

RULES AND DIRECTIVES
BRANCH
LONFC

2013 AUG 13 PM 1:48

RECEIVED

7/01/2013
78 FR 39344

2

SUNSI Review Complete

Template = ADM - 013

E-RIDS = ADM-03

Add = M. Moser (MEMI)

Subject: Docket ID NRC-2013-0053

From: [REDACTED] AL

To: [REDACTED] NRC

Date: Wednesday, July 10, 2013 11:04 AM

Hi,

I wish to submit comments in reference to Docket ID NRC-2013-0053 concerning Shine Medical Technologies, Inc. proposed isotope production facility here in Janesville, WI. and environmental concerns and questions. The NRC will conduct an environmental public scoping meeting in Janesville, WI on July 17, 2013 on this matter.

First, In your material on this, the NRC presented incorrect important information, on page 4, by stating the proposed Shine facility would be located approximately four miles south of Janesville, Wisconsin. This site is within the Janesville city limits, on land purchased by the city and connected to other city tax incremental financing district land.

This proposed site is less than .06 of a mile South of a Trailer Court. Potential Environmental risks causes those residents concern about about any planned or unplanned release of any dangerous or contaminated airborne emissions from the site, and being carried by normal Southerly or S/W winds directly over the nearby trailer court. There is also the potential risk of fire or explosion or other accidents that could pose a danger to the nearby residents at the Trailer Court. This location appears contrary to NRC desires that uranium facilities of all kinds be located outside of cities and in more remote areas to reduce dangers, hazardous exposures and protect the public from such exposures and more easily protect the environment and humans.

There is a matter that the FFA may have concerns with the proximity, size, type & use of this proposed Shine building, considering the Southern Wisconsin Regional Airport and its runways being right across the street. Even though its runways may not be directly in line with the proposed building, many airport crashes occur where the airplanes veer off the runway to either left or right of the runway. Additional concerns would be the height of the proposed building possibly impeding line of sight for pilots. Would the proposed building withstand a large cargo or other large plane that could crash into it due to some malfunction, and cause release of contaminated material and cause environmental dangers?

There are a number of other environmental concerns. One involves nearby high quality agriculture land and its following food chain. There is the large Macfarlane Pheasant farm and meat processing facility approximately less than a mile to the North. Any releases of hazardous materials, particles or radiation emissions could cause great harm to his business and to those who may eat contaminated products before receiving

knowledge of it.

There is also much high quality farm land to the East of the proposed Shine site, where hundreds of acres of corn and other crops are raised and harvested for & by the canning company Senica Foods. They have a large nearby processing plant in town, just to the North/East, down wind of the proposed site. Any leak of hazardous material or waste like uranium contaminated material or air particles could be a disaster to important food production, for who knows how long. There could also be ground and ground water contamination from hidden or undiscovered leakage of hazardous materials, like radiation or uranium products or waste.

Water use concerns: Senica Foods is in the process of enlarging and already using a very large unknown amount of water in million of gallons and will be using much more after enlarging their processing of vegetables production. Now Shine alone, indicates it will use about 6600 gallons per day or 2,409,000 gallons per year. Both of these businesses may threaten our well water & pumping resources in the summer. We have at least two city wells that have high levels of nitrates that can't be used for drinking alone and in recent news Rock County has just experienced a huge increase of nitrate in wells throughout the County. Where will we get good drinking water? Last year many area wells went dry according to news reports. We must preserve our water and other natural resources and address environmental concerns.

Now the second part, where will Shine's hazardous waste and all those 2,409,000 gallons of salt brine/uranium waste water go, much of it contaminated water? What kind of monitoring systems will be required for leaks and waste filtering and radon levels in all areas, including all waste products, as well as incoming uranium sources? How can they filter out all the salt brine and the trace uranium from the waste water? We can't drain all this inferior water into the Rock River and contaminate our sewage disposal system and underground water supplies. Has a study been done on the depth and capacities of our underground water supply and aquifer levels? How far down beneath the building site does one reach the first water table? How far down to the second water table?

Who is responsible for site clean up, should an accident take place and contaminate the entire site? What if Shine would just pick up and leave? Can the site be cleaned up say after ten years use, so that the site can safely be used for any other purpose? How much contaminated waste water or material can be accepted and stored on site and for how long? Shine has said it will be using a salt brine in their accelerators in conjunction with uranium. There is great concern that this will quickly cause great dangerous erosion/corrosion to all elements and cause further damage disposing waste salt water with uranium contaminated water. These two products together presents and accelerates all the dangers resulting from corrosion caused by salt brine.

How deep will the building excavation be? How much of the building be below ground level? What outside agencies will be inspecting operations and how often when completed? Will they have 24 hour security and what type of security. Will you seek separate environmental impact studies from the State of Wisconsin, the DNR, the EPA and Health & Safety Regulatory Agencies? Will they be furnished with the comments and questions I have listed here, so they address them from their perspectives, without your suggestions or results? Should not Shine be required to pre-fund a clean up account or be bonded for at least say, \$10,000,000 to cover accident, harm or any possible negligence? What if a patient is harmed by a flawed product, which is new because it was created by a new process? Shine's process is fairly new so should not this whole process be scrutinized much closer in every respect, for safety?

Shine stated they will have to clean the accelerators every 5 & 1/2 days. How will they be cleaned? What products will they use to clean the accelerators? How can uranium be cleaned? How much uranium can be at the site at any one time? Will they have a limit on how much they can bring on site and have on site? Will the facility be required to sign the site as to what it is and that there are hazardous materials? Who inspects the facility for compliance after operation begins and how often? Where can one find the inspection reports?

