

October 19, 2011, 2011

Elizabeth H. Miller  
Commissioner of Department of Public Service  
Vermont State Nuclear Advisory panel

The Brattleboro reformer reported on October 7, 2011 that La Rock Excavators hauled off a lot of mud from Vermont Yankee after Irene with nothing to be wasted.

Previously, Vermont Yankee had been given NRC waivers to stockpile up to 150 cubic meters per year of radioactive contaminated silt and waste sludge some from the cooling towers at the south side of the property in an unlined and uncovered location near the Connecticut river

Has that contaminated dirt now been hauled off to be used on Vermont farmland for growing our food in Vermont?



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Rutland, Vermont



## 'Nothing is wasted nowadays'

By BOB AUDETTE / Reformer Staff

Posted: 10/07/2011 03:00:00 AM EDT

Friday October 7, 2011

BRATTLEBORO -- For a number days after the floods caused by Tropical Storm Irene swept across Windham County, all that road crews, contractors and some residents could see was mud.

It settled over streets and parking lots, in homes and in basements and in many cases needed to be scraped up with shovels.

In downtown Brattleboro, heavy equipment was used to clean the streets and haul the mud out of town.

"It was everywhere," said Rocky La Rock, of Bernie La Rock & Son, a private contractor in Guilford.

His crew was very busy following the flooding, said La Rock, and was involved with the clean up of Melrose Terrace, in West Brattleboro, which sustained significant damage.

For two weeks following the flooding, his crews worked long days, seven days a week, said La Rock.

"We were cleaning up debris and repairing roads," he said. "It was amazing the amount of damage."

La Rock also hauled much from Vermont Yankee nuclear power plant.

"It's fine and clean," he said. "There's no glow to it."

An environmental enforcement officer was dispatched to make sure the mud from Yankee wasn't contaminated with any hazardous materials, but phone calls to that department were not returned.

The mud his crews scraped up was hauled to a gravel pit where it's being dried out.

"Once it dries out, we can turn it into loam and grow grass with it," he said. "Nothing is wasted

nowadays."

"We're reusing everything we can," said Steve Barrett, director of Brattleboro's Department of Public Works.

Like La Rock, the town's crews are drying out much of the mud that washed up all over town.

But the department has had to purchase gravel to fill in holes in roads that were damaged, said Barrett.

About 75 percent of the expense of cleaning up and repairing damage will be reimbursed by FEMA, said Barrett.

"The state may or may not kick in to help and the town will end up with the rest," he said.

Unfortunately, most of the mud, even when dried out, is too fine for uses such as rebuilding roads, he said, but asphalt that was torn up will be melted down and reused, said Barrett.

"That saves a lot of money," he said.

The finer materials can be used as loam or mixed with compost, said Barrett.

The town may also be able to exchange it for gravel.

"If we have a big pile it might be worth something, but it needs further working to make a final product," he said. "Contractors would have more use for it than us. We build roads."

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None of the mud the town removed was contaminated, he said.

"Our employees know if something appears to be contaminated to stop and seek help," said Barrett.

Brian Jerosé, of the Composting Association of Vermont, said reusing the muck makes much more sense than dumping it in a landfill somewhere.

"Even if there was sewage in the flood waters if it was dried out over time the chance there would be pathogens or viruses in it would be low," he said.

James "Buzz" Surwilo, an environmental analyst with the Vermont Department of Environmental Conservation, said the mud can be used just like any other kind of fill.

"That's fine by us," he said. "This material probably started off up a mountain side. It's probably pretty clean."

However, it's against the law to dump the muck back into a waterway, he said.

Anyone who is thinking about using the mud in their garden should have it tested first, said Surwilo.

"The chances are there's nothing in it, but you may want to be a little more judicious with its use," he said.

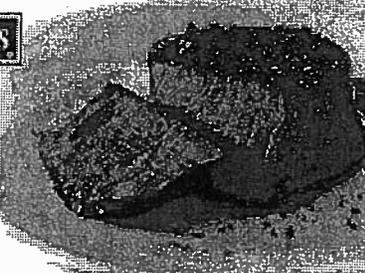
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The advertisement features the Omaha Steaks logo at the top left, which includes the text 'HEARTLAND QUALITY', 'OMAHA STEAKS', and 'SINCE 1987'. Below the logo, the text 'SAVE up to 64%' is prominently displayed. Underneath that, it says 'Plus, get 3 FREE Gifts'. To the right of the text is a black and white photograph of three steaks. At the bottom right of the ad, the special code '45069ZWN' is provided. At the very bottom, the ordering information is given: 'To order: www.OmahaSteaks.com/print71 or call 1-877-605-0496'.

NUREG-1437, Supplement 30  
Vol. 2

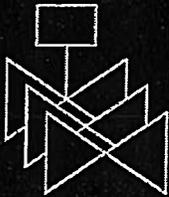
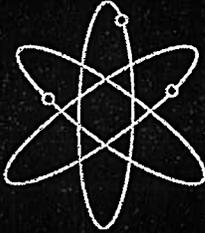
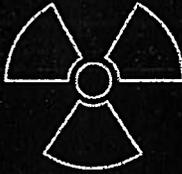
**Generic Environmental  
Impact Statement for  
License Renewal of  
Nuclear Plants**

**Supplement 30**

**Regarding  
Vermont Yankee Nuclear Power Station**

**Final Report – Appendices**

**U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, DC 20555-0001**



The GEIS cost estimates on an accident at a reactor, based on outdated cost information from 1980 updated only to 1994, 12 years ago, is flawed for a number of reasons. First, the outdated cost information, aforementioned, should be updated to reflect current reality. Second, you did not include Indian Point. This is disingenuous. Although it may be an "outlier" due to the large population living within 50 miles of its reactors, nevertheless an accident there would have an enormous impact on the economy of New England, and the entire country. It should not be left out of your accident consequence cost calculations. (VS-HHH-6)

