

INDIAN ORCHARD CITIZENS COUNCIL

117 Main Street
Indian Orchard, Massachusetts 01151
(413) 543-3172

June 29, 1992

Ivan Selin, Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Interstate Nuclear Services
Parker Street, Indian Orchard, MA

Dear Mr. Selin:

The Indian Orchard Citizens Council is comprised of a fifteen member Board of Directors who are elected by residents of Indian Orchard neighborhood of Springfield. We are the recognized Community Development organization for this area and have been incorporated since 1976. One of the reasons we exist is to deal with community issues and problems. Further, our organizational goals include "to preserve and improve the quality of life in our neighborhood".

Enclosed you will find a copy of a news article which appeared in the Springfield Sunday Republican, June 7, 1992. As a direct result of this article our office received a great many telephone calls from residents living in close proximity to Interstate Nuclear Services, all expressing a great deal of concern over possible health issues. The Board of Directors for this Council discussed this matter at our regular monthly meeting, June 10, 1992. At that time great concern was expressed again about health and safety issues affecting both residents and employees, as well as the impact these issues have on the environment. The INS property is very close to a residential area and directly adjoins Springfield Park Department land, Hubbard Park, which includes Conservation Land. Also of concern is Dimmock Pond in Hubbard Park, as well as the nearby Loon Pond.

The statements in the enclosed article that are of major concern to us are:

1. The reporter's finding that radiation readings outside the INS perimeter fence, near a waste-filled truck, were 12 to 15 times normal background radiation levels experienced in every day life.
2. That all INS waste will be stored on site as of January 1, 1993.
3. In 1989 INS stored twice the volume of waste than it shipped.
4. Corporate health physics manager at INS, Michael Bovino, said the trucks of waste are removed twice a year - NRC records indicate it is removed only once a year, and was not removed at all in 1990.
5. Because of much stiffer regulations for nuclear power plants, a person standing at the INS fence for two days in early May would have received a higher dose of radiation than a person standing at Vermont's Yankee fence for a year.
6. Allegations of discharge of radioactive water into the City sewer system.

As a result of the concern generated by this article we are requesting responses and/or action to the following:

- A. A public hearing, in Indian Orchard, with representatives from the NRC, in order that residents may have their concerns addressed directly.
- B. ~~Access to property and records, with no notification to either Interstate Nuclear~~ UniFirst Corporation.
- C. ~~Access to property and records, with no notification to either Interstate Nuclear~~ UniFirst Corporation.
- D. ~~Access to property and records, with no notification to either Interstate Nuclear~~ UniFirst Corporation.
- E. That the adjoining Park Department land, including Dimmock Pond be checked for contamination and for possible illegal dumping of waste material.
- F. That Loon Pond be checked for contamination and for possible illegal dumping of waste material.
- G. With regard to items 3 and 4 above, if waste material was not shipped, where is it?
- H. At the present time, what type of monitoring is being done, who does it, and when is it done?
- I. Is there a Public Documents Room for INS and if so, where is it?
- J. What is the docket number for INS?

Further, on behalf of neighborhood residents, we demand the following:

First, that the radioactive readings outside the INS fence perimeters be "0" at all times.

Second, that "0" nuclear waste by-products (foam, water, etc.) be allowed to enter Springfield's water/sewer system.

Third, that INS stop using residential streets to get to and from their plant. Specifically, Nagle and Nichols Streets.

Fourth, that under no circumstances INS be allowed to store nuclear waste products on their property.

Thank you for your attention to this matter. We are looking forward to your response and resolution to these issues.

