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Docket: NRC-2011-0086
University of Missouri; License Amendment Request

Comment On: NRC-2011-0086-0001
Curators of the University of Missouri, Columbia, MO, Pickard Hall; License Amendment Request, Opportunity to Provide Comments, Request a Hearing and to Petition for Leave to Intervene

Document: NRC-2011-0086-DRAFT-0002
Comment on FR Doc # 2011-11113

Submitter Information

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General Comment

Please see my statement pertaining to Docket ID NRC-2011-0086, which I have uploaded here as a file. It is longer than can be posted in the space allowed in this comment block so that is why I am sending it as an attachment. Thank you.

Attachments

Docket ID NRC-2011-0086-Wilcox statement

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My name is Jeff Wilcox. As a member of the staff of the Museum of Art and Archaeology, I have worked in Pickard Hall on the MU campus, the building under discussion in this radiation matter, for over 35 years. My comments as stated below reflect my own personal thoughts and opinions. In no way do I speak in any capacity for the University of Missouri or the Museum of Art and Archaeology.

Even though the University claims that no one is getting a harmful dose of radiation from the residual radiation that remains in the building from when personnel in the Chemistry Department worked with radioactive substances many years ago, I and others who work in or otherwise occupy the building still feel unnerved about being exposed to the radiation. The fact that faculty, staff, and students who work in ground floor "hot" areas of the Pickard Hall have been issued dosimeters to wear causes worry and concern on our part. When visitors need to be taken into these "hot" areas they are likewise alarmed and concerned. We employees were given no choice in the University's decision to classify us as "radiation workers." I----and I'm sure others----would never have chosen to be so classified if we had been given the choice.

In the presentation that was given at the NRC public meeting on June 23, 2011, it was stated that the highest quarterly result from a dosimeter worn by a person in Pickard Hall is 13 millirems. Presumably that is from a dosimeter worn by a person who is probably constantly moving about the building. I question the actual dose someone might receive if they stayed in one of the "hot" areas of the building for a longer constant period of time. What if someone someday has a sedentary 40 hour-a-week desk job over one of the "hottest" spots in the floor? Would that person not receive a much higher dose of radiation? Also I question why, if no one is currently being subjected to a high dose of radiation, did MU officials choose to put 1" thick sheets of lead on the floor of room 25 to shield that room's occupant from the "low level" radiation?

I understand that one of the health issues that can arise from radiation exposure is cancer. I know for a fact that since 1975 at least four persons who have worked in Pickard Hall have dealt with some form of cancer----and two of those persons have died. I understand that it is being said that the radiation exposure in Pickard Hall is below harmful levels. Still it gives me pause to consider that some people might be much more sensitive to radiation than others. And by continuing to indefinitely leave the radiation in the building----radiation that is albeit low but that is still higher than the allowable amount under the NRC's decommissioning rules----it will allow suspicions to remain in some persons' minds about the safety of the building. Is that the kind of environment the University wishes to have for faculty, staff, and students who work daily in such a building on its campus----as well as members of the general public who come to visit that building? To have to explain to a visitor why there is a radiation hazard sign on a door is not a particularly pleasant thing to have to do----and I dare say, the visitor does not go away with a good impression of the place!

As for the access controls that the University's Environmental Health and Safety personnel have put in place outside the doors to room 12----one of the "hot" rooms on the ground floor----the access control being an honor system sign-in sheet on which people are supposed to sign in and out as they enter and leave the room----I feel it is ineffective in practice. And besides, what does signing that sheet do to protect anyone from the radiation? Also, to a worker who needs to

go in and out of that room numerous times a day as part of routine work, signing that log sheet is a nuisance and a burden.

In their application to the NRC, I understand that MU officials would like to indefinitely delay cleaning up the residual radiation in Pickard Hall. One reason they cite for the delay is that Pickard Hall is on the National Register of Historic Buildings and they don't want to jeopardize that status. While it is true that the building is on the historic register, it is also true that MU has recently completely renovated two other buildings that are also on that register: Switzler Hall and what used to be the Sociology Building---now the Reynolds Journalism Institute. In both of those buildings, the renovations involved complete gutting of the interior walls and floors and essentially building new structures inside the original exterior brick walls. Those extensive rebuilding projects apparently did not disturb the historic status of those buildings or their eligibility to remain on the historic register. In fact, the interior of Pickard Hall was remodeled in 1974-1975 (though not as drastically as Switzler Hall and the Sociology building) and its status on the register was not jeopardized. I'm not positive, but I think that being on the historic register means that the *exterior* of a historic building is supposed to be maintained in its original appearance as much as possible. I don't think that what happens to the character of the *inside* of a building is really a concern as far as the register goes. If MU was to use the renovation methods that were employed for Switzler and the Sociology building, I suspect that the radiation remediation in Pickard Hall could be effected and the historic register status of the building could still be maintained.

It is also true that one of the current operations in Pickard Hall----that is, the day-to-day operations of the Museum of Art and Archaeology----involve the exhibition, study, and storage of many valuable and fragile artworks and archaeological items whose care, environmental control, and safe handling must be considered. I suspect that any radiation remediation plan would mean that these delicate and valuable collections would need to be relocated while the remediation work is carried out. To be sure, packing and relocating these items to another suitable place----and making them available for on-going exhibition and research, both of which are at the heart of the Museum's mission, would be no small task. And who knows to what other space on the MU campus they could be relocated? Working in the Museum, I share these concerns; I am very concerned about the future wellbeing of the Museum. But I also feel that the University needs to face up to the issue of fixing the radiation problem in the Pickard Hall and not simply ask the NRC to allow them to indefinitely delay dealing with it.

I feel that MU's application for an indefinite extension to remediate the radiation in Pickard Hall is unreasonable. Without some deadline being established by the NRC for the clean-up, MU would have few pressing reasons to ever deal with it. I am not saying that a quick deadline should be imposed, but I think some sort of date should be set-----something that is fair and reasonable. In my opinion that might be something like ten years. Such a time frame should give the University enough time to find a new or temporary home for the Museum, allow for the orderly and careful packing and redeployment of the artworks and archaeological artifacts into the new location, and then allow sufficient time for workers to perform the actual removal of the offending radioactive substances that are apparently imbedded in the floors, walls, obsolete drain pipes and flues of the building. I believe it is in everyone's interest that the radiation be removed and according to some set time frame. I encourage all parties to look seriously at all the issues

surrounding this radiation issue in Pickard Hall and I hope that both the NRC and the University of Missouri will work in arriving at a fair and reasonable solution that everyone can live with.