

RAS 12020

# Official Transcript of Proceedings

## NUCLEAR REGULATORY COMMISSION

Title: U.S. Army, JPG Site  
Limited Appearance Hearing

Docket Number: 40-8838-MLA; ASLBP No.: 00-776-04 MLA

Location: Madison, Indiana

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD PANEL  
LIMITED APPEARANCE HEARING

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In the Matter of:                   :  
U.S. ARMY, JPG SITE                : Docket No.: 40-8838-MLA  
  : ASLBP No.: 00-776-04 MLA

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420 West Main Street  
Madison, Indiana

Tuesday,  
July 18, 2006

PANEL:

- ALAN S. ROSENTHAL, Chairman
- PAUL B. ABRAMSON, Member
- RICHARD F. COLE, Member

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## P R O C E E D I N G S

(6:30 p.m.)

1  
2  
3 CHAIRMAN ROSENTHAL: Good evening ladies  
4 and gentlemen. I am Alan S. Rosenthal. Sitting with  
5 me on my left is Paul B. Abramson, on my right Richard  
6 F. Cole. The three of us are administrative judges of  
7 the United States Nuclear Regulatory Commission and,  
8 as such, are members of an NRC Licensing Board that  
9 has been assigned to conduct a proceeding involving  
10 the United States Army's Jefferson Proving Ground site  
11 located here in Madison. I might add that we are  
12 accompanied by two members of the Board's support  
13 staff, Debra Wolf and Ashley Prange.

14 As many of you might be aware, between  
15 1984 and 1994 the Army conducted on its JPG site  
16 accuracy testing of depleted uranium tank penetration  
17 rounds. Because the employment of radioactive  
18 materials was involved, it was necessary for the Army  
19 to obtain an NRC materials license in order to conduct  
20 this testing. And, once the test activities were  
21 concluded, under NRC regulations the Army became  
22 obligated to furnish the Commission with a plan for  
23 decommissioning the site; in other words, a plan  
24 calling for either removal of the radioactive material  
25 from the site or the institution of alternative

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1 measures that would equally ensure the protection of  
2 the public health and safety.

3 Although the Army first presented such a  
4 site decommissioning plan for NRC approval well over  
5 six years ago, for reasons that I will not dwell upon  
6 this evening neither it nor a revised plan was found  
7 acceptable by the Commission's technical staff. What  
8 is currently before this Licensing Board is, instead,  
9 a proposal by the Army to be given a five year period  
10 in which to come forth with a new decommissioning plan  
11 that would safety Commission requirements. As part of  
12 the proposal, the Army has identified certain programs  
13 that it intends to pursue during the five year period  
14 for the purpose of obtaining sufficient information  
15 regarding site conditions to enable it to formulate an  
16 acceptable decommissioning plan.

17 As permitted by NRC regulations, a local  
18 organization, Save the Valley, Incorporated, has  
19 challenged several aspects of the proposal as being  
20 insufficient to accomplish the ultimate purpose of  
21 providing an acceptable decommissioning plan at the  
22 end of the five-year period. The Board has already  
23 determined that at least one of the challenges meets  
24 the standards imposed by Commission regulations for  
25 consideration at a hearing that will take place here

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1 in Madison at a later date. At a conference to be  
2 held beginning at 9:00 o'clock tomorrow morning in the  
3 Council Chambers of the Madison City Hall, the Board  
4 will discuss with the lawyers for the three parties to  
5 the proceeding, Save the Valley, the Army and the  
6 Commission's technical staff, the question as to  
7 which, if any, of Save the Valley's other challenges  
8 should be included in the hearing. Interested members  
9 of the public may attend tomorrow's conference as  
10 spectators.

11 At the eventual hearing, which likewise  
12 will be open to interested members of the public as  
13 spectators, the parties to the proceeding will be  
14 provided an opportunity to present evidence in support  
15 of or in opposition to each of the challenges to the  
16 proposal that has been determined by the Board  
17 following tomorrow's conference to be worthy of  
18 further consideration. What the Board is conducting  
19 this evening, called in NRC parlance a limited  
20 appearance statement session, is entirely different in  
21 purpose and format.

