



THE WEST VALLEY  
CITIZEN TASK FORCE

VIA EMAIL

February 10, 2013

Dr. Jane Summerson  
DOE NNSA  
PO Box 5400  
Building 401  
KAFB East  
Albuquerque, NM 87185

**RE: Draft DOE/EA-1919**

Dear Dr. Summerson,

The West Valley Citizen Task Force (CTF) is a representative community advisory group formed by the New York State Energy Research and Development Authority (NYSERDA), with the support of the US Department of Energy (DOE), to provide public participation and comment on policies, priorities, and guidelines for the clean up, closure, or long-term management of the West Valley Demonstration Project and Western New York Nuclear Service Center. The CTF has been made aware of the DOE Draft Programmatic Environmental Assessment (PEA) for the Recycle of Scrap Metal Originating From Radiological Areas (DOE/EA-1919). The DOE is accepting public comment on the Draft PEA referenced above. In that regard, the CTF submits the following comments:

The draft PEA does not provide an adequate basis for evaluating the potential environmental impact of the proposed action, so a Programmatic Environmental Impact Statement (PEIS) is needed. The reason for our position on the need for the PEIS is that the potential environmental and human exposure impacts of the proposed reuse and recycling cannot be determined and have not been fully identified or evaluated.

1. The DOE release criteria are not explained clearly, particularly with respect to dose conversion. The PEA Figure 1 flow diagram (p. 8) greatly oversimplifies the steps needed to justify a release of scrap under DOE Order 458.1. (See Section 4(e) of DOE Order 458.1, Demonstrating Compliance with the Public Dose Limit) The PEA provides no details of the method in which DOE, or its contractors, would calculate allowable exposure (expressed in millirems, for example) from a given level of surface contamination on scrap (expressed in picocuries or dpm, for example). Knowing how this conversion is done, and knowing the assumptions that are made, is crucial for understanding potential impacts.

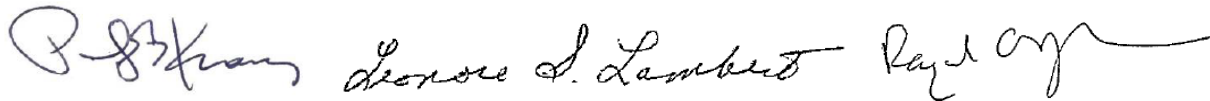
Table A-1 on page 30 of the PEA, for example, shows "Release Criteria for Surface Activity" but does not indicate how the activity listed in dpm is converted to an allowable dose, and it does not identify

the assumptions made. Factors such as volatility or vapor pressure of the radionuclides would need to be taken into consideration, especially for contaminated scrap going to a smelter, but it is not clear that such factors have been considered for the various deliberate and inadvertent uses and processes into which the contaminated scrap would go.

2. Footnote 3 on page 5 of the PEA implies that DOE dose standard will apply "to each lot or stream of scrap cleared from an individual site." The apparent meaning is that a dose limit in millirems would be set for each lot or stream of contaminated scrap released by DOE, and it is not clear whether the cumulative dose from multiple lots or streams is being considered, or whether there's an unstated assumption that any given person is unlikely to be exposed to more than one lot or stream of contaminated scrap. This issue is not addressed in either the PEA or DOE Order 458.1. This would be a particular cause for concern for any entity contracted to accept and recycle the material.

Given the concerns and deficiencies noted above, the CTF cannot adequately judge the impact of the proposed reuse and recycling. The environmental and potential human health impacts of the proposed release of contaminated scrap metal cannot be adequately assessed from the DOE Draft Programmatic Environmental Assessment. The CTF submits that a more complete Programmatic Environmental Impact Statement (PEIS) is needed.

On Behalf of the West Valley Citizen Task Force,



Members:

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Office of NYS Senator Catharine Young

**Rob Dallas**

Int'l Assoc. of Machinists and Aerospace Workers

**Judy Einach**

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