Sincerely,

Gloria M. Mitchell
Gloria M. Mitchell, President

Linda Hammons
Linda Hammons, Vice President

Enclosures

CC: U.S. Senator Edward Kennedy
U.S. Senator John Kerry
U.S. Representative Richard E. Neal
Federal Environmental Protection Agency
State Senator Brian Lees
State Representative Paul Caron
Massachusetts Department of Public Health-Radiation Control Program
Massachusetts Department of Public Health-Division of Food & Drugs, Radiation Control Program
Massachusetts Department of Public Health - Division of Environmental Health Assessment
Massachusetts Department of Environmental Protection-Water Management Bureau
Massachusetts Low Level Waste Management Board
Mayor Robert T. Markel
Springfield City Councilors
James P. Dwyer, Inspector, Division of Radiation Safety & Safeguards, NRC Region 1
Springfield Department of Public Works
Springfield Health Department
Springfield Parks Department
Springfield Conservation Commission
Springfield Local Emergency Planning Committee
Springfield Community Emergency Planning Corporation
Springfield Fire Department
Citizens Awareness Network
Springfield Sunday Republican
The Register

Sunday Republican

ESTABLISHED BY SAMUEL BOWLES
WEEKLY IN 1824 DAILY IN 1844 SUNDAY IN 1875

100 YEARS OF

SPRINGFIELD, MASSACHUSETTS

JUNE 7, 1962

108 PAGES

Nuclear neighbor spurs concern

By WESLEY BLANK

SPRINGFIELD — Who, an Indian Orchard company erected a tent on its well-manicured front lawn last winter and began removing soil from inside, its neighbors had no idea the soil was radioactive.

Nor did they realize that company trucks visible from a bordering recreation area were being used to store radioactive waste for months at a time.

After 30 years, some neighbors did not even know the company's

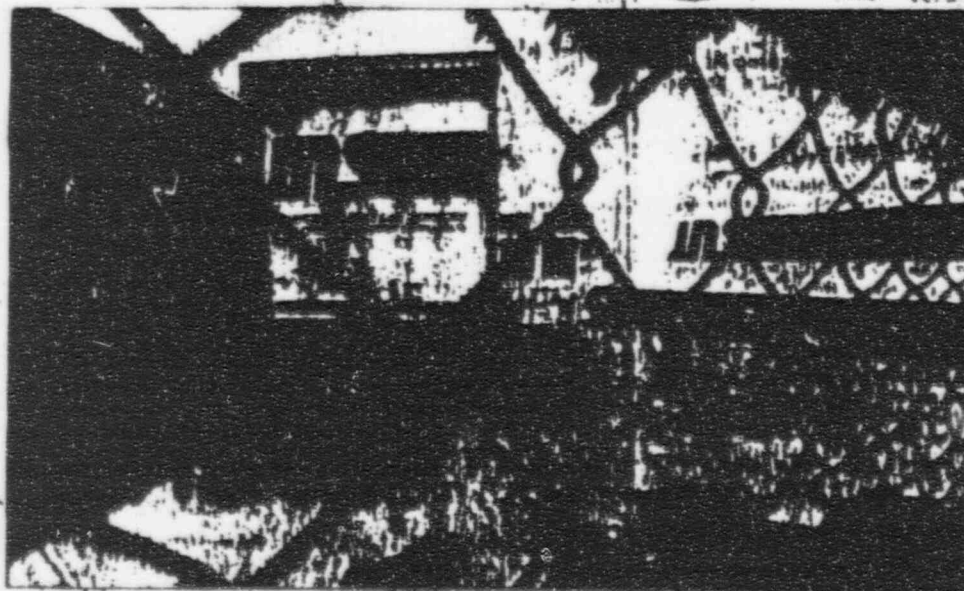


name.

"All I knew was they were hauling out dirt," said Frederick Crochata, who lives at 251 Parker St., less than 50 yards from the removal site. "Nobody told us anything. Of course, we were kind of worried."

Officials at Interstate Nuclear Services, which launders radioactive uniforms for the military, the nuclear power industry, and research labs, confirmed that radioactive foam had bubbled up from a manhole less than 20 yards from its city sewer connection.

At one time, that kind of over-



BACK LOT — Interstate Nuclear Services trucks parked in the back lot, viewed from a house they rent, spurred concern among neighbors.

flow happened routinely at INS, two former employees say.

Corporate health physics manager Michael J. Bovino also confirmed a reporter's finding that radiation readings outside the INS perimeter fence, near a waste-filled truck, were 12 to 15 times normal background radiation levels experienced in every day life.

