1205-1110200001

[redacted]

UNITED STATES DEPARTMENT OF ENERGY

SITE SPECIFIC PLAN MEETING

DATE OF MEETING: Wednesday, September 19, 1990, 7:00 P

PLACE OF MEETING: Miamisburg Civic Center
10 N. First Street
Miamisburg, Ohio

APPEARANCES:

Patrick Higgins
U.S. Department of Energy
Albuquerque, New Mexico

John Lyons
U.S. Department of Energy
Dayton, Ohio

Howard Charbeneau
EG&G Mound
Miamisburg, Ohio

Richard Neff
EG&G Mound
Miamisburg, Ohio

SUZANNE DENSLOW
Court Reporting
3341 Sheffield Road
Dayton, Ohio 45449

(513) 299-7652

UNITED STATES DEPARTMENT OF ENERGY

SITE SPECIFIC PLAN MEETING

DATE OF MEETING: Wednesday, September 19, 1990, 7:00 P.

PLACE OF MEETING: Miamisburg Civic Center
10 N. First Street
Miamisburg, Ohio

APPEARANCES:

Patrick Higgins
U.S. Department of Energy
Albuquerque, New Mexico

John Lyons
U.S. Department of Energy
Dayton, Ohio

Howard Charbeneau
EG&G Mound
Miamisburg, Ohio

Richard Neff
EG&G Mound
Miamisburg, Ohio

SUZANNE DENSLOW
Court Reporting
3341 Sheffield Road
Dayton, Ohio 45449

(513) 299-7652

MR. HIGGINS: Let me introduce myself first. I'm Pat Higgins from the Albuquerque Operations Office. I'd like to welcome you to the first of our Site Specific Plan meetings. What I'd like to do first is kind of give you an overview of what we plan to do in terms of the conduct of the meeting and then go through some specifics as to what I will cover and then what Mr. John Lyons from the Dayton area office at the facility here will then go through and cover for you.

This indeed is a public participation meeting, so we do encourage your active participation. We have provided services to record the meeting here so we make sure that we do indeed record your excellent questions and concerns accurately.

In this particular session, we're going to be talking about the Five-Year Plan activities that the Department of Energy has developed and undertaken and then some specifics for the Mound Plant here in Ohio. What I will be covering for you, are the specifics of that Five Year Plan, what that plan attempted to try to encapsulate in terms of DOE facilities and then

walk you through some of the highlights that came through that agency and then discuss with you what the process, the comment process that we're trying to have you all engage in with us here and where your comments will be utilized in the process in the future. In gathering those comments from you, we will ask you to come up to the microphone, state your name and the organization that you represent, if you do indeed represent one, and then proceed with your question or statement.

The Five-Year Plan effort was an effort that was initially started back in February of last year. The current plan which the DOE has published, which is dated July of 1990, is actually the second -- or I should say is first revision of that particular plan. And it represents an effort aimed at this particular goal, and that is to conduct all operations at the facility such that all environmental risks are reduced, as well as project ties, if you will, our clean-up efforts as those need to be conducted at each of the sites that DOE is responsible for.

I just want to use one slide here

to emphasize a point. The environmental awareness that the Department of Energy is having to incorporate into its everyday operations is something that is indeed somewhat new to us across the board. It is something that we've seen accelerate quite recently. This particular chart is just one that shows the amount of environmental regulations and laws that have come into existence. And it's quite obvious that since the early 1970's, the interest both expressed by the general public, as well as the legislatures of various states. Of course, the congress has certainly brought the point home to us. DOE and all of its facilities are committed to conducting all of our activities in compliance with all of those regulations, and that's one of the prime interests of the Five-Year Plan itself.

Let me take just a moment to walk you through the elements that are in the Five Year Plan, primarily to clear up what I at least perceive as a misperception. Many people believe that the Five-Year Plan covers clean-up activities exclusively. While it does indeed include what is listed under environmental restoration, which is the clean up of inactive

sites, it also includes a couple of other major elements which are adjunct to that particular attempt or effort, if you will.

The first is the effort to correct any noncompliant conditions that exist at any of our facilities. That is referred to as the Environmental Corrective Activities Program. It is aimed specifically at identifying and correcting out of compliant conditions as they relate to federal or state regulations.

Environment restoration, as I mentioned, which is the effort that is almost exclusively aimed at environmental clean-up of inactive sites.

Waste management operations is that part of the plan that attempts to address or encompass day-to-day operations and delineate what is the best way to conduct those operations so that we indeed operate in compliance with the laws and regulations.

The fourth major program effort that is outlined in that Five-Year Plan, which in the recent revision is the single largest growth area that the Department of Energy has identified, is the technology development area

where we have attempted to utilize the resources available through our national laboratory network to address the environment compliance and day-to-day waste operations.

The first plan simply attempted to capture efforts that were under way already in that particular arena. In this revision, what we have attempted to do is expand on that, and have our laboratories identify where that scientific and energy expertise can be brought to bear on a specific problem.

The portion of the Five-Year Plan that the Albuquerque office addresses covered a multitude of site production facilities, laboratories, projects, programs and local sites. Of course, today's meeting is specifically to talk about the Mound Plant. In the documentation that is available to you in the reading room, you can also see some of the details concerning the other sites, but it does include the basic technology plan.

Albuquerque's particular portion of that plan virtually stretches across the nation. We're in several states, multiple facilities, and dealing with multiple EPA

regions. And that is one of the difficulties, if you will, that we've had to deal with, is trying to encompass all the regulatory authorities and the very good regulations that we have to deal with between the state and various EPA regions.

Let me move onto some of the prime highlights that are in the Five-Year Plan. Of course, one of the main highlights is the reiteration of the thirty-year clean-up goal that the Department of Energy has identified. And what that goal basically states is the Department of Energy is committed to completing the assessment and clean-up of all of our contaminated sites by the year 2019.

Other major commitment that was made in the current plan, was the full operational compliance with all laws and regulations by the end of FY ninety-six. Many of the facilities that we now operate will be in full compliance well before that, but that was a goal that was established by Mr. Leo Duffy, who is director of the Office of Environmental Restoration and Waste Management in our DOE Headquarters. His aim is to bring all facilities in line by that date.

The third goal is one that reflects the first series of comments that we received on the Five-Year Plan, primarily from the Environmental Protection Agency, as well as various state regulatory agencies. And, basically, what that concern was, was based on the fact that we had applied a prioritization system to our out of compliant conditions. Basically, the concern was that, if we have a facility that has a documented out of compliant condition, why would a particular activity show up as something less than a priority one?

The activities and the structure of the budgeting for support of that particular plan were adjusted so that all corrective activities of noncompliant conditions were rated as priority one across the board.

Again, as I mentioned, technology development is the single largest growth area in the current Five-Year Plan. It is aimed exclusively at, as I mentioned, using the national laboratory and any expertise that we can garner at the individual facilities to indication of problems in the environment clean-up compliant arena.

Two major areas that that technology is going to be aimed at. Of course, one of those relates to the minimization of any wastes that are generated at the sites, as well as minimization related to operations so that we can indeed treat, store, or dispose of wastes appropriately.

Assessment and remediation, as it relates to environmental clean-up, is the other major focus of that area. One of the things that we've seen that has significantly influenced the focus of the DOE effort and the actual plan that is encompassed in the Five-Year Plan is related to the much stronger and more aggressive oversight role that both the Department of Energy and the EPA has initiated.

There is now the Legislative Defense Nuclear Facility Safety Board which was set up through an Act of Congress, which is also a vehicle that will be visiting all DOE sites and again preparing reports to be provided directly to the Secretary of Energy.

One of the other elements was the environmental assessment Tiger Teams. One visited Mound Plant here the latter part of the

last calendar year. Those Tiger Teams are composed of individuals separate and distinct from the individual site that they're evaluating. They show up and go through that site virtually with a fine tooth comb.

Agreements in principle. Those are a series that the DOE has been negotiating with each state in terms of establishing the ground rules, if you will, under which that state will conduct its monitoring and assessment program of the DOE site. Right now, Albuquerque Operations Office is finalizing agreements with the state of New Mexico, the state of Texas, and the state of Florida. My understanding of the condition here in the state of Ohio, is that the Ohio EPA already feels they have enough vehicles to use in the execution of their oversight authority and didn't need a specific agreement separate and different from the vehicles they already have.

One other major effort, the initiation and development of a consensus based prioritization system. The current one that was used is goal oriented primarily. It seeks to look at environmental and safety hazards first

and then look at compliance and other necessary activities and subsequent order along that prioritization scheme.

There are efforts under way. And our first efforts are looking at the environmental restoration program to develop a model, if you will, that will attempt to weigh risks as well as clean-up benefit and costs for individual clean-up efforts. That particular prioritization scheme is being reviewed by the EPA, and at least the current projection is that we will probably officially apply that in the next update to the Five-Year Plan.

We are also moving along those same lines in looking at the waste management operations and those various activities. That particular prioritization scheme will have to be a little different because of the nature of the activities you're attempting to prioritize. It is still somewhat unclear to us right now whether or not that particular prioritization scheme will be available for use in the next updated Five Year Plan. There is programmatic and environmental impact statement that will be initiated shortly. That covers the entire scope

of activity encompassed in the Five-Year Plan. The notice of intent for that is currently being prepared by the Department with a target date of the end of September for publication of that notice of intent.

Subsequent to that, there will be a series of meetings, and that particular effort will then attempt to encompass the major decisional elements that have to be executed by the Department for management of this program roughly for the next thirty years.

There is a waste complex minimization study that is looking at all the sites with an attempt to gain knowledge and take advantage of expertise at various sites, and in an effort to identify the sources of all of our wastes and look at specific efforts that are aimed at reducing the amount of waste we generate, irrespective of the type of waste. We're trying to see what expertise already exists within the DOE and how that can be shared with our individual sites as well as initiating sites that are specific to that minimization effort.

The particular program is outlined by the Albuquerque Operations Office in the Five

Year Plan, encompassed, if you look at the fiscal year '90 through '95, encompasses about a four point two billion dollar program. The Mound's facility represents roughly about nine point two percent of that total programmatic effort.

The two bars that you see in those two charts -- the first one represents the first Five-Year Plan, the second one represents the revision to that. In both cases, you see that the profile of the resources required has changed dramatically.

Number one, we have seen several things happen to us. Number one, the emphasis on oversight has changed the way we intend to do business, as well as encapsulating things into a programmatic complexion as opposed to conditioning conduct them as an overhead function. We have forwarded these comments to the U.S. Congress. And today we wait to see what they do to us in the budget. This is one of several meetings that we'll have, and in the future we'll be asking for your participation in the future as we update.

