

**From:** geomike5@att.net  
**Sent:** Friday, March 20, 2015 6:32 AM  
**To:** Snyder, Amy  
**Subject:** NRC meeting on PTA license

Dear Ms Snyder,

I would like to participate in the NRC hearings for the Army Nuclear Possession License to be held March XX, 2015.

There currently is a time difference between eastern Daylight Savings time (EDST) and Hawaii Standard Time (HST) of 6 hours; Hawaii does not have a daylight saving mode. I will probably not participate in the full conference but only those times where Hawaii is discussed or technical interest such as license requirements regarding monitoring. Therefore, I may make contact on the toll free number several times. I do not know when they will be until I see a draft proposed topical schedule for the meeting.

In order that I do not miss an opportunity to address the meeting on a matter of importance to PTA, I present now a request for NRC to change a requirement for the PTA monitoring operations.

I ask that the license clearly address the need for monitoring ground water and mechanisms of transport of possible depleted uranium and products transport into groundwater.

This request is based on the newly discovered presence of ground water at shallow depths at PTA. Potable water is presently trucked daily to PTA at great expense. The Army has authorized drilling to see if ground water could be located at PTA in order to eliminate the high cost of transportation.

In a surprising discovery, overseen by the University of Hawaii at Hilo, ground water was found at shallow depth. The Army has now proposed pumping tests and additional drilling to see if these newly discovered resources are practical to use for potable water.

When the Army asked for relief from monitoring ground water earlier, based on the belief that ground water is probably at a 6,000 foot depth, it seemed reasonable as it could take millennia for surface contamination to be introduced into the ground water. Therefore any problem would be 10s of generations in the future and need not be dealt with today. While that is not a very good position for stewardship of the land, it was persuasive enough for NRC to grant an exemption. This fits well the standard of "do not seek and ye shall not find."

However, with the discovery and potential use of shallow 1,000 to 2,000 foot aquifers, thought to be perched aquifers, the scenario has changed. No one knows the recharge source of speed. Consequently, monitoring of ground water and potential sources of

the transport mechanisms of DU and DU products must be incorporated into the monitoring plan for PTA.

I do not know if this is an appropriate meeting in which to bring this concern but if not, please keep it in mind for adding a monitoring requirement to the PTA license.

Thank you for your attention to this matter.

Michael Reimer, Ph.D., retired geologist  
[GeoMike5@att.net](mailto:GeoMike5@att.net)