

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

To: Kane, NMSS
Appropriate Action

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ACTION OFFICE: EDO

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DEDMRS
DEDR
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AO

AUTHOR: GLENN BELL

AFFILIATION: MD

ADDRESSEE: RICHARD MESERVE

SUBJECT: RECYCLING OF CONTAMINATED NICKEL FOR USE IN CONSUMER PRODUCTS

ACTION: Appropriate

DISTRIBUTION: CHAIRMAN, COMR, SECY/RAS

LETTER DATE: 06/12/2000

ACKNOWLEDGED No

SPECIAL HANDLING: OCM #3024

NOTES:

FILE LOCATION: ADAMS

DATE DUE:

DATE SIGNED:

June 12, 2000
Mr. Richard Meserve, Chairman, NRC
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. Meserve:

The information provided is for your information. I am deeply concerned that the present moratorium on the recycling of contaminated nickel from the former K-25 Plant in Oak Ridge, and other similar processes may be rescinded. I do not believe this is in the best interest of the public, for the reasons stated in the enclosed documents. I would appreciate your support of a permanent ban, which would eliminate the chance for error and possible ill health effects for an unsuspecting public.

Thank you for any consideration your office may give this issue.

Regards,

Glenn Bell
504 Michigan Ave.
Oak Ridge, TN 37830

Cc: Senator Fred Thompson
Senator Bill Frist
Congressman Ed Bryant
Congressman Bart Gordon
Congressman Van Hilleary
Congressman John Duncan, Jr.
Mr. Richard Meserve, Chairman NRC

June 10, 2000
The Honorable William B. Richardson
Office of the Secretary of Energy
Forrestal Building
1000 Independence Ave.
Washington, DC 20585

Honorable Secretary,

I want to take this opportunity to personally thank you for the work you and your office have done for those of us affected by the legacy and ongoing contamination issues at the Department of Energy sites. The compensation bill presently before Congress could never have become a reality without your willingness to admit the sins of the past, and offer equitable resolution for those of us who became victims. Much work remains, but perhaps more than a small amount of trust has been restored. By working together, and listening to each other, a bond has been formed where none existed before. My sincerest thanks to you, your staff, and to Dr. Michaels and his tireless staff, also.

I would also take this opportunity to reaffirm my support for your moratorium on the volumetrically contaminated nickel from the former K-25 site in Oak Ridge. At present there are those who feel the science is sufficient, and controls ample, to assure no danger to the public. I am still not convinced of this. We have made too much progress in the correction of past policies of production, profit, and public image over worker and resident health to repeat the mistakes in the future. I do not want my children's generation to fight a battle over nickel contamination, the way we have had to fight for better controls with beryllium and other toxins. Mistakes will certainly happen, we should not take the risk because of concern over jobs and property values. I urge you to continue your stand against the recycling proposal.

Regards,

Glenn Bell
Beryllium Victims Alliance
504 Michigan Ave.
Oak Ridge, TN 37830

June 12, 2000
Congressman Zach Wamp
423 Cannon Office Building
United States House of Representatives
Washington, DC 20515

Dear Congressman Wamp:

I recently read your comments regarding the nickel recycling from the former K-25 site, and feel compelled to comment on this issue. When the recycling was being considered, I submitted a letter to the Nuclear Regulatory Commission, stating my reasons why I felt the plan was not a sound one. A copy is included for your convenience. Far too many mistakes have been made in the past, and far too often public image and property values have been put ahead of health and safety of the citizens. This should not be allowed to continue to satisfy the profits of corporations, however powerful their local or national presence.

I have triple stakes in this issue, as I am an Oak Ridge resident and property owner, an employed worker at the Y-12 Plant, and a victim of that work, as a result of Chronic Beryllium Disease. I do not wish Oak Ridge to have a "Three Mile Island" stigma, but neither do I want the facts concealed that there are problems here that must be addressed. A balance must be struck, wherein the legacy health problems are dealt with, while maintaining a credibility that the community cares for its own. This does not demand an either/or solution. With openness, and a building of trust between the ill residents and workers and the general population of the area, we can show others the benefit of addressing our differences, and reaching solutions which benefit all.

The affected workers appreciate your support of the compensation legislation now under consideration. We trust that you will continue to champion the "best" version of this legislation. We also look to your office to carefully consider the consequences of the nickel recycling, should things go wrong.