Bovino said the readings recorded outside the plant did not exceed federal radiation limits, nor had there been an excessive discharge of radioactivity into the Springfield city sewer system.

Just what those legal limits are and whether they are monitored, however, remained unclear. State, federal and company officials gave conflicting accounts of INS operations, and radiation experts gave widely varying assessments of the health risks.

Continued on Page A-10



FIRST IMPRESSION

First Corporation's sign on the fence at the site of the nuclear power plant in Indian Orchard.

Radioactive foam incident at INS concerns Springfield community

Continued from Page A-1

diation exposure at the levels recorded at INS.

Although INS remained near the top of a list of the state's 400 low-level radioactive waste producers last year, it has operated with virtual anonymity in the residential neighborhood for more than 30 years.

"That's the way we like it," said Bovino. "People hear the word 'nuclear' and they get upset."

The plant borders the popular Dimmock Pond recreation area, Hubbard Park and a neighborhood of neat single family homes. Several residents said last week that they worry about INS, but most said they know little about the company.

INS launders 80 percent of the radioactive work clothes in the U.S. at 13 locations. The Parker Street plant, the company's flagship facility, launders clothes for every nuclear power plant in the Northeast, as well as Portsmouth Navy Yard, the Massachusetts Institute of Technology research lab, and others. It is a subsidiary of UniFirst Corporation, which launders non-radioactive uniforms.

INS operates under Nuclear Regulatory Commission authority but is not subject to the hearing and notification procedures required of the nuclear power plants it serves because it does not operate a nuclear reactor. However, radiation readings at the INS fence, for instance, far exceeded similar readings taken last week at Vermont Yankee Nuclear Pow-



Critics say limits too high

The NRC limit is 500 millirems per year, or two millirems per hour for a person standing at the boundary of a licensed facility.

That limit is about to be cut to 100 millirems per year, and the NRC recommends that nuclear plants voluntarily stay below a guideline of 5 millirems per year.

For low-level radioactive waste sites, the limit is 25 millirems per year.

In terms of what any nuclear facility is allowed to release into the air, Massachusetts wants to follow the federal EPA limit of 10 millirems per year.

That is the level of radioactive air emissions that would be expected to cause three extra cancer deaths in a population of 10,000 over 70 years.

Even that limit, according to critics, is far too high. A coalition of anti-nuclear and public health advocacy groups has called for a limit of 0.015 millirems per year. That standard would result in one additional cancer death in a population of one million people every 70 years, the same standard used for toxic chemical waste.

The manhole cover in question emitted radiation of about 1 millirem per hour last winter, said Bovino.

That had dropped to between .05 and .1 by May 11 when Bovino re-measured the cover in the presence of a reporter.

Radiation readings taken out-

tion of nuclear power plants, a person standing at the INS fence for two days in early May would have received a higher dose of radiation than a person standing at Vermont Yankee's fence for a year.

'People don't know it's there'

While UnitFirst prominently displays its sign, INS has an unlisted telephone number and its sign and trucks are not visible from Parker Street.

"People don't really know it's there," said Scott Goodreau of Wilbraham who was one of several people fishing recently at Dimmock Pond, a dozen yards from the INS fence. "I know about it, and I'd like to know more about it. I'd like to know if it's safe. It's a very good question. But most people don't really think about it."

Massachusetts is one of a handful of states that has not been granted authority by the federal government to control the siting or operation of low-level radioactive "by-product materials users" like INS — even though next January, the state will be forced under federal law to take responsibility for all the waste generated by INS.

This means that as of Jan. 1, all of INS's waste will be stored on site.

INS is licensed by the Nuclear Regulatory Commission, which conducts an inspection about once every three years according to the NRC's files.

State doesn't monitor site

The last inspection was Dec. 4, and no violations were reported. Samples of the discharge taken that day were more than 1,000 times below allowable limits for various radioisotopes, according to the inspector's report.

