



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE DIRECTOR

P.O. Box 176 Jefferson City, MO 65102-0176

JUL 23 2001

Mr. James E. Dyer, Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

RE: Westinghouse Electric Company, C-E Nuclear Power LLC
Hematite Fuel Operations, CENP License No. SNM-33

Dear Mr. Dyer:

I am writing regarding contamination, cleanup, and decommissioning at the Westinghouse C-E Nuclear Power LLC Hematite Fuel Operations in Jefferson County, Missouri. On May 3, 2000, I submitted formal comments to the Nuclear Regulatory Commission on the pending license transfer of this facility to British Nuclear Fuel. My concerns over contamination at the site and the need for sufficient cleanup are even more pressing given intentions to decommission the facility. Radioactive and chemical contamination in the soil and shallow groundwater exists at the site as a result of past disposal practices. It is likely that contamination associated with the current processing operation also exists.

The *Hydrogeologic Investigation and Groundwater, Soil and Stream Characterization* for the site identifies soil and groundwater contamination by Uranium (U-235), Technicium-99 (Tc-99) and Trichloroethene. The half-life of the radionuclides ranges from 211,100 to 703.8 million years. A copy of our comments on that report are enclosed.

Our agency is working with the United States Environmental Protection Agency to assess the site for inclusion on the Superfund National Priority List. It is my understanding that the plant shutdown will follow the decontamination/decommissioning process prescribed by the Nuclear Regulatory Commission. To aid in our assessment and to coordinate cleanup efforts, I ask you to provide the department copies of all correspondence pertaining to the closure of this facility.

Your support in coordinating the closure and cleanup of the site with our department will ensure a comprehensive assessment and full cleanup of the site to protect health and the environment for Missourians. To that end, the following need to be addressed:

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1. Development of a comprehensive human health and ecological risk assessment using existing hydrogeologic data and at least four quarters of groundwater and surface water monitoring.
2. Continued groundwater and surface water monitoring to provide data to develop a scheme for long-term monitoring.
3. Characterization of the site's soil and groundwater conditions around evaporation ponds and other areas identified as contaminated. Although characterization work has been performed around the 40 unlined burial pits, additional work may be necessary.
4. Sampling is needed, on a regular basis, of the public and private drinking water wells near the plant for gross alpha, gross beta and volatile organic contaminants. Sampling should be annually at a minimum.
5. Full assessment of the site's waste including associations with the Nuclear Weapons Complex.

Thank you for your consideration of these issues, which are very important to the state of Missouri. I am confident that we can work together to protect Missouri's citizens and our resources. For further information or to set aside time to discuss this project, please contact Julie Warren at (573) 751-3176.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Stephen Mahfood
Director

SM:bgp

Enclosure

c: Environmental Protection Agency
Combustion Engineering