

NRCREP Resource

From: Laray Polk [laraypolk@me.com]
Sent: Friday, August 07, 2009 2:31 PM
To: Brown, David; NRCREP Resource
Subject: Docket No. 70-7005

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2009 AUG 11 PM 12:21

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VERSION

7/09/09

74FR 32983

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RE: Public Commentary, Docket No. 70-7005

Dear NRC,

I am writing in regard to Docket No. 70-7005 concerning Waste Control Specialists LLC. It is with utmost concern that I am prompted to enter this statement. I am a resident of Texas and a freelance writer who has been actively investigating the WCS site. I am submitting the following based on my sense of responsibility as a citizen.

Through interviews, investigations of records, studying maps, and reviewing the applications submitted to the Texas Commission on Environmental Quality (TCEQ), I believe, along with others who work mainly in scientific fields, that the site in Andrews County is unsuitable for the disposal of uranium byproduct and low-level radioactive waste. If I understand the opening here for citizen input, this is specifically in regard to special permissions sought by WCS in handling the special nuclear material on premises.

It is also my understanding that the special permissions sought by WCS on handling SNM is based on the potential for increasing employee exposure to harmful amounts of radioactive material. My point in filing this concern is to express that the overall proposal to permanently dispose of the SNM and LLRW at WCS is of a greater deterrent to a larger population, and to urge the NRC to investigate the site more fully. I understand that this is the final step in the Fernald, Ohio, clean-up. If the waste is disposed of as planned, there is the potential that nothing will be gained but, rather, the chances increased that WCS will be its own Superfund site in the near future.

There are mapping incongruities that are not resolved. Though the debate continues to be centered on the presence of the Ogallala --is it an aquifer or a formation?--there is currently water present at the WCS site. The water has surfaced during the dredging of the byproduct dumpsite. It has not been adequately accounted for by WCS.

Recently, WCS has publicly relied on maps revised by the Texas Water Development Board (TWDB) in 2006. However, in communication with the TWDB on these matters, it is clear that the revisions which depict the Ogallala further from the WCS site, came as a result of expanding the presence of another aquifer in the region: the Pecos Valley aquifer. So, while one aquifer has been minimized, the perimeter of another aquifer has expanded. A major aquifer, none the less, underlies the WCS site.

Further, in speaking with a hydrologist who worked on the mapping revision of major and minor aquifers of Texas, the aquifers in Andrews County are "contiguous hydrologically connected units." That is, there is communication among the aquifers present in Andrews County. The four aquifers are: Pecos Valley, Ogallala, Dockum and Edwards-Trinity. In this context, to argue how far the water-bearing sections of the Ogallala are located from the WCS site is willfully missing the larger point.

To my knowledge, WCS has not recognized the Pecos Valley aquifer nor the fact that it is located above the Dockum. Though heavily-relying upon the newly revised maps, the full data set is overlooked. The water that is presently on site could be tested to identify the source. To my knowledge, those techniques for determining the source of groundwater, water chemistry and isotopes, have not been pursued by WCS nor instigated by the licensing-granting entity, TCEQ.

The water system of Andrews County is complex; it is a nexus of four known aquifers. Those aquifers supply drinking and irrigation water throughout the state of Texas; the Ogallala extends to eight states.

I am new to the various regulations regarding the disposal of uranium byproduct and LLRW, but it is reiterated in general rules on several levels that groundwater present at these sites is unacceptable. The crises of the abundance of radioactive waste is real; it must go somewhere. Add to this dilemma, an urgent need to move hazardous and radioactive waste from Superfund sites to off-site locations. However, it is my strong and informed opinion that the hydrogeologic features of the WCS site are sufficiently complex as to halt disposal of these materials until the mapping incongruities can be resolved by way of an unbiased team of hydrologists and geologists.

SUNSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Cdd = J. Brown (DDB)

Respectfully,

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