Glenn Bell
504 Michigan Ave.
Oak Ridge, TN 37830

November 24, 1999
Mr. Richard Meserve, NRC Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn.: Rulemaking and Adjudications Staff

Dear Chairman Meserve and Staff:

I am writing to comment on the Nuclear Regulatory Commission's intent to approve historically contaminated nuclear and legacy waste for release in recycling. I find this concept unacceptable, based on past mistakes, incompetency, and the growing revelation that rad contamination, at any level, can be hazardous to human health. Murphy's Law- "If something can go wrong, it will"- is especially true in the rad arena.

For background, I am a 51-year old machinist at Oak Ridge's Y-12 Plant, where I have been employed since 1968. I was diagnosed with Chronic Beryllium Disease in 1993, after several years' misdiagnosis as asthma. My symptoms range from mild to quite severe. Since being diagnosed, I have immersed myself in educating myself in the historical blunders of DOE/DOD throughout the 50 years of nuclear development. In the last few years, I have attended several DOE and local health conferences, as an affected employee, and the relationship has resulted in much better communication for both sides. But much more work needs to be done.

I would cite several examples as reasons for my opposition to recycling the contaminated metals. Locally, there are two former salvage yards, the DuPont Smith yard in Oak Ridge, and the David Witherspoon yard in nearby Knoxville. Both acquired salvage materials from Oak Ridge Operations, both were later found to have contaminated equipment.

Last year, a large piece of equipment, I believe a vertical turret lathe, was purchased at auction from ETTP (the former K-25 site), and was found to have internal contamination, despite being "green-tagged" for public release.

About two years ago, barrels of rad waste, destined for out-of-state shipment to a proper disposal site, were found to have been misdirected to Y-12's burial grounds.

The well-publicized destruction of documents at INEEL and other sites (including Y-12) make verification impossible.

The acknowledgement of plutonium at Paducah, the cancer clusters around

Brookhaven Lab, and the almost unbelievable contamination releases from Hanford solidify the assertion that we haven't done a very good job of containment to date, even at the site level. Heaven help us if we release these materials to the unsuspecting public. This is not the proper approach to population control.

I would call on the NRC to extend its comment period on this action at least a year, as more facts such as these examples are surfacing almost weekly. The workers at these sites are your most valuable resource. I beg you to use them in any final decision.

Regards,

**Glenn Bell
Beryllium Victims Alliance
504 Michigan Ave.
Oak Ridge, TN 37830
865-482-7641
Wheezin2@aol.com**

April 19, 2000
Congressman Zach Wamp
423 Cannon Office Building
United States House of Representatives
Washington, DC 20515

Dear Congressman Wamp:

I was pleased to see in today's Knoxville paper that you have joined the growing ranks of legislators who have pledged strong support for the ill workers and residents of Oak Ridge, and other sites affected by the legacy contamination and illnesses resulting from the DOE /AEC operations. Your office was approached in 1996 by a group of Chronic Beryllium Disease victims, including myself, asking for assistance similar to what is under consideration now. At that time, the magnitude of the health problems was possibly not recognized, but through DOE's public meetings and national publicity from almost every site, the true scope of the problem is becoming apparent. I am pleased that your support has come our way, and pray that you will join your colleagues who are insisting reasonable compensation and health coverage, not just a band-aid fix to the problems.

I want to emphasize a couple of issues I feel are of importance to the resolution of these admittedly difficult problems. One is the very strong probability that community, as well as worker, populations, have been affected by these plant operations. Toxins and radionuclides know no boundaries, as was seen in the massive mercury releases of the 80's. The same is likely for other toxins, such as Iodine-131 and UF-6, and suspect illnesses in the communities should not be ignored.

There is also the very real fear of reprisal of workers speaking out on issues of health and safety. The "zero tolerance for reprisal" is still not a reality, although some are willing to risk career suicide to 'do the right thing'. This attitude has to change if the true nature of the safety of the plants is realized.

The comment was made in today's paper alluding to the assumption that everything is done in a safe and proper manner in today's environment. The fatalities at ETTP and Idaho Falls, the NaK explosion at Y-12, DNFSB stand downs, violations of conduct of operations in Y-12's beryllium area, almost daily reports of "incidental" contamination of employees in both primary and sub-contractor ranks, shows the problems are perhaps not yet under control. We need to all work together to insure that the new generation of workers do not have this discussion twenty years from now.

