

From: [Stephen Louis Paulmier](#)
To: [Snyder, Amy](#)
Subject: [External_Sender] Army request for categorical exclusion from all DU monitoring requirements at PTA
Date: Saturday, July 18, 2015 3:10:09 PM

July 18, 2015

To: Ms. Amy M. Snyder

NRC

Senior Project Manager

Materials Decommissioning Branch

Office of Nuclear Material Safety and Safeguards

Amy.Snyder@nrc.gov

Re: Comments on the June 1, 2015 CATX request by the US Army for license SUC-1593.

Aloha Ms. Snyder,

As the Army admitted a desire to be exempt from having to acquire any license to possess DU in more than a dozen states, 3 foreign countries and Hawaii (where it used it with the Davy Crockett (DC) spotting rounds). And it can reasonably be inferred that the Army used a lot more DU around live fire training areas in the U.S. and abroad than just DU from the DC spotting rounds of the 1960s. It is incumbent upon the NRC to investigate and ask the Army and independent contractors to investigate the almost certain exposure risk this use poses, especially in light of the NRC's chief priorities: "protection of public health and safety and the environment." The Army claims it wants a categorical exclusion (CATX) to NEPA requirements for the license SUC-1593. As such this amounts to no license requirement at all and hence no license. This claim is clearly evidence of contempt for the legitimate authority of the NRC. In simple language, the Army has no idea how much DU was used any of these sites or where exactly it was fired. They cannot account for it, and they clearly intend to continue conducting high explosives in an area likely contaminated with DU, spreading it in the wind upon troops and surrounding civilian communities. The fact that the NRC made the suggestion that the Army

request categorical exclusions is contemptible of its own authority, the public it is bound to serve and completely irresponsible behavior for a regulator of this serious dangerous material.

Monitoring and testing to determine the full extent of DU contamination is the first order of business. The monitoring must include testing of air, soil, water (including new water wells in the area), plants and animals. Hunting of wild pigs, goats, and sheep around PTA is very common. There have been reports of unusual tumors in some animals harvested from this area. A prohibition against all explosives that have the potential to disperse the contamination makes regulatory sense. The first publicly documented indication of radiation contamination at Pohakuloa training Area (PTA) came from civilian radiation monitors on May 29, 2007, months before the Army confirmed DU use at PTA. The radiation was detected outside the perimeter of the base at Mauna Kea State park, now a county park.

A comprehensive EIS needs to be done at PTA and all other Army sites known to have DU to determine the full extent of the contamination and to develop a plan about what should be done. This investigation must be independent of the Army because of their clearly stated intention to be exempt from regulation designed to protect everyone. In fact they want to be able to use high explosives in the areas that they know contain DU contamination. This shows a blatant disregard for health and safety and is further evidence of the need for aggressive and disciplined regulatory oversight.

The only prudent course available is for you to reject the Army's request for a categorical exclusion to its DU license to possess at Pohakuloa and all other Army sites. Independent testing, monitoring and clean up of the DU present as called for in an 8-1 Hawaii County Council vote on July 2, 2008. But more must be done -- A full EIS on the issue of radiation contamination to include more than just DU from Davy Crockett spotting round. As DU was not prohibited in training until 1996, it is likely it was used in training before that time. That includes

34 years since DU was first used in DC spotting round at PTA.

Please reply at the earliest opportunity,

Stephen Paulmier
Resident of Hilo, Hawai'i