22 Specifically, pursuant to a notice  
23 published in the Federal Register on June 12,  
24 interested members of the public are being given the  
25 opportunity at this time to present an oral and/or

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1 written statement setting forth their position on  
2 matters of concern relating to the proceeding.  
3 Although not constituting testimony or evidence, these  
4 statements nonetheless might help the Board and/or the  
5 parties in their consideration of the issues presented  
6 in the proceeding.

7 The Federal Register notice invited  
8 persons desirous of making an oral statement this  
9 evening to submit a written request no later than July  
10 7. I am advised that just one such request was  
11 received by the prescribed deadline. That requester  
12 will be heard first, for a period of no more than five  
13 minutes. After his statement has been received, the  
14 Board will entertain oral statements from others in  
15 attendance, each likewise not to exceed five minutes  
16 in length. Although it should be possible to  
17 accommodate all those who wish to provide an oral  
18 statement, in no event will the session go beyond the  
19 8:30 p.m. closing time specified in the Federal  
20 Register notice.

21 I might say in that connection that at  
22 least insofar as the individuals that so far have  
23 indicated a desire to present statements, there's no  
24 danger of the session reaching 8:30.

25 At this point I will ask the first speaker

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1 to come to the table and that is the individual who  
2 registered. Oh, before we get into this matter,  
3 there's -- Judge Abramson has reminded me that I  
4 should take note of the fact that the role of the  
5 Licensing Board and the role of the Commission's  
6 technical staff are quite different. The Commission's  
7 staff is responsible for evaluating the application  
8 and when it gets to a hearing, that hearing is  
9 conducted and a decision is reached by a Licensing  
10 Board which is totally independent of the Commission's  
11 technical staff. The technical staff's role in the ad  
12 judicatory proceeding before a Licensing Board, in  
13 which it is represented by lawyers in the Commission's  
14 General Counsel's Office, is to put forth before the  
15 Board its own position with respect to the particular  
16 matter in adjudication.

17 And that's why when this proceeding gets  
18 to hearing, ultimately, there will be three parties to  
19 it. There will be Save the Valley, presenting its  
20 particular position on the various issues that it has  
21 raised; there will be the Army which will be  
22 presenting its position on those issues; and the third  
23 party will be the Commission's staff which will be  
24 presenting its position based upon its prior  
25 evaluation of the proposal. And these three parties,

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1 as I indicated earlier, will be represented at  
2 tomorrow's conference.

3 One final thing, normally you would be  
4 seeing members of the Licensing Board, as well as the  
5 lawyers appearing before it, in suits, usually dark  
6 suits, with ties --

7 JUDGE ABRAMSON: No robes.

8 CHAIRMAN ROSENTHAL: No robes. The Board  
9 does not employ robes. This evening, as you'll note,  
10 and this will also be true at the conference tomorrow  
11 morning, in view of the excessive heat which seems to  
12 have afflicted Madison as well as the Washington, D.C.  
13 area, we decided to relax the normal uniform  
14 requirements. And that's why you'll be seeing -- you  
15 see the members of the Board in shirtsleeves, without  
16 ties and tomorrow morning's conference you'll see,  
17 presumably, the lawyers participating, as well as the  
18 members of the Board, similarly attired.

19 All right. So we'll now turn to the first  
20 speaker, representing the Hoosier Environmental  
21 Council. So would you come up to the table. If you'd  
22 give us your name. You might spell your last name for  
23 the benefit of our Reporter.

24 MR. WIENEKE: Thank you, Your Honors. My  
25 name is Joel Wieneke. The last name is spelled W-I-E-

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1 N-E-K-E.

2 As you've acknowledged, I'm here today to  
3 speak on behalf of the Hoosier Environmental Council.  
4 To my knowledge the Hoosier Environmental Council has  
5 a -- it's an environmental, non-profit organization of  
6 the state and has members located in Jefferson County  
7 and the two other counties in which portions of the  
8 Jefferson Proving Ground are located.

9 I apologize if I'm not totally prepared.  
10 I have a bar exam in six days.

11 So anyway --

12 JUDGE ABRAMSON: We're empathetic.

13 MR. WIENEKE: The material that I reviewed  
14 in preparing for today, I noticed that there were a  
15 lot of questions that still remain unanswered. As far  
16 as -- especially concerning hydraulic conductivity  
17 between streams, stream flow, the rates of water  
18 infiltration. You have some evidence, at least, to  
19 show that infiltration may be quick. The evidence is  
20 there's low permeability in the soil types over much  
21 of the area.