**Response:** *The comments relate to Category 1 design-basis and severe accidents issues. Environmental impacts of postulated design basis and severe accidents will be discussed in Chapter 5 of the GEIS.*

#### A.1.13 Comments Concerning Uranium Fuel Cycle and Waste Management

**Comment:** Vermont Yankee had gotten permission to store contaminated soil on site, starting back, I think in 1998, maybe a little earlier. And, at the time, the amount was some excavated soil from a construction project, about 135 cubic yards. And then roughly at 35 or 40 cubic yards per year, they anticipated generating through contaminated sanding salts from the roads from silt in the cooling towers, and also from waste sludge. And, in 2004, Entergy received permission to increase that amount. They had accumulated, they thought, about 500 cubic meters of contaminated soil on site, and they wished to dispose of, on-site, an additional 150 cubic meters per year. That's about ten big dump truck loads. And this disposal site or, excuse me, this storage site is on the south end of the site, just south of the cooling towers. It is constantly sprayed down with what is called drift, sideways spray from the cooling towers. It is on the riverbank. We believe that the phenomenon of bio uptake, of sedimentary separation, of chemical combination, can leach and separate and concentrate the radioactive material in that disposed of or stored soil, complicating decommissioning, polluting the river, winding up in the biota. And so we believe that should also be investigated as part of the environmental assessment. (VS-D-3)

**Comment:** So we have to run the other way to nuclear. You have to really think hard about all of the nuclear waste that's going to be with us forever. And will Entergy be with us forever. As long as it takes for the radiation to dissipate. (VS-L-5)

**Comment:** Especially if Entergy gets its way and does not even have to provide berms around the casks. And, of course, there's also a flooding danger. In 1991, there was a study regarding the construction of a low-level waste repository down on the plant grounds, and it was deemed not wise. (VS-N-3)

**Comment:** Nuclear is not cheap electricity. Protect the waste for 100,000 years, tell us how much that's going to cost. Spend some of that money to protect that waste, and then tell us it's cheap, affordable or inexpensive electricity. I challenge you on that. To anyone who claims that

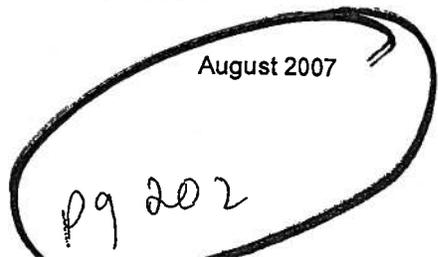
Appendix A



**Comment:** Just preceding the uprate application, Entergy was given permission to stockpile 150 cubic yards of radioactive soil per year on-site, that's about eight large dump truck loads per year dumped apparently in an unlined and uncovered location near the Connecticut River. These piles of radioactive dirt will be subject to erosion and over land flow, rain and snow melt tend to wash into the river. The storm drains are designed to collect over land flow but no monitoring is done on the storm drains, so how do we know that the effluent that discharges from these storm drains is within regulatory limits or that there is no environmental impact from it? (OO-6)

**Comment:** Septic sludge too hot to send to commercial septic haulers is also surface spread in three or four locations on the site. This is a site, by the way, that was deemed unsuitable for a low-level waste dump by an independent environmental review a number of years back, I think it was in the '80s. If you don't monitor the outflow pipes that collect storm drain run off from the site, how can the NRC claim in this supplemental environmental impact statement that there are no radioactive liquid effluents? (OO-7)

**Comment:** Just preceding the Uprate application, Entergy was granted permission to stockpile 150 cu. meters of radioactive soil per year outside on site (that's eight LARGE dumptruck loads per year) in uncovered, unlined piles. There is no mention of this large quantity of radioactive soil in the SEIS, nor an explanation of where it comes from. The soil is apparently in the open, exposed to rain, snow, overland flow, erosion. Storm drains tend to pick up overland flow-but no monitoring is done so how do you know that the outfall effluent from the storm drains is within regulatory limits? I submit as new and significant information the Site Characterization Data Report for the Vernon/Vermont Yankee Site Volume 1, November 1991 prepared for the Vermont Low-Level Radioactive Waste Authority by Battelle [Battelle, 1991, Site Characterization Data Report for the Vernon/Vermont Yankee Site Volume, prepared for the Vermont Low-Level Radioactive Waste Authority]. The study concluded that due to a number concerns the site should be removed from consideration for siting a low level rad waste facility. Concerns included jurisdictional wetlands (VYWI, VYW2, VYW3 and VYW4) which meet federal criteria under Section 404 of the Clean Water Act (in addition, the palustrine wetlands are likely to be within the 100-year flood limit of the Connecticut River, under the new FEMA floodplain delineation); depth to water table (water level data from spring 1990 indicated groundwater within 4 inches of land surface at one location (103S in Battelle, table 3.1-1); travel times to river, to shallow domestic wells south of the site, and to surface seeps south of the site (preliminary minimum travel time (along most conservative pathway to riverbank estimate: 3 months to 9 yrs; to domestic wells uncertain. This travel time for leachate is not enough for Cobalt 60 and other long half-life radioisotopes WHICH WERE FOUND IN SEDIMENTS IN THE 1989 VYNPS RADIOLOGICAL SURVEY, ALONG WITH "DETECTABLE LEVELS OF HUMAN-MADE RADIONUCLIDES IN MILK, MIXED VEGETATION, AND FISH." (p. 2.9-1, Battelle). The study's conclusion was to recommend that the Authority suspend further characterization at this site and consider other alternatives. Why then is ENVY allowed to turn the site into a de facto low level radioactive waste dump with its open air radioactive soil



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