Let me take a minute to talk about the process and where your comments will be

utilized to influence the system.

What I'd also like to do in this is point to documents that you can find in the Reading Room if you're interested in going through the documents that have been prepared.

The first of these is a set of what we refer to as activity data sheets. Those are an individual set of descriptions. Let me start with these first sets of documents, and then I can move it over as we move across the screen. Those activity data sheets for the Mound plant are available in the Reading Room. And, as I mentioned, they go through the daily activities specific to each of the four programs that I mentioned. Those particular activity data sheets were assembled by each facility, went through a review process at the Albuquerque Operations Office and were submitted to our DOE Headquarters. Those were meshed into a draft plan which went through a review process.

Reviewing comments through that process were then incorporated into what was actually published in this particular case, the last one being July of 1990. That particular book, if you will, is also available to you in

the Reading Room, if you'd like to take a look at it.

From that particular effort, we asked each individual site to develop a Site Specific Plan, which is the implementation vehicle of that five-year planning for that specific site. Now, the current Five-Year Plan Site Specific Plan that you all have available to you, is based on the August 1989 published Five Year Plan that DOE first did. Our process here -- we're still manipulating that to get it in line so that we're -- we have documents that are a little more timely in terms of the review process.

But what we're asking everyone to do is, you can use your review of that document in terms of an assessment of the process we're trying to get you involved in. If you're interested in the details of the programmatic content at Mound Plant, as an example, I would refer you to the individual activity data sheets and their current version.

The intent is to take your comments in the state and local review process that we're going through right now and use those

in two places. The first of those is this bottom arrow which feeds back, if you will, into the Site Specific Plan. We will be asking each of the sites to revise those in the October through December time frame, to incorporate into that document what funding level we actually received from congress for fiscal year 1991 and then any of the change in the programmatic direction that we've encompassed in the July 1990 Five-Year Plan.

In addition, we'll be using those comments in the next update to the Five-Year Plan, which we will start that process internally within the Department of Energy roughly during the same process, with the intent of publishing the next Department wide Five-Year Plan, hopefully, in July-August 1991.

UNKNOWN SPEAKER: When you translate that, is it BPFM at the bottom of the small --

MR. HIGGINS: Which one? The environment -- Department of Energy Environmental Department of Energy and and Environmental Restoration and Waste Management.

UNKNOWN SPEAKER: Thank you.

MR. HIGGINS: Five-Year Plan.

UNKNOWN SPEAKER: Thank you.

MR. HIGGINS: If you go to the Reading Room to look for that particular document, with is a two inch thick blue book, with that particular overview -- I would like to encourage you all to take advantage of the fact that we've published these. These are -- at least my name is on that particular list as one of the DOE contacts. We've also listed our public affairs individual. If you have specific questions that you want to forward to the Albuquerque Operations Office, the number is 505-845-5194. It's in the fact sheet also.

UNKNOWN SPEAKER: Is this what you're referring to as the fact sheet?

MR. HIGGINS: Yes, ma'am.

With that, let me go ahead and turn it over to John Lyons for his discussions on specifics at the Mound Plant.

MR. LYONS: Good evening, ladies and gentlemen. My name is John Lyons, and I'm the Environmental Engineer for the Dayton area office here in Miamisburg.

This is one of my many

responsibilities, is the Five-Year Plan. So these are the definitions that Mr. Higgins put up earlier for corrective action environmental restoration and waste management. So I won't read them. They were put up earlier. But in general action, corrective actions are things that are ongoing activity to bring them within regulatory compliance. Environmental restoration for inactive site and waste management is for ongoing waste management activities.

Under corrective activities, we only have two projects. One is replacement of a fuel storage facility and the replacement for a potable water supply. And our accomplishments thus far, the fuel facility is nearly complete in the design phase. The potable water is in the design process, just starting.

Currently, no uncertainty associated with those projects. Relatively simple construction projects. We are complying with all regulations governing the construction of those items that apply. And in late fiscal year 1992 we should have both completed.

And the opportunities for the public involvement. Until they are complete,

they will be part of the meetings that we will be holding yearly.

Environmental restoration is the second category. And basically what, to put it in a nutshell, we basically have two areas -- the decontamination and decommissioning sites and CERCLA clean-up. Under the D and D, we have a program that was started in the '70's. They spent approximately twelve million dollars a year and is scheduled to go through the year 2000. Our CERCLA clean-up sites, basically a hundred and nine sites that have been identified in the past.

UNKNOWN SPEAKER: Is one of those the Super Fund?

MR. LYONS: Yes. The other word associated that the public is used to hearing. CERCLA and Super Fund, synonymous.

UNKNOWN SPEAKER: Does this area include Fernald?

MR. LYONS: No, sir. We have sites - and basically grouped into a term of operable units. We have eight on that operable unit and that grouping is based on the geography of the site, the type of contamination or the

immediate area that's been contaminated, area, water or the ground.

Our first one is area B. And if you know anything about our site, that is the valley area between the two hills we have and that -- the thrust of that operable unit is the ground water contamination from the site.

The main hill seep is our main -- there are some natural springs on the side of the hill. And any contamination that is the result of from that hill is in that operable unit, and we have seen some volatile organic compounds and tritium in those seeps. Miscellaneous sites are nonradioactive areas where we don't know of problems but there may have been an operation in that area in the past, and we need to look at it and verify that there is no contamination.

Miami-Erie Canal in the park down here in the city of Miamisburg. The contamination resulted from a spill from a pipeline break in 1969, and 1974 it was studied by the EPA and then Monsanto and looked at various levels, and it was determined that in its current state is not -- there is no risk to the city of Miamisburg. It has been looked at since,

under the new regulatory guidance, and it's still - the risk assessments were done in '74, are standing up under today's new clean-up guidelines.

Radioactively contaminated soils. Those are areas we have known radioactive condition contamination. We're not sure of the extent of it, but this operable unit will verify it's there and will -- we'll pin down the extent of the contamination and clean that up if it's appropriate.

Decontamination and decommissioning sites. That was used earlier. But this is a separate operable unit that we are going to look at hazardous constituents and to verify that the radiological levels that were cleaned up are appropriate to today's standards.

Limited action sites are sites that have been identified in previous surveys where they thought there might have been a problem, but in looking at it and further review and study, it doesn't look like we're going to do anything because there isn't a problem. The primary example is some of the dipsy dumpsters where paper trash was thrown in. That was

identified as a possible area. Upon looking at it, that's one of the ones on the list.

Inactive underground storage tanks. We have tanks that are covered by the U.S. regulations, underground storage tank regulations. We're looking at all of them, the ones that are going to be taken out, and the environmental restoration program will do sampling to see if there is any contamination that's escaped.

And the site wide RIFS. That is the ninth operable unit. Roll all the operable units up into one thing and look at it and say, have we looked at everything? So the site wide RIFS will look at eight as a whole and make sure it's been cleaned up. It's a remedial investigation feasibility study. We have to go through that with the EPA, the Ohio and U.S. EPA. And they were going to look at all the work we do. And basically the remedial investigation, we're going to go out and look at it, and the feasibility study will look at alternatives to clean-up and whatnot. And that will roll up, based on what is found in that and what the regulators agree with, will be called a record of

decision. And that will dictate what we have to do to that site.

Environmental restoration. FY '90. After two years of negotiating, we have a Super Fund agreement with the U.S. EPA. They will control the clean-up of our sites. We're very happy. That occurred the eighth of August. And it's anticipated that it will become effective sometime late this month or early next month, and then the clock starts running as far as meeting deadlines and public involvement of the clean-up of the sites.

Uncertainty. You watch the news as well as I do. The federal budget process is in limbo, so that is a concern for us. They are going to be the ones that supply the money. And the project scope, we think we know -- we have the site characterized very well. There is a lot of work that's been done at the Mound Plant, but there's always Murphy's Law, so to speak. So anything not explicitely stated after the agreement is found will be added. So it's not something that has to be gone back and renegotiated. It will be automatically added if the regulators want it in.

Current activity. We're in the phase right now, have plans written to have the regulator approve, to dictate how we go out and look at the site and make sure we're not going to miss something that we would -- -- nobody would want us to miss.

Assessment and decisions. This takes a long time, and, in particular, the site wide RIFS, because it's going to look at everything as a whole. Several of the operable units will be done, the remedial investigation will be done in the '93 time frame. But because we have to wait on ones that are longer, like the Miami Erie Canal, we have to wait until they are all done. So all nine of those will be done in the '93 time frame with current status.

Public involvement. CERCLA. We have to have public involvement. It's in the law. We're going to have public meetings wherever it's warranted when there's a period of time for it. We will be holding public meetings. Check the repository of the Miamisburg City Library, and the yearly public meeting, like we're in now. They're in the Five-Year Plan.

Waste management. And this more

or less is our activity area. This is ongoing. Generate waste -- any facility that makes anything generates waste. It just so happens we generate some waste that most places don't. Handle our ongoing activity and treatment and storage and disposal of waste. We have radioactive and hazardous, and the third, mixed waste. Mixed waste is a combination of both together. And there are some very special restrictions on that.

And waste minimization program, off-site drainage and replacement of underground storage tanks, FY '90, Part B, Resource Conservation and Recovery Act. We submitted a revised one and that's to the state. They have authority now, and they will review our ongoing processes, and any permit required, they will be issuing those. We are in interim status as long as you got the paper work in by -- I forget the date -- you had interim status until the EPA could approve your permit.

We had some underground tanks tested. The law allows us ten years. We had a plan that allows us five years. We've found some tanks that were leaking, and we've taken them out

and had the ground tested to make sure that the fuel oil didn't get away. If we went by the letter of the law, we wouldn't have had to look until 1997.

The mixed waste issue -- approved repository in the United States. If you generate a mixed waste, you have to keep it. Now, that violates the holding time restrictions on the hazardous waste as far as the EPA is concerned. But then there's no approved repository. So while that is being worked between the EPA and anybody that generates a mixed waste, and hospitals do it too, we have to store it on-site. So that is a concern for us.

Planned activity. We're increasing staff in the Dayton area office, which oversees EG&G. We're going to add another twenty-six people. Of that twenty-six people, like I say, seventy-five percent are in environment, safety, and health. The contractor had approximately a hundred and fifty, and EG&G had a hundred and fifty, and they're going to add at least fifty more in environment, safety and health. So out of about twenty-two hundred, ten percent will be dedicated to environment, safety

and health. So it's a very important issue to us.

