

# PUBLIC SUBMISSION

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License Amendment Application for Source Materials License; Jefferson Proving Ground

**Comment On:** NRC-2014-0097-0002

Jefferson Proving Ground License Amendment Application for Source Materials License; Notice of Intent to Prepare an Environmental Impact Statement and Conduct Scoping Process

**Document:** NRC-2014-0097-DRAFT-0001

Comment on FR Doc # 2014-26060

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## General Comment

We at Citizens' Oversight do not believe it is appropriate to terminate a license unless the area has been returned to safe conditions such that no security around the area is needed. If radioactivity remains, an NRC license should be required until radioactivity is removed or until it falls to levels below background radiation levels, so that the NRC can ensure that the security provided is sufficient.

The summary said "The Army proposes to leave the depleted uranium and the undetonated munitions in place while it continues to maintain institutional control over the area, such as physical access restrictions."

Thus, it is inappropriate for the NRC to allow license termination until there is no need for "institutional control over the area, such as physical access restrictions" due to radioactivity concerns. This license should remain in place, and the access restrictions reviewed as appropriate by NRC personnel. If no license is in place, what assurance do we have that appropriate access restrictions are in place several decades from now? How about if the property is transferred to another owner? Thus license termination is inappropriate at this time.

Respectfully submitted,

Raymond Lutz

CitizensOversight.org

**SUNSI Review Complete**

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