



Illinois Department of Nuclear Safety

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Director

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PDR - Return
396-55

July 27, 1982

Mr. R. G. Page
Chief, Uranium Fuel Licensing Branch
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Page:

Attached are the comments from the Illinois Department of Nuclear Safety on the DEIS for the decommissioning of the Kerr-McGee Rare Earths Facility in West Chicago, Illinois.

I hope these will prove useful. Thank you for the opportunity to comment.

With best regards,

Sincerely yours,

Philip F. Gustafson
Director

PFG:klr

Attachment



FEE EXEMPT

Discover The Magnificent Miles of Illinois



21045

Review of Draft EIS for the Kerr-McGee
Rare Earths Facility in West Chicago, Illinois

1. Alternatives I and II appear to require final ownership of the disposal site by the state or federal government. This is not addressed further in the document and its feasibility with regard to affected agencies is not explored; i.e., Is any governmental agency available to finally accept the site?
2. The radiation dose assessment in Section 5 (Table 5.5) is based on the population of the entire metropolitan area (7.5 million people). This appears to reduce the person-rem/year value to very low levels, but may be artificial.
3. The decommissioning plan calls for establishment of a temporary complex on Factory Street after the last on-site building is removed. The location appears to be one of the contaminated sites along Factory Street. If the facility is to be used for final survey and evaluation of the area, the background level may be too high.
4. It appears that the monitoring programs are designed to check disposal cell integrity immediately after construction and then change to a minimum frequency. If failure of the disposal cell would occur with time, a more complete effort would seem to be necessary at some time period; i.e., several years, after the cell is completed and closed.
5. Moving the Reed-Kepler park debris and that from various "hot spot" areas in West Chicago, to the Kerr-McGee site is desirable. The State of Illinois will help initiate whatever steps are constructive and appropriate to implement this course of action. Although the EIS specifically says that debris from Kress Creek is beyond the scope of this document, this decision might be reconsidered in terms of the logic of returning all thorium and thorium residues to their point of origin.
6. Disposal/Storage cell integrity is a two-edged sword. The more impermeable to water, biological, and human intrusion, the more difficult removal of wastes will be if and when a permanent disposal site is available, and the decision made to move the wastes. Conversely design for ease of removal may have undesirable environmental and public health consequences.
7. Although not addressed in the EIS (with proper reason for not doing so), the State of Illinois has no plans nor intention to use the Kerr-McGee site as a de facto low level waste disposal or interim storage site for any purpose other than for waste generated in the course of the Lindsay Company, the American Potash and Chemical, and the Kerr-McGee Chemical Corporation operations.