Public involvement. The yearly meetings, again, while it's not really a public involvement, the U.S. EPA and the Ohio EPA have control over us with certain items like resources. In water we discharge to the Great Miami River, the state issues a permit, and we have to comply and submit monthly reports to them.

Clean Water Act. Just a myriad of laws that we have to comply with under waste management. FY '89 we spent eighteen point two million dollars, that was money spent. We budgeted in '90, twenty-three point eight; '91, almost thirty million and requested almost sixty million; '94, eighty; '95, seventy-one million, '96, fifty-nine. The Department has a fair amount of money invested.

My last comment is a very important date. It's in your hand now. October the twelfth is the closing period for comments on the Site Specific Plan. And Mr. James A. Morley is the person that you need to send any written comments to that you would like to have

addressed. And that name is also in that handout you got at the front door.

If there aren't any other employees, we'll open the meeting up. Now, Pat, we're going to need --

MR. HIGGINS: If you have a specific question that you'd like to ask, just come forward and identify who you are and what organization you are, if you represent one, and who your question is directed to.

MS. SHEARER: I have some comments, and these were written previous, of course, to tonight's meeting, to some of the explanations that you have given tonight. I'd like to go through the whole thing, if I may.

I'm Dr. Velma Shearer of Englewood, Ohio. I represent the Church of the Brethren.

Public meetings, such as this, are an appreciated value in our society, historically and in the present. I do hope that this meeting will become the first of many public meetings. And you've explained that to us. For it is precisely these meetings that will enable all of us, the Department of Energy, the Albuquerque

Operations Office, the EG&G Mound Facility, the U.S. EPA, the Ohio EPA, and the community to work at and bring about the changes within the Department of Energy operations, as ordered by James Watkins and as required by legislation.

This is a time to care about each other and to work cooperatively to attain a series of goals, a working agreement between Federal and Environmental Protection Agency and the Albuquerque Office, called the consent agreement, I believe, is a good working document. There are some circumstances in relation to the agreement, however, which remain to be clarified.

First, the consent agreement provides for cooperative work effort between the Department of Energy, the Federal EPA and Ohio EPA and the clean-up plans for the EG&G Mound Facility.

The consent agreement between the two federal agencies was signed by the two parties as recently as August eighth, 1990. The Ohio EPA consent agreement is not yet signed.

The circumstance in question is this. The Site Specific Plan for environmental

restoration and waste management, as presented tonight, cannot have been a cooperatively prepared document as ordered by congress in the Comprehensive Environmental Response Compensation and Liability Act, or CERCLA, since the Site Specific Plan predates the consent agreement.

The second circumstance of concern centers around the 1988 environmental monitoring report as the basis for the Site Specific Plan development. This report was essentially invalidated by findings of the Tiger Team assessment, as reported in their documents of November and December 1989. It would be fitting to redo the Site Specific Plan as a cooperative document, using data collected cooperatively and and tested, separated, that is split samples as a base for defining the details of clean-up plans or operable units.

And the third circumstance of concern is that the operable unit eight, that it be identified as a glass melter testing and assessment and the glass melter confirmation for the -- under Environmental Policy Act or NEPA regulations.

I notice that you have another one

for number eight. So just move this down one. And operable unit nine should be added as air monitoring assessment and air monitoring remediation to assess and remediate on-site and off-site monitoring equipment and skills.

In the Site Specific Plan operable unit ten should be added to assess the Plutonium 238 in other off-site locations since off-site soil samples tested in 1977 revealed measurable amounts of Plutonium 238 in soil east of the site. Plutonium 238, it is -- two hundred seventy-five times more toxic to humans as two thirty-nine used in nuclear weapons. Soil sampling on-site and off-site should definitely be included as an operable unit.

A fifth circumstance of concern arises from the need for the evaluations of an independent third party or agency on all assessments and tests. Simply good scientific practice.

A sixth circumstance of concern is that the five recommendations be used as guidelines in the new Site Specific Plan, in all assessments, remedial investigations operations and waste management businesses.

Seventh, from the -- from congress in 1988 included information that the Mound Facility nuclear -- this one here -- activity to be discontinued by 1995. With the transfer and location of other sites, how does this schedule measure with the Site Specific Plan and the Five Year Plan when several of the environmental restoration and waste management activity go beyond that date?

Eighth, it is my concern with accessibility of copies -- that the accessibility of copies of the Site Specific Plan and, needless to say, the availability of upcoming documents, my concern is with the availability of those plans or those documents. Only one copy of the Site Specific Plan was available at the Miamisburg Library and it could not be checked out. It had to be used there. Since copies of such documents under circumstance are, by law, to be made available to the public, sufficiently in advance of public meetings, I suggest that a list of persons interested in receiving copies be made with some arrangement for postage or pickup. And I think you'll all be able to discuss that and hopefully to make copies available for more of

us. I thank you for this time.

MR. WIGGINS: Let me make one or two comments in regard to some of the concerns that you listed.

We are quite aware of the fact that recent events have changed perhaps the next perspective that you'll see in the Five-Year Plan and certainly in the next revision to the Site Specific Plan. The basis for our process was that we felt that it would be more advantageous for the general public for the Department to produce a document to review, as opposed to saying you all come and let's talk.

The current Site Specific Plan encompassed whatever they believed would come out of that agreement and negotiating process. Several did result, and those, as you mentioned, are currently not, if you will, expressed in the current Site Specific Plan. And those -- any agreement that has been signed and put in place will be reflected in the revision that we'll be doing, hopefully, the next quarter of the next fiscal year, October, December of this year, roughly.

As far as accessibility and

availability, again, this particular process is just getting started, so our first attempt was to place those in public reading rooms. If you do wish to be put on a mailing list, we would ask you to put your name and address, if you will, for us on the comment sheet, and we'll use that to assemble a reading list, if you will.

Again, trying to cross cut a whole myriad of activity, as John points out, not only CERCLA is a concern, but all of the other environmental regulations in trying to put together, if you will, a concerned citizens list that covers gambit, is indeed quite an undertaking. So any help that you could give us in providing your name or someone else's or organization, if you will, that you think should be put on that list, we would certainly appreciate your comments.

MR. LYONS: I'm going to have Dick Neff come up because he's the EG&G employee, and he knows more about the individual units.

MR. NEFF: I wasn't able to write your questions down. But we have taken a position about the mailing list. And there are things that we mail out frequently. The

documentation is going to be massive, I mean, it is just going to be horrendous, and we really can't mail copies of these things out because it won't be unusual for some of these things to be five and six inches thick. So just mailing it out when the document is readily available in the library, we've taken a position that we're not going to do it.

We have asked the library to keep track of the number of people going there so -- if it's a problem. And they're saying they're only seeing one or two people a week. So right now we don't perceive it to be a problem. We were thinking about putting more copies down there and too, if we get a lot of interest from places north of the site, considering doing something with the Daytonand Montgomery County Library, because not only are the documents massive, each individual document, but we have to keep every one of them in the reading room, and there is a high probability that this library won't be able to handle it when we go into full production of producing these documents. So it may not even be here in the future.

MR. LYONS: The Dayton Library

would have a lot more room, and they're being treated as a reference book. You can't check every book out of the library. They're being treated as reference. You can make photo copies of them if you need that. So it's not any different than any other reference book in the library.

UNKNOWN SPEAKER: Is there a possibility that you can provide an extra copy for people to be able to take out of the library? If if you have a library card --

MR. CHARBENEAU: Let me explain where we are. Okay? We got a special concession from Jean Gaffney, the librarian here in Miamisburg, that yes, she would cooperate with us in letting us to use that as a public repository. We are in the process of buying furniture so that they can store what, in some cases, will be three feet of documents coming in at a time.

We have no such agreement, or actually, way into the Montgomery County and Dayton Public Library. They are not required by law to take any of these documents or by even a courtesy to take any of these documents and make them available to you. The requirement by the

law is incumbent upon us to make them available.

Now, the reason we have not put multiples of the very, very large documents, is that Miamisburg has more room -- to contradict you, John -- has more room than the library downtown. If we start putting in multiple copies of some documents, we're going to run out of space. So that those things can be available to you -- or they're going to be up at Mound in our lobby, which will make them even more inaccessible to you. We are literally talking about not pounds of paper but tons of paper in the long run.

Now, we asked Jean, very carefully, to look at the kind of traffic we were getting to reading it, and where they had multiple documents, yes, she will allow them out of the the library in circulation under their normal rules. But you have to understand that she has not expressed to us that those have been tied up and anybody has requested them.

MS. SHEARER: I've been there, and I have requested them.

MR. CHARBENEAU: But not tied up so somebody else couldn't read them. Until that

becomes a problem, I don't think we're going to respond to that. When it becomes a problem, we will try to make some arrangement so people can have those documents in their hands to read. And they are literally reference documents. We have to go down there and check regularly to see that that inventory is correct.

So, you know, that's where I stand on the subject right now. If it becomes a problem, we'll work to make it easier.

MR. NEFF: The last thing Howard said -- keep us informed if you have problems. We've asked Jean to, but our commitment is to make sure that the documents are available. We will feel like the system we've set up is the first step. If it turns out that's not sufficient, we need to know that. If there are problems, you go down there and they're always unavailable, let us know that and let the library know that, because we'll adjust if we have to. We do have that commitment.

Let me go down the list and see if I've covered most of the things. You mentioned the fact that the U.S. EPA and Ohio EPA were both involved in the agreement -- weren't both, so the

site needs to be redone.

They were both involved. And in our working on the federal facility agreement that John mentioned, we've been negotiating two years, we have met monthly with both in continuing to involve the Ohio EPA, as well as the U.S. EPA, so we're behaving as though we have an agreement with both, as to exchange of information, the review of documents, the input, coming from both regulatory bodies, not just U.S. EPA, even though we only have the agreement with the U.S. EPA. The review of the site has been involved with both agencies, as well, so it is coordinated with both.

I'll mention adding operable unit eight, glass melter. The glass melter is an incinerator that we're trying to get to. It would be cost effective and a very cost effective way. But you have to have a permit to do that from Ohio and U.S. EPA. We're pursuing that.

Research Conservation Recovery Act. These are separate from the Environmental Restoration Program, and that's why it's not an operable -- it is part of public records -- and are right now negotiating and discussing with

them, trial burns of this glass melter incinerator and see if it can't meet requirements. So it is going through a regulatory review and not part of the program -- part of a different EPA regulation.

