



Department of Energy  
Washington, D.C. 20585

OCT 31 1980

Dr. David M. Rosenbaum  
Deputy Assistant Administrator  
for Radiation Programs (ANR-458)  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

POOR ORIGINAL

Dear Dr. Rosenbaum:

This is the Department of Energy's response to your request for comments on the draft Federal Register notice, "Proposed Disposal Standards for Inactive Uranium Processing Sites" (August 25, 1980), and the Draft Environmental Impact Statement, "Remedial Action Standards for Inactive Uranium Processing Sites" (August 25, 1980). These documents do not alleviate any of the Department's serious concerns related to implementing and certifying the proposed remedial action and disposal standards, which were explained in my letters of June 13, 1980 to Mr. Douglas M. Costle, of March 7, 1980 to you, and of February 15, 1980 to Mr. David Hawkins.

The language in the standards implies that "reasonable expectation" and "reasonable assurance" will be provided to substantiate that the numerical values of physical and chemical quantities are nowhere exceeded after remedial action. The Department's experience indicates that unqualified numerical values could be interpreted by many to be absolute limits. Consequently, the numerical values that we have to achieve might have to be lower than the standards so that the unavoidable inaccuracies in the measurement, and in the survey and sampling procedures will not cause final conditions to exceed the standards.

These difficulties can be avoided with no loss of health benefits if, in addition to the statements regarding reasonable expectation and assurance, the numerical values for physical and chemical quantities in the standards are qualified as goals to be achieved within the accuracy of available field and laboratory instrumentation used in conjunction with reasonable survey and sampling procedures.

If you have any difficulty in accepting the proposed recommendations and incorporating them into the proposed standards, please contact Dr. William E. Mott of my staff so that a meeting can be arranged.

Sincerely,

*Ruth C. Clusen*

Ruth C. Clusen  
Assistant Secretary for Environment

cc: Mr. David Hawkins, EPA  
Mr. Douglas Costle, EPA

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