

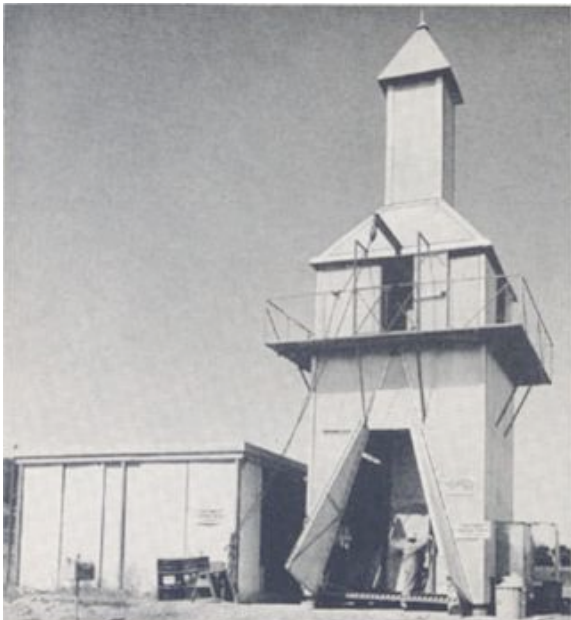
ACME ADRS

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5/7/2010

United States Environmental Protection Agency (EPA) Region IX (Via Electronic Mail)

ACME (Aerospace Cancer Museum of Education) Comments on the Historical Site Assessment(HSA)5-C of April 9, 2010



TINY TOWER—This 40-ft. instrumentation test tower, small in comparison to another AI tower of 102 feet, is used for sodium instrument tests. P. C. Borbon stands at the base.



The Above Facilities, the Sodium Instrumentation Building (Building 4383) and the Sodium Instrumentation Tower (Building 4393 Shown Above) were designed to function under the conditions required for Sodium Graphite Reactors (SGR). The SGR program involved the development of many specialized items of equipment that were not yet available. Necessary, for the Atomics International Division (AI) of North American Aviation (NAA) as a special facility for the experimental investigation of various components and techniques. This was accomplished through the modifications of an existing structure. Within this facility instruments were developed to determine liquid level, flow, pressure and oxide content in Sodium Systems. All instruments are tested and calibrated here before installation in a reactor.

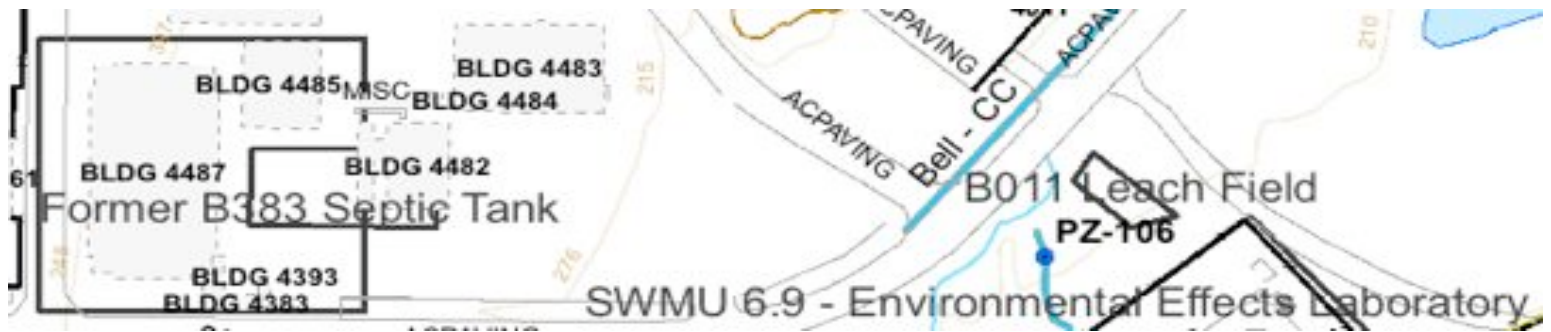
There looks to be a potential storage area to the North of the Facility (Below Photograph). These areas should be noted as potential areas of Radiological Concern.



