

Please provide a copy to Mr. Scaletti,
Decommissioning Section, NRR.



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Chief,
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US NRC,
Washington, D.C. 20555-0001

July 12th.2000

Re: Comments on the supplement to the Final Generic Environmental
Impact Statement of Nuclear Facilities NUREG-0586
on Decommissioning of Nuclear Facilities.

65 FR 34741
May 31, 2000
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To say that something radioactive can be "decommissioned" is misleading. It gives the impression it can be rendered harmless and done away with, when that is a lie. A given radioactive contaminant must decay back to its natural stable state which can take from seconds to millions of years and during that process other radioactive contaminants can be created from the original "parent", with its own set of decay problems. Nothing can be done to something radioactive- burn it and it just goes out the stack (or, depending, also contaminates the fly ash which may be either landfilled to contaminate the landfill and groundwater, or it may be incorporated into bricks, or cement or even, insanely, added to fertilizer if the contaminant winds up in sludges to pollute the food chain) - dilution does nothing but spread it around - recycling contaminates whatever it is recycled into- alter it chemically and it's still the radioactive blob from hell - you can't even neutralize it. If we knew how to render something radioactive safe and harmless, there would be no "waste problem", no desperate search that has gone on decades for a solution. There is NO solution. NRC and DOE know this. What remains is trying to isolate this deadly garbage for eternity, somewhere, somehow, and "cleaning up" a site by removing the mess to whatever depth and breadth is needed so there is barely a peep out of any radiation monitor, and taking it all to that "Somewhere" that doesn't exist. The title should be changed, ~~to~~ "Supplement to the Final Generic Environmental Impact Statement of Nuclear Facilities on Decommissioning of Nuclear Facilities" or "Draft Supplement to the Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities"; or whatever NRC is calling it in its "Information Sheet" I was sent wherein the title keeps changing, just does not fit the issue at all. NRC needs a more truthful title that states what it is really about. I suggest: "What the hell are we going to do environmentally about all the radioactive blobs from hell out there decaying away for all eternity? Good question. Herewith a Draft Supplement to the original Doozy, maybe there's something in it with a good beat we can dance to. What do you think?" Comments due by blah-blah-blah. Here are a few things I think should go in the supplement to the original Doozy. NRC can tap dance around them and so can industry.

No site should ever be returned for public or private use. NRC should retain oversight in perpetuity. Licensees should cough up a \$100 Million dollar advance in cash, treasury bonds and other securities to guarantee this oversight by NRC (or/and any successor agency) to cover the oversight, environmental monitoring, repairs, cleanups, maintaining a number of onsite staff, and similar.

A written, detailed description of the facility and what occurred there, how dangerous it is, why it should remain off limits, what problems can occur in the future to watch out for, reasons environmental monitoring must continue, health hazards from the facility, and a list of every

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mechanical, technical and structural problem, violation, non-cited violation and inspection report, PNO and LER since construction began and initial testing and startup, should be provided to those who will staff the site, and those with oversight, to be passed on to each generation and added to as things happen, to create a history that can be referred back to. It should also include site specific AND area geology, hydrology and meteorology going back as far as records exist. Much of the aforementioned can be found in the Docket for the facility,

This document should be provided to every contractor to READ before planning any remedial action, site assessment etc. (emergency situations would obviously involve acting before reading !) Any contractor should : a) be fully qualified to work around nuclear materials and have B) a good, proven track record and should not be allowed to subcontract the work to others. The same applies to site assessors, and others involved. This is so unqualified people are not hired to save money. Perpetual site staff should include a radiological health physicist with a medical background, a biologist with experience in radiation, a nuclear engineer, and someone qualified in the earth/environmental sciences. This would be a sort of Nuclear Environmental Guardianship program. The pay should be high and those hired should preferably be past the age when they desire children (due to the genetic damage they get). The hazards should be made clear- the protective clothing should be the best. This program should be promoted worldwide so other nations see the dangers of nuclear materials and the importance of trying to safeguard the horrendous messes resulting from the age of nuclear greed and stupidity.