Adding an operable unit for assessing air monitoring and so on. The environmental restoration is to look at clean-up of past spills or leaks or incidents. While the Tiger Team had some findings in this area, air monitoring and location, they're separate in the program we have, and there's a copy in the public repository down here.

A copy of the Tiger Team assessment, a draft Action Plan assessment. The final Action Plan was just approved by Secretary Watkins last week, and it will go in there once we get our copy back. It didn't change significantly as far as actions, but you'll see in that Action Plan, the actions do address any deficiencies that were found by the Tiger Team in the air monitoring, for example. But it's a separate program. The ER is designed to address past spills and leaks and so on. So assessing how we -- it is being addressed through the Tiger

team response.

Operable unit four. Talked about adding other off-site soil monitoring. Four is the canal, five is the radioactive soils on-site. In both those cases, we're looking at the whole site, the off-site area, including the canal, and looking at the operation and what contributed to the spill, and if we see indications we need to look further, we'll look further.

The commitment we've all applied to the agreement is we will assess whatever needs to be assessed, and if clean-up is appropriate, anything we -- not just these eight. So if we see indications that there's a level of Plutonium to the east -- you mentioned to the east -- we know there are levels that we can detect, but if there are levels there, well, we would go in that direction.

We have submitted to a background assessment around the site, determine what background should be around there, what it is around the site, and comparing to that. But, in any case, east, whatever direction, if there's a reason we need to do further monitoring, that will be rolled in. We're very early in that

program.

We're just now receiving and responding, to comment on the site wide work plan. That's the kind of issue that will come up in the work plan. Once the regulator agrees with, it will go out for public comment.

So that's the -- if you see something specific that you think we've missed, we and the regulators -- you say why aren't you checking in the east where you know there's Plutonium -- we need to respond to your comment and advise you why we have not or maybe make some changes. But that process will be very possible, and the work plan is the first key document that I think you'll be seeing a comment on that kind of thing.

Independent third parties you talked about the analytical techniques and so on. That is a requirement of CERCLA. We are not, under the Environmental Restoration Program, doing the analyses at Mound on these samples. We've hired contractors who do the field work, take the samples and then send them to EPA approved off-site. They have to meet EPA requirement. So in the Environmental

Restoration, EG&G Mound is not doing the analyses. We do for a normal routine emission, but completely separate from this clean-up assessment. If we want to assess what has to be recommended, it will be done.

MS. SHEARER: Do they take the samples, as well?

MR. NEFF: Yes, Weston is one of the corporations. Adopt a work plan, takes samples, either analyze the samples or sends them to an independent for analysis. All of those get reviewed by EPA. The labs have to meet EPA specs and be approved by EPA. I think it meets your concerns. And that's something else that I think you'll see more detail on it, as we get into the ER Program.

MS. SHEARER: Will you spell Weston?

MR. NEFF: W-E-S-T-O-N. Weston Corporation.

You mentioned using bar five. We're guided by the contract, we're guided by the contract with DOE on following DOE orders, as well as environmental regulations. I don't think bar five yet is quoted by either the EPA or DOE

as the bible we follow.

When we look at clean-up standards and health protection standards, we have two documents. We have the clean-up standards. We have to look at those kinds of things. But the mandatory things are the EPA. Bar five, I don't think is a part of those yet but it is something that will be looked at when we start setting standards.

You mentioned the discontinuing of radioactive work at Mound. That isn't the DOE decision yet. That is a recommendation that was made out of a study called the 20-10 study to the then Secretary Harrington of DOE. There was a recommendation that was made -- many recommendations -- third group down, a lower priority. But even if it were implemented, the radioactive work around and clean-up would continue for years at Mound.

The transfer of technology, even if you say let's stop treating operations at Mound, for example, the transfer of that technology to some other site would take years. There are over a hundred and some million dollars that would have to be constructed at some other

site, people trained, and then the technology transferred.

It's a long-term effort, and even if it were made more than a recommendation, we would still have this clean-up ongoing for fifteen, twenty years. So we'll be in the radioactive business, as far as clean-up at least, for a long time.

MR. LYONS: Also, the document you mentioned was a study. And we have a commitment from Mr. Higgins' boss, Bruce Dwayne of Albuquerque, and my boss, Jim Morley, that we will continue to get money as if Mound is going to stay in the treating business. And if sometime in the future, the DOE decides that Mound will not be in the treating business, then the money to upgrade the facility will stop, and then we will clean the thing up.

But we are not going on a study that's not even accepted yet, that we're going to pull the Tritium out of Mound, you don't get any more money for upgrades. We have fought that, and we have the manager of the Albuquerque Operations Office backing that we will continue to get money as if we were going to be in the

Tritium business forever.

MR. NEFF: I have one more thing. Access to the information, documents, and I think we've already hit that a lot.

One thing I might mention though is there's a distinction, at least in my mind, on the Environmental Restoration Program from the Five-Year Plan. And we're going through a separate CERCLA, required public participation, that's separate from the overlapping public participation Five-Year Plan.

And the documentation for this ER Program, as everybody said, it's horrendous. It is just a mountain of paper that CERCLA requires that we go through very thoroughly, so we can show you all the details. When we ask you to participate, you have something to sink your teeth in and say I see what they're doing now.

The Five-Year Plan documentation, we have copies of the Five-Year Plan and Site Specific we can send to people. That is not a problem. We had extra copies made so we could forward those to you. That would be proper right now if somebody wants to sign up and get a copy of what's in the library. The Five-Year Plan,

which is about an inch and a half, the Site Specific, maybe a quarter inch document, we can forward those to you without a problem.

MR. HIGGINS: Anything else?

MR. LUCAS: I have a statement I would like to read. I'd like to thank you for giving us the opportunity this evening to comment on the Site Specific Plan.

I am here because of my concern about possible radioactive effect on workers and on the general population. The Site Specific Plan appears to have been written over a year ago, as I think has already been mentioned, since it contains no reference to the assessment of the Mound made by the Department of Energy's Tiger Team late last year.

There are a number of troubling points in the Tiger Team report which I believe should be addressed in the Site Specific Plan.

There are many radioactive emission sources consisting of ten active stack release points and twenty-two contaminated soil areas at the Mound and one off ground contaminated soil area, which includes the Miami Erie Canal and the Great Miami River. The canal

area contains radioactivity in vegetation and fish which are higher than background levels in the surrounding area.

In 1974 an evaluation said that the risk of Plutonium contamination in the Miami-Erie Canal was within acceptable DOE guidelines. However, the Tiger Team said that a new evaluation should be done using current methodologies, since the 1974 dose/risk assessment remains conservative based on current land uses near the canal.

The Tiger Team report also mentions that some radioactive constituents are not included in determining doses of radioactivity received by the public. In other words, the public may be getting doses of radioactivity unknown to the Mound.

Apparently, the Tiger Team believed that the Mound should be more concerned about the danger of possible radioactive emissions, since it commented that the EG&G Mound emergency preparedness system does not recognize the potential for off-site release. In the view of the Tiger Team, EG&G personnel, quote, consistently maintained that off-site releases

are not credible events. End of quote.

The Tiger Team ran into a number of difficulties at the Mound in its attempt to get the information it needed. This is somewhat disconcerting since the public relies on the DOE to protect it's safety. The Tiger Team could not find accurate records of the Mound Plant's compliance with the National Environmental Policy Act, and the Mound was unable to locate certain files before 1988.

At the beginning of their assessment, the Tiger Team was not routinely allowed into two rooms of one building because of security. The Team also found handwritten changes in certain analytical procedures, such as air samples of Plutonium 238.

I am concerned about safety within the plant, based on newspaper accounts over the years of inadequate safety practices within the plant. Despite the change of management at the Mound, this remains a concern, based on the Tiger Team report.

The Tiger Team report mentions a system at the Mound which requires that releases of radioactive substances be reported as unusual

occurrence reports, called UOR's. This is to be done to protect human health.

The Tiger Team report said that twenty-eight operations had been shut down, but none had been reported as UOR's. Other significant events were not reported as UOR's, such as the failure of room monitor to detect Tritium release and many releases to on-site ditches from laboratory and service operation. My question is, how can human safety be protected if such emissions happen? Further, there is lack of contamination supplies in Building twenty-three.

In speaking of the safety risks to workers and the public, the Tiger Team assessment stated that there is an inadequate safety training program that has not resulted in well run compliance - driven operations. A further setback is the fact that oversight surveillance has been minimal on the part of the Mound safety staff.

The Mound has nineteen safety analysis reports. Some of them will not be completely processed until 1997. Does this mean that it will be seven years before we know of

unsafe conditions?

On this subject, the Tiger Team comments that this time frame is excessively long, given the importance of the documents in establishing the safety framework for the operational activities.

No analysis has been done to determine if the drums of waste oil are radioactive. Also, waste generated by the decontamination and decommissioning program have not been adequately analyzed to determine whether or not they contain hazardous substances. Yet, they are shipped off-site for disposal as a low level radioactive waste. This raises the possibilities that some people somewhere are getting more radioactive material than they are aware of.

The Tiger Team mentioned also that the quality assurance coordinator is not independent of the analytical labor operations and that documentation practices of the Environmental Monitoring Program do not allow independent verification.

I would like also to recommend that EG&G improve its access to documents. The

Site Specific Plan was placed only in the Miamisburg Library. It would help if it were also placed in other locations, particularly the downtown Dayton library.

Apparently, other improvements and public relations can be made, judging by the Tiger Team's comment that the Community Relations Plan does not follow all of EPA's recommended guidelines.

While I would like for the risk of radioactivity to be removed from the Mound, I would like to see also the gradual ending of the Mound's role in the production of nuclear weapons. The reason most often given for the manufacture of nuclear weapons has been the need to deter the Soviet Union from attacking the United States. But since the cold war is over, that reasoning is no longer relevant.

The other reason for our possession of nuclear weapons is to coerce other nations during times of international crisis. That's why we have, at this time, hundreds of nuclear weapons in the Persian Gulf. This does not add to anyone's security.

EG&G, in my opinion, should

develop an economic conversion plan for the Mound, so that the nuclear weapons part of its operation can be replaced by the production of civilian goods in order to save jobs. The Department of Energy plans call for the end of such nuclear activity at the Mound by 1995.

And recently, the layoff -- there was a lay-off of sixty-seven persons announced. Perhaps they could be used for clean-up purposes or for doing research into the creation of such things as ceramic automobile engines, which would be more fuel efficient.

Thank you very much for your attention.

MR. HIGGINS: Let me just make one point in regard to some of the statements the gentleman made there.

