

CTF to NRC draft b            September 25, 2006... Lee

The Citizen Task Force (CTF) for the West Valley site is very concerned about the continued spread of the radioactive plume of strontium 90 across the North Plateau of the site

As you know, the CTF was formed over nine years ago to advise federal and state site managers for the West Valley Demonstration Project (WVDP). Through the years we have studied the various waste management areas on the site, often questioning decisions and actions, sometimes becoming frustrated by what appeared to be indecision and inaction. Once more we are mystified by official inaction.

In order for the Department of Energy (DOE) to take control of operations at the site, implementing the WVDP Act, ~~your agency~~ NRC suspended the license for the site then held by New York State Energy and Research Authority (NYSERDA). The justification for that decision (putting the license in abeyance) was that DOE held the expertise for dealing with radioactive waste, and therefore could be depended on to handle it with the health and safety of the population as a top priority. ~~Obviously, that was a poor decision, given the dilemma that now faces us.~~

As we understand it, NRC ~~your agency~~ is responsible for the health and safety of the populace regarding radiological matters. Even though you normally exercise this duty in the context of licenses, we believe you have a broader, more general national duty to protect ~~the health and safety of citizens radiologically~~ [from radiological exposure](#).

[According to m](#)Monitoring reports from your office to DOE, ~~mention that~~ a radioactive plume of strontium 90 (Sr-90) in the groundwater was apparently discovered at the site as early as 1990. By 1995 the source was determined to be a spill in the old Process Building, ~~site of the failed experiment in commercial reprocessing of nuclear fuel rods (1966-1972), which was the impetus for the WVDP Act.~~ [The most recent NRC monitoring report verifies that the spill occurred in 1967.](#) Numerous monitoring visits to the site by [NRC officials](#) ~~members of your department~~ included reports on [documented](#) mitigation efforts by DOE to slow the progress of the plume, [including](#) DOE dug wells and initiated a "pump and treat" system, [and then built a Permeable Treatment Wall to capture the radioactive waste](#) ~~where contamination could be captured, the contaminant separated out and the resultant resin disposed of off site as low level waste.~~ Neither system has worked satisfactorily. Parts of the plume have gone around the wells and the wall, [by passing and have by-passed](#) treatment entirely.

Contaminated water is still daily spreading to previously uncontaminated media, [migrating and expanding](#) ~~The plume continues to migrate and expand~~ in the sand and gravel of the North Plateau. The underground portion is moving rapidly beyond the



Sincerely,