



# CCNS

**Concerned Citizens for Nuclear Safety**

October 5, 1998

FAXED to (505) 827-1544  
and MAILED

Ms. Janice Archuleta  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galisteo Street, Building A  
P. O. Box 26110  
Santa Fe, NM 87505

Re: Comments on the Revision Request No. 7.0 (June 1998)  
Los Alamos National Laboratory, Federal Facility Compliance Order  
October 4, 1995

Dear Ms. Archuleta:

Thank you for the opportunity to comment on the Revision Request No. 7 of the Federal Facility Compliance Order for Los Alamos National Laboratory. Our comments are as follows:

Section 1.2 Contents.

It appears that the Compliance Plan no longer consists of a schedule for the submittal of applications for permits, construction of treatment facilities, and technology development. We are unsure of the definition of "completion of parallel options" that has been added to this section.

Sections 2.6 Recycling/Re-use and 2.7 On-Site Radiological Decontamination.

Recycling/re-use does not have "the same net effect as off-site shipment for treatment and disposal." Off-site shipment for treatment and disposal "confines" the mixed waste. Recycling/re-use does the opposite. Recycling/re-use allows materials containing radioactivity to be released to the general public. DOE plans to use on-site radiological decontamination, including sandblasting, hand-scrubbing, or electrolytic decontamination. All of these processes leave some radioactivity in the materials. There are no radiation monitors that can detect the internal, or volumetric, contamination.



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The recycling/re-use and release of these materials containing radioactivity are covered by internal agency guidances for *surface* contamination only. The Nuclear Regulatory Commission adopted its NuReg 1.86 in 1974. The DOE adopted NuReg 1.86 in its DOE Order 5400.5. These guidances are outdated and based upon an annual 5 rem *occupational* dose, not a dose to the general public. In 1991, the International Atomic Energy Agency (IAEA) lowered its annual occupational dose from 5 rem to 2 rem largely in response to the reevaluation of the atomic bomb survivor data. For the same reason, in the same year, the IAEA lowered its annual exposure to the general public from 0.5 rem to 0.1 rem. In addition, there is new scientific evidence that exposure to radiation in utero, in infancy and in the later years of life is more detrimental than previously thought. Before NMED allows the addition of §§2.6 Recycling/Re-use and 2.7 On-Site Radiological Decontamination to the Site Treatment Plan, NuReg 1.86 and DOE Order 5400.5 must be brought into line with the IAEA standards for occupational and general public exposures, including exposure in utero, to infants and to the elderly.

Should you have any questions regarding our comments, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Joni Arends".

Joni Arends