

From: [Jim Albertini](#)
To: [Snyder, Amy](#)
Subject: [External_Sender] Army wants categorical exclusion from all DU monitoring requirements at PTA, etc
Date: Thursday, July 16, 2015 2:40:38 AM

July 15, 2015

To: Ms. Amy M. Snyder
NRC
Senior Project Manager
Materials Decommissioning Branch
Office of Nuclear Material Safety and Safeguards
Amy.Snyder@nrc.gov

Re: Comments on the June 1, 2015 CATX request by the US Army for license SUC-1593.

Aloha Ms. Snyder,

I recall the Army not wanting to have to acquire a license to possess DU in Hawaii and the more than a dozen other states and 3 foreign countries where it used it with the Davy Crockett (DC) spotting rounds. I suspect since the Army was not prohibited from using DU in training until 1996, there is a lot more DU around live fire training areas in the U.S. and abroad than just DU from the DC spotting rounds of the 1960s. Will the NRC look, ask the Army and independent contractors to look, especially in light of the NRC's chief priorities: "protection of public health and safety and the environment." Now I see they want a categorical exclusion (CATX) to NEPA requirements for the license SUC-1593. In essence no license requirements, hence no license. Such arrogance is hard to top. In simple language, the Army has no idea how much DU was used at these sites, where exactly it was fired. They cannot account for it, so they will continue business as usual --conducting high explosives in an area likely contaminated with DU and spread it in the wind upon troops and surrounding civilian communities. And the NRC made the suggestions of categorical exclusions? This in my judgment is completely irresponsible behavior for the NRC. The NRC should be the REGULATOR, not the anything goes rubber stamp for the Army.

It would seem to me that monitoring and testing to determine the full extent of DU contamination is the first order of business. The monitoring should include air, soil, water (including new water wells in the area), plants and animals. Hunting of wild pigs, goats, and sheep around PTA is very common. I have received reports of unusual tumors in some animals. A prohibition against any explosives that may disperse, instead of contain, the contamination makes common sense. The first indication of radiation contamination at Pohakuloa training Area (PTA) came from civilian radiation monitors on May 29, 2007, months before the Army confirmed DU use at PTA. The radiation was detected OUTSIDE the base perimeter at Mauna Kea State park, now a county park.

I think a full EIS should be done at PTA and all other Army sites known to have DU to determine the full extent of the contamination and a plan what should be done. This should be taken out of Army hands because it is clear they want nothing to be done. In fact they want to be able to use high explosives in the areas that they know contain DU contamination. Talk about having no regard for health and safety.

At a minimum, I urge you to reject the Army's request for a categorical exclusion to its DU license to possess at Pohakuloa and all other Army sites. Require independent testing,

monitoring and clean up of the DU present as called for in an 8-1 Hawaii County Council vote on July 2, 2008. But more should be done -- I call for a full EIS on the issue of radiation contamination to include more than just DU from Davy Crockett spotting round. If DU wasn't prohibited in training until 1996, it was likely used in training. That includes 34 years since DU was first used in DC spotting round at PTA.

Thank you for your consideration.

Jim Albertini
President

--
Jim Albertini Malu 'Aina Center For Non-violent Education & Action P.O. Box 489 Ola'a (Kurtistown) Hawai'i 96760 Phone 808-966-7622 Email ja@malu-aina.org www.malu-aina.org This communication may be unlawfully collected and stored by the National Security Agency (NSA) in secret. The parties to this email do not consent to the government retrieving or storing of this communication and any related metadata, as well as printing, copying, re-transmitting, disseminating, or otherwise using it. If you believe you have received this communication in error, please delete it immediately.