by ANL. The law requires more than a fatal flaws approach; rather it requires a broader analysis to additionally provide the decisionmaker with an understanding of whether any significant impacts to the environment and public health are probable construction and operation of the MRS at the proposed site.	See response to Comment 88.	M&O

7 0 3 8 9 1 9 9 2

90	With respect to ANL's approach as to the extent of public participation to be provided in the EA process, it may not be the best approach to plan on only two public scoping hearings, one near the site and one in the State capital (ANL, p. 3). Certainly such hearings may lengthen the time it would take to complete the EA. However, the provision for hearings would not virtually double the time for EA completion as ANL suggests (ANL, Fig. 1). Even 3-5 hearings could be held, all within the same week, and not cause any real problems in completing the EA on time. Additionally, the EA might be more resistant to litigation if a thorough public hearing process was held. the EA will most certainly be litigated for its adequacy under NWPAA and NEPA. A focus of the litigation may be directed toward why DOE did not evaluate x, y, or z storage alternative. NEPA lawsuits that result in a court injunction stopping a federal agency's program in its tracks often result from the agency's failure to evaluate what a court considers to be a "reasonable" alternative.	Please note Figure 1. Options contain reviews beyond that for the hearing. Hearings will add comment response and further reviews to the EA process. The document will not be litigated under NEPA, the EA is a statutory document. A volunteer site could reduce litigation potential. In addition, if anything is litigated it would likely be the EIS, rather than the EA.	M&O

7 0 3 8 9 1 9 9 3

9 1	Public hearings on the draft EA will provide DOE an opportunity to see what other alternatives are proposed by the public that a court might find reasonable so that DOE can adjust their final EA as appropriate. Providing the public an opportunity to comment on a draft EA will make it very difficult for MRS opponents to succeed in a NEPA lawsuit by raising alternatives that were not forcefully presented during the public participation process. Vermont Yankee Nuclear Power Corp. v. NRDC (U.S. Supreme Court), 435 U.S. 519 (1978). Further, DOE has set a precedent for public hearings on draft OCRWM EAs as in case of respositories.	Comment noted. Comment refers to NEPA and an EIS. As further precedent, the hearings on the draft EA for the repository added 1.5 years to the schedule.	M&O
9 2	The objective of the MRS EA process is to first define what is legally required and best to withstand legal challenge, because a court imposed injunction would be devastating to the program. Once parties agree on this approach, an EA implementation plan should be prepared if the appropriate management attention are resources and provided and we begin now, even without a site.	Comment noted. An implementation plan is not required for the EA.	M&O

7 0 3 3 9 1 9 9 4

93	This is not an "issue paper" as is implied by its title. An issues paper presents various options, analyzes pros and cons of each option, and suggests a preferred option. This paper seems to lay out the requirements for EA scoping. Perhaps it is more appropriate to label it "The Monitored Retrievable Storage Facility: Requirements for the Environmental Assessment Process."	Comment noted. No change made. Issue paper not in the title. See third sentence of comment; we are in agreement. This paper looks at options of EA process and makes a recommendation on an expedited schedule.	M&O
94	In accordance with comment #1 (93), the heading for Section 2.1 should be changed to read "Requirements for External Review." This change would also make the heading and content of Section 2.1 more consistent with that of 2.2.	Comment noted. No change made. Participation is defined as review and comment. (Paragraph 2 of Section 2.1)	M&O

7 0 3 3 9 1 9 9 5

95	The entire Section 2.1 show a lack of understanding of the public participation process as it relates to an EIS. •It is not clear what is meant by "discretionary" public participation. The entire NWPA, not just those sections referring to the EA, point to heavy public participation throughout the siting process. •It is not clear what is meant by "open comment" on the draft EA. We presume that this refers to public comment, rather than just the comment of State officials required under SEN-15-90. •Past experience does not indicate that "two public hearings are sufficient, one in the vicinity of the site and one in the state capital." Far more than two public hearings were held during the siting process for the first repository and on the draft area recommendation report for the second repository; in addition, public meetings were held approximately thirty days before each of these hearings. There were numerous, not limited interactions on the EA's.	Section 2.1 has been revised. Discretionary means at the discretion of the department. NWPA does not require further public participation after the initial hearings. The negotiator, not DOE, could be responsible for other levels of public participation. "Public" inserted before "comment" for clarification. "Past experience" deleted. There are no requirements as to how many hearings are required. See response to Comment 91.	RW-421