Below we see an aerial view of Buildings 4383 and 4393 in the year 1965.



This is also the area of the Former Building 383 Septic Tank and should be located.



Below is the current location of Building 4015 (Photo 2007 with grazing cow in the area).



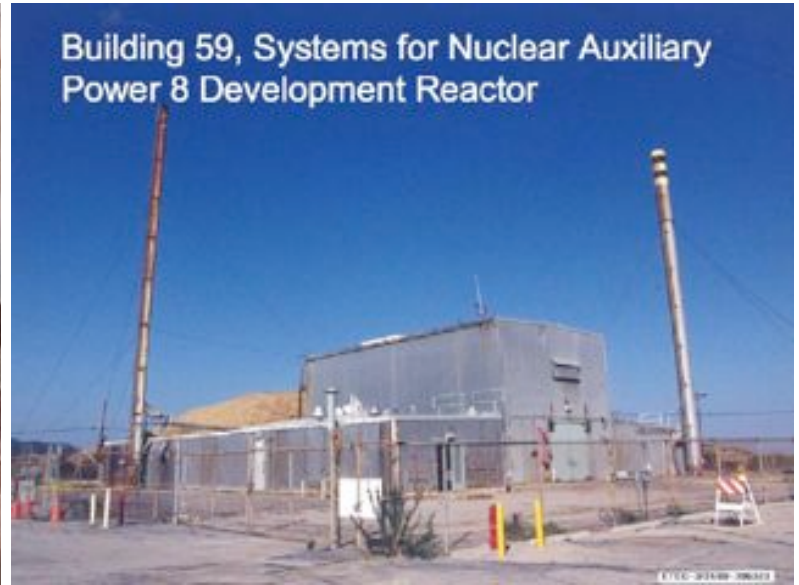
The Building 4373 Leach Field could impact this group even though located outside.



Records should be obtained by the Landauer Dosimetry Company to see the excess of certain radiological information on employees and where they were recorded to have the highest readings (See Below).

