

Tri-Valley CAREs

Communities Against a Radioactive Environment

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Comments on the US Department of Energy Programmatic Environmental Assessment on the “Recycling” of (Radioactive) Scrap Metals Originating in Radiological Areas; DOE PEA-1919

1. In the proceedings that led to the July 2000 suspension to prevent potentially contaminated surface metals from being sent to recyclers, public stakeholders were told by DOE officials that a full Environmental Impact Statement would be prepared to address the potentially significant impacts to the environment posed by allowing potentially radioactively contaminated scrap metal to be commercially recycled. Despite the continued threat of exposures to the public, this Agency backtracked on that verbal promise and instead released this Programmatic Environmental Assessment (PEA) that is based on inadequate analysis of the potential pathways and exposures of this metal in order to come to a predetermined decision. Additionally, the information contained in the PEA display that there are potentially significant impacts to the environment from potentially radioactively contaminated scrap metal to be commercially recycled in the form of exposures to individuals. The Agency should now compile a full Environmental Impact Statement to perform a more detailed analysis of the issues surrounding the recycling of this scrap metal.
2. DOE should permanently expand its metal bans to also stop radioactive soil, concrete, asphalt, wood, plastics, chemicals, glass and other materials from dispersal in recycling streams or reuse in everyday items. These should also be prevented from going into regular or hazardous waste landfills and incinerators.
3. DOE should maintain, expand and make permanent, its ‘suspension’ on the recycling of "surface" contaminated radioactive metal from ‘radiological control’ areas of DOE sites. The July 2000 suspension was put in place to prevent potentially contaminated surface metals from being sent to recyclers. The suspension should be made permanent and expanded to cover more than metal. "Surface" contaminated means the radioactivity is on the surface and supposedly not within the metal. When metal gets melted for recycling, the radioactivity blends in and the final products will be contaminated throughout. The implication that surface contamination can be completely removed is not true.
4. DOE should expand its suspension on “recycling” of surface contaminated radioactive metal to also prevent disposal and reuse—that is to prevent potentially contaminated metal from being treated like regular garbage and sent to landfills, incinerators, etc. or reused as if it is not radioactive. When the suspension was put in place in July 2000, the then-DOE Secretary told the public no contaminated metal would get into regular daily items. This commitment should be fulfilled, not reversed.
5. Nuclear Waste will contaminate recycling streams increasing the demand for more metal mining. DOE claims that sending slightly radioactive metal into recycling reduces the need for more polluting metal mining but in fact it does the opposite. There will be greater demand for new metal if the recycled supply is polluted with nuclear waste.

6. Health risks are higher than DOE claims and higher than the Environmental Protection allows. A “millirem” is a calculated dose that cannot be measured, enforced or verified. Even if that is all that is released per load, if exposed for our whole lives and to multiple releases, our cancer risk is higher than the 1 in a million to 1 in 10,000 which is EPA’s allowable risk range.

7. DOE should replace its "Authorized Limits" [that release radioactive material] with a *prohibition* on release/recycle/reuse of radioactive wastes and materials. DOE can currently send non-metal radioactive materials into general commerce if they meet DOE’s internal "Authorized Limits," self-authorized contamination. DOE should revise authorizations in DOE Internal Order 458.1 to prohibit DOE radioactivity in commerce or regular trash.

8. Once radioactive material are released from the DOE complex, there is no limit on where they can go- frying pans, belt buckles, playgrounds, garden-fill, cars, buildings, zippers, braces, hip-replacement joints and more. It can be used for anything. There can be multiple exposures from many different deregulated waste streams.

9. The cost and burden of proof that materials are completely clean of DOE radioactive contamination must lie with the DOE. Full monitoring and labeling would make it too expensive to release the materials, so DOE adopted short cuts in its Internal Order 458.1, adopted without public notice or comment in 2011. Monitoring at the lowest achievable levels of detection for every radioactive isotope to determine the amount and type of contamination is difficult, expensive and nearly impossible to carry out for all the wastes and materials.

10. Deliberate dissemination into commerce of nuclear wastes now held at atomic facilities will unnecessarily spread radioactivity into communities. Background radiation already causes unavoidable exposures, so why add preventable doses from "recycled" nuclear waste to it?

11. We cannot trust unverified computer models (including the RESRAD code), developed at DOE and NRC expense, with highly questionable assumptions, to predict correct levels, doses and risks from an unlimited array of radioactive sources.

12. Multiple exposures: We could be exposed to radiation from many different contaminated consumer products, building materials, etc. The risks add up and are multiplied when we are exposed to more radiation and other carcinogens in our lives.

13. No tracking or labeling. We don’t know where “cleared or released” waste goes. Recyclers might have detection equipment at their entries to stop some nuclear wastes from getting in, but they can miss some and should not be expected be watchdogs for the nuclear establishment. DOE waste contaminated a recycling site in Knoxville, TN when radioactive metal was sent, resulting in a state Superfund mess. Radioactive dog bowls, bike baskets, tissue boxes and a cheese grater are some consumer goods already discovered in the marketplace.

14. Since any standard set is not physically or economically possible enforceable, it legalizes unlimited amounts of nuclear waste being fused into our homes, vehicles, workplaces.

15. DOE can’t be trusted to release any levels of contamination, nor can they be trusted to honestly carry out the Environmental Assessment. A contractor (SAIC) with conflicts of interest, making money on releasing metals, was originally hired to carry out DOE’s 2001 Environmental Impact Statement, but had to be let go. Now DOE is simply doing an Assessment.

14. DOE should maintain and make permanent, its ‘moratorium’ on the release and recycling of "volumetrically" radioactive metal, which also began in 2000. “Volumetric” means the radioactivity

is within/throughout the metal and includes large amounts of nickel from uranium enrichment facilities. DOE should expand the 'moratorium' on "volumetrically" contaminated metals to cover all potentially contaminated materials and wastes in addition to metals.

Sincerely,

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