The Tiger Team assessment that was done at each facility did cover a wider range of activity than specifically addressed in the Five Year Plan. That may be one source of confusion for the general public in terms of reviewing the document. So let me try to briefly walk you through that process.

While the Tiger Teams were called

Environmental Assessment Tiger Teams, their role in life was to do more than assess the environmental conditions and compliance conditions of that site. They were empowered to go in and look at every safety aspect of operation, as the gentleman pointed out. Many of the actions that will be taken by individual sites, Mound included, to correct deficiencies that were identified by those teams are outside the scope of the Five-Year Plan. They come under the base appraising of that particular facility. So you may have difficulty if you're trying to look for solutions to some of those recommendations in the structure of the Five-Year Plan.

The best place to find those particular actions, as they're outlined by the site, is indeed the Action Plan that was recently approved by the Secretary of Energy. That review process for that Action Plan, as it went through the process of review and approval through the Albuquerque Operations Office, as well as through the myriad of organizations in our DOE headquarters, was to address all issues brought up by the Tiger Team.

Now, I'm not knowledgeable to specifically tell you how they were addressed in the case of Mound Lab. What I would recommend to you is when the final response plan is indeed available, you will probably find the answers to many of your concerns in that final documentation.

MR. LYONS: I'm going to try to answer as many of them as I can. The stacks are covered -- we have limits, and it's not like it's carte blanche. We can't release anything we want. So the stacks are something that is separate and not being ignored.

The twenty-two soil sites that are radioactively contaminated. We have a radioactive soil site -- I'm not sure of the twenty-two the gentleman was talking about -- but it's covered in one of our operable units already.

The Miami-Erie Canal, the Tiger Team concerns -- yes, they were concerned. The assessment was done in 1974. What they did was directed us to redo an assessment on its use right now. And that assessment has been done, and it basically corroborates whatever was done

in '74. And the Tiger Team said they would be happy with this, that they could wait until we addressed the Miami-Erie Canal under the Federal Facilities Agreement, that CERCLA 120 thing I mentioned earlier.

For its current use now, we can wait until the U.S. EPA -- until the clean-up is done. We don't want to -- there was a concern, so they wanted us to do the focus risk assessment. And we did it, and it basically agreed with the previous assessment in '74.

MR. NEFF: I think a number of these, it's appropriate to look at the Action Plan in detail in the library, and you'll see how we're addressing it.

Example, the Tiger Team was concerned that we have buildings that we can detect radon and -- well, if you look at our response, we do, we have taken those into account. Those are not a significant factor. The dose is based upon Tritium and Plutonium, that's all we can detect off-site. The radon that we get in the area is not a high enough volume. So we assess it. And I think that kind of information though would show up in the Action

Plan where you see the response.

For example, when you talk about the Tiger Team. Statement that we don't recognize the potential for off-site dose for exposure, that isn't a true statement. We have continuously monitored emissions for amount of radioactivity, but they're so low, below the EPA standards. We recognize the potential.

We have what we call a maximum credible access, a scenario, the maximum credible accident for a facility. We've calculated what the worst case is, and those are factored into our calculations, what we told the Tiger Team, the worst case accident can't create a dose high enough off-site that it would cause us to have to evacuate the public. That got garbled, but I think if you look at the response, they've accepted this response when we say we have an improved Action Plan. They accept and show us, yes, we recognize the potential for off-site dose but not an efficient dose to -- the response would reflect this. It's an important document to look at.

MR. LYONS: Basically, not a standard manufacturing facility. We don't deal

in large volumes of things where you would worry about big events. We deal with very small volumes of things. That makes things very different than if you had a tank of two hundred thousand gallons of something. We don't have this kind of situation up here. It does make us unique with -- the other two facilities in the state do have large volumes of things, and it's a concern for them. But we're slightly different.

Another one, decontamination, Building twenty-three. It's a storage area. It's not raw -- it's not -- it's in containers that are inside melting drums. It's not a processing area, so it's not as critical -- I don't know the exact comment on the lack of equipment there, but it's not like an area where you would have raw radioactive material.

Safety training program has been enhanced. Within DOE, it is now a big item, and there's a whole group out there dedicated to work on that issue.

MR. NEFF: I'll comment on that. Pat talked about the change in climate we're in today. One of the key changes that DOE is trying to put in place -- we had a person who was

operating a certain process, and he's very knowledgeable about the process and he knows how to do it. And he says, well, I'm going to change step three, and he writes it out on a sheet of paper. In today's climate, he can't do that. It's got to go through a review and document and printed up, got to be filed, formality of operations.

Lack of formality of operation was a key finding of the Tiger Team. But these individual things, that is a known thing that we're going to address right now. Going through the very detailed procedures, how you're going to change something, who's going to approve it, who's going to oversight and so on, it's something that we know we've got to change. We're trying to.

MS. SHEARER: John or Dick, I think that the gentleman was referring in regards to the stacks with the air monitoring. I think he was referring to the location of the monitoring equipment. Also --

MR. NEFF: As far as the Tiger Team deficiencies?

MS. SHEARER: Yes, because I

remember reading that the location of the equipment was not --

MR. NEFF: Tiger Team did cite a couple things in relation to monitoring. They were seeing that the elevation of the monitoring station didn't meet the correct -- talked about it being a meter and a half off. And there was a deficiency in there, some of the monitoring stations, and these are smaller, about that big, which has inside of it, an air sampling system.

Part of one of their comments were some of these monitoring stations were over grown, there might be a branch that keeps emissions from properly being pulled in and tested, something like a branch that needs to be pruned back or something.

Part of the problem is we aren't free to say okay, I want to have a monitoring station right there. That's somebody's private house, so unless they agree -- we've tried to work out agreements where, if we wanted one right there -- which the Miamisburg Fire Department is a good example. It's on the roof top. It's not as accessible if we had vandalism or whatever. It's easier to maintain.

The county health district takes the samples. We pay them for a contract to do that for us. That was one of the problems we had in the exact location. Again, in the action plan, I think you'll see we're addressing these after we got more information. They've agreed and we've agreed on the issues that need to be addressed.

We're a little bit -- we're outside of what the meeting was intended to be on, the Five-Year Plan. Good if you've got concerns on the Tiger Team. We'd like to receive them. Maybe it's more appropriate on some of them to pass them back through the public relations and focus a little more on the Five Year Plan tonight. But I don't want to turn off anybody from commenting on the Tiger Team, because we welcome your comments on that too.

MR. LYONS: The oversight on safety and taking too long -- yes, they're trying to beef their staff up by basically adding another fifty to seventy people so that will help resolve part of the issue of safety oversight and taking -- as far as the safety agency's report. They have to be done by people, they didn't have

them. Without getting any extra money from DOE, the plant engineer has taken money from other areas in the plant and we've handled some independent contractors, and we'll speed that process up.

I guess the last thing to say, community relations plan not following EPA guidelines, that is true. When the Tiger Team was here, we weren't covered by the guidelines. We did not have to comply with CERCLA with our community relations plan. Now they're in the process of revising it to meet the CERCLA requirements. But at the time of the Tiger Team assessment we weren't required to meet the CERCLA requirements. But that has already been at least one review by the EPA, right?

MR. NEFF: Yes.

MR. LYONS: Submitted April 13, and already got the comments back?

MR. NEFF: Yes. Another thing on community relations plan. It wasn't specifically as covered by CERCLA, not talking about Mound overall community effort. In fact, in the Tiger Team assessment there are three noteworthy assessments. One of them is community relation

efforts. We've done an awful lot of effort and put resources into trying to provide information to the public and let them have easy access back to us. That was a noteworthy achievement.

MR. LYONS: Next?

MS. FOREST: I haven't looked at the Five-Year Plan and if you'd send me one, so I -- I can comment though on -- I'm Jane Forest. I'm with the Ohio Citizens Action and Toxic Action. We're a state-wide citizens and environmental organization.

Like I said, I didn't read the Five-Year Plan, but I have some general questions that I'd like to get answers to tonight.

First off, I'd like to congratulate the EG&G folks for looking into waste reduction, promoted as a way of reducing waste at the source as opposed to trying to find alternative ways of disposal. And, as many of you know, a lot of chemicals aren't -- are going to be slowly but surely banned from landfills and incineration. So at least you're one step ahead of the thing. But when I hear in your Part B Permit, that you are going to incinerate your wastes, it raises a lot of concern.

We support, you know, waste reduction. We don't want to see any incinerated because you're putting what would end up in a landfill into the area. There are regulations as far as air polution control sources, but little known about the particulates of incomplete combustion and other air emissions, not to mention here in the Dayton area, we do have over four -- five million pounds of toxics emitted into our air. I am going to look into that, and I think it's a concern that Miamisburg citizens should look into as to a hazardous waste incinerator in their backyard.

One question I did have was, is there constant monitoring at Mound, and I had heard the -- that the public information --

MR. LYONS: Yes.

MS. FOREST: The work plan for the RIFS through the CERCLA, is that going to be available any time soon?

MR. LYONS: Right now through one review with the U.S. EPA and Ohio EPA, and we just had a meeting about the eleventh of this month, and we're in the process of revising that document. And we will have to resubmit it to

them. Once they approve of it, that looks like that's an acceptable means to go, we have to -- the public --

MR. NEFF: It will be in reading rooms.

MS. FOREST: CERCLA --

MR. LYONS: There will be an opportunity for everybody to read it and make comments on it.

MR. LYONS: January 1990 that plan will be developed.

MR. NEFF: '91?

MR. LYONS: '91, yes.

MS. FOREST: Since it's a CERCLA site, that means that citizens from around the Miamisburg area, Montgomery County, should apply for a technical assistance grant?

MR. LYONS: Yes.

MS. FOREST: Does RIFS in draft form or even the Site Specific Plan look into off-site ground water contamination, as we've heard about at Wright-Patterson Air Force Base? The scope of work here did not include off-site investigation, and due to some work done by the city, we found substantial ground water

contamination. Are there off-site monitoring wells to --

MR. LYONS: Yes, there are. There have been since what year?

MR. NEFF: Since '84.

MR. LYONS: Off-site wells in the city of Miamisburg for ground water monitoring. We have an entire operable unit dedicated -- the Area B Operable Unit is dedicated to the ground water contamination. Now, when you roll all the other eight operable units up and look at it from the site wide RIFS, that's where any other -- if any of those other units would contribute to ground and water contamination, that will make sure that's not a problem,.