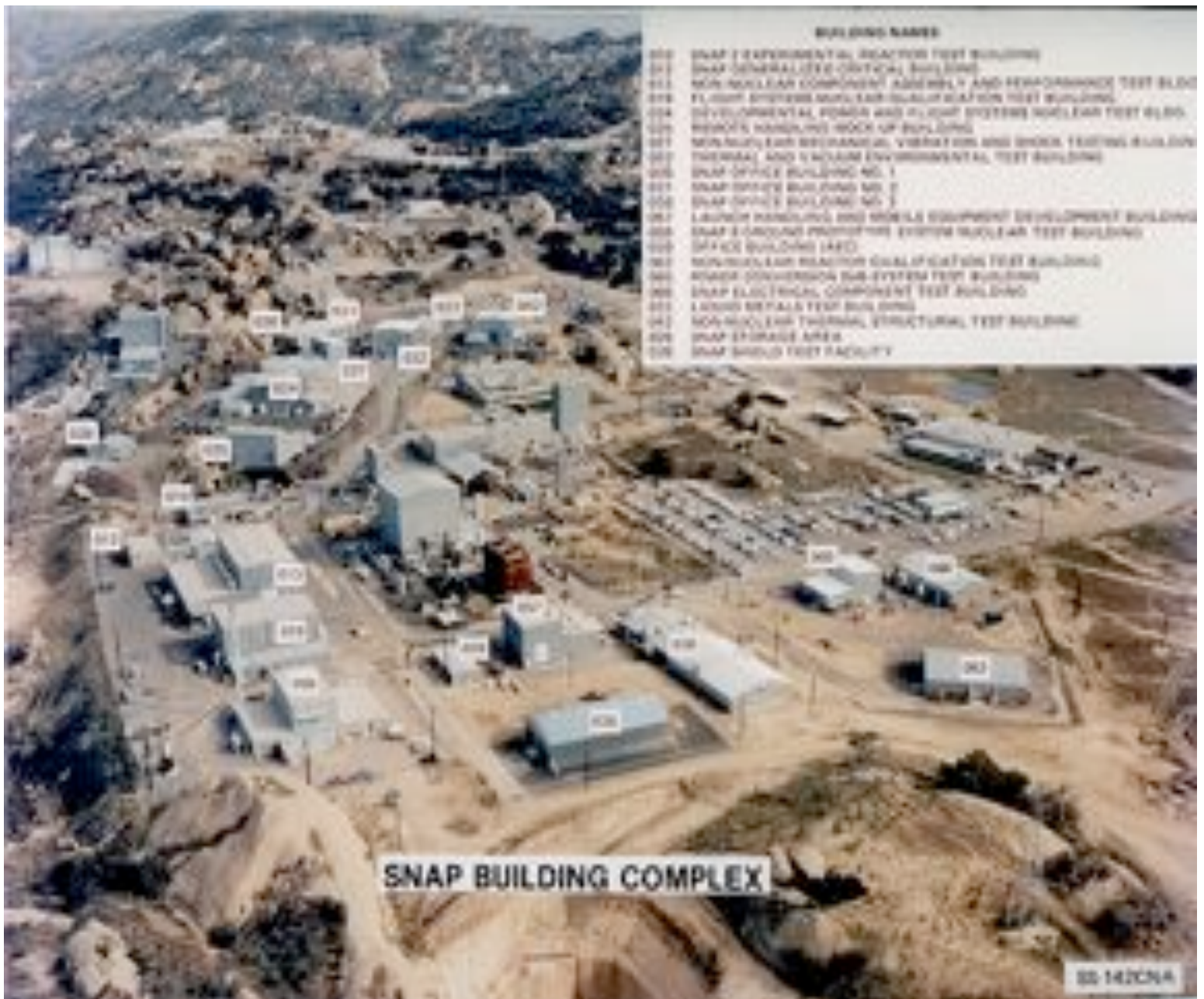
RADIATION MONITORING RECORDS. Radiation Safety folders which recorded individual employee exposure history were used. Additional radiation information for workers was obtained from national databases such as the Department of Energy, the Nuclear Regulatory Commission, and Landauer Dosimetry Company.

The below areas were used as staging during the Demolition and Decontamination (D&D) of the Building 4059 Systems for Nuclear Auxiliary Power (SNAP) Facility. There have been many examples of using parking lots in the past as radiological storage. More study of historical photography needs to be implemented to target certain areas for a proper cleanup.



Please include the ACME Resource Conservation and Recovery Act (RCRA) Facility Investigation Report of the Santa Susana Field Laboratory (RFI) Group 5 Comments that were submitted in 2009 as they deal with some of these same areas.

http://acmela.org/images/ACME_Group_5_Comments_DTSC_May_14th_2009.pdf



The above photo should help in identifying some outdoor storage areas that could be a potential Radiological Concern. There needs to be a more in-depth study of these type of photographs. The September 2004 Presentation Poster on the Energy Technology and Engineering Center (ETEC) Website notes that the Building 59 area is a possible Tritium source and should be addressed.

It should be noted that on February 12th of 1970 in the Building 59 Test Vault during the D & D of the SNAP 8 DR a Vacuum Filter ruptured contaminating various areas. Again in February of 1970, there was a reported incident where an employee was cutting a NaK Line in Pipe Chase Room in Building 59 that caused a fire. This report should be obtained and looked into further.

Below are two links that I would like to submit to help understand the operations in the HSA 5-C area. The first document located on the link below is the Characterization of Atomics International's SNAP Fuels from 1966-1973.

