



State of Ohio Environmental Protection Agency

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February 19, 2008

Mr. Steven A. Reynolds, Director  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region III  
2443 Warrensville Road, Suite 210  
Lisle, IL 60532-4352

Dear Director Reynolds:

I am writing to provide comments on the Nuclear Regulatory Commission's (NRC's) proposed decommissioning of the Battelle Memorial Institute's (Battelle's) West Jefferson, Ohio facility. First, let me express my appreciation for the willingness of NRC staff, particularly Pat Loudon, and representatives from Battelle, for their willingness to work with Ohio EPA staff to describe decommissioning activities, answer our questions and address most of our concerns.

Ohio EPA's remaining concern is data indicating that strontium 90 may still be present at the site in a shallow area, referred to as the "bog area", at levels exceeding drinking water maximum contaminant levels. While we don't believe the area where this contamination is located would provide sufficient water to support a drinking water well, there is some uncertainty about how interconnected this area is with underlying areas that could and do support drinking water wells. We believe more testing is necessary to determine the interconnectivity of these zones and the potential for contaminants to migrate at levels of concern. Even if it was determined there was little ability for contaminants to migrate through the natural hydrogeologic environment, there is still the potential for someone to drill a well through the middle of this zone, thereby creating a preferential pathway for migration into lower drinking water zones.

In light of the above, Ohio EPA respectfully requests that additional action be taken to remediate this area. At a minimum, additional testing, including additional hydrogeologic evaluation, should be completed to confirm what level of contamination and migration potential exists. If contamination removal does not occur, then we believe institutional controls should be put in place to prevent residential wells from being drilled on this property and to prevent the bog area from being disturbed.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

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Division of Nuclear Materials Safety  
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I appreciate your consideration of these recommendations prior to taking final action on the license. Please contact Michael Baker, Division of Drinking and Ground Waters at 614-644-2752, if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Korleski", written in a cursive style.

Chris Korleski  
Director

cc: Robert Owens, Ohio Department of Health  
Charles McCracken, Ohio Department of Health  
Mary Gade, Administrator, U.S. EPA Region 5  
Tom Poy, U.S. EPA Region 5, DWPB  
Michael G. Baker, Chief, Ohio EPA-DDAGW  
Isaac Robinson, Chief, Ohio EPA-CDO  
Patrick Loudon, Chief, Decontamination Branch NRC