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95(cont'd.)	•The statement that public comment will "possibly interfere with the negotiation process" is rather absurd. A negotiated agreement is one which will reflect the interests and concerns of the public. Furthermore, this statement is contradictory to statements by Admiral Watkins and John Bartlett of the need for the need for building public confidence.	Paragraph revised.	RW-421
	•How can it be said that public comment on the draft EA will meet "an as yet defined public outreach objective," or the public comment on the draft EA "will not add significant value to the final document"? As above, this statement is contradictory to the policies of the Secretary and the OCRWM Director.	Paragraph revised.	

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96	Section 2.3, "Analytical and Data Requirements," refers to site-specific analyses" beginning when the Negotiator requests that the Secretary prepare an EA. This statement is misleading, as "site-specific analyses" might imply ground-disturbing activities. The NWPAA mandates that "In preparing an environmental assessment. . .the Secretary shall use available geophysical, geologic, geochemical and hydrologic, and other information and shall not conduct any preliminary borings or excavations at any site that is the subject of such assessment. . ." We recommend changing the wording in this paragraph, even though the point is clarified somewhat in the following paragraph. Section 2.3 also states in the last paragraph that "Considerable time and effort could be saved if the EA would address only these siting requirements and considerations." Are we talking about the "Preliminary Draft Site Requirements and Considerations" prepared by OCRWM? The previous paragraph likewise refers to "site considerations." If we mean the considerations developed by OCRWM, in reality, only the site requirements eliminate fatal flaws. This section needs to be clarified, so its intent is clear.	Change made. 10 CFR Part 72 added to Section 2.3 for clarification.	RW-421

7 0 3 3 9 1 9 9 8

97	The use of the word "discretionary" appears again in Part 3, entitled "Tasks for Environmental Assessment Preparation." One can assume from this section that the concepts of public participation and public involvement laid out the the OCRWM Credo and SEN-15-90 are "discretionary," and do not necessarily require strict adherence to these principles. This is not the case.	The word "discretionary" does not imply that the public participation program will not be implemented but rather that the extent of involvement can be decided upon by the Department. When we state that an item is "discretionary" this means that there is no requirement (DOE, legal or external) for the stated activity.	RW-421
98	Section 3.1.2, entitled "Public Hearings," again shows a misunderstanding of the public participation process. As indicated above, there were more than two public hearings per State in the past. The first paragraph also states that "no additional hearings be planned either in the state or inadjacent states so that the process will remain manageable." Is it not realized that public outrage at not being able to participate in the process, may actually make the process more unmanageable. We would suggest that public hearings for the EA be held one month after public notification of such hearings, not 15 days or, alternatively, that informal notice be provided within the community before the notice is published.	Since public participation will occur throughout the negotiated siting process, we believe that two public hearings are sufficient. See response to Comment 91. Past OCRWM experience need not be used as a guideline. A sentence has been inserted to replace previous wording; it states that additional hearings will be held if necessary. Comment noted. This will be determined at the appropriate time.	RW-421

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99	Part 4, "Process for Preparation of the MRS Environmental Assessment." While this part correctly states that "The public will be allowed to provide input to the process soon after the site is proposed and again throughout the EIS preparation," the basic point seems to be missed that one of the main purposes of getting public involvement during the development of the EA is to build public confidence before a decision is reached, and a proposal is submitted to Congress.	Public involvement will occur in both options during the negotiated siting process. Public confidence will be built during this process.	RW-421
100	The paper recommends a comment response document under Option 1. Although we feel strongly about the need for a public hearing on the draft EA, we do not feel that a comment response document is necessary. Eliminating such a document would save considerable time in the schedule.	The comment response document will be prepared in parallel to the Draft EA revision. The amount of time specified is essential to complete Draft EA revisions.	RW-421

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101	In conclusion, there are several points we wish to make: This paper should focus on the requirements for an EA, and how these requirements might affect the schedule. The process for involving the public will be determined by the MRS institutional and siting program, and should not be dealt with in depth in developing two different types of EA Outreach Plans, and the M&O further has the assignment of developing a broad community Relations Outreach Plan for all siting interactions which include, only in part, the EA.	Comment noted.	RW-421

7 0 3 8 9 2 0 0 1