22 The Army has referred to the dissolution  
23 of depleted uranium which is the, to my understanding,  
24 the remaining source of the reason why we're here  
25 today. And it's the reason why the NRC has

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1 jurisdiction over this. The dissolution rate of  
2 depleted uranium is site specific. There's several  
3 references to what the depletion rate is elsewhere.  
4 However, I'm not convinced that it's ever been  
5 answered what the dissolution rate is at this  
6 particular site.

7 And those two questions, the hydraulic  
8 conductivity, the dissolution rates of the depleted  
9 uranium, are definitely key to any inquiry that's  
10 going to eventually lead to a decision on  
11 decommissioning of the Army's license.

12 Some studies that I've seen show that  
13 dissolution or corrosion rates of depleted uranium  
14 could be as long as 20,000 years. But yet we're  
15 talking about decommissioning in five years of a  
16 project that just ended 12 years ago.

17 I think that keeping that in mind, it's  
18 going to be very difficult to get a true grip on what  
19 the potential effects are going to be in the future  
20 years at this site, in this whole watershed, through -  
21 - wherever the ground water ends up. I assume that a  
22 large portion of this ground water ends up in the Ohio  
23 River which flows then on into the Mississippi. I  
24 can't speak as far as what the actual effect will be  
25 on those bodies of water or international waters in

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1 general, because I don't have that expertise.

2 But you will be presented, hopefully, in  
3 your pursuit of this matter, evidence in regards to  
4 that. And I encourage you to consider both the  
5 information presented by the Army and by Save the  
6 Valley and take it very seriously, as I know that you  
7 will. And keep in mind there are a lot of questions  
8 that remain unanswered.

9 One thing that I do remember from  
10 reviewing the Army's responses to requested  
11 information from the Board, in regards to deer samples  
12 and tissue samples taken from those deers. In 1993 to  
13 my recollection, five deers were sampled and yet the  
14 testers weren't even sure if they were sampling the  
15 kidney tissue of those deers or not. The organs were  
16 assumed to be the kidneys. Well, that leaves a lot of  
17 questions out there. Especially when we're saying  
18 that the remaining buildup of depleted uranium is  
19 going to be in the kidneys of those samples. And  
20 there was only one deer that was tested in 1994. That  
21 doesn't seem to be a very good sample set of the  
22 population there.

23 And in fact, of all the deers that were  
24 taken throughout the year, there is no evidence of  
25 where those samples were harvested from. We don't

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1 know if they were harvested from inside the DU area,  
2 we don't know if these were animals that may have  
3 occasionally visited there. We don't know if these  
4 animals never even visited there at all.

5 So I would ask that -- I don't know what  
6 the Army's study currently entails, but definitely ask  
7 for more complete and more rigorous tissue samples  
8 from deer populations and a consideration of other  
9 indicators species.

10 There was a request for information on the  
11 condition of the monitoring wells because there was  
12 evidence showing that they had -- were growing  
13 vegetation, they weren't all locked. I believe the  
14 Army replied and stated that they had been locked and  
15 I assume the vegetation removed. I don't really know  
16 what the effects of that would be on the current  
17 samples taken. However, that's definitely a concern.  
18 These monitoring wells should be continuously assured  
19 that they are going to be kept in a locked condition  
20 and other things like that.

21 For all these reasons and for the reasons  
22 that there's several outlying questions that still  
23 have yet to be answered by the Army, I appreciate the  
24 fact that a study is being conducted currently but I  
25 request that the Board not look towards

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1 decommissioning at this time. To keep the Army under  
2 the jurisdiction. If the Army is able to relinquish  
3 this connection with the NRC, it may be difficult for  
4 potential injured victims many, many years in the  
5 future to be able to address their injuries to tie it  
6 into what has happened at this place and be able to  
7 seek compensation for their injuries. Thank you.