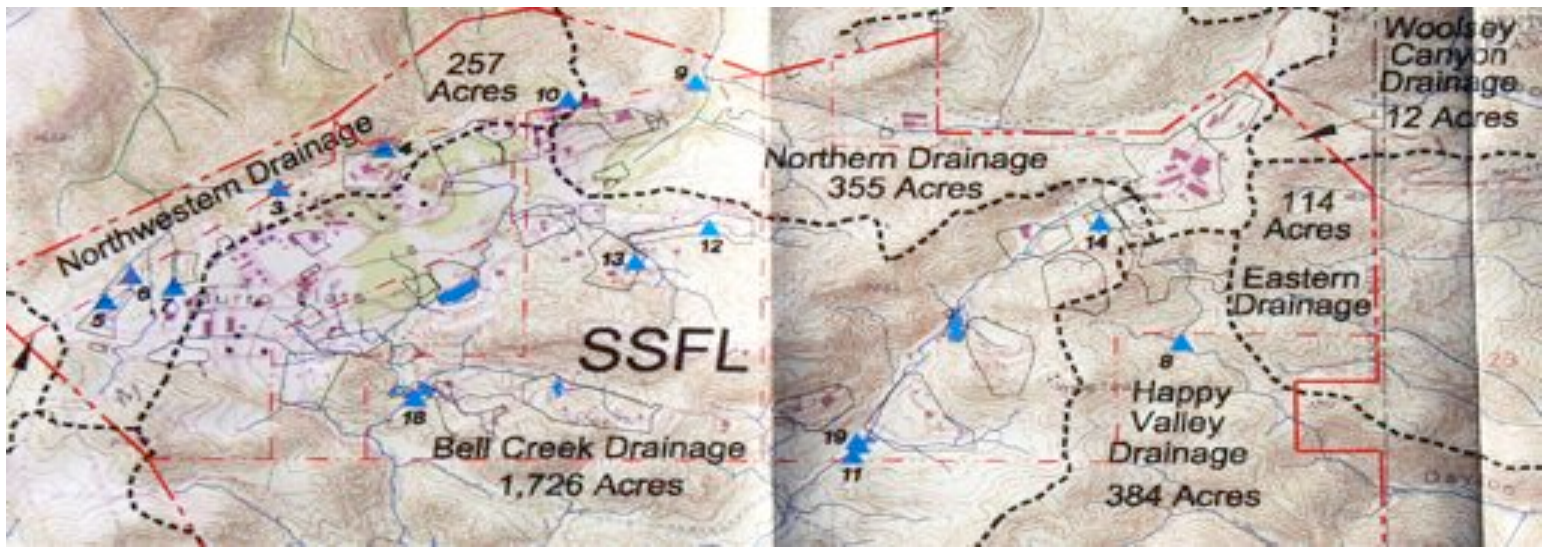
http://acmela.org/images/SNAP_Fuels_Characterization_1966_thru_1973.pdf

and this link below explaining the uses of Liquid Metals within the HAS 5-C area...

http://acmela.org/images/PWR_LM_Molten_Salt_Testing.pdf

The below photo is taken from outside of Building 19 and should be noted that this area was used for staging of debris, soil and water that could have a potential impact. There are also documents that note a Reservoir under this facility and there is a large welded cap of a circle larger than 10 feet across. More investigation of the past operation of this facility need to included in the HAS 5-C section.





The majority of the HAS 5-C of the Santa Susana Field Laboratory (SSFL) AREA IV surface drainage of the SSFL drains into the Los Angeles River via Bell Creek, yet this reporting area is a portion of the 257 acres of northern surface of the total 2850 acres of the SSFL that drain onto the Simi Valley side onto the property of the American Jewish University's Brandeis-Bardin Campus.



Yet all the Sewers run from the HAS 5-C reporting area connect to the AREA III Sewage Treatment Plant and contamination should be followed as per the Multi-Agency Radiation Survey & Site Investigation Manual (MARSSIM). See Below Map for Reference.