Because they are regulated by the NRC, INS is exempt from state Dept. of Public Health radiological guidelines and monitoring and it is exempt from the detailed local reporting and emergency planning required of companies that handle other kinds of hazard-

DIMMOCK POND — Indian Orchard's Dimmock Pond is popular among local fishermen, who are often unaware of its proximity to Interstate Nuclear Services. Radiation readings 12 to 15 times normal background radiation levels experienced in everyday life were recorded at a fence just behind the trees visible on the far shore.

In fact, state records show that in 1989, INS shipped 432.4 cubic feet of waste, consisting largely of radioactive lint from INS washing machines and dryers. At the same time, NRC records indicate INS stored on site more than twice that volume of waste.

Michael Downey of the industrial pretreatment division at Springfield's wastewater treatment plant said he had not been aware of the full extent of the recent allegation of the INS discharge. Downey said his department can only rely on INS to take its own radiation readings prior to discharging water into the sewer.



Sunday Republican map by Mike Neusel

William Bell of the DPH then visited the INS plant but he took no radiological readings at the

INS employee and business agent for Local 66.

"Without us there, they won't have to worry about anybody calling the NRC. There won't be anybody to demand better safety regulations. If the union is thrown out, the workers there are going to be at the mercy of those people, and those are people you don't want to be at the mercy of," she said.

Complaints bring no response

Soltys, who now works for the union, said that safety violations are nothing new at INS, and that many workers simply don't understand that they have a right to go to the NRC with alleged safety violations.

"Contaminated soap suds used to flow right out onto Parker Street," said Soltys. "We called the city because we don't understand why they don't do anything about it. They just say, what do you want us to do about it?"

Soltys also said that complaints to the NRC rarely brought much in the way of a response.

Bovino said that while he complied with a DPH request for a report on the manhole incident, he was under no obligation to do so.

"We are highly regulated by the Nuclear Regulatory Commission," said Bovino. "Someday we will report to Massachusetts, but not yet. They have never asked for copies of our records."

Water dumped in city sewer

NRC spokesman Karl Abraham said that the agency not been informed of any allegation regarding radiation problems at INS and does not plan any investigation.

Bovino declined to discuss the process by which INS handles its

times normal background radiation. If those readings remained steady for a year, they would translate into 1,752 millirems per year.

That is 18 times the new NRC limit, 180 times the EPA limit, and 360 times the NRC recommendation for nuclear power plants.

No hearings, no monitoring

Both Bovino and the NRC's Karl Abraham said such a comparison is unfair, since it assumes a constant source of radiation, which exists at a nuclear power plant but not at the INS facility.

"But that argument can be misleading," said Mary Olson of the radioactive waste project of the Nuclear Information and Resource Service in Washington.

"For all anyone knows, the level may actually have been higher at other times than on the day you took readings," said Olson.

"With facilities like this, no one is looking at how a given community may be affected. There are no hearings, and no real-world monitoring. As long as they appear to have done on paper what they are supposed to do, there is no monitoring done."

While Bovino said the trucks of waste are removed twice a year, NRC records indicate it is removed only once a year, and was not removed at all in 1990.

And barring a U.S. Supreme Court decision to the contrary, federal law will require that as January 1, companies like INS will have to store all waste on site.

When that happens the need for more oversight may become more acute, said several officials.

Carol Amick of the state's Low-Level Radioactive Waste Management Board last week called the level of NRC oversight of firms like INS "totally inappropriate," and said the state will institute "much more aggressive licensing" of such facilities if it wins the authority to do so.

planning required of companies that handle other kinds of hazardous waste.

That may explain why a recent anonymous complaint about alleged radioactive contamination at the site hit a dead end.

None of the state and local officials who investigated had any significant knowledge of INS operations, or the authority to do anything about the complaint.

Tipster reports 'coverup'

Springfield waste water treatment officials, the state public health department, and the Department of Environmental Protection were all notified in February after the Springfield Health Department received an anonymous call regarding an alleged discharge of radioactive water into the city sewer system.

A caller said that elevated radiation readings were taken from a manhole and manhole cover at INS, that company officials had ignored the problem and then tried to cover it up, and that there might have been a release of radioactivity into the city sewer system.

Randy White of the city Health Department said he passed the report on to waste water treatment officials, and to the state Dept. of Public Health.