8 CHAIRMAN ROSENTHAL: Well, I would just  
9 stress that the Commission is not going to lose  
10 jurisdiction over this matter. The Army is still  
11 going to be obligated to present to the Commission a  
12 decommissioning plan. The Commission's regulations  
13 specifically require that. And that plan will have to  
14 receive Commission approval before the Commission  
15 terminates the materials license and terminates its  
16 jurisdiction.

17 MR. WIENEKE: Okay.

18 CHAIRMAN ROSENTHAL: So that's a concern  
19 that you need not have, that there's going to be a  
20 relinquishment of Commission jurisdiction any time  
21 soon.

22 MR. WIENEKE: Can I ask you a question --

23 JUDGE ABRAMSON: Well, generally we don't  
24 answer questions.

25 CHAIRMAN ROSENTHAL: No, we don't answer

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1 questions.

2 JUDGE ABRAMSON: But let me just add to  
3 that. That the current status of this litigation is  
4 that the Army has asked for a delay of five years  
5 before they have to submit their decommissioning plan,  
6 so that they can characterize the site. The big  
7 problem here has been characterizing the site.

8 So what's going to be going on in the next  
9 increment is characterizing the site before they  
10 submit their decommissioning plan and then that will  
11 be submitted to the staff and the staff will review  
12 it. We sit only as a Board to adjudicate matters that  
13 get litigated. And right now what's being challenged  
14 is the plan to do --

15 MR. WIENEKE: Okay.

16 JUDGE ABRAMSON: So that's where we are.

17 CHAIRMAN ROSENTHAL: Thank you. I might  
18 stress that the reason that the members of the Board  
19 have not been taking notes is that this evening's  
20 session, in common with the conference tomorrow  
21 morning, is being stenographically transcribed. So  
22 that the Board will have the benefit, in writing, of  
23 the comments of the speakers this evening. And that  
24 being the case, there's no necessity for us to be  
25 engaging in writer's cramp at this point.

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1 All right, the second speaker.

2 JUDGE ABRAMSON: Betsy -- somebody from  
3 the City of Madison. Could you spell your name for  
4 us, please?

5 MS. VONDERHEIVE: Vonderheive. V, as in  
6 Victory, O-N-D-E-R-H-E-I-N-E.

7 JUDGE ABRAMSON: And it's Betsy, is that  
8 correct?

9 MS. VONDERHEIVE: Yes.

10 JUDGE ABRAMSON: Thank you.

11 MS. VONDERHEIVE: I have to say -- I have  
12 to point out that the previous speaker and I have both  
13 worn our dark suits.

14 JUDGE ABRAMSON: Congratulations.

15 CHAIRMAN ROSENTHAL: But that was a matter  
16 of choice, not as a matter of necessity.

17 MS. VONDERHEIVE: Okay. I'm here  
18 representing Mayor Al Huntington who was unavoidably  
19 called to Indianapolis and could not be here. But he  
20 feels very strongly about this issue and asked me to  
21 read a letter to you for the record indicating his  
22 feelings about this matter.

23 Dear Chairman Rosenthal:

24 Thank you for accepting my comments for  
25 the record regarding the Department of the Army

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1 application to amend NRC materials license number Sub-  
2 1435. Speaking on behalf of the citizens of Madison  
3 and the affected population located downstream in the  
4 Wabash Valley Watershed, I strongly oppose any  
5 amendments to this license which will relieve the Army  
6 of its humanitarian responsibility.

7 In the interest of public safety and  
8 protection of human consumables, that is, livestock,  
9 produce, and milk within the watershed, it is  
10 absolutely essential that a complete and thorough site  
11 characterization be established and followed on a  
12 timely basis. In accordance, an appropriate  
13 decommissioning plan must be put in place to assure  
14 both public health and safety.

15 To insure public confidence, accommodation for  
16 reasonable access to the site must be guaranteed.

17 While proposed sampling plan is laudable,  
18 I question whether we are looking in the right places  
19 and just how long the testing should be conducted.  
20 Due to the unknown characteristics of depleted  
21 uranium, the proposed five year window of time for  
22 testing is absolutely irresponsible and  
23 unconscionable. It could be very well twenty years or  
24 longer before radiological or chemical breakdown of  
25 the DU begins to occur. Protection against airborne

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1 and surface water migration of potential hazardous  
2 chemicals must be assured by expanding the testing  
3 period to a minimum of 25 years and expanding the JPG  
4 DU testing area with more monitoring wells to the west  
5 and southwest. This concern for human safety is  
6 supported by a study at Northern Arizona University  
7 which finds that depleted uranium can cause genetic  
8 mutations.

