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General Comment

Comments JPG DU EA Docket ID NRC-2019-0027

We appreciate the opportunity to comment on the Draft Environmental Assessment for the Proposed Amendment of Source Material License SUB-1435 for Jefferson Proving Ground. I am commenting on behalf of Save the Valley, Hoosier Chapter of the Sierra Club, and Lower Ohio River Waterkeeper.

As I have participated in the decommissioning process for JPG since its inception, I and my affiliated organizations are generally pleased with the proposal to amend the NRC license to a possession only license (POL). We do find this proposal preferable to a license termination/decommissioning under restricted conditions or the no action alternatives.

However, we do have some continuing concerns about potential future migration of DU from the area. Thus, we would request some consideration and assurances in the following areas:

- 1) We would like to be assured that there will continue to be public access to the semi-annual monitoring results.
- 2) We would also request an option for periodic public input regarding the status of the site, as well as review of technological advances related to potential remediation.
- 3) The 20-year time span for renewal of the POL seems potentially excessive when considering the possibility of accelerated technological advances in the future. We recommend a review of the situation more frequently,

perhaps every 5 years.

4) An action plan should be developed and publicly noticed to address any indication of increased migration of the source material.

5) Finally, we would like to be kept on the mailing and email list for this license.

Thank you for this opportunity to comment,

Richard Hill for

Save the Valley, Hoosier Chapter Sierra Club, and Lower Ohio River Waterkeeper