



State of Rhode Island and Providence Plantations

EXECUTIVE CHAMBER, PROVIDENCE

J. Joseph Garrahy  
Governor

May 7, 1981

The Honorable Joseph M. Hendrie  
Chairman  
United States Nuclear Regulatory  
Commission  
Matomic Building  
1717 H Street, N.W.  
Washington, DC 20555

Dear Mr. Chairman:

I am writing concerning the decontamination and decommissioning of the uranium recovery facility operated at Wood River Junction, Rhode Island by UNC Recovery Systems, a division of United Nuclear Corporation. As you know, UNC ceased operations at this facility in July, 1980 and has been dismantling and decontaminating the plant and grounds since that time. As you also know, since July, 1980 my office has been working closely with your agency to ensure that the site is decontaminated as completely and quickly as possible. During this time, you and your staff have been highly cooperative and responsive to our requests and a productive relationship for which I am personally appreciative has been forged.

However, as the licensee proceeds with his program of decontamination toward decommissioning, the condition in which he leaves his property on license termination has become an increasingly important and sensitive issue with the citizens of Rhode Island. There is a growing and deep conviction among Rhode Islanders that environmental contamination caused by operations and accidental releases at the UNC Recovery Systems plant should be cleaned up by the United Nuclear Corporation prior to license termination and that all costs for such cleanup should be borne solely by the Corporation. This has been my consistent position in past dealings with UNC and with your agency as well.

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There is a parallel concern among Rhode Islanders that additional sources of contamination may be identified after known sources are corrected and the NRC license terminated. This could well leave Rhode Island taxpayers with the financial burden of supporting expensive cleanup efforts or the equally onerous and time consuming task of seeking relief through the courts.

We are also concerned that the current UNC license as it is now written could be terminated before the aquifer beneath the UNC site has purged itself of the radioactive contamination caused by the release of radionuclide contaminants from UNC's storage lagoons. If this were to occur then both licensee and licensor would be in a position to depart Rhode Island leaving one of the State's largest untapped potential drinking water sources contaminated by radioactivity.

It has been our clear understanding throughout the course of our dealings with your agency that the United Nuclear Corporation's NRC license and their fiscal responsibility for site decontamination will not be terminated until decontamination standards acceptable to both the State and the NRC have been agreed upon and complied with. We further understand that NRC regulations require these standards to be sufficiently stringent as to allow for immediate and unrestricted use of the site for other purposes.

In order to avoid possible misunderstandings and inspire public confidence that unforeseen contamination problems will not jeopardize future use of the site, I would propose at this time that we formalize these understandings in writing.

I propose, then, a written agreement with the Nuclear Regulatory Commission which contains the following points:

- a) Agreement that NRC and the State of Rhode Island will develop and NRC will impose mutually acceptable standards for decontamination of UNC Recovery System's Wood River Junction site and the groundwater aquifer beneath that site.
- b) Agreement that these standards should be sufficiently stringent to allow for immediate release of the site and the groundwater beneath it for general unrestricted use prior to termination of the license.

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- c) Agreement that UNC Recovery Systems' NRC license and its obligations under that license will not be terminated unless and until NRC and the State of Rhode Island jointly determine that decontamination standards have been complied with by the company.
- d) Agreement that a licensee-regulator relationship between UNC and NRC be retained until the aquifer underlying the plant site has purged itself or been purged of radioactive and nitrate contamination.

It is also my understanding that an NRC consultant team will be at UNC on May 6 to conduct a preliminary evaluation of the site with the objective of developing an appropriate survey strategy. As you may know, existing survey information for areas outside the fenced security zone is limited to 1979 aerial overflight data which we have found to be totally inadequate and unacceptable and the results of which are questionable to NRC. Absent a reliable data base we, therefore, find ourselves largely in the dark as to the present condition of most of the 1,000-plus acres owned by UNC Recovery Systems. This is a cause of understandable anxiety to area residents and represents an intolerable situation from the State's perspective. I must again, therefore, urge NRC to move expeditiously and to press its consultants to move expeditiously in both designing and implementing an overall site survey. The State will participate in the May 6 evaluation and stands ready to assist in moving this matter to a quick resolution.

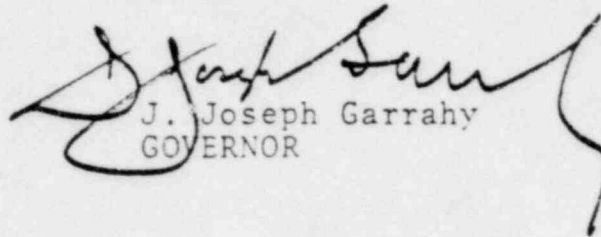
Finally, we remain deeply disturbed by UNC's apparent reluctance to ship more than token quantities of waste to the Beatty, Nevada burial site despite the fact that their Nevada disposal license has been reinstated. We are not convinced that this reluctance is justifiable on technical or safety grounds although these may be considerations and are not sympathetic to arguments based on the costs involved. Waste material should not be allowed to accumulate on site and should be removed to licensed burial facilities as soon as it is properly processed and containerized. I urge you to bring the full weight of NRC's regulatory authority to bear to ensure that this happens.

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Again, my thanks to you and your staff for your cooperation in this matter. I will look forward to your early response to these proposals and a continuation of our cordial relationship. I am prepared to discuss these issues with you at any time.

With best wishes, I remain

Sincerely,



J. Joseph Garrahy  
GOVERNOR