

27-7

W. B. McCoel, Secretary
(THRU K.E. Fields, General Manager)

MAY 14 1958

H. L. Price, Director
Division of Licensing and Regulation

INFORMATION PAPER ON ISOTOPE SPECIALTIES COMPANY, INC., BURBANK,
CALIFORNIA--LETTERS OBJECTING TO ISSUANCE OF A LICENSE

SYMBOL: DLR:DAN

It is requested that the attached letter of May 9 from the Director, Division of Licensing and Regulation to Mr. Seth Gordon, Director, Department of Fish and Game, State of California be circulated to the Commission with a note substantially as follows.

Attached for the information of the Commission is a copy of a letter from the Director, Division of Licensing and Regulation to Mr. Seth Gordon, Director, Dept. of Fish and Game, State of California regarding a proposed AEC license to Isotopes Specialties Company, Inc. and the disposal of radioactive waste in ocean areas adjacent to California.

This letter is in reply to Mr. Gordon's letter of April 14 which was circulated to the Commission in Information Paper AEC R 35/1 dated May 8, 1958.

Enclosures:

Ltr. to Mr. Seth Gordon
Dtd. 5/9/58

May 26, 1958
AEC-R 35/2
Docket - 27-
Isotopes Special

OFFICE ▶	DLR	DLR	DLR	DLR	AGMA	GM
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DATE ▶	5/13/58			5/12/58		

FORM AEC-818 (Rev. 9-55)

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May 9, 1958

Mr. Seth Gordon, Director
Department of Fish and Game
State of California
722 Capitol Avenue
Sacramento, California

Dear Mr. Gordon:

Thank you for your letter of April 14, 1958, in further reference to Isotopes Specialities Company, Inc., and the disposal of radioactive waste in ocean areas adjacent to California.

We appreciate very much your giving us the benefit of the views expressed in your letter of April 14 and your earlier letter of March 20. The Commission, of course, recognizes the important interest of California in the sea disposal of waste and it is for this reason that we have undertaken to keep the interested agencies of the State informed of licensing actions involving persons and organizations in California.

The safety criteria employed by the Commission for waste disposal are based upon the most authoritative technical and scientific data available and we believe that they provide reasonable and adequate safeguards to public health and safety. As is true of all of the Commission's safety standards, however, the criteria applicable to waste disposal are continuously reviewed and are subject to revision as dictated by experience and the development of new scientific data.

With specific reference to waste disposal in the ocean areas adjacent to California, we estimate that some 10,000 curies of activity (at the time of disposal) were deposited by Federal agencies and their contractors in the area south of the Farallone Islands (centered at about $37^{\circ}40'N - 122^{\circ}20'W$) and in the Santa Cruz Basin ($33^{\circ}39'N - 119^{\circ}28'W$) from 1946 through 1956. In addition, disposals by AEC licensees in the ocean areas off the West Coast are estimated to have totalled less than 5 curies. Of these amounts, less than 0.5 percent were deposited in the Santa Cruz Basin area. Records of disposals since 1956 should be available in the near future. All sea disposals made during the period indicated consisted of packaged low-level waste, as contrasted to the high-level wastes originating at AEC installations such as Hanford which are stored in underground tanks.

* Circulated as AEC-R 35/1

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Wrong - Should be $123^{\circ}20'W$.
in 2000' west in San Francisco Bay 4 miles north

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Mr. Seth Gordon - 2

Although our safety criteria governing sea disposal of wastes were prescribed only after consultation with authorities in oceanography and radiological safety and after determination by AEC that the safeguards to public health were adequate, we nevertheless subject the criteria to continuous review not only to confirm our original determinations, but to develop improved criteria as well. In furtherance of this policy, AEC, together with the Office of Naval Research and the University of California, arranged with the Scripps Institute of Oceanography, in April 1957, to conduct a radiological survey of the Pacific Coast disposal areas. A preliminary report of this survey was received only recently. The data developed, however, indicate no detectable effect from waste disposal operations. The report states, in part: "Recent radioactive fallout containing Ru-103, Ru-106 and Zr-95 was detected in the surface organisms. A lesser amount of artificial contamination, probably originating from airborne fallout, was detected in the standard 200-meter plankton hauls. Little or no activity was detected in the standard organisms collected at 1000 meters." The report concludes that "A preliminary survey by standard oceanographic methods has not disclosed easily detectable amounts of radioactivity even in the immediate vicinity of the oldest official marine disposal area."

Also as a part of its continuing review of sea disposal activities, AEC recently requested the Committee on Oceanography of the National Academy of Sciences to evaluate the factors related to the feasibility of establishing additional disposal areas off the Atlantic Coast. We expect to receive a report of this study within the next few weeks. Following completion of that study, it is intended that a similar study will be made of ocean areas adjacent to the West Coast. Since many of the technical considerations pertinent to the general subject of waste disposal have been explored during the Atlantic Coast study, it is anticipated that the Pacific Coast study may be completed in a shorter time.

The data obtained from the studies described above should enable us further to test the validity of our present criteria and possibly indicate ways in which they may be improved. Any revisions, however, must be deferred pending completion of the studies and analyses of the results obtained. To the extent that revisions are found desirable or necessary, they will be incorporated as conditions to existing licenses.

I should like to emphasize that the Commission is anxious to cooperate with the Department of Fish and Game and other interested State agencies in resolving the problems of concern to them. We will, of course, be glad to share all of the scientific data available to us on sea disposal and to review this data with the several agencies as it relates to particular questions of interest to them.

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Mr. Seth Gordon - 3

In this connection, I believe that it would be mutually helpful to arrange a meeting of the interested agencies with our staff for the purpose of considering the entire subject of sea disposal. Such a meeting would provide opportunity for a thorough discussion of matters of interest to California and would, at the same time, enable us to more fully familiarize them with the bases upon which the Commission's safety criteria are developed and continuously evaluated. The meeting might be more beneficial if it were held following the completion of the studies previously described herein, probably in late summer, but if you believe that an earlier discussion would be of value, we will be glad to meet with you in California at your convenience.

Copies of this letter are being sent for information to Governor Knight, Dr. M. H. Merrill, Director of Public Health, Mr. E. B. Webb, Director of Industrial Relations, Mr. A. C. Blackman of the Department of Industrial Relations who is a member of our Advisory Committee of State Officials, and to Isotopes Specialities Company, Inc.

Sincerely yours,

(Signed) H. L. Price

H. L. Price
Director
Division of Licensing
and Regulation

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