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April 30, 2007

Thomas Johnson
ETEC Project Manager
U.S. Department of Energy
5800 Woolsey Canyon Road
Canoga Park, California 91304-1148

**RE: Santa Susana Field Laboratory Radioactive Materials Handling Facility
(RMHF) Decontamination and Decommissioning (D&D) Engineering
Evaluations & Cost Analysis (EE/CA)**

Dear Mr. Johnson:

I appreciate the opportunity to comment on the Radioactive Materials Handling Facility (RMHF) Decontamination and Decommissioning (D&D) Engineering Evaluations & Cost Analysis (EE/CA) document. In reviewing the information I would like to request consideration of the following actions:


- 1) The RMHF D&D EE/CA is basing cleanup efforts on residential use standards. However, I would point out that current zoning includes RA 5, rural agriculture. Using a rural agricultural land use standard instead of suburban residential would be more appropriate because it is the actual zoning of a portion of the site. Additionally, the agricultural standard errs on the side of safety by reducing risk to the public, and is in line with EPA guidance that calls for using the prospective land use that leads to the lowest permissible remaining contamination, and relies on factors such as current zoning in determining prospective land use.
- 2) Additionally, I urge a full site characterization study be done as called for by the EPA and for which I understand the DOE initially agreed to comply. The characterization

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study should be done prior to commencement of final cleanup so that there is full understanding of the scope of contamination to ensure cleanup is complete.

3) Finally, the RMHF D& D EE/CA proposes two alternatives to meet CERCLA requirements: the No Action alternative, and the alternative for Demolition and Removal based on lower cleanup standards. Another alternative should include higher cleanup standards (i.e. as close as possible to the one in a million cancer risk standard rather than the one in ten thousand standard contemplated) with an opportunity for public comment.

Thank you for your consideration of these three requests,


Linda Parks
Supervisor, 2nd District