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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-0008

Comment on FR Doc # 2014-26060

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## Submitter Information

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## General Comment

Dear Sir/Madam, as the full EIS has yet to be undertaken I will restrict my comments to the proposed action and the issue of future clearance.

The Army's proposal to cease its annual monitoring programme would, I believe, set a dangerous precedent for the many other sites within the US that are affected with legacy contamination from the production and testing of DU munitions. That this has been suggested for the JPG, where a considerable quantity of contamination is present, is particularly troubling.

While considerably more is now known about the environmental behaviour of DU than was the case a decade ago (e.g. A review of the environmental corrosion, fate and bioavailability of munitions grade depleted uranium. Sci. Total Environ. Nov 21;408(23):5690-700. Epub 2010 Sep 21.) the key lesson from environmental studies is that DU's behaviour within different environmental media is highly variable. In this respect, and given the considerable time frames involved for corrosion and transport, it seems extremely short sighted to be seeking to cease monitoring so soon. There is significant potential for transport of U and its decay products off the site, be it through controlled burns or groundwater.

More broadly, if undertaken properly - and I note that the NRC has a number of questions over the conduct and efficacy of the Army's sampling programme - monitoring studies could be of use in helping to inform response at domestically contaminated sites and those overseas contaminated during testing or conflict.

On the issue of range clearance, I am not convinced from the studies to date that the Army has given enough consideration to clearance of the range, or parts thereof, to allow them to be returned to the local community. More consideration should be given to clearance options as part of the NRC's proposed review. The US Army is responsible for the contamination and should be at the forefront of efforts to resolve the problems - and not be seeking to walk away from them.

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