

to: RADB, (301) 492-3446

Comments to NRC, December 12, 2011

Subject: Docket ID NRC-2011-0258

Thank you for the opportunity to comment on this matter.

First of all, I must complain that the notification for a proposal of relaxation of remediation requirements is very hard to understand/interpret by a lay person such as myself. The greatest difficulty is in finding and interpreting the existing standards for concentration of contaminants to which this request for an alternative standard was made. There is much discussion of the Alternative Standards, but the standards are never clearly stated nor clearly referenced. Therefore I am uncertain of the magnitude of the proposed change, as well as what it really means.

I believe there is a requested change of standard associated with radium only, not other radioactive materials. From the proposal: "This standard is that the background level is not exceeded by more than 5 pCi/g (picocuries per gram) of radium-226 averaged over the first 15 centimeters (cm) below the surface and 15 pCi/g of radium-226 averaged over 15 cm thick layers more than 15 cm below the surface." Not knowing what the existing standard is in pCi/g makes it difficult to know whether 5 more is significant. I think, from looking at <http://www.nrc.gov/reading-rm/doc-collections/cfr/part040/part040-appa.html>, the standard is 5 mg/L, so I don't know how to compare the two.

In any case, I don't understand why standards should be relaxed based on the geography of the locations. The proposal speaks of four discrete sites for which Alternative Standards should be allowed. What the Colorado Department of Health and Environment is actually proposing is that the Alternative Standards, which reflect the existing conditions, should be applied such that no additional effort or expense is necessary. How clever! "The four discrete areas are referred to as: the Mill Hillside Area; A-Plant North Area; River Ponds Area; and County Road Y-11."

The Mill Hillside Area was considered too steep and dangerous to clean up. It drains directly into the San Miguel River, which joins with the Dolores River which then drains into the Colorado River, a drinking water supply for much of Arizona, Nevada and California. The Dolores River is habitat for several endangered species of fish, and is also a current candidate for Wild and Scenic Designation. Surely there could be some way to mitigate the situation at Mill Hillside, possibly to include diverting surface water and water table water from flowing into the area, as well as catching and treating water which comes out of the area, before it reaches the river.

The A-Plant North Area and the River Ponds Area were said to be impractical to remediate because they were buried by three feet of sediment during spring floods. That they are impacted directly by stream flow is all the more reason to assure their clean-up. There was also the unreasonable assumption that the San Miguel River will not be relocated.

The fourth area, County Road Y-11, is supposedly unnecessary to clean up because the contamination is under three feet of road. This appears to be a way of shifting the responsibility to Montrose County, which has neither money nor expertise to manage such a risk.

I appreciate your interest and attention to my comments. I do hope you will take seriously your responsibility in assuring that public safety and the environment are appropriately valued.

Sincerely,
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