9 Lastly, the Department of the Army must  
10 guarantee sufficient appropriations to fund all  
11 aspects of the DU Liability. Otherwise, suspected  
12 problems and actual incidents will become the  
13 financial burden of the EPA, the NRC and IDEM.

14 Those of us who choose to live in the  
15 Madison area and the Wabash Valley Watershed have a  
16 right to expectations of personal safety from depleted  
17 uranium. This is a matter which I take very seriously  
18 and trust that you will join me in my concerns by  
19 holding the Department of the Army further  
20 accountable.

21 Sincerely yours, Albert G. Huntington, Mayor, City of  
22 Madison.

23 CHAIRMAN ROSENTHAL: Will you please give  
24 the letter to Ms. Wolf and give it to the Reporter, if  
25 you would, and I would like the letter than included

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1 in the transcript.

2 MS. VONDERHEIVE: Thank you very much.

3 CHAIRMAN ROSENTHAL: Thank you very much.

4 JUDGE ABRAMSON: Thank you for coming.

5 CHAIRMAN ROSENTHAL: Mr. Hill I think is  
6 the next --

7 MR. HILL: Oh, I don't intend to speak.  
8 Did you say Hill?

9 CHAIRMAN ROSENTHAL: Yes, I thought you --

10 JUDGE ABRAMSON: Yes, you signed up -- you  
11 just signed in?

12 MR. HILL: I just signed it because there  
13 was a sheet to sign in. I'm President of Save the  
14 Valley and we're a party, so this is not for us.

15 CHAIRMAN ROSENTHAL: Is there anybody  
16 else?

17 JUDGE ABRAMSON: That wishes to speak.  
18 Come forward.

19 CHAIRMAN ROSENTHAL: Come forward.

20 JUDGE ABRAMSON: Give us your name.

21 MR. ROBB: My name is Joe Robb, R-O-B-B.  
22 I'm the Refuge Manager of Big Oaks National Wildlife  
23 Refuge located on the former Jefferson Proving Ground.

24 Just a brief statement. As you may know,  
25 that there is a 50,000 acre national wildlife refuge

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1 over the way on the former Jefferson Proving Ground  
2 and we're involved in several types of habitat and  
3 management -- wildlife population management of the  
4 property.

5 We also oversee public use of the property  
6 in accordance to a memorandum of agreement that was  
7 signed by the U.S. Fish and Wildlife Service, the Army  
8 and the Air Force, which helped establish the National  
9 Wildlife Refuge.

10 I just, as the manager of the property,  
11 understand there's lots of things to consider about  
12 the decommissioning plan. It's something that  
13 directly effects our management and we want the best  
14 information available to make our management  
15 decisions. Since we're liable for the decisions and  
16 management activities that the Fish and Wildlife  
17 Service makes.

18 So I understand that there's lots of good  
19 information being gathered now. I want to encourage  
20 the Board to oversee the types of information that's  
21 being taken. I think it's always a good thing to get  
22 as much information so that decision can be made.  
23 Especially, when assessing risk. Assessing risk, as  
24 you well know, is a very difficult decision weighing  
25 on public health and safety and versus costs versus

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1 actual -- actual risk. And it's a difficult decision.

2 So I would laud your efforts, the Army,  
3 the Nuclear Regulatory Commission and the Board and  
4 outstanding parties who are interested in this issue  
5 to come to the best decision possible. Because it  
6 affects how I manage the property in future years.  
7 Thank you.

8 CHAIRMAN ROSENTHAL: Well, thank you.

9 Anyone else that...

10 (No response.)

11 CHAIRMAN ROSENTHAL: Well, before  
12 concluding the session I would just again stress that  
13 tomorrow morning's conference is open to the public as  
14 spectators. It will be in the Council Chambers at  
15 City Hall commencing at 9:00 o'clock. But I would  
16 like to stress, however, that this will not be a  
17 hearing in which any evidence is received. There will  
18 be no witnesses. What we will be dealing with  
19 tomorrow morning is strictly the question as to what  
20 issues that have been presented by Save the Valley in  
21 its various submissions, are to be included in the  
22 hearing that will ultimately be held.

