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University of Missouri; License Amendment Request

Comment On: NRC-2011-0086-0001

Curators of the University of Missouri, Columbia, MO, Pickard Hall; License Amendment Request, Opportunity to Provide Comments, Request a Hearing and to Petition for Leave to Intervene

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RULES AND REGULATIONS

General Comment

The attached file contains the comments I made at the public hearing held in Columbia, MO on June 23, 2011.

Attachments

Comments to NRC Public Hearing June 23

SUNSI Review Complete
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Comments at NRC hearing June 23, 2011

My name is Peter Ashbrook. I have been the Director of the University's Environmental Health and Safety department for over 11 years. Thank you for giving me the opportunity to make a few remarks.

My office provides leadership in developing and implementing safe working practices throughout campus on a wide range of technical areas including radiation safety. We are also the lead campus department for ensuring compliance with a wide variety of environmental and safety regulations, including those of the NRC.

The University of Missouri was established in 1839. Our many research and educational activities over the years have contributed to the quality of life enjoyed today. We are here this evening because Herman Schlundt, a chemistry professor who has two campus buildings named after him, spent much of his career, which dates back over 100 years, extracting radioactive materials from natural ores. He supplied many researchers with these "new" radioactive materials, including the Marie Curie Institute. A hundred years ago, there was no NRC, nor even its predecessor regulatory agency. Standard safe working practices, in general, and radiation safety, in particular, were much different from today. Not surprisingly, residuals from Schlundt's work went into pipes, ducts, floor cracks and crevices, and in some cases accumulated to detectable levels. The radioactive materials of interest have very long half lives: 1600 years in the case of radium, and much longer for others. These radioactive materials are not going to decay away in our lifetimes.

Radiation safety staff at the University have been aware of these radioactive residuals going back at least to the late 1970's. At that time, the staff surveyed the building to identify areas of potential exposure concern to ensure the building was safe to use. Where it was easy to do so, they removed the contaminants, but in many cases the residuals were in hard-to-access locations—such as behind walls and beneath floors. The staff took steps to provide shielding in a few places to make the building safe to use. We are not aware of anyone having been harmed by exposure to radiation in Pickard Hall. We have placed quite a few dosimeters, which measure radioactive exposure, in a wide variety of locations, some of which have been atypical, "worst case" areas. Most of these dosimeters have returned very low readings, which has confirmed our assessment that the building was and is safe to use. In some of the locations, even though exposures were low, we have taken additional steps to reduce exposures even more to be ALARA (as low as reasonably achievable). And we have restricted access to a few locations to ensure no unnecessary exposures.

In the safety arena, understanding of risks and regulations changes periodically over time. These changes are often to provide a higher margin of safety for the public. That is just what happened a few years ago when certain NRC regulations became applicable to the situation at Pickard Hall. Our approach was to conduct a new round of monitoring with the specific goal of determining whether the decommissioning regulations applied to us. We found a few new areas of concern not previously identified and took actions to address them (just to be clear, we did not find that anyone had received a dangerous exposure; rather we found locations to which additional steps could be taken to reduce potential exposures); and we determined that Pickard Hall was subject to the NRC regulations. We notified the NRC of our findings, as required, and contracted with an experienced consultant, Chase Environmental, to conduct a thorough characterization study. As a result of Chase's findings, which were

largely consistent with previous surveys conducted by the University, we conducted some additional remediation (removing some soil) where it was straightforward to do so. We applied some sealant in a basement mechanical room. We restricted access to the attic and some basement locations, and temporarily relocated a faculty member from their office to provide a higher margin of safety and to comply with more restrictive standards than we had previously used. All these activities were discussed on several occasions with the building occupants and the NRC. [Let me clear up some misinformation here that we did not remove any attic insulation]

The issue now is, “how do we remove legacy materials to have a building that is radiologically clean by current standards?” If this were a simple office building, it would be relatively straightforward to provide temporary quarters to empty the building, gut it to remove the residuals of concern, and then renovate it to meet current campus needs, much as has been done with Tate and Switzler halls (neither of which had radiation issues). In the case of Pickard Hall, renovation is not straightforward because it houses the Museum of Art and Archaeology. This museum is a valuable cultural resource used not just by university students and researchers, but by students throughout mid-Missouri, and beyond. Relocation of the museum is logistically challenging, something you want to do rarely, and, of course, expensive. The unique resource of the museum and expenses associated with the handling of museum pieces, dictate that considerable planning go into efforts to remove these legacy contaminants. These complications, combined with the many steps we have taken to keep the building safe for public use have led the University to request an indefinite extension to the NRC’s timeline requirements.

Taken in the larger campus context, over 30 campus buildings have been identified by our facilities staff as in need of renovation due to deteriorating infrastructure. In addition, the campus has many academic needs that are factored in when deciding what buildings to renovate—people are cramped for space, classrooms are outdated, research space needs to be updated, and so on. To give all these competing needs proper consideration, this campus has a very deliberate, very strategic, very transparent process for capital expenditures, as evidenced by the Campus Master Plan which is publicly vetted each spring. This process ensures that the limited funds available (and I emphasize “limited”) are put to the best use.

If this alternate timeline to submit a Decommissioning Plan is granted by the NRC, does this mean the University will forget about Pickard Hall? Absolutely not! From a regulatory point of view, Pickard will now be a part of our license, to be addressed at each renewal and included during some NRC inspections. In addition, it is a part of our Decommissioning Funding Plan, and will be reviewed at each update. In addition, it is now on my office’s quarterly monitoring schedule. And last, but not least, my staff have been visiting the building regularly in response to requests when building materials might be disturbed.

In summary, the University has consistently acted with a priority of protecting the health of building occupants and the public. We have met with potentially affected individuals on several occasions to explain the situation and address their concerns. We have worked closely with the NRC since they gained authority to address this situation and have appreciated the cooperative approach that has developed. We believe that the NRC will take all appropriate factors into account in reviewing our request for an alternate time line.... Thank you.