MR. NEFF: Let me mention, we've had off-site monitoring wells since the '70's. When we started the Environmental Restoration Program in '84 -- since then, we've put in probably fifty total wells, and probably twenty-five or thirty were off-site additional, and even abandoned some of the ones we had because they didn't meet the requirements of CERCLA. So we have a lot of off-site monitoring wells, probably a total of thirty off-site.

MS. FOREST: What do you monitor for, what chemicals?

MR. NEFF: Full range of chemicals, and what you --

MS. FOREST: BSE, heavy metals?

MR. NEFF: Yes, the total --

MS. FOREST: Total, okay. And in the -- I guess the, let's see, corrective action, one of the things was the new potable water supply. What happened to the old potable water supply and what's being done right now?

MR. LYONS: Basically, you have a forty year old plan and, therefore, have been connections to the process water. And we use a lot of single process tooling water, non-contact, but under present guidelines, it is not acceptable. I think it's the Ohio Revised Code.

So rather than -- we had a study done on three types of buildings, a typical office building, a typical manufacturing building, and I forget the other one, to see how many connections there are. And basically it came back that the simple thing to do is put in a brand new water system for the potable water and use the old lines for the process water, because

one of the options that we could have done is go back and look at every connection and put a back flow preventor on it so that any process water couldn't come back in. That's a maintenance problem, if the back flow preventer fails, you've defeated the purpose. So it was more cost effective to put a new potable water system in for the plant, the drinking water system.

MS. FOREST: Okay. That's all the questions I have.

MR. LYONS: Any other questions?

MS. FANNING: I've pondered a problem. I also studied the Tiger Team assessment so that the gentleman who talked about it ahead of me covered several things that were in my talk. And I've been sitting here trying to figure out how do I take out what he put in and how do I subdivide it up. And if it's all right with you, I'll go with my written statement and, well, I hope that's okay. It's just a little difficult to change it at this time. We should have gotten together and tried to get our statements separate some way. It may be of interest to you to notice that he picked up a number of things that I did, so that obviously

they are general interest rather than just one person.

One of the things that the Tiger Team found is that the Mound Plant measures only a very limited amount of radioactivity in their environmental assessment, so that we, the public, have only limited information. The only radioactive elements or isotopes they measure are Tritium Oxide and Plutonium-238. The only ones. The Tiger Team pointed out that this does not include other known radioactive elements which may affect the public. There are known emissions of radon from the Mound Plant, for example. Radon is a radioactive element.

A report in 1988 included releases of radioactive Tritium, Plutonium-239, Uranium-233 and 234, and Uranium-238. There are also areas contaminated with other radioactive elements, such as Thorium-228, Actinium-227, Cobalt-60, Cesium-137, and Bismuth-207. These radioactive elements are not measured in the environmental monitoring program at the Mound. And this means their presence is not evaluated in the dose to the public.

I am troubled by another finding

of the Department of Energy Tiger Team. It found that wastes generated by the decontamination program at Mound, have not been adequately identified to make sure that they do not contain hazardous substances. And yet, they continue to be shipped off-site for disposal as a low level radioactive waste. Without careful identification, no one can be certain that they are indeed low level radioactive wastes.

When the Department of Energy Tiger Team checked and evaluated the EG&G Mound facility, one of their forty-six findings was that the system for reporting unusual happenings or unusual occurrences at Mound does not meet requirements of the Department of Energy. They want an improved system at Mound to include the identification and reporting of unusual occurrence events.

The Tiger Team said that a number of events involving shutdowns and releases at Mound had occurred within the previous few months. These events were not reported as unusual occurrences. At that time, twenty-eight operations were shut down, but none of these shutdowns were reported as an unusual occurrence.

The Tiger team also said that other significant events, such as the failure of room monitors to detect Tritium releases, were not reported as unusual occurrences, and that many releases from laboratory and service operations to on-site ditches were not reported as unusual occurrences.

We are left to conclude that since the Mound does not meet Department of Energy requirements in this respect, we, the public, just never hear about these unusual occurrences. We don't hear about room monitors which fail to detect Tritium releases or the many releases to on-site ditches from laboratory and service operations. If these are not unusual occurrences, we are left to wonder what the Mound would consider an unusual occurrence.

The Tiger Team reported that the Mound Plant has numerous radioactive and non-radioactive air contaminant sources. Radioactive emission or discharge sources include ten active stack release points. Plutonium 238 and Tritium are the radionuclides of primary concern so far as the air pathways that result from the Mound's current or past operations.

The air sampling measurements at

Mound are substantially below the radionuclide health criteria of the United States Environmental Protection Agency and the Department of Energy.

The Mound Plant has twenty-two known radioactively contaminated soil areas on-site and one known off-site area. The off-site area includes the Miami-Erie Canal area and the overflow creek which connects the Miami-Erie Canal to the Great Miami River. The sediments in the Great Miami River also contain levels of radioactive material that are higher than background levels for the surrounding area.

Two years ago a Mound report about the characterization of radioactive materials in site soils concluded that additional radiological characterizations of these areas was necessary, as Mound put it, to answer existing questions or resolve inconsistencies or apparent anomalies in specific parts of the data, unquote.

There are approximately a hundred areas on-site that are either known or suspected to be contaminated hazardous substances. On-site sediments and biota have not been sampled at these sites for hazardous or nonhazardous

components.

Groundwater in the buried valley aquifer at Mound has also shown evidence of Plutonium-238 and volatile organic compounds or VOC contamination.

The Mound Pland doesn't have administrative and work controls for conducting operations to include items such as pre-job planning and calibration and monitoring of operational activities. The Tiger Team gave many examples of what this leads to. Here are just a few examples.

There were panel and equipment indicator lights burned out because of no periodic required checks.

They said there was an empty oiler in the brine pump probably because there's no written requirement for routine checking of equipment.

Tiger Team found that an unapproved continuity meter was used on explosive devices. There were no routine tests established in laboratories to check such things as the oil level in the glovebox bubblers or the radioactive monitors. A bubbler was noticed with

apparent low level and no markings to indicate the proper level.

Uncalibrated equipment, instruments, and tools were being used. There were no established procedures or requirements for proper recording of routine or periodic log sheet data.

I appreciate you letting me speak. And I would like to just add that I hope all of us can be and become more interested in the environmental matters so that some of these things which, perhaps in some cases have been taken care of, at least will be taken care of in the future.

MR. NEFF: I think we tested and monitored off-site -- -- I want to make a couple of general comment before we address specific ones.

There have been so many comments on the Tiger Team. If you look at the Tiger Team report, which obviously a number of you have, you also see in there the statement -- I don't know the exact words -- but no imminent threat, nothing that would cause cessation of operations or something. That's not necessarily true at all

times. What the Tiger Team said was management had a number of things that needed to be addressed, but you don't have any really critical problems that we need to shut down until you fix the problem.

If you look at the Action Plan, we have in the library, that tells you how we addressed each finding, and I would encourage you to do that. The comment I want to make, if you look at that Action Plan, it puts out that our submitted cost through fiscal year 1996 to address all of these Tiger Team findings is around a hundred and twenty million dollars. Out of that hundred and twenty million, and I'm not sure of the exact number, something like a hundred and fifteen million of that, we already had planned and had in our plans prior to the Tiger Team. So what I'm saying is we already knew we had a number of things, we had to address.

What the Tiger Team did is, they came in and said you've got all these deficiencies. What they don't tell you is you guys already knew that. If you look at the Action Plan, it addresses -- it tells you, you've

been doing a good job of identifying deficiencies in current operations and getting a plan in, now carry those plans out. That's important to note, this wasn't -- the Tiger Team didn't come in and say, you have a hundred and twenty million dollars worth of problems and -- we knew about almost all of them.

The thing that would help us most in getting your involvement in incorporating your concerns and comments is comments on the action plan. You can see how we're incorporating it in the Action Plan. If you had that, which has been accepted by the Tiger team, if you see that and you think we're not addressing it promptly, tell us that. The things you're telling us tonight are things that you're saying the Tiger Team found a problem, and we know that, we've read the report too. But tell us if you don't agree with the Action Plan. That would really help us.

MR. LYONS: The second time I heard, I guess, the lack of characterization of low level waste being shipped off-site. And what the Tiger Team said was you weren't looking for hazardous constituents, nonradioactive. The issue of whether the level of the activity of

that soil being shipped off-site wasn't the issue, it was to nonradioactive portion, and it wasn't a requirement in the past to do that with DOE.

Since then, the Nevada Operations Office, where most of our -- depending on the level of the activity -- you go to the Nevada test site or Idaho lab. Depending on the level of activity. We have to -- there's -- we have to get a permit now through the EPA region in those states in order to send waste there. And right now we're not shipping any waste because we're going through the mechanism that's required to show that that's not a mixed waste. So that's -- it wasn't a lack of characterising of nuclides. There was a problem with it, and DOE has since come up with a new order, our new reporting system to the Secretary of Energy, the events that go on in the plant. He had a concern that he was not being notified of things, so created a whole new order for mandatory notification on given events.

And that has necessitated the Albuquerque Operations Office, where Mr. Higgins is from, to have an EOC, emergency operations

center, that has somebody in it twenty-four hours a day. So we have adjustments to a lot of things since the Tiger Team event has occurred, and new orders, which is causing a lot of additional requirements on the plant. We now have four facility managers that have beepers twenty-four hours a day. And if anything happens in that plant, they have to be called. It didn't happen prior to the Tiger Team. That's something that's been done beyond the Tiger Team to beef up the notification of unusual --

MS. FANNING: Are you saying that it would be impossible now to have Tritium escaping into a room without it being monitored?

MR. LYONS: No, I'm --

MR. NEFF: You look closely at that finding. The format listed a finding and then gave you some discussion of what they observed. If you look at that discussion in there, it says that Mound is not consistent with the -- we're doing what Albuquerque told us, but DOE ordered that we're not consistent with. We work through Albuquerque Headquarters. We're following our immediate supervision and what the Tiger Team said was the result of that

discrepancy. Albuquerque -- you've got to follow the headquarters' order, which means you've got to tell the contractor to do that. We were following the current guidance. We're following the guidance we have in Albuquerque but that was inconsistent with DOE orders. I think you'll find that in the discussion with the Tiger Team reports.

MR. LYONS: The UOR system was to notify other sites that there was an event and this was why it happened and you need to look to make sure it won't happen to you. So it was not a notification system that you had so many minutes.

Right now, if there's an emergency, we've got fifteen minutes to call the Secretary of Energy Emergency Operation Center. Now we have to call them directly within fifteen minutes of its classification of emergency. So there are all sorts of new things that were never placed on the site before as far as notification goes.

