



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL HEALTH AND ENVIRONMENTAL EFFECTS  
RESEARCH LABORATORY  
WESTERN ECOLOGY DIVISION  
200 S.W. 35TH STREET, CORVALLIS, OR. 97333

March 29, 2006

OFFICE OF  
RESEARCH AND DEVELOPMENT

MEMORANDUM

SUBJECT: Safety, Health and Environmental Management Program Audit

FROM: David W. Burr, Facilities Safety Manager  
Western Ecology Division *David W. Burr*

THRU: Thomas Fontaine, Division Director  
Western Ecology Division *Thomas Fontaine*

TO: Ms. Beth Schlupper  
Nuclear Regulatory Commission

The Western Ecology Division (WED) recently received your agency's draft Environmental Assessment for submission to the Federal Register for comments. The draft was referred to the Radiation Safety Committee members and Staff of WED. The few comments received dealt with recommendations for clarifications rather than errors in the document, and have been attached.

In a recent email message, you inquired as to whether I agreed with the name of our branch facility identified in Newport, Oregon. The facility is correctly known as the Pacific Coastal Ecology Branch (PCEB) of the Western Ecology Division.

It was a pleasure hosting your review team and we thank you for the opportunity to have an external audit performed at our facilities.

If you have any further questions or concerns about the safety and health of our employees, please contact me at (541) 754-4721.

Attachment

Cc: Thomas Fontaine  
Jennifer Orme-Zavaleta  
Bruce Boese

Memo

To: Dave Burr  
From: Phil Monaco, Dynamac Corp  
Date: March 20, 2006  
Subject: Review of NRC EA of WED Decommissioning

I reviewed the NRC's Draft EA of decommissioning WED and have the following four comments:

1. Section II EA Summary p.2 . They refer to the license authorizing the use of radioactive materials "including tracer studies involving marine organisms and plants but excluding animal studies, sample analysis, soil moisture, and instrument calibration." This reads as though we were only authorized for tracer studies. It would be clearer if it parenthetically stated that animal studies were excluded i.e., "including tracer studies involving marine organisms and plants (but excluding animal studies), sample analysis, soil moisture, and instrument calibration."
2. Section II EA Summary p.3. They refer to the license authorizing the use of radioactive materials "including tracer studies involving marine organisms and plants but excluding animal studies, use in gas chromatographs for sample analysis, use in Troxler Model 4300 Series gauges to measure soil moisture, and use in liquid scintillation counter for instrument calibration." This reads as though we were only authorized for tracer studies. It would be clearer if it parenthetically stated that animal studies were excluded i.e., "including tracer studies involving marine organisms and plants (but excluding animal studies), use in gas chromatographs for sample analysis, use in Troxler Model 4300 Series gauges to measure soil moisture, and use in liquid scintillation counter for instrument calibration."
3. Section II EA Summary p.3 and p.5. One of the three facilities being decommissioned is listed as the Hatfield Marine Science Center in Newport. I question the accuracy of referring to the US EPA facility as the Hatfield Marine Science Center. I would think it would be more accurately described as the US EPA Western Ecology Division, Pacific Coastal Ecology Branch facility or laboratory.
4. Section II EA Summary p. 6 Environmental Impacts of Alternative 2

Typo. The opening sentence should read: "A second alternative is the to deny the licensee's" ...