Again, I am glad to welcome you to the list of those who are trying to reach a reasonable restitution of past mistakes, and build a protection for future generations. Everything works better when we communicate, and work together.

Glenn Bell, Y-12 Machinist and CBD Victim
504 Michigan Ave.

Oak Ridge, TN 37830

<< Subj: Diffusion-exposure during converter teardowns.

Date: 04/28/2000 3:53:48 PM Eastern Daylight Time

From: TILISOJD@apci.com (TILSON, JOHN D.)

To: dm4stand@am.net ('dm4stand@am.net'), webmaster@beryllium.org, CHE-OAKRIDGE@onelist.com, markkris@earthlink.net, fmarler@usit.net, downwinders@onelist.com, pmaser@govmail.state.nv.us, bimie@gci-net.com, theresan@psc.lsa.umich.edu, burlin@icx.net, Fostergs@usit.net, ESTHERSHU@aol.com, Magnu96196@aol.com, Xminesupt@aol.com, larryes@uswest.net, lawsondw@bellsouth.net, hillboy@icx.net, Jmac23a@aol.com, Wheezin2@aol.com

CC: LFrank@tennessean.com, TNJAG23@aol.com, twig1@knoxnews.infi.net, lbrass@oakridger.com, samroe@theblade.com, skolnick@newstrench.com, sschwartz@bullatomsci.org, malonej@sunsix.infi.net, peisler@usatoday.com, mcalliso@cdi.org, Senator_Thompson@thompson.senate.gov, Libby_Wood@thompson.senate.gov, Senator_Frist@frist.senate.gov, caldwell@tennesseeweb.com, Harmanos@mail.house.gov, Bart.Gordon@mail.house.gov

One of my projects at the PGDP included looking at the program where the used diffusion material was processed at the PGDP (as part of the rebuild that occurred at all three diffusion plants). After initial disassembly and partial decontamination the guts of the system were processed to reduce their volume. One somewhat common thread between three diffusion plants was the cutting and hammermill operations that resulted in chipped material that could be stored in drums and shipped to the smelting unit at the PGDP. I thought this information was important to give to former workers because of the incredibly nasty nature of the residual material or "cosmic dust" that was known to reside in this used equipment (there are reports from the early 60's that detail how much Trans. was in it).

The use of multiblade chain saw units on old converter guts was one of the classic stories told to me by former workers. I doubt that workers had access to the analytical data on the material that they were processing, but I did, and I would be curious to know what levels exposure these workers had.

When you team material with this level of contamination with the mode of disassembly, decontamination, and cutting operations used on the entire contents of three diffusion plants you invariably have plenty of room for significant human exposure and release to the environment. (the drawings that I have that detail the flow of rad. through and out of the plant during the rebuild are actually very well drawn and tell an interesting tale)

There are declassified prints that detail some of these operations and I believe I can still supply the numbers if anyone wants to check them out. I particularly like the ones that detail the spray booth/converter washer in the C-409 building... If you get the right drawing you will see that one of the drain valves is labeled essentially "to C-400 dissolver system" and the other is "to Little Bayou Creek".....all worked "fine" when the highly contaminated wash water was sent to the dissolver system and the lightly contaminated rinse water went to the ditch for off site drainage.... you guessed it....things didn't look so good when workers mixed it up and sent contaminated acid wash water straight to the ditch....management guessed something was up and had someone put a pH probe in the ditch so they could record when it would drop to around 3am each night....I still have copies of part the internal investigation into this little screw up....do you think the regulators were ever told???

another case of

Casey Jones and the Mexicali Blues...

John

Nickel Ingots—Signs of Transuranics in Oak Ridge and Portsmouth Diffusion Systems

During the rebuild of the three US gaseous diffusion plants scrap materials were sent to the PGDP for final processing (melting) and storage. Prior to the melting of this material, studies were conducted to determine the approximate amount of contaminants contained in the scrap material. Small scale melting programs were used to determine the best mode of melting down metals and determine the fate of any residual contamination. It was found that residual transuranics, technetium, and uranium were present in all of the Paducah scrap nickel. Technetium is directly tied to the presence of transuranics because they both come from the same source, the reprocessing of fuel rods. Analysis of the samples taken during the test melts revealed that uranium and transuranics were removed from the molten metal and were essentially not present in the ingots formed from the melt, these materials were concentrated in the slag. However, the technetium made it through the melting process and was present in the ingot (this is important because it acts as a indication spike for contaminants present in the raw material that was melted).

