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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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DEC 5 1977

The Honorable Jack Brooks, Chairman
Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

On June 16, 1977 the General Accounting Office issued a report entitled "Cleaning Up the Remains of Nuclear Facilities--A Multibillion Dollar Problem" (EMD-77-46) (enc. I). As you know, section 236 of the Legislative Reorganization Act of 1970 requires the responsible agency to submit to you within 60 days of report issuance the actions it plans to take in responding to recommendations we made.

The Energy Research and Development Administration submitted such comments on August 11, 1977 (enc. II). The comments were not, however, limited to actions on the recommendations. Also included were discussions of some of the material and findings presented in our report. The purpose of this letter is to redress the ERDA discussions with which we disagree.

1. Our report stated that ERDA has not paid enough attention to its facilities that are obsolete. We made this statement because ERDA has accumulated hundreds of obsolete contaminated facilities for which no plans existed for their ultimate disposal. In its letter to you, ERDA commented that our report gave the impression that ERDA was negligent and had no programs or plans in the decommissioning area. ERDA went on to mention some of its decommissioning experiences and to discuss some of its plans for decommissioning its facilities.

We agree that ERDA has taken some recent actions which we view as steps in the right direction. ERDA, over the past few years, has been working on a computerized information system to assist in its planning effort. Since our report was issued, ERDA has implemented this system at its Hanford site which contains some of the types of information that are needed. Also, ERDA has since engaged several contractors to adopt the system at its other major sites. The

data from the information system is necessary to develop a strategy for decommissioning and decontaminating nuclear facilities.

ERDA's comment on our report is perhaps rooted more in a major semantic problem involved in reports and discussions of decommissioning. ERDA defines decommissioning as the closing or shutting of a facility with some action taken to prevent, at least temporarily, health and safety problems. By this definition, ERDA has indeed had quite a bit of decommissioning experience. However, these so-called decommissioned facilities have not been dealt with in a permanent or ultimate way and additional work will be necessary to preclude future health and safety problems.

2. ERDA's letter states that

"In assessing performance, care should be taken that actions with respect to decommissioning and decontamination activities be assessed on the basis of standards in effect at the time such action was taken."

This refers to our reporting on ERDA's efforts to identify and take corrective clean-up actions at sites that it had released for unrestricted use by the general public 20 to 30 years ago. ERDA recently became concerned that these sites might not have been cleaned up or decontaminated adequately and, in fact, have identified some that need remedial actions. Nevertheless, the point made in our report is not aimed at assessing performance. Instead, we are trying to point out that increasing conservatism in radiation standards is an historical trend and because of it, actions thought to be safe 20 or 30 years ago are no longer viewed as safe.

3. In our report we recommended that ERDA require its program managers to plan for future decommissioning and include decommissioning cost information in their program budget. In its letter ERDA commented that such a requirement was, in essence, already in effect. ERDA said that a 1973 ERDA publication (WASH 1202) calls for ERDA program managers to budget funds toward the end of a project to pay for decommissioning and decontamination costs. At a recent meeting with ERDA officials, they stated

that since 1973 funds for decommissioning have been budgeted for only two shut down projects. ERDA officials explained that it was difficult to get ERDA program administrators to implement the policy because of higher funding priorities and the fact that there is a reluctance to include funds for decommissioning in the budget.

4. In its letter ERDA says the statement in our report that induced radiation can remain dangerous for thousands of years is unfounded. ERDA states the period of concern is more like 100 years. ERDA's position is in disagreement with the only study we have seen dealing with reactor decommissioning. The study, done by the Atomic Industrial Forum, was issued in January 1977. This study lists two radioactive elements, expected to be found in reactors, which it says remain hazardous for thousands of years. The two are nickel-59 and carbon-14 with decay periods from 51,350 years to 505,000 years. The report concludes that because of these elements, permanent methods of protective storage--commonly called mothballing and entombment --are unlikely to be practical solutions for the permanent disposition of such facilities.
5. In our report we mention that ERDA has two separate programs underway to remedy a radioactivity problem resulting from uranium mill tailings. Our report mentions also that \$5 million in Federal funds has been authorized for one of the programs and that the second program is expected to cost \$80 million. In describing the problems caused by mill tailings, we state that "unless uranium mill tailing piles are stabilized, radium can be spread to the environment by wind and water erosion."

In an appendix to ERDA's letter to you, ERDA stated

"The [GAO report's] discussion of ERDA programs pertaining to uranium mill tailings permits the reader to infer that solid uranium mill tailings can be dispersed by wind and water so as to be a public health hazard, and that the present corrective program in Grand Junction is a result of such a situation."

This comment gives the connotation that uranium mill tailing piles are not a public health hazard. This is contrary, however, to a joint study of inactive tailing piles done by ERDA, the Environmental Protection Agency and the States, that concluded that tailing piles were indeed a health problem. ERDA has since sent us a letter amplifying on this comment. It said that its objection to this section of our report was keyed to our saying that "radium" could be spread by wind and water erosion. This ERDA amplification indicates had we not used the specific reference to "radium," then it would not have disagreed with this section. ERDA's amplification states--and we would like to underscore and emphasize--

" * * * the fact remains that a costly remedial action (on the order of \$80 million) will be required to minimize this exposure and if the work is to be done the Federal Government may have to bear the major part of the cost."

We believe that this additional information places our report and ERDA's response in proper perspective.

ERDA officials have reviewed this letter and we have incorporated their comments.

Sincerely yours,

(SIGNED) ELMER B. STAATS

Comptroller General
of the United States

Enclosures - 2

bc: Mr. Keller, OCG
Mr. Dembling, OGC
Mr. Horan, OP
Mr. Canfield, EMD
Mr. Peach, EMD
Mr. Carlone, EMD
Mr. Howard, EMD
OCR