MR. NEFF: One other general comment. I mentioned that the Tiger Team states that there's no imminent threat, nothing that

would warrant shut-down of operations. But I think something we lose sight of when we see the Tiger Team assessment, we see a list of findings and say, oh, my God, the world is falling apart.

UNKNOWN SPEAKER: Forty-six is what I found.

MR. NEFF: There were forty-six compliance findings, and there were whatever the rest of the total to get the seventy-seven. There was a total of seventy-seven findings, but you're right, forty-six compliance. You see this long list of deficiencies, without the detailed knowledge of the process, you think, gee, things are really bad.

But if you look at the real health risk, if you look at what we put out, health standards, I've heard concerns expressed from workers, if you look at our worker safety in industrial as well as exposure injuries, you look at our air emissions, dose to the public off-site for one year, it's well below the standards. And we're not in compliance with the letter of the requirement, but we're not -- we don't have a significant threat to an individual worker or member of the public that's uncontrolled. We're

well below the standards.

We need to improve our system, we need to improve our documentation. But comparing to health risk standards, I think -- I would stack the Mound up against any in the industry. We have an excellent record in lost time, exposure, environmental release, true health risk impact.

UNKNOWN SPEAKER: Why do you think the EG&G will be more successful than Monsanto was? All this waste has been accumulating some time.

MR. NEFF: That almost implies that Monsanto did not do a good job on --

MS. SCHEARER: Because they certainly did accumulate.

MR. NEFF: The waste did, yes. In fact, the conditions happened while Monsanto was here, but it wasn't a Monsanto caused problem.

The philosophy of operations twenty or thirty or forty years ago was entirely different than today's. That's not -- it's a common industrial situation. I think DOE, especially Mound, is doing a better job of addressing those issues and staying on top of

them than many in private industry, but we get more publicity because we have radioactive material.

Again, the conditions twenty years ago, the conditions today, if you look at our health risk issues, what's the exposure to workers, what's the exposure to the public, what's the rate of accidents, they're excellent records. What we're seeing is we have a number of things we can do better, and we need to do better with to comply with today's requirements. They're based on requirements with a regulatory procedure. I think that's a key distinction.

I'm not trying to downplay it either. We had plans to already spend over a hundred million to address these things. They need to be addressed. It isn't that they're insignificant. Just keep it in perspective. We're not talking about people falling over from health problems because of it. .

MR. HIGGINS: Let me add one statement about the unusual reporting requirements that were mentioned a moment ago. If you are familiar with that system, and probably, in general, people aren't, you have to

understand that the original system that's set up, as Dick pointed out, was an information exchange system, not set up as an emergency notification process. That's not what it was designed to do.

Okay. Admiral Watkins came in and said when things go awry, by George, the top man knows about it and knows about it very quickly, so fix this system. Okay. We understood what the order of the day was. And the system has been revamped rather considerably. But, quite honestly, you have to understand what the system was originally set up to do. It was not originally set up as an immediate notification process. It is now set up to do that.

As a matter of fact, there are capabilities throughout Albuquerque that we generally can contact both the Admiral and several members of his staff virtually where they live. They drive around in cars with phones in them, as well as carry beepers, so the system has been changed both in terms of its capability and also its intent. It's also now used as an immediate notification system. And you have to understand that that originally was not one of

the original requirements.

Let me just make one other comment to amplify on something that Dick said a moment ago in regards to some of the other comments that the lady just mentioned.

In any industrial process, there are always a hundred and one things that you have to do. Whether every one of those is dotted every single step and whether it's been approved, and whether you have a changed control process and whether the individuals are trained and follow that religiously is, you know, a concern that we have to deal with more today than we have in the past. The operational program, which is a -- has a counter part both within EG&G and the area office is the program that has been put into place to develop that entire process.

Dick pointed out the formality of operations. That's one, but it's only one of them. Going in and trying to figure out everything that needs to be documented is something of a task, especially when you have skilled workers that are used to doing the job every day. They tell you they don't believe that you have to have it documented in front of them,

we're telling them yes, we do. Not even though you may be an expert machinist or whatever, to change that process, to add a step, to change a step, you're not the only one that can do that. It must go through some review and documentation process, and, in addition, everyone else has to be trained to know that new procedure.

Okay. So the program which we hope will alleviate the concerns that people have expressed, the Tiger Team just being one of those vehicles. That program is very active, and it has very active elements both with Mound and the offices, and we expect to see results from that in the future. (A short break was taken at this time.).

MR. HIGGINS: Why don't we go ahead and start here. Let me just make one statement that I neglected to make earlier and should have, and that is in the fact sheet there is a comment page that can be removed. If you decide later that there's something that you want to say that you neglected to say at this particular meeting, you can put it that comment sheet and send it to us. If you'd like to fill it out tonight and leave it in the back of the

the room, we'll take it tonight. There are plenty of those hand-outs, fact sheets, in the lobby, just as you walked in here, so take as many of those as you feel you need. Let me just state that we do appreciate all your comments.

I think what I'd like to do now is to again focus on the Five-Year Plan and the program activity there. I would ask you all to, in regard to your comments on the Tiger Team, as Dick pointed out and John, to concentrate your current review on the Action Plan. The action plan addresses those activities that the Mound Plant specifically will undertake to correct any of the deficiencies that were outlined in that particular document.

MR. LYONS: I just have one more response. On the issue of preventative maintenance and things not being corrected prior to the Tiger Team's arrival, Mound had already decided it as a problem, and they're developing a computer system to automatically track it, to track items that needed preventative maintenance. And when it spit the piece of paper out that said go do this, it also spit out the instructions also.

That has since come on line. And the items in that system have a prioritization, and a number one priority means it's an E, S, or H, environment, safety, or health. And even if you lay the whole plant off, somebody has to be there. If you don't have people available, you have to work according to priority. Two, three and four and five ones -- I don't know -- a good example of a five, you know, grease a wheel or something like that. Between that and number one, you have no choice, you have to do them in their priority. So if you only have five workers, all the ones will be done. And if you have more, maybe twos and maybe threes.

It's a system that was in the works for a long time, and it is now active. And it automatically, when you enter an object for preventative maintenance, its frequency is built into it, the priority and all the instructions, so a worker has that when his foreman says here, go down there. It's all here. This is a new system that's come on line since the Tiger Team's departure. It was in development since -- before, prior to that, and it's a massive system. And I think in the future, things like that

shouldn't be a problem. With any luck, that is.

MR. SMITH: I'm Reed Smith, a professor of political science at Wright State. And we've been concerned about many of these areas for a long time. On your Site Specific Plan on page five, this has already been referred to, but it came out, the potable water system is listed as a corrective. What would be the source of this new potable water system?

MR. LYONS: Still use the same wells we have, put new lines that supply the water to the buildings. And the lines that are there presently will continue to be used for -- it's like when you add a faucet in your house, you run a new pipe. And this will be a dedicated pipe, and it will be marked for potable water only.

MR. SMITH: Will that water be safe, not contaminated at all, the wells?

MR. LYONS: Presently, our wells do have VOC's in them but below EPA guidelines. We're in the process of getting air stripping our water supply prior to the people getting it. And we're in the process of preparing a report to submit to the Ohio EPA because they control the

water, and they will issue us a report to install and we install the air stripping to --

MR. SMITH: I'm not into the scientific side, but we do know about it's indicated it's in the area and the tendency which seems to be in the public domain, when there's a problem, you redefine the -- you know, I'm very delighted about Admiral Watkins, and I'm sure you people reflect it too, a more conservative environment. But it wasn't too long ago that people -- these low level ranges, we redefine it.

I may be completely off base here, and If I am, please forgive my ignorance, but I guess the impression is that the whole intention of the DOE is to show that they're considering the public so that operations can go on in the future as needed. Well, there's a good many people in the public -- you're beginning to ask the public what they think. There's a good many people who think that the whole nuclear operation has been illegitimate from the beginning, and we're not interested in a government that it sets out to prove that it can go on as normal.

As you, yourself, admitted, the mere complications of monitoring all these many

elements means often mountains of paper, and you get caught in a mountain, tons and tons of paper, when the basic question is, is the production of nuclear radioactive things legitimate at all? When does the democratic government undertake to shoot the citizens in their foot and say, I'm sorry, I didn't realize that forty minutes ago.

It seems that the government has been doing an illegitimate thing, and now they're trying to say, we're trying to help. But the thing is still illegitimate, as the gentleman mentioned a minute ago, the need for nuclear weapons, and we have fifty thousand of them in the world, is ridiculous. It's like you need a hole in your head, to keep a facility going so we can make a -- going to make more nuclear weapons is just insanity, if I may give an opinion.

There are a lot of people who are delighted to see you concerned about the environment, but we still have no place to store these things, the waste, and we still have no use. We have many more pressing problems. And why on earth do we have to make more bombs in a democratic government?

You asked the citizens to express themselves. We think the whole business is illegitimate. But so don't bend over backwards trying to make yourself looking -- you're trying to do a job, you're going at it conscientiously. But let's work for the day when we can abolish the whole business. It's not really needed. If you'd care to comment, you're welcome to.

MR. CHARBENEAU: I'll comment for EG&G. I think it's important to realize that the defense policy of the United States is set by its citizens through its elected representatives, including the president of the United States.

MR. SMITH: When were we asked for making the atomic bomb?

MR. CHARBENEAU: You vote for a representative every election. That policy is set by our elected officials. And EG&G performs the job in Miamisburg, not for a great deal of money, but for money, yes, and as a corporate citizen, is interested in national defense. And we will make no excuse for that. But you can express your opinion to your elected officials because that is where those priorities are set.

MR. SMITH: We do.

MR. CHARBENEAU: Okay. From EG and G's perspective, that's where we are.

MR. SMITH: Thank you.

MS. SHEARER: Howard, there's been an element of secrecy for years and years. Only now are we beginning to understand, the public --

MR. CHARBENEAU: An element of secrecy about what, Velma?

MS. SCHEARER: The development of weapons and such.

MR. HIGGINS: Let me state that the people who are here tonight, I'm not really equipped, and I don't think anyone in this room really is equipped to debate the morality of nuclear weapons with you at length. The rationale that we can put forward to you, as Howard pointed out, the elected officials decide what the defense posture is, and there is a rather elaborate system that does dictate how those elements are executed.

In the past, there was an element of secrecy because of the nature of the business and the concern that the nature of that business could expand beyond our immediate control.

