DATE: July 18, 1980

TO: Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FROM: Catherine Quigg, research director
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RE: Draft Environmental Impact Statement related to Chemical Decontamination at Dresden. NUREG-0686

1. NUREG-0686 states that Dow Chemical's proprietary solvent NS-1 will be used for the decontamination process.

COMMENT: The NRC and the nuclear industry should be obliged to disclose the chemical composition of NS-1 to the public. The public will have to bear the health burdens of potential impacts from NS-1 and is therefore entitled to this information. The protection of the public health and safety should supercede the proprietary rights of the Dow Chemical Company.

2. In Appendix A, page 9, NUREG-0686 states: "Migration as observed at the Oak Ridge site would not occur at the Beatty, Nevada or Hanford, Washington sites. A solid waste is to be disposed at the commercial sites. The climate, geology and hydrologic conditions eliminate the possibility for flow to saturate soils and transport radionuclides as observed at Oak Ridge."

COMMENT: The NRC's entire premise of safe burial of NS-1 contaminated wastes from the Dresden cleanup is based on the supposition that Hanford and Beatty are arid lands where the potential for transport of radionuclides is virtually non-existent. The NRC has not provided the public with specific factual data on the geohydrology of the Hanford and Beatty sites to back up its contentions that these sites are safe for the burial of radioactive wastes containing NS-1 which, most likely, contains EDTA -- a chelating agent known to speed the migration of radionuclides through the soil and groundwater.

The NRC thus obliges the citizen interested in the protection of public health and safety to take a giant leap of faith in accepting the NRC's assessment of the suitability of these sites. We refuse to take that leap and urgently request the NRC to provide current scientific documentaion on the geology and hydrology of these sites and their past experiences with leaks, seepage and migration. This investigation should be made by independent hydrologists and geologists. The NRC has not made its case for the safe disposal of these wastes. We await adequate information upon which to base sound decisions as to the full environmental impacts of the decontamination of Dresden-1.

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