



OHIO ENVIRONMENTAL COUNCIL

400 Dublin Avenue • Columbus, Ohio 43215-2333
Tel. (614) 224-4900 • Fax (614) 224-4914

41

BOOKET NUMBER
PROPOSED RULE PR MISC
(58 FR 62384)

'94 JAN 19 P: 5

January 14, 1994

Chad Glenn, Project Manager
Decommissioning and Regulatory Issues Branch
Division of Low-Level Waste Management and Decommissioning
Office of Nuclear Material Safety and Safeguards

**SUBJECT: Written Comments on Preparation of EIS regarding in
Shieldalloy Metallurgical Corporation's Facility near Cambridge, Ohio**

**FROM: Submitted by the Ohio Environmental Council
Bridgette Mariea, Director of Environmental Research**

TO WHOM IT MAY CONCERN:

Although I could not attend the NRC scoping hearing in Cambridge, Ohio at 7:00 pm on December 13, I want to submit written comments regarding the Shieldalloy Metallurgical Corporation's Facility near Cambridge, Ohio.

I am writing on behalf of the Ohio Environmental Council which is a non-profit coalition of over 170 environmental, conservation, and public health groups and approximately 1000 individual members from throughout Ohio. The OEC works with communities to improve environmental protection and public health statewide.

I find it irresponsible that the NRC would consider a decommissioning plan for the Shieldalloy site which would permit it to leave the waste on-site. NRC's own guidelines require a site to be cleaned up so all radiological contamination is removed and any residual contamination is at "acceptable levels." This policy should be followed and the site should be completely cleaned up so it can be used again for other activities.

Shieldalloy created a big mess -- about 10 million cubic feet of radioactively contaminated soil and slag -- and now they want to employ the cheapest method of cleanup. Just because they have filed bankruptcy, they should not be allowed to bend NRC's weak rules and get away with leaving the waste on-site as they propose.

What is the point of regulations if smart companies can bend them to suit their financial needs? The concentrations of thorium and uranium exceed NRC's current criteria for allowing a site to be released for unrestricted use. This fact alone should cause NRC to deny Shieldalloy's request. This community does not deserve to be continuously threatened by the site.

The site is proposed to be a disposal site for this waste simply because this is where Shieldalloy operated. The site was never characterized to meet regulations for treating or disposing of llrw. In fact, its in the middle of wetlands which drain into a tributary to the community's drinking water supply. Other treatment and disposal

9401240336 940114
PDR PR
MISC 58FR62387 PDR

DS10



sites exist which were sited to be treatment and disposal sites because they met criteria to be treatment and disposal sites. (Of course, as official treatment and disposal sites, they also have in place a monitoring system and they expect regulatory oversight.)

Another issue of concern is if NRC allows Shieldalloy to leave the waste on-site, would the engineered protective measures be enough to protect the community and the environment from exposure to radioactivity for the length of time it would remain radioactive? Thorium 232 has a half life of 14 billion years and uranium 238 has a half-life of 4.5 billion years. Yes, billion! It takes about 10 half-lives for waste to decay to "safe" levels of radioactivity. Obviously, this site wouldn't need just long-term protective measures in place, it would need perpetual barriers! Thus, there is no future date that we can imagine whereby the site would be available for unrestricted use even though that is what decommissioning is supposed to mean.

On page 10 of the NRC summary, Shieldalloy's plan is to "cover and grade" the site in a manner that would minimize spread of contamination. This is totally insufficient. What about liners? What about monitoring wells? What about air monitors?

One problem is that current NRC guidelines do not allow for land use restrictions. This is because the whole purpose of decommissioning a site is to get radioactive levels down so the site is safe for unrestricted use. But if Shieldalloy gets their decommissioning plan approved and can leave waste on-site, the site will require restrictions so no one could get on-site and get exposed. These restrictions are really land use restrictions, which current NRC guidelines do not allow! Why would Shieldalloy deserve such special treatment?!

It has been stated that cleanup at the Shieldalloy facility may displace 100 workers. To deal with this possibility, we suggest the company set aside \$10 million. Use the interest, which will be about \$600,000 per year, to distribute to the displaced employees. This would equal about \$6,000 per year per displaced employee. After all the employees die, the \$10 million should be turned over to Guernsey County."

No matter which decommissioning plan gets approved, the citizens group - Save the Wills Creek Water Resources Committee - should be designated as a watchdog and funded to do monitoring of the clean-up.

The Cambridge community should know there is a big debate about a proposed low-level radioactive waste disposal facility being sited in Ohio on behalf of the Midwest Compact. This debate centers around siting criteria for the dump and whether there is any suitable location in Ohio to dump waste that is life-threatening for thousands of years. The waste at the Cambridge site is as dangerous as low-level radioactive waste and should be treated as such. Unfortunately, it appears the NRC may let Cambridge become a defacto llrw dump in Ohio without any of the necessary precautions that are being taken for the Midwest dump being met for the Cambridge dump (such as site characterization to see if the site meets any siting criteria). This is totally unfair to Cambridge, Ohio.