During the major melting phase used to process the scrap metal of all three plants, ingots from each plant were sampled and tested for uranium and technetium level. These tests revealed that ingots cast from Portsmouth and Oak Ridge scrap nickel did contain technetium and would therefore un-melted scrap would have contained transuranics. Though the level of transuranic material in the scrap metal is low by most standards it should in no way imply that the levels encountered during scrapping activities was low. The worst exposure to diffusion equipment related transuranics was tied closely to material referenced by a PGDP term of art, "cosmic dust". This grayish powder was encountered during rebuild of compressors and converters. Early internal documents indicate that there was much concern with very high levels of radiation emitted by this material. Prior to the rebuild there were several documents written based on sampling and analysis conducted on the dust. Though most of these reports are classified (for no apparent reason) they essentially reveal that this stuff was very highly contaminated with transuranics.

I have reviewed many of the documents written on this material, internal lab books used to record information on test melting programs, and headed a small project to accumulate available data on the ingots. Though I didn't find any data on raw nickel from Ports. or Oak Ridge I did review the ingot data which indicated that transuranics would have been present in both systems and probably was concentrated in the same manner as the PGDP. Workers that conducted disassembly/decontamination/shredding work on the converters, piping and compressors would have received the most significant exposure during the rebuild. Research on the effluent/treatment of cleaning solutions from decontamination processes would have been highly contaminated and if not handled properly, would have resulted in significant environmental exposure.

Documents reviewed to address this issue (there might be some small problems with the internal document numbers as it has been years since I reviewed them).

PGDP Lab Logbook PA-452
PGDP Lab Logbook PA-493
PGDP Lab Logbook PA-514
PGDP Lab Logbook PA-565

Internal presentation titled "Melting of Contaminated Nickel Scrap"—Pulley
Nickel Smelter Data List, Final—Tillson
KY 701
KY/D 4085
KY/L 893
K/WIC 700002
KY/L 861

(From John Tillson, PGDP)

<< Subj: Re: [downwinders] Fwd: Steel workers position on radioactive waste in steel
Date: 6/12/00 4:46:15 PM Eastern Daylight Time
From: gwingard@earthlink.net (Greg Wingard)
Reply-to: downwinders@egroups.com
To: downwinders@egroups.com

To the list:

Though this might be of interest.

Greg

From: "Perquin, John" <jperquin@uswa.org>
To: "gwingard@earthlink.net" <gwingard@earthlink.net>
Cc: "Foster -11, Dave" <dfoster@uswa.org>, "Wright, Mike" <mwright@uswa.org>
Subject: RE: Radioactive Waste position
Date: Mon, 12 Jun 2000 07:50:33 -0400
MIME-Version: 1.0

Greg: Thank you for comment. We appreciate your support for our position.

"If you poison your boss a little each day it's called murder; if your boss poisons you a little each day its called Threshold Limit Value." James P. Keough, M.D.

John Perquin
Assistant Director - Health, Safety & Environment Dept
United Steelworkers of America
Five Gateway Center, Rm. 902
Pittsburgh, PA 15222
412-562-2582
412-562-2584 (Fax)
jperquin@uswa.org
<http://www.uswa.org>

> —Original Message—

> From: Webmaster
> Sent: Thursday, June 08, 2000 10:48 AM
> To: Safety Dept Mail Box
> Cc: Gerard, Leo; Foster -11, Dave
> Subject: FW: Radioactive Waste position

> Feedback sent to USWA Home Page

> ++++++

> —Original Message—

> From: caster@uswa.org [mailto:caster@uswa.org]
> Sent: Wednesday, June 07, 2000 5:43 PM
> To: webmaster@uswa.org
> Subject: Radioactive Waste position

> *****

> *****

> Name: Greg Wingard
> Address: PO Box 4051
> CityState: Seattle, WA 98104-0051
> email: gwingard@earthlink.net
> Phone:
> Fax:
> Local:
> Date: 6/7/00
> Time: 5:42:56 PM
> Remote Name: 63.39.51.92
> Remote User:
> HTTP User Agent: Mozilla/4.51 (Macintosh; I; PPC)

>
> Comments:
>
> Just wanted to say thanks for your position on keeping radioactive waste
> out of our nations metal supply.
>
> Regards,
>
> Greg Wingard

>>