

ANTHONY C. BEILENSON
23RD DISTRICT, CALIFORNIA

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Congress of the United States
House of Representatives
Washington, D.C. 20515

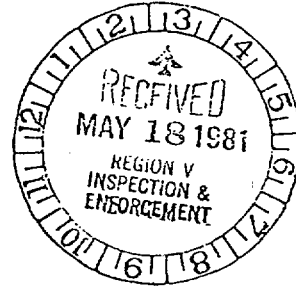
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Mr. Herbert E. Book
United States Nuclear
Regulatory Commission
Region 5
1990 North California
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Walnut Creek, California 94596



Dear Herb:

I very much enjoyed meeting you last Thursday during the NRC testing at the Veterans Administration/Brentwood waste disposal site.

I have enclosed for your review a series of questions and comments regarding the disposal site which were received by our office from Dan Hirsch, representing the Committee to Bridge the Gap. Larry Scamper has indicated that he would appreciate your forwarding him the enclosed Bridge the Gap material after you have had an opportunity to examine it. Please feel free to contact me at (213) 345-1560 or (FTS) 796-3006 so that we may further discuss this matter.

Thank you again for your assistance. I look forward to talking with you.

Sincerely,

Joan Shaffran-Brandt

Joan Shaffran-Brandt
Legislative Assistant to
CONGRESSMAN ANTHONY C. BEILENSON

Enclosure

WHAT NEEDS TO BE DONE BEFORE SAFETY OR HAZARD OF BRENTWOOD DUMP
CAN BE ADEQUATELY ASSESSED

1. Get from Wetterau detailed maps of exactly where the material he buried was buried (not just the general area, but the location of each hole). If he has no such maps (and he was using some records in leading the NRC around), he should point them out to the scientific panel at the site itself.
2. Find out from VA how to contact J.O. Erickson, Wetterau's predecessor, to determine from him whether burials took place prior to 1960, and if so, precisely where, what, how much, and when. (The 1960 Erickson records imply prior routine burials).
3. Determine (from Wetterau or Wetterau's records) whether the 3-foot in diameter circles (in which vegetation is not growing in the areas indicated by Wetterau on the map he previously provided as containing the waste dump holes) ~~correspond~~ correspond to dumping locations. If so, what explanation does he have why vegetation is lush all around the holes and why little or nothing grows on top of them.
4. Determine (from Wetterau or Wetterau's records) as closely as possible how much toluene (in gallons) and how much dioxane were buried. Confirm whether the records are correct in indicating that gallons of the material were just poured into 4-8 foot holes. Determine whether any chemicals besides toluene and dioxane were buried (by checking records and asking Erickson and Wetterau directly).
5. Request of UCLA its records for the fifties and sixties regarding disposal of radioactive materials. We know some UCLA material was buried in the VA dump during the sixties. The records should indicate whether any more dangerous materials were buried in the fifties.
6. Determine from Wetterau or Wetterau's records (or Erickson) whether any other radioactive materials besides those recorded were disposed of, and if so, through what means? If nothing radioactive was disposed of during that period except through burial or by dumping down the drain, check radioactive inventory records of incoming materials to see if materials other than those listed in burial records were on site and what was the disposition of them.
7. Monitor water wells downstream for tritium, carbon-14, toluene, dioxane, and if possible, strontium, iodine, cesium, and plutonium.
8. Arrange for regular and routine monitoring in the future, preferably for at least tritium, carbon-14, toluene, and dioxane.
9. Take in the range of 20 soil samples, from top six inches or so, of dump hole locations and areas where vegetation won't grow, plus from streambeds down below; monitor for as many of the substances listed in 7 as possible (at least dioxane and toluene--bare minimum).
10. Take about the same number of vegetation samples for monitoring, including roots (of grasses) from dump hole locations and particularly from the circular areas where little vegetation except stunted grasses grows.
11. After the above has been done, depending on the information received, determine whether some coring is needed.

SUMMARY OF WHAT IS KNOWN

1. Of the more dangerous isotopes recorded as buried (e.g. I-131), virtually complete decay should have taken place by now.
2. Of the long-lived material recorded as buried (i.e. tritium and carbon-14), the quantities listed as buried indicate a relatively small hazard because the materials are weak internal emitters and the quantity stated to be buried there is small.
3. A relatively large volume of toluene is recorded as having been buried at the site (in the hundreds of gallons), and at least some of the toluene is recorded to have been merely poured out of cans directly into the bottom of holes dug 4-8 feet deep and then covered over.
4. A less certain volume of dioxane was also buried; one receives the impression of less than 10% as much as the toluene.
5. Toluene is a highly toxic material; estimated lethal dose to a 150 pound person is one teaspoon to one ounce (a child proportionately smaller lethal dose.)
6. Dioxane is suspected of being a highly potent carcinogen.
7. One geologist on the technical committee says that he feels the primary means of transport would be upward migration, in part through capillary action, in part through vegetation roots, in part through rain followed by warming conditions evaporating the water that has sunk a few feet in the ground rising again.
8. The lack of vegetation, aside from stunted grasses, in 3-foot-diameter circles in the area marked on Wetterau's map as disposal areas, is, according to a couple members of the technical committee, worrisome indication of possible upward migration and potent effect.
9. The streambed so close to the disposal area provides a potentially worrisome means of transport of materials; although there may be a self-cleaning tendency also and the stream may not connect with ground water.
10. UCLA did, despite initial denials, bury material at the VA during the 60s. The VA, despite initial denials, did dispose of radioactive materials in the ocean.

WHAT IS NOT KNOWN

1. What if anything was buried prior to 1960? If material was buried prior to 1960, where was it buried?
2. Did UCLA bury material there prior to 1960?
3. How accurate are the records provided to date?
4. What migration of materials has taken place?

SUMMARY OF WHAT NEEDS TO BE DONE

1. Determine if there are either any records or personal recollections by the people involved which indicate one way or the other whether materials other than those listed on Wetterau's inventory were ever buried at the VA. In particular, determine (through Wetterau, his predecessor, NRC personnel, and UCLA radiation personnel) whether there were any burials prior to 1960, when his records begin.
2. Determine precise location of dump holes and whether they correspond to areas where vegetation doesn't grow; if so, has upward migration of the material made the soil toxic to plant life.
3. Take a few soil and vegetation samples from near the surface of these dumping and dead areas.
4. Determine whether Wetterau's map given to the technical committee, showing the dumping done at the side of the proposed lease area, is accurate, or whether the area he led the NRC through (middle of proposed lease area) is the correct location.
5. Visually inspect area to see if other circular no-vegetation areas exist outside of the known dump area as an indication of possible past dumping.
6. Monitor downstream water routinely for at least a couple radionuclides and toluene and dioxane.
7. Based on results of the above, determine whether some coring is needed (much easier than previously thought because the actual dump holes are apparently easy to find visually where we previously thought it would be trial and error.)