No matter how "low" the contamination, onsite groundwater should be pumped, run through resin beds, sand filters and charcoal filters to remove as much particulate etc. as possible. All site runoff should be channelled to COVERED detention ponds equipped with filters to catch radioactive particulates and non-radioactive contaminants and heavy metals, oil and so on, (rather than just letting it runoff as is the case) prior to release. All public and private wells in a five mile radius should be tested. If ANY radioactive, or other, contaminants show up 1) the plume should be traced and blocked, 2) well sediment should be removed and the casing if contaminated, the well pumped and filtered prior to installation of a new well 3) an alternative water supply should be provided. All these costs should be paid for by the company and parent company, not ratepayers or taxpayers - they've been soaked enough already by the nuclear boys. All plumes must be traced, blocked, pumped and filtered. Contaminated soils removed. Inject impermeable lines below the deepest contamination across the entire site. Chanel infiltration as under site runoff above. Cover entire site with heavy mesh netting on posts to prevent migratory birds and other airborne species (large butterflies, grasshoppers) from landing on site. Replace as needed. Sterilize all wildlife on site and keep them contained there to die off naturally so they can't pass their damaged genes on. In adjacent rivers or lakes which receive discharges, use removable steel temporary barricades, like wiers, channel the water around them by basically creating a "box", dredge out contaminated sediment for at least two miles.

Construct proper containment domes over all spent fuel pools, reactors that don't have domes (e.g. BWR's) and over all sites that have spent fuel casks sitting outdoors (what idiot thought that idea up ?) with roof filter systems. To cool the interiors, power cooling systems with solar AND wind systems (they ~~don't~~ need little maintainance and don't require fossil fuels. Re-enforce spent fuel pools above, below, and the sides with extra liners and a few feet of cement and a steel outer shell. Add an extra one million gallon water storage tank as back-up water to cool the fuel in case of water shortages etc.

Create additional "exclusion zones" past the site boundary and

fence them. Mark all land deeds at county and state courthouses that the land is radioactive WASTE LAND (this is done also for highly contaminated non-radioactive sites by property owners), and it must never be used for habitation or any other purpose whatsoever in perpetuity.

Nothing from the site should be recycled or re-used nor dumped in landfills (all landfills ultimately leak and contaminate groundwater), applied as sludges, incinerated, It should be entombed, above-ground (for monitoring and replacement) on site. There is nowhere to put it anyway. Should some facility become available years from now, it can then be taken there.

As the estimated costs for a minor cask accident involving only one spent fuel assembly has been calculated at \$12 million, that figure should be multiplied by the amount of spent fuel assemblies stored in casks on site and the total amount should be paid in advance by the parent company of the licensee into an account that bears interest that NRC would hold in escrow in case of accident, with the GAO (or any successor) to have oversight. Half the interest should be paid out yearly to the State in which the facility sits for the express and sole purpose of upgrading its emergency management for nuclear accident and materials purchase to have at the ready. A borated ~~skxxxxx~~ water storage tank that will be at PWR sites has an estimated accident cost, should it rupture and cleanup be needed, of \$110 Million. That sum should also be paid in CASH up front for investment of half of it in treasury bonds which can be re-invested upon maturity. NRC can figure out with FEMA how best to apply the other half.

After defueling of reactors and draining of all radioactive liquids the reactors should be entombed under the containment dome, in cement lead, steel and more cement. It is ridiculous to expose workers by having them cut up the radioactive hulk.

All offsite doses from the facility SHOULD BE KEPT TO BELOW THE MEDICAL DOSE ALLOWED BY A PHYSICIAN WHO SPECIALIZES IN RADIATION EFFECTS/DAMAGE TO THE DEVELOPING FETUS IN THE WOMB, AND NOT TO NRC OR DOE'S LOUSY STANDARDS. WHAT SUCH A PHYSICIAN WOULD ALLOW, BASED ON THE LATEST KNOWLEDGE OF THE TERRIBLE EFFECTS OF LOW LEVELS OF RADIATION. A PHYSICIAN WITH EXPERTISE IN GENETICS AND EMBRYOLOGY AND MATERNAL AND INFANT MEDICINE. ONSITE DOSES SHOULD BE BASED ON WHAT SUCH A PHYSICIAN WOULD ALLOW TO A CHILD UNDER AGE SIX IN ORDER TO PROTECT THE WORKERS something neither NRC or DOE has never done

NRC's idea of protection to date has been to ~~regurgitate~~ regurgitate the phrase "protect health and safety" of the public ad nauseum, and toss in "common defense and security". Had NRC actually meant it would protect the health and safety of the public it would have shutdown every licensee the day NRC was created. The least NRC can do is try and do a better job of trying to protect all future generations better.

All other nuclear facilities under NRC license should be similarly required to take the aforementioned measures, but adapted to their facility.

What I have stated in this letter, would also increase safety if there are earthquakes or tornadoes or hurricanes. Many sites are in zones vulnerable to one of those three, some are vulnerable to all.

No decommissioning costs should be charged to ratepayers or taxpayers. Surcharges made to date on utility bills should be returned.

Offsite emergency plans should still be required forever. It is outrageous that NRC does not intend to require them, though ISFSI's and spent fuel pools would still be on site.

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