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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control
Atlanta GA 30333

58 FR 11642

2/26/93

April 21, 1993

(18)

40-8989

'93 APR 26 P1:20

USNRC

OFFICE OF ADMINISTRATION

Chief
Rules Review and Directives Branch
Division of Freedom of Information and Publication
Services
Mail Stop P-223
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir or Madam:

We have completed our review of the Draft Environmental Impact Statement (DEIS) to Construct and Operate a Facility to Receive, Store, and Dispose of 11E.(2) Byproduct Material Near Clive, Utah. We are responding on behalf of the U.S. Public Health Service. Technical assistance for this review was provided by the Radiation Studies Branch (RSB), Division of Environmental Hazards and Health Effects, National Center for Environmental Health, Centers for Disease Control and Prevention.

The RSB reviewed the Draft EIS for potential radiological health impacts. The following comments are offered for your consideration.

The DEIS section 5.2.8 discusses potential radiological health impacts (workers and offsite public) resulting from the construction of the radioactive waste disposal facility near Clive, Utah, managed and operated by Envirocare of Utah.

Paragraph 5.2.8.1 states 'the potential radiation doses can, in a statistical sense, increase the potential for individual and population health effects (excess fatal cancers) above those expected from normal causes. It is assumed that environmental systems will be adequately protected against any adverse radiological impacts if workers and members of the public are adequately protected against the same impacts.'

Page 4.7 of the DEIS presents a wind rose out to greater than 5 kilometers (km) or 2.5 miles from the proposed facility, showing nearest residences (Table 4.3). This Table suggest that there are a considerable number of residents that live outside 2.5 miles of the proposed facility. The DEIS does not discuss emergency warning systems for members of the public or how the public will be protected in the event of a large waste-product release. The assumption in section 5.2.8.1, paragraph one, as stated above, needs to be explained.

Furthermore, on page 5.25 of the DEIS, the statement is made that the presence of ^{232}Th and decay products in the airborne pathway will contribute significantly to the offsite dose via inhalation (932 mrem/year to 3 rem/year). The DEIS should show how these high inhalation doses are calculated, i.e., distance from the facility and dose conversion factors used. As stated on page 5.26, 'Envirocare will need to consider potential radiation doses from particulate inhalation of ^{232}Th in demonstrating compliance with the public dose limit in 10 CFR part 20.1301'.

Most of the land within a 10 mile radius of the South Clive site is public domain administered by the U.S. Bureau of Land Management (BLM) (Section 5.1.1 Land Use). 5.1.1 states clearly that this land is used for sheep grazing, transportation, hunting, and recreational activities. Are the sheep part of a potential food chain pathway for human exposure? If so, what are the potential doses to humans from consumption of sheep?

For public health purposes, the DEIS should address the potential for offsite radionuclide exposures to the public through air pathways, food chain pathways, accidents, and recreational activities within the BLM public domain which surrounds the proposed facility. The fact that 'the Department of Energy (DOE) did not calculate potential population doses because no residents live within 30 km of the site' (pages 5.17, 5.19) does not exclude potential health risks to the hunter, camper, or visitor to the area.

Thank you for the opportunity to review and comment on this document. Please ensure that we are included on your mailing list to receive a copy of the Final EIS, and future EIS's which may indicate potential public health impact and are developed under the National Environmental Policy Act (NEPA).

Sincerely yours,

Kenneth Holt

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cc:
Felix Rogers, RSB