

SEED Coalition Addendum #3 – Regarding the Thomas Gray & Associates /Environmental Management & Controls Import Application

In addition to the comments submitted previously, SEED Coalition has the following comments on the Thomas Gray & Associates /Environmental Management & Controls Import Application:

- 1) The Compact Commission not approve this or any other applications for the importation of radioactive waste until the Commission devises a system for prioritizing applications that takes into account annual and lifetime limitations on volume and activity.
- 2) As noted in comments on the Bionomics application, the round numbers for brokers suggest that this is simply an estimate of the waste that the broker would like to send to WCS. Estimating curies and cubic feet by brokers amounts to a “blank check” rather than a reliable estimate of the total activity and volume of waste that will actually be shipped.

This application should include a breakdown of how much and which waste is to be coming from each individual generator. It may not matter too much today, but it could be important at some time in the future under circumstances that are hard to predict.

There are three limited radionuclides in the application; C-14, Tc-99 and I-29 which need to be tracked carefully. The application should be more complete so that the Compact Commission and interested members of the public can distinguish who exactly is the generator, not just the broker, for each of these radionuclides. What if it turned out that one of the generators was less than accurate or honest? It would be important to be able to sort out who was involved if a problem arose. Will TCEQ have more thorough records of the imports than the Compact Commission?

Hopefully it will never be a problem, but the missing information could be important if there was to be a leak in transport or once the waste is buried. Also, it could turn out that there are problems in the future with shipments from a particular generator, and it may become important to track shipments from a particular generator, as opposed to just the broker.

- 3) Waste from the U.S. Army Joint Munitions Cmd. (third generator form) seems to be waste that should go into the Federal facility rather than the Compact facility, which is for waste generated by the Compact States. A handwritten note on the document says "numerous licenses depending upon state." What exactly does this mean?

It is nearly impossible to read the signature of the EHS Specialist who signed for the University of California, Davis, and the names on all forms should be provided in printed form as well as a in a written signature. Legibility is an issue on several of the forms.

- 4) Contact information should be provided for all of the generators, including addresses and phone numbers. There could be questions with the waste later and TCEQ or other

inspectors or auditors may need to be able to find out additional information from them. This is true for forms provided for the University of California, Davis, the VA Greater Los Angeles Healthcare System, US Army Joint Munitions Cmd (?), University of Arizona (which location?), Eckert and Ziegler Isotope Products, NDC Infrared Eng. Inc, (can't read the signature), Conoco Phillips Company (where? / can't read signature), Cypress Semiconductor, LLUAHSC (?), and Ampex Data Systems Corporation. Hopefully Thomas Gray & Associates has more information from these generators themselves. They should provide it with their application.