"(INS) has some filter that is supposed to remove radioactivity. My understanding is that the uniforms they launder are not really radioactive but they launder them as if they were," said White.

White visited the INS plant but he took no radiological readings at the site.

"I don't dispute that there may have been contamination," said Bell. "But I looked around and was satisfied that there was no problem."

Bell's report was not turned over to the NRC, and the incident sparked no further attempt by the state or city to monitor INS operations.

"There have been innumerable complaints from employees there over the years, but the radioactive end of things always appeared pretty well dealt with," said John Higgins of the state DEP.

Workers worry about safety

Higgins, White and Bell all said they chalked up the complaints, at least in part, to what they had been told were union problems at INS. And Bovino attributed the complaint to a disgruntled employee who, he said, "had an attitude problem" and was subsequently discharged.

In a decertification vote Thursday, unionized workers at Unifirst voted 47-31 to retain the Laundry and Dry Cleaning International Union Local 66 as their bargaining agent.

In fact, ongoing labor problems at INS have repeatedly focused on radiation issues and occupational safety, according to union officials and former employees.

"That's why they want us out of here," said Elsie Soltys, a former

Bovino declined to discuss the process by which INS launders radioactive uniforms. NRC records, however, show that water from four INS washing machines is piped to two holding pits, of 1,150 cubic feet and 460 cubic feet respectively, and then is dumped into the sewer system twice a day after a 50 milliliter sample is tested.

Foaming, Bovino said, occurs when that water is flushed and comes into contact with detergent from Unifirst's nonradioactive laundering in an on-site manhole. Radioactive particles, then, settle out and collect at the bottom of the manhole, Bovino said.

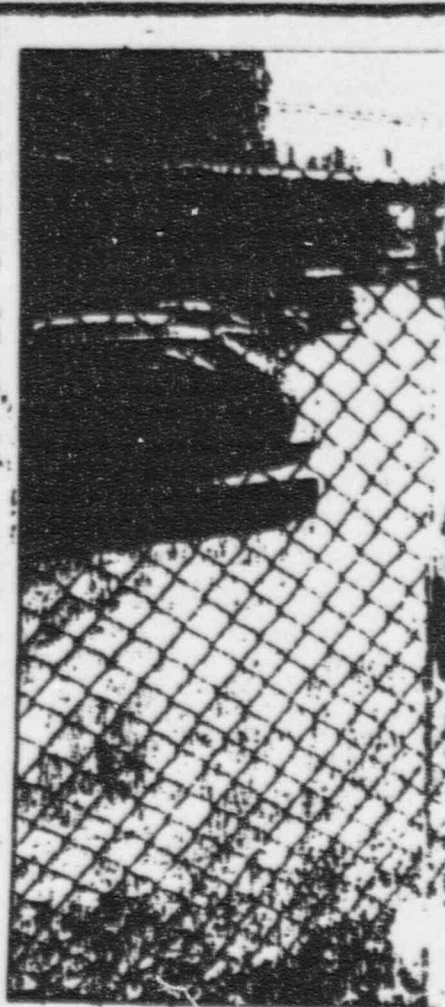
A sample of such sediment taken at the manhole last December showed the presence of radioactive Cobalt 60, Strontium 90, and Iron 53, NRC documents show.

Bovino said the problem will be remedied by the company's construction of its own wastewater treatment plant, now under way.

Just what the radiation exposure limits are for a facility like INS, however, are anything but clear.

Human exposure to radiation is measured in "rems," short for "Roentgen-Equivalent-Man." A millirem is one-thousandth of a rem.

The NRC and the Environmental Protection Agency have varying sets of millirem limits. In addition, the state is trying to set limits as part of its attempt to win authority to regulate companies like INS.



ON WATCH — Elsie Soltys of Springfield is a representative for the laundry strike at the facility on Parker Street.

Statistics, questions surround debate

The debate over the health effects of low-level radiation is bitter and impassioned, and casually peppered with references to the number of cancer deaths that are likely to occur for any given unit of radiation exposure.