In British Columbia engineers and other experts have successfully developed medical isotopes using a cyclotron. These isotopes for scans can be created by in hospital run cyclotrons, eliminating transportation dangers and and the rush to hospital due to short use life. Would not that be safer and healthier from production, to transportation, and to actual use on a patient and even for disposal? Why would not the NRC curtail the unnecessary use of uranium for a better, cleaner and healthier environment? Why would you even grant any medical isotope licenses to any who would use uranium processed isotopes without fail safe methods and procedures all through the process?

The North Star isotope facility in Beloit, Wi., 12 miles from Janesville, will be producing medical isotopes with a different process within a year of two, from what I read. Would it not make more sense to regionalize as to site locations of the four companies planning to produce isotopes in the US? To not bunch them up? Transportation and timing would be much more efficient. So why would the NRC approve an already outdated process that Shine proposes? The North Star site is ahead of Shine. In my opinion, Shine took the wrong course in going the current uranium route. The Arizona proven process and North Star took the better route. Don't feel sorry for Shine Medical Technologies, some technologies succeed, some do not.

From what I read the Nation is trying to get away from over-abundant use of uranium in so many areas, because it poses both short term and long term dangers and with threats to humans, the environment and with the disposal difficulties. Lets clean up the environment now and preserve our kids future and their health, by only approving

super-low nearly uranium free or uranium free medical isotopes. This can be accomplished.

From the issues I indicated and commented on and raised questions on in this email/letter and possibly other factors, Janesville's site is not a good or desired location for this type of facility, in my opinion. These facilities should be located outside city limits and away from close-by population, farm animals for meat, farm crops for human consumption and the nearby food processing facilities, away from water sources and not right next to an airport where airplanes are more apt to have problems and crash, adding to already present risks and dangers. The total environment dangers and to danger to humans presented from such a facility are tremendous in this location in my opinion. I thought the NRC was opposed to locating these type of facilities that handle any type of uranium, where this one is proposed, and wanted them located in the open, unpopulated countryside.

I pray that the NRC reads the entire contents and discuss fully each question and comment I have typed and give just consideration to all issues.

Thank you. *Al Lembrich*
A Concerned Janesville resident

To: NRC Docket ID NRC-2013-0053

July 17, 2013

From: Al [REDACTED] Lembrich

I had registered to speak at today's NRC public meeting, but since learned that I could not be present, so I ask that Billy McCoy be allowed to speak my following comments during my scheduled time.

Here are those comments:

1. The NRC information mailed out was incorrect by stating the proposed Shine site would be located approximately 4 miles South of Janesville, WI. The fact is, it will be within the city limits of Janesville. I understood the NRC preferred sites that were away from population, animal, crops and food chain sources and operations, was I wrong?
2. The occupied Trailer Court, is less than .06 of a mile down-wind from the Shine site. If there should be any fire, explosion, leaks, or accident's with dangerous or contaminated airborne emission releases or other waste from the site, that could pose potential dangers and risks to those residing downwind in this nearby Trailer Court. That's a potential environmental risk.
3. The local citizens have concerns and possibly the FFA with the Shine building location, height and its uranium content being right across the street from the Southern Wisconsin Regional Airport and its runways. There are possibilities of an airplane crash and potential uranium exposure or contamination from a demolished building and its contents. Could there be an impediment to pilot's line of sight in evaluating their approach to land? Is the height of Shine's building too high and raise the risk of a plane strike when something goes wrong, ^{with} the resulting environmental concerns?
4. Other environmental concerns involve risks to the food chain There is a large pheasant farm and it's meat processing plant less than a mile to the North and downwind of the Shine site. Release of hazardous materials, airborne harmful particles or radiation emissions could cause great harm to feed, pheasants, their business and loss of jobs, and potential contamination of the food supply for human consumption.

5. The large Seneca Foods canning company and its processing of vegetables is located just to the North/East, down-wind of the Shine site. There are hundreds of acres of farm crops that they harvest from this entire nearby area for their plant. Any accident, leakages, or contaminations to air, water, land could be very harmful to the edible crops, the entire food chain and to this business. The present environment could be greatly threatened.

6. There are water use concerns. Shines indicates it would use approximately 6,600 gallons of water per day, that amounts to 2,409,000 gallons per year. The nearby Seneca Foods uses even much higher amounts of water as well, and will be expanding and using more water yet. The large water use may threaten our water resources and even pumping capacities during the hot summer. We need to preserve our drinking water resources.

7. Shine's use of salt brine within the accelerators with uranium appears very risky, with the increased corrosion dangers of salt brine and expected leaks. Shine says they clean them every 5 ½ days. How do they clean them and what products can they use to clean them? Where does all the waste water and salt brine water go? How is that water safely cleaned or filtered?

8. Who is responsible for site accident or contamination cleanup? What if Shines just pulls out and leaves? Do they not have to be insured or have set-aside reserves for site cleanup or designated bond funds of a few million to guarantee a clean environment for future uses of the site?

9. Why have two medical isotope places (North star & Shine) within 12 miles of each other? With the processed products short life and needed short transportation times, would it not make more sense to allow four regional sites, spaced across the country, because I understand there are four isotope companies planning sites and operations now? Other sites that Shine had looked at would be much better & safer in my opinion. I ask that all my concerns & questions be fully provided to The EPA, the Wis. DNR, the FFA and all other regulatory agencies that may have some oversight or concern.

Thank You, *Al Lembrich*
AL Lembrich