



# CCNS

**Concerned Citizens for Nuclear Safety**

Mr. Kelly Crossman  
1190 St. Francis Drive  
Santa Fe, New Mexico, 87501

RECEIVED

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PUBLIC HEALTH DIVISION  
DIRECTOR'S OFFICE

Dear Mr. Crossman,

Enclosed are comments from Concerned Citizens For Nuclear Safety on Los Alamos National Labs (LANL) radioactive-hazardous waste incinerator.

First, we would like to thank you for being on the stand to answer questions from the public. We object to the fact that EID did not provide a panel that included representatives from air quality, radiation protection, etc. We feel it would have been more comprehensive and helpful to you, as well as the public.

We protest the idea that only the "permit" was on the stand, therefore, only the state had to answer all the questions. There would be no permit if LANL had not applied. The fact that LANL refused to participate and answer any questions from the public is appalling. There is something wrong with the policy at EID if there is no right to publicly question the applicant. In light of Secretary Watkins' ideas on DOE facilities being more open and less secretive, LANL's refusal creates more of the same distrust.

As we understand the idea of segmenting the permitting process, there are still major questions about the radioactive portion of the permit that won't get answered before the incinerator is allowed to burn. We object to DOE being allowed to essentially permit themselves in regard to radioactivity. We would like to see EID take a more aggressive stand on regulating DOE facilities. If new legislation is needed, we would be happy to participate.

EID doesn't seem to question DOE credibility, even in the atmosphere of criminal investigations at Rocky Flats. Does the EID have access to infra-red photography? This was the only method the FBI could use to determine that Rocky Flats was incinerating illegally. EID should not take the stance that they



trust DOE, no one in the community does in light of the DOE's past track record of safely operating and managing facilities.

With optimum health and safety considerations in mind, we would like to see continuous stack emission monitoring (CEM) on this incinerator. It is necessary to have CEM with immediate shut-down abilities in case of malfunction of the machine. LANL promotes this incinerator as the best, most highly technical incinerator ever built. No doubt it is, however, when relying on technology, we need to remember the Challenger disaster, the Chernobyl explosion, the Titanic and other examples of advanced technology that failed. Our concern is not only failure of technology, but of human error, such as the Valdez accident. With the public's fears at it peak, CEM by both the EID and an independent citizens monitoring group, would help to ease some of the concerns.

It is necessary for CEM to check for dioxins, furans, heavy metals, and other toxic substances that could reach the atmosphere and pollute our environment. The Radioactive Waste Campaign Fact Sheet included covers this subject in detail. It is critical that the EID recognizes the need for researching all toxic emissions and not hesitate to call for a full account of these substances.

The choice of incineration for disposal of radioactive waste has not been proven as the most appropriate method. Radioactivity has been dealt with previously in a closed system, incineration opens radioactivity to the atmosphere. LANL states that it would only be a small amount of radiation that would escape, however, the question of how much radiation is harmful is toxic. LANL and other nuclear proponents have long held to the threshold theory which believes there is a "safe" level of radiation for the human body. Enclosed find reports by Drs. Sternglass and Gould that find this long time assumption to be false.

There has been no health and safety assessment done on the local effects of radioactive-hazardous waste incineration. There has been no environmental impact statement done to determine if the quality of life in New Mexico would change in case of a fire or accident in the incinerator. There has been no studies on the impact of fire and/or explosion on the tourism and real estate in the area.

Enclosed find a list of incinerator accidents from the Citizens Clearinghouse. There has also been no study on the cumulative effects of all the incinerators in the country burning at once? What is the effect on our atmosphere?

There is growing evidence that radioactivity is adding to the depletion of the

ozone layer. Has this been addressed by EID? Why not? We have global ecological concerns that can no longer be denied. Radioactive substances can last 240,000 years, how can one take responsibility for the safety of thousands of generations with so little thought to the dire consequences? No longer can the public let the decisions that affect thousands of generations be in the hands of those who take the word of DOE as the truth. The truth is that we are at one of the most critical junctures in the history of mankind. We can go ahead with a lack of respect for natural law, or choose to discontinue producing that which is impossible to dispose of. The DOE should clean up its' mess before being allowed to produce more. Cleanup at Los Alamos is estimated at \$2 billion. Does this point to a working hazardous waste program? We don't think so. How can we continue to afford this type of waste cleanup.

It is ludicrous to invest in a waste disposal program that generates more waste. The ash is highly concentrated radioactive waste, the water that cleans the filters becomes radioactive and the filters themselves must be disposed of in a radioactive dump. Incineration is a landfill in the sky. The waste does not disappear because the volume reduces, it is only dispersed in the air we breathe. There is no excuse for this kind of short-sighted thinking.

The EID and other state and federal agencies must begin to think in terms of the long range results of their methods of dealing with radioactive materials and byproducts.

I have enclosed several recent reports that support our position of the need for greater safety measures and more research needed before any incineration takes place.

Respectfully submitted,

A handwritten signature in cursive script that reads "Elizabeth Billups". The signature is written in black ink and is positioned to the right of the typed name.

Elizabeth Billups  
Research Director