

**Nuclear Information and Resource Service Comments to
California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) on the Draft
Program Environmental Impact Report (PEIR) for the Santa Susana Field Laboratory (SSFL),
Ventura County, California SCH# 2013111068
December 7, 2017**

Nuclear Information and Resource Service (NIRS) is non-profit, public-interest group concerned about radioactive waste among many nuclear issues. Closure and decommissioning of radioactive sites has very long term impacts on the immediate communities and the entire bioregion. We support full cleanup of radioactive sites and state assertion of authority to enforce the most protective standards. We support the polluter pays principle--the entities that made the mess clean it up without leaving it to threaten current and future generations, many unsuspecting and certainly not consenting to the health, environmental and economic risks.

We have tracked the long history of the Santa Susana Field Laboratory (SSFL) and were heartened in 2010 when the Administrative Orders on Consent were agreed to by the US Department of Energy, NASA and California DTSC committing to full cleanup of the site to background levels by 2017 and by the determination by DTSC that it would require Boeing clean up to background levels. It has been frustrating to see that the cleanup never started despite the state and federal commitment and the continued pressure from the impacted community. It is disappointing that the cleanup has not been carried out and that now the DTSC in this PEIR is proposing to essentially renege on its agreement and abandon the commitment for full cleanup.

Because of the partial nuclear meltdown at the site, accidents at several of the nuclear reactors at the site, radioactive fires in the hot lab, releases of radioactive gases, illegal burning of toxic and radioactive wastes for decades in open air, tens of thousands of rocket tests and widespread radioactive and chemical contamination, SSFL is among the most contaminated sites in the United States, with both radioactive and toxic wastes. It is upstream, upwind and close to residents and communities. It is unconscionable that the PEIR doesn't meaningfully consider the full cleanup "option" to which it has already committed and fails to lay out the steps to achieve the full cleanup that it had agreed would be achieved. It fails to consider the multiple, additive, cumulative and synergistic health impacts (of leaving the deadly pollutants in place) on the community, area and population which has already been exposed for decades.

NIRS objects to the disingenuous proposal to leave most of the radioactive and hazardous waste in place, to spread and continue to expose people, and to enter the food chain and biological systems including the human food web. The irresponsible omission in the PEIR of data and analysis of the health, environmental and economic consequences of leaving the waste in place appears to violate the California State Environmental Quality Act.

To honestly evaluate the cleanup options the PEIR should provide information on how the hazardous and radioactive contaminated soil, remains of buildings and other structures, plants and other materials, if left at the site, could impact residents now and in decades to come. The PEIR is skewed toward emphasizing risks of removing the contamination. It fails to provide basic data such as the amount of contaminated soil would be permitted to remain at the site. The PEIR should completely review the consequences of not cleaning up, with an eye toward the health effects already being experienced.

We strongly oppose consideration of future use of SSFL as a park, which appears to an increasingly common practice to avoid the costs of full cleanup at radioactively contaminated sites across the country. By assuming less hours of exposure in the park scenario, more radioactive waste can remain. The land will not be cleaned up to DTSC's promised cleanup levels consistent with the uses allowed under Ventura County's zoning and General Plan which are agricultural and residential. People living and working near SSFL will continue to be at risk from migrating pollution if all of the contamination is not cleaned up as was promised. The PEIR does a disservice.

The PEIR is misleading, incomplete and potentially illegal. In addition to leaving people at risk near Santa Susana, is a bad precedent for work like this at other sites. DTSC should proceed to implement the 2010 agreements and requirements for full cleanup of the entire site.