MR. CHARBENEAU: You've been been through our place. We told you twelve years ago, as a matter of fact, in 1979, that we could talk about eighty-five percent of what we did. And we talked with you about that; did we not?

MS. SCHEARER: Um-hum.

MR. CHARBENEAU: And for the subsequent six or seven years, we continued that dialogue; did we not?

MS. SCHEARER: Yes.

MR. CHARBENEAU: So, at least from the elements that we can talk of, that have nothing to do with national security, you and the people at Church of the Brethren and Sisters of Loretto and other groups that were interested had every bit of information that was at our disposal to give.

MS. SCHEARER: There were limitations to what you would give us.

MR. CHARBENEAU: Eighty-five percent is what you got. The other fifteen percent, even I'm limited from knowing.

MR. HIGGINS: Any other questions related clean-up efforts?

UNKNOWN SPEAKER: I wanted to

refer to something that Reed said. The phrase within acceptable limits has been used tonight and below DOE guidelines. I'm not an expert on radioactivity, but my understanding is that at one time, much more radioactivity was considered below acceptable limits, but as time proceeded forward and more and more information was secured about radioactivity, guidelines became much more stringent. And we have current limits now, but we can't really be sure that those limits will apply in the future, because, in actuality, there's no safe level of radioactivity, the activity, it's all relevant.

So my concern is that all the radioactivity be eliminated, if possible, because even what you consider minor agents that aren't dangerous are being released, and at some future point there may be a revision of the guidelines. And they may be below the acceptable levels now, but may be above acceptable levels at sometime in the future. And at that point, it will be too late to do anything.

MR. SMITH: Cumulative. I understand.

MR. NEFF: We've got to keep in

mind the amount of radioactivity we're talking about. We mentioned that Mound's emissions, you get over three hundred milligram from nature every year. That isn't saying that ours is acceptable, but well below the EPA standard of ten that's allowable.

What we have is a program -- lowest reasonably achievable. A program. Try to reduce it wherever it is reasonably achievable. Once we're below a standard, that standard is based on current knowledge of health risks and, yes, those standards are changed over the years. Whatever the standards are at that point in time, our commitment is to operate within those standards.

Again, I'll go back and say we have -- will it be lower in ten years? They may be. Might be they'll be higher. I doubt it. But we're trying to be as low as we can. We're not just meeting the standards, we're below. So I guess I can say I think we're doing about the best we can do to be as low as reasonably achievable at the current time.

UNKNOWN SPEAKER: You look at the cancer rate at different parts around Ohio? I

understand right near these facilities, there's a much higher cancer rate.

MR. NEFF: There's no information that I'm aware of that there's an increased cancer rate around Mound. One part of this, of the CERCLA process, is a study with the ATSER, agency for toxic substances. This is a study that's going to help.

UNKNOWN SPEAKER: One of the things that occurred in the Super Fund process, there's an agency for toxic substances, agencies for toxic substances, disease registry and they're a part of Center for Disease Control. And it's a collection of pretty top-notch medical doctors, epidemiologists. And what they're going to do is do what they call a health assessment. It's exactly this kind of thing that they're interested in in terms of cancer rates, in terms of any other symptoms.

They are mandated by the Super Fund Law, CERCLA, to do these, once a site goes on the national priority list, which Mound is. And it went on last year. They'll have to be doing that within a certain time frame, memory says about two years. And they'll be looking at

that, and they'll do that.

First, they'll do a sort of initial assessment to be looking into data on sources and what it takes to do so. And they'll be doing a final one. The remedial investigation under the CERCLA process adds more background data for them to look at, what kinds of problems there are. And they will be coming up with a rather extensive health assessment at the end. So they'll do one early in the first couple of years, and then in 1997 when they're done, they'll be doing another one that kind of wraps it up and looks at what our incidences are. What they'll find, I don't know. I have heard it, there was the preliminary thing, there isn't anything that they found on the first pass. That's all I've heard of anything. First ever --

MR. SMITH: I heard that the study out shows the cancer rate and how much they're increased by Fernald and and these various areas.

MR. CHARBENEAU: That report by the National Cancer Institute is on my desk. Three volumes, it's about that thick. Okay, it indicates -- it's by the National Cancer Institute, sir, and that was done without

consultation with DOE or EG&G or anybody. They used counties with similar population densities and took a good long healthy look, and they say no increase of cancer around nuclear facilities.

MR. SMITH: Didn't Dr. Schearer have something to that? I think I heard --

MR. CHARBENEAU: That report is on on my desk and a synopsis was -- and that's exactly what it says, as reported last Saturday in the Dayton Daily News on page three.

MS. SHEARER: I saw the item in the Dayton Daily News. When you do a breakdown of the cancer mortalities in Montgomery County, you see that the liver cancers have increased by over -- by like about a hundred and forty-seven percent.

MR. CHARBENEAU: I can't speak to that. All I can speak to is the National Cancer Institute on Nuclear Facilities. If you had taken a look at that Dayton Daily News article, when they reported on emissions from plants, okay --

MS. SCHEARER: I read that.

MR. CHARBENEAU: -- other

operational plants, you would see that such emissions were significant in a lot of the industries, and in our case were insignificant. And, you know, if you take that and the National Cancer Institute report, and I'm sure that, you know, we can at least forward you a synopsis of that, you will see that it -- what the gentleman says just did not bear true.

MS. SCHEARER: I have to differ with you. And I have a list of statistics to show it.

MR. CHARBENEAU: Let's differ on the basis of good science, and let's take this meeting back to where it belongs, because literally, this is a meeting, a DOE meeting on their Five-Year Plan for remedial action.

UNKNOWN SPEAKER: Would it be all right, could she finish her one point?

MR. HIGGINS: Yes, sure.

MS. SHEARER: I have worked with the statistics, I have not altered them to suit my point of view or anything. I've taken it as -- I've looked at them as a registered nurse. My profession is at stake here.

The Montgomery County statistics

are commensurate with the Ohio average for cancer mortality. But when you do a breakdown of the different types of cancer, then you see a difference. And I'll not go into it any further than that. You can't say that the Mound facility does not make a difference. And I think it contributes a small amount. Okay. I will not say it's the only cause of cancer in Montgomery County. But when you add the exposure here, and to smoking and various other causes of cancer, you see a difference.

MR. NEFF: I think that's the kind of thing that is expected to show up at this disease registry study, so maybe we ought to hold that until we get data. That would be intended to be around Mound and try to identify things that Mound may have contributed to, because, as you say, there are so many other industries.

And one of the other people who gave a prepared statement also mentioned the five thousand tons of toxic material, and the list has Mound around three hundred on the list, way down, so we may be contributing, but minor. But regardless, the intent of that study -- let's see how much Mound is contributioning to disease.

MS. SCHEARER: May I add one other little thing? The fact that it's liver cancer indicates a relationship here to the Plutonium two thirty-eight.

MR. NEFF: Why to Plutonium thirty-eight? It's a --

MS. SCHEARER: That's where the tie is. It's not a high elevation of cancer. The tie is in the type of radioactivity has a specific affinity for liver tissue.

MR. NEFF: You may have information --

MR. HIGGINS: As I recall the epidemiological, it has affinity for bone tissue.

MS. SCHEARER: Bone and liver.

MR. HIGGINS: But the levels of affinity on a relative scale, better than a hundred to one and --

MR. NEFF: But you can look across the scale and see a number of items that are to the kidneys and liver and so on. I don't know of information that ties Plutonium -- that ties it to the bones. It --

MS. SCHEARER: I did have that data about the combination of the toxic and

hazardous materials, that one adds to the other.

MR. NEFF: Again, that is the kind of information this study intended to uncover, seeing if there are ties to disease, cancer.

MS. SCHEARER: I just wanted to add one thing, talking about the study. The studies where the -- and right in the clipping, which I have right here, they pointed out that the methodology is incorrect because it was not designed to find anything. You have to -- the nuclear plants have not been up long enough for people who have developed cancers to die from them. You have to look at the instance rather than mortality rate.

MR. NEFF: I guess I'll defer back to studies based on CERCLA. We've looked at epidemiological studies and haven't seen the trends, but that should answer the question for us.

MS. SCHEARER: Sorry if I blew a fuse. I didn't mean --

UNKNOWN SPEAKER: I assume that the Tiger Team had the ultimate in security clearance.

MR. HIGGINS: Not across the

board, no.

UNKNOWN SPEAKER: Why did they come out supporting -- with personnel that did not have adequate clearance to do the job?

MR. HIGGINS: The first selection criteria that was used was on the basis of technical. Eventually, as I recall, and I'll ask John to comment on it, was different at Mound. All Tiger Team members were allowed virtually into every building in every facility. The problem was that some of those initial members that were selected for those teams, as I mentioned earlier, were separated from the site that they were inspecting. And they typically had worked in departments that didn't require acute clearance across the board.

UNKNOWN SPEAKER: Perhaps you could give us a report as to what was in the two rooms?

MR. HIGGINS: I'm not sure we can detail that for you. I personally don't know.

MR. LYONS: A process goes on in the two rooms. It's an assembly operation that is classified. But on the issue of why did they come so poorly equipped, it's not an issue of did

they come poorly equipped. It's getting acute clearance, which is what getting into the plants takes. If you're lucky, one a year. Because the Admiral wanted as independent and objective a view as he could get. Drew on an outside agency, OSHA, where he had three OSHA inspectors from the Department of Labor on there. They don't need clearance.

I was associated with the environmental team and the assistant environmental team leader did not have a clearance. Was a DOE employee, was an expert in some phase of environmental area, so they tried to get the best people they could. And, in general, most of them were granted clearance during the exercise so that they could see it. There were the -- the issue of hiding things would not be an issue.

MR. HIGGINS: I might add that the Department of Energy is not the one that conducts the investigation for acute clearance. That is by the FBI and that is --

MR. LYONS: And it is the Office of Personnel Management.

MR. SMITH: The issue is whether

we need the bombs. Manifestly, we don't. That's what the public would like to tell you.

MR. HIGGINS: Any other questions? Folks, I thank you for coming tonight. And we look forward to the next meeting. Thank you all for coming.

(Whereupon, the hearing was concluded.)

STATE OF OHIO )
) SS: C-E-R-T-I-F-I-C-A-T-E
COUNTY OF MONTGOMERY)

I, Suzanne Denslow, a court reporter and notary public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the foregoing is a true and accurate transcript, taken to the best of my ability, of the proceedings in the within matter.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Dayton, Ohio, on this tenth day of January, 1991.

Suzanne Denslow

Suzanne Denslow

My commission expires: 10-28-91