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Ms. Stephe Jennings
NEPA Document Manager, SSFL, Area IV EIS
U. S. Department of Energy
4100 Guardian Street
Simi Valley, CA 93063

Dear Ms. Jennings,

I am pleased to submit these comments on the Draft Area IV EIS, not only as a former worker, community stakeholder, and member of the SSFL CAG, but as a knowledgeable nuclear professional with almost 60 years of experience who is familiar with most of the technical disciplines involved in developing the information for the EIS and preparing the DEIS.

I would like to commend the Department for its diligence in preparing the draft which presents evaluations of reasonable remediation alternatives in strict compliance with NEPA. The technical data accurately reflects the information that has been developed in recent years and the evaluations are sufficiently detailed to allow the decisionmakers to compare the benefits, risks, and costs of the alternatives in reaching their decisions.

Two important conclusions are made that should strongly influence any public discussion of the DEIS and the eventual Record of Decision. As stated in Table 4-60 under the No Action Alternative, for a hypothetical future suburban resident, "Cancer risk and toxicity impacts from chemical and/or radionuclides in Area IV and the NBZ are comparable to or less than the risk determined for background soil." This clearly means that SSFL now poses no additional risks from soil to off-site residents, and that it is questionable whether any soil removal is necessary to protect unlikely future on-site residents under any land use scenario. It is highly unlikely that any local stakeholder would spend their own money to remove soil from their own backyard if they were told that the risk was comparable to or less than the risk determined for background soil. The expenditure of tax dollars to remove such soil from a distant site cannot be justified.

The second conclusion is that the AOC's as written are unworkable and are in need of revision. On Page S-26, DOE discusses Acceptable Error Rate and Background Data AOC LUT Failures. With the DTSC-accepted error rate in sample analysis of 5 percent, and the AREA IV 116 chemicals and 16 radionuclides of concern, DOE would likely be remediating clean soil, not just contaminated soil. Also, when comparing the background soil results with the AOC LUT values, it was found that 42 percent of the samples exceeded their respective AOC LUT values in at least one analyte. Thus, if the point-by-point, AOC remediation decision process was applied to the background study locations, they would be declared contaminated and subject to soil remediation.

As stated on Page S-28: “DOE concluded that low AOC LUT values, coupled with the false positive issues and the inability to accurately distinguish TPH from a range of other organic molecules, resulted in data showing almost the entirety of Area IV to exceed an AOC LUT value for at least one chemical.” On the same page DOE addresses the issue of replacement soil, considering onsite and offsite borrow sites for soil meeting the chemical AOC LUT values, and packaged soil products sold by home improvement stores. DOE concludes: “Based on this initial evaluation and given the low AOC LUT values, it appears unlikely that replacement soil meeting the AOC requirements can be found.” The absurdity of the exceedingly low AOC LUT values should be apparent to any objective observer or decisionmaker.

The already 10-year delay in starting final remediation will extend for another several years while detailed plans are developed, approved, and funded, even if the 2010 AOCs were to be modified and lawsuits are not brought by the same parties who stopped the implementation of the 2007 agreements. There is now sufficient information to make the required remediation decisions based on this DEIS with the knowledge that SSFL is truly a somewhat contaminated industrial site that does not pose any unusual risks to the surrounding communities.

Whether or not the 2010 AOC’s will be modified, it is still possible to make very justifiable SSFL remediation decisions based on the information contained in this DEIS. Based on the discussion in Section S.11.2 Potential Environmental Consequences of Combined Action Alternatives and Appendix J Cost Benefit Analysis, I reach the following logical conclusions. A clear distinction can be made between the costs, risks and benefits of the High Impact Combination and the Low Impact Combination. Because the selection of a soil remediation alternative will have no impact on Groundwater Resources these decisions are fully decoupled and may be made separately. Similarly, the Building Demolition activity is common to all scenarios except the No Action Alternative, allowing the soil decision to be made independently.

Cancer risk for all remedial action alternatives would fall within the USEPA target cancer risk range of 1×10^{-4} to 1×10^{-6} , and are therefore acceptable. Cost estimates for the remedial action alternatives range from \$468 million for the Cleanup to AOC LUT Values to \$124 million for the Conservation of Natural Resources, with \$168 MM for the intermediate Cleanup to Revised LUT Values. Because of the increased severity of the environmental impacts of either of the LUT approaches, and acceptable risk from all alternatives, there is no justification for choosing any alternative except the Conservation of Natural Resources Alternative for soil remediation.

The preferred choice for Groundwater Remediation should be Monitored Natural Attenuation, because, with the exception of the FSDF TCE plume and the RMHF Leach Field Sr-90, all of the chemical plumes will reach acceptable levels after 10-20 years of monitoring with no other action. While the Sr-90 in the bedrock will take 50-150 years to reach drinking water quality levels, it is highly unlikely that SSFL would be used as a source of drinking water in any credible scenario in the foreseeable future. The minimal risk from these groundwater plumes does not warrant any remedial action other than monitoring, even with minimum environmental consequences from such remediation.

Therefore, the DOE preferred alternative should be the Low Impact Combination of Conservation of Natural Resources plus building Removal plus Monitored Natural Attenuation. While some might suggest that the Cleanup to Revised LUT Values for soil, which removes

radionuclides to AOC levels and chemicals to risk based levels, represents a reasonable compromise, I contend that no compromise is necessary simply to assuage the angst of individuals who have an irrational fear of radiation, no matter how small or close to background the dose. As a taxpayer, I believe that the Department should not waste the additional estimated \$44 million, damage the additional acres, or inflict the additional truck traffic on the surrounding communities. Choosing the Low Impact Combination is in the best interests of the future use of the site as open space, minimizing the negative effects of remediation on the environment, and avoiding the waste of taxpayer dollars.

Sincerely,

A handwritten signature in cursive script, appearing to read 'A. Weitzberg'.

Abraham Weitzberg