

H-29-09

Paul Krohn  
NRC King of Prussia

Attached is a letter to USACE about  
Removal of Vincent Dam and dredging.  
We are concerned about Radioactive  
Wastes in the Schuylkill contaminating  
the spoils. USACE appears to not have  
any ideas about this. I hope to hear  
from you on this issue.

Toni Daly

1-29-09

District Engineer  
US Army Corp of Engineers  
Regulatory Branch  
Wanamaker Boulevard  
100 Penn Square East  
Philadelphia, PA 19107

Subject: CENAP-OP-R-2007-107961  
Vincent Dam, Schuylkill River  
Chester / Montgomery Counties, PA

Dear District Engineer,

This letter is about the dredging involved in a project to remove the remains of the Vincent Dam. We need to know if the "sediments" are the potential dredge spoils.

We understand that sediments have been tested. We need to know the location from which the test samples were taken, the dates, who did the testing, and who paid for the testing and report.

We need to know if the dredge spoils were tested for all radionuclides, including all types of alpha, beta, and gamma radionuclides.

We believe this dam is the first impediment downstream from Limerick Nuclear Power Plant's radioactive discharges. Limerick Nuclear Power Plant appears to be about 3 miles upstream from the Vincent Dam. This nuclear plant has a permit that allows radioactive discharges into the Schuylkill River.

For decades, Limerick Nuclear Power plant has been discharging into the Schuylkill River, over 5 billion gallons per year of radioactive wastewater. We know the water and sediment are contaminated with radiation from Exelon's own Annual Radiological Environmental self-monitoring reports to NRC for Limerick Nuclear Power Plant. In fact, for 2007, Exelon reported 12 radionuclides above background in water and 8 radionuclides above background in sediment. There are likely many other radionuclides associated with nuclear power operations in both water and sediment, which may have been determined by Exelon to be below background.

It is likely these spoils are radioactive. Will dredging stir up more radioactivity than what is removed? The Schuylkill River is a source of drinking water for vast numbers of people. Many use the river for recreation. Even though there are warnings about eating fish from this contaminated water, some still eat the fish they catch from the river.

Because there are so many kinds of radionuclides associated with operating a nuclear power plant, it is imperative to test spoils for all kinds of radionuclides, including all types of alpha, beta, and gamma. Minimally, full disclosure of potential radiation exposure is important in order to alert and protect workers. The National Academy of Sciences report states there is NO SAFE dose or level of exposure to radiation:

Will landfills be permitted to receive spoils from this project if they are radioactive? I spoke with Brenda Schrecengost 1/28/09. She indicated these spoils might go to a landfill. If so, which landfill? If not, might they go to a mine? If so, which mine? Landfills and mines are not end points. Landfill leachate and gas can become contaminated with radiation. Leachates go to treatment plants and on into sewage sludge often used as fertilizer to grow food we eat. Landfill gas goes into the air and into our lungs.

These are the kinds of problems one gets when toxic materials are disposed of improperly, as in discharging radioactive materials into a river.

We need prompt replies because we may need to comment further PRIOR to permit issuance. I look forward to hearing from you.

Sincerely,



Tina Daly

Cc: NRC  
DRBC  
PA DEP