23 In other words, what issues are relevant  
24 to the adequacy or inadequacy of the Army's proposal,  
25 which has been challenged in various respects by Save

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1 the Valley.

2 And what basically will be done tomorrow  
3 is, as was indicated to the parties in an order  
4 scheduling this conference tomorrow morning, the  
5 parties' counsel, counsel for each of the three  
6 parties, will be given a brief opportunity at the very  
7 outset to provide an overview of their position on the  
8 questions as to what issues are worthy of evidentiary  
9 consideration.

10 Following which counsel will be called  
11 upon to respond to questions from the Board. Indeed,  
12 it's the latter part that will occupy the major  
13 portion of the conference. Because the Board has  
14 before it a large amount of written material coming  
15 from the three parties on the question as to what  
16 issues should be considered at this evidentiary  
17 hearing. And those written submissions have raised,  
18 in the Board's mind, a number of questions. And this  
19 conference's principle purpose is to allow the Board  
20 to explore, with the parties -- more accurately with  
21 their counsel, the questions that the written  
22 submissions have raised.

23 So once again, anyone who is interested is  
24 invited to attend and on behalf of the entire Board,  
25 we thank you all very much for your presence this

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1 evening. We understand the local interest in this  
2 matter. And we appreciate that interest and we  
3 appreciate your presence this evening.

4 So at that point, the limited appearance  
5 statement session is concluded.)

6 (Whereupon, at 7:00 o'clock p.m., the  
7 limited appearance statement session was concluded.)

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CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

Name of Proceeding: U.S. ARMY, JPG SITE, LIMITED  
APPEARANCE HEARING

Docket Number: 40-8838-MLA;  
ASLBP NO. 00-776-04 MLA

Location: MADISON, IN

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and, thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.

  
GARY BALDWIN  
Official Reporter  
Neal R. Gross & Co., Inc.

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Albert G. Huntington  
MAYOR



City of Madison  
OFFICE OF THE MAYOR



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July 18, 2006

Mr. Alan S. Rosenthal, Administrative Judge  
Atomic Safety and Licensing Board Panel  
Mail Stop T3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RE: U.S. Army, JPG Site  
Docket No. 40-8838-MLA  
ASLBP No. 00-776-04 MLA

Dear Chairman Rosenthal:

Thank you for accepting my comments for the record regarding the Department of the Army application to amend NRC materials license No. Sub-1435. Speaking on behalf of the citizens of Madison and the affected population located downstream in the Wabash Valley Watershed, I strongly oppose any amendments to this license which will relieve the Army of its humanitarian responsibility.

In the interest of public safety and protection of human consumables, i.e. livestock, produce, and milk within the watershed, it is absolutely essential that a complete and thorough site characterization be established and followed on a timely basis. In accordance, an appropriate decommissioning plan must be put in place to assure both public health and safety. To insure public confidence, accommodation for reasonable access to the site must be guaranteed.

While the proposed sampling plan is laudable, I question whether we are looking in the right places and how long the testing should be conducted. Due to the unknown characteristics of depleted uranium, the proposed five year window of time for testing is absolutely irresponsible and unconscionable. It could very well be twenty years or longer before radiological or chemical breakdown of the DU begins to occur. Protection against airborne and surface water migration of

July 18, 2006  
Mr. Alan Rosenthal  
Page 2

potential hazardous chemicals must be assured by expanding the testing period to a minimum of 25 years and expanding the JPG DU testing area with more monitoring wells to the west and southwest. This concern for human safety is supported by a study at Northern Arizona University which finds that DU can cause genetic mutations.

Lastly, the Department of the Army must guarantee sufficient appropriations to fund all aspects of the DU Liability. Otherwise, suspected problems and actual incidents will become the financial burden of the EPA, NRC, and IDEM.

Those of us who choose to live in the Madison area and the Wabash Valley Watershed have a right to expectations of personal safety from DU. This is a matter which I take very seriously and trust that you will join me in my concerns by holding the Department of the Army further accountable.

Sincerely yours,



Albert G., Huntington  
Mayor, City of Madison