On one side are health physicists like Interstate Nuclear Services's Michael Bovino who have been trained by and work for the commercial nuclear power industry.

Bovino, one of 800 licensed health physicists in the country, believes that the dangers of radiation are overrated — misunderstood by the non-technical public and manipulated by those trying to halt nuclear development.

On the other side is a loose coalition of medical doctors, nuclear industry renegades, and anti-nuclear activists arguing that radiation is lethal at levels far lower than those now regulated by the NRC.

'Dizzying' range of limits

John Gofman, Marvin Resnikoff, Helen Caldicott and Ernest Sternglass are among the scientists who argue that — in the words of Harvey Wasserman and Norman Solomon, in their book "Killing Our Own" — "the vast bulk of nuclear technology is simply too dangerous for safe use."

Somewhere in the middle are the state and federal agencies that set vigorously contested radiation discharge and exposure limits. The dizzying range of those limits reflects the lack of scientific consensus on the issue.

The Nuclear Regulatory Commission says that no one should be exposed to more than 25 millirems a year from a radioactive waste facility, but 500 millirems from any other nuclear facility — limits that the NRC calls "conservative" even though they vary by a factor of 20.

"That has given us the fear of God, the fear of the regulations. We do everything by the book and we are in this for the long haul. If that weren't the case, if this were not safe, I wouldn't work here."

Bovino and other industry health physicists believe that the dangers of exposure reach a vanishing point at radiation levels above those handled by INS. On a personal level, Bovino believes radiation to be the motive force of evolution: without it, he said, there would be no mutation.

"The only protection needed for most of what we do is a lab coat and gloves," he said. "That doesn't mean we discount the danger, but we put it in perspective. You see, there is no direct relation between radiation and any particular cancer. They have been irradiating mice forever and they still can't prove it."

Industry fights extinction

Opponents, however, say the proof is simply being ignored by an industry that is trying to save itself from extinction. They say no mutation induced by human-produced radiation has ever been found to be beneficial; and no level of radiation exposure has been found to be safe.

Mary Olson of the Nuclear Information and Resource Service said some of the latest research shows a higher rate of cancer deaths per unit of radiation at low levels than at higher levels.

Among the cancers most often cited as being induced by radiation are breast and thyroid cancer, and leukemia.

Like physicist Marvin Resnikoff of Radioactive Waste Management Associates in New York, Olson fears biolog-

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the NRC will cut the 300 million-
rern limit by 80 percent by
1994," and the Environmental
Protection Agency has an emis-
sion limit that is even 90 per-
cent lower than that.

Massachusetts has been
urged to adopt an emission lim-
it 90 percent lower even than
the EPA limit.

'No relation with cancer'

According to Bovino, INS is
well run specifically because
its management has come from
the nuclear power industry. Bo-
vino himself came from the
front lines of the battle at Sea-
brook (N.H.) Station nuclear
power plant. He makes no
apologies for his unqualified
support for nuclear power or
for his belief that INS benefits,
rather than harms, the health
of the community.

"I got into this because I con-
sider myself an environmental-
ist," said Bovino. "You see, we
are the end result of people
turning on their lights.

"Everybody here has a nucle-
ar plant background," he said.

patients and women could be
making their way into the
neighborhood, Dimmock Pond
and into the Springfield sewer
system.

"All the signposts pointing to
a real problem are there," Ol-
son said of INS.

Who's telling the truth?

Asked about the enormous
gap between the two scientific
positions, in light of Bovino's
assurances, Resnikoff said, "If
you believe what you are doing
is extremely dangerous, you
find it hard living with your-
self. So, you must not believe
it."

The Deerfield-based Citizens
Monitoring Network considers
the radiation danger immedi-
ate enough that its members
attempt to make radiation
alert meters more accessible to
the general public.

Asked about researchers like
Resnikoff, Bovino held up his
hands and shuddered.

— BLIXT



1987 photo by Dave Huxford

ys of Springfield, former employee at Interstate Nuclear Services and now uni-
laundry workers there, says safety concerns have long been a source of labor
arker Street in Indian Orchard.