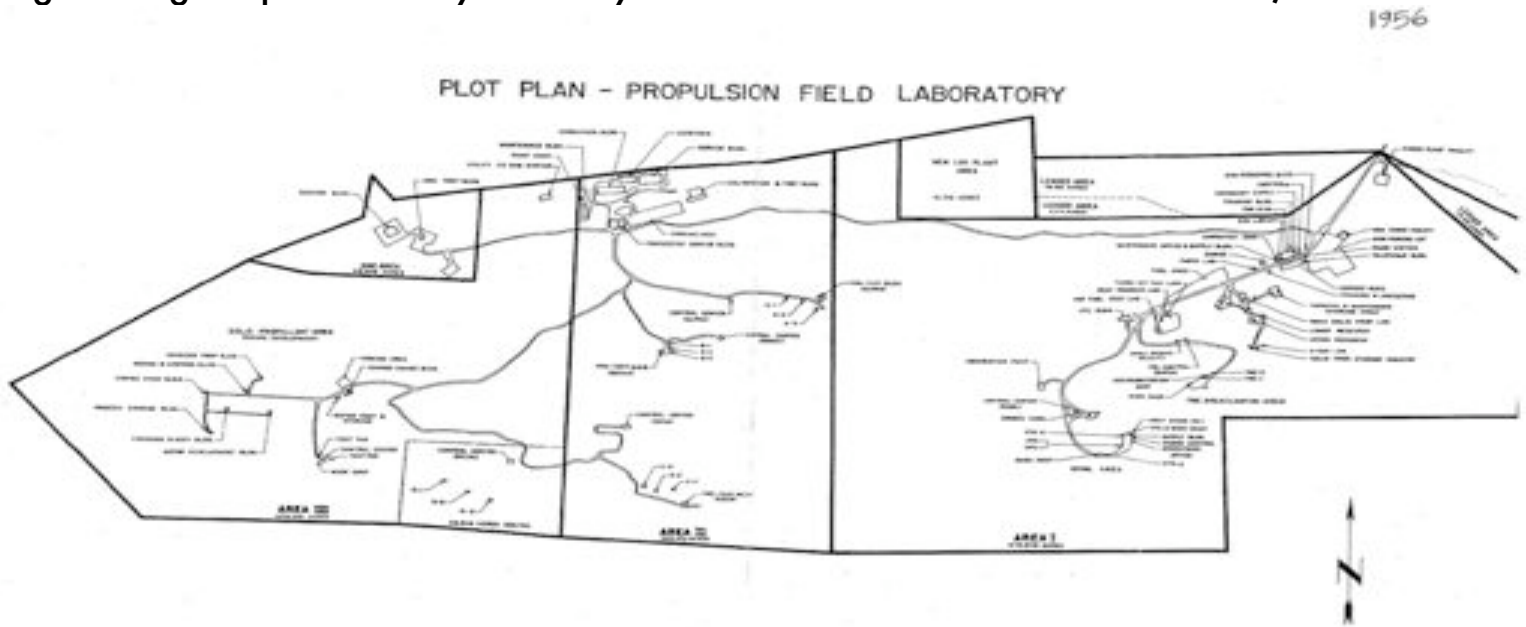


In the bibliographical references at the bottom of each page in the HAS 5-C any reference to DTSC -SSFL should be confirmed with the Department of Toxic Substances Control (DTSC) as they have created a new website and this one is to be inactive. These documents should be referenced in their current location, as this public information is important. Also, some of the other reference materials should be placed on the EPA Website as a downloadable document for an easier public reference.

Building Numbers are cut off in some cases incomplete. Where the number belongs and almost make out what number is to be placed there. Please check all of these map pages. On page 19, there is a missing building (4374 - The Test Loop Enclosure).



On Page 49 where you see the location of Building 4450 (Which Reads 445 and a blank spot where the "0" should be) this was the former location of Building 4459 - The Uninterruptible Power Supply and should be noted as such (As per the Facilities Engineering Map created by R.K. Boyles for Rockwell International in 1984).



The above map shows how the boundaries were not always divided up as AREA's I, II III & IV and older Plot Plans should be investigated in terms of Building Locations and Compared to Current & Former and what the past operations were.

Some of the areas that are removed and reused should be looked into closer than usual in the example of Building 4065 - ETEC Chemistry Lab and the fenced yard behind building 38 (Below) that now has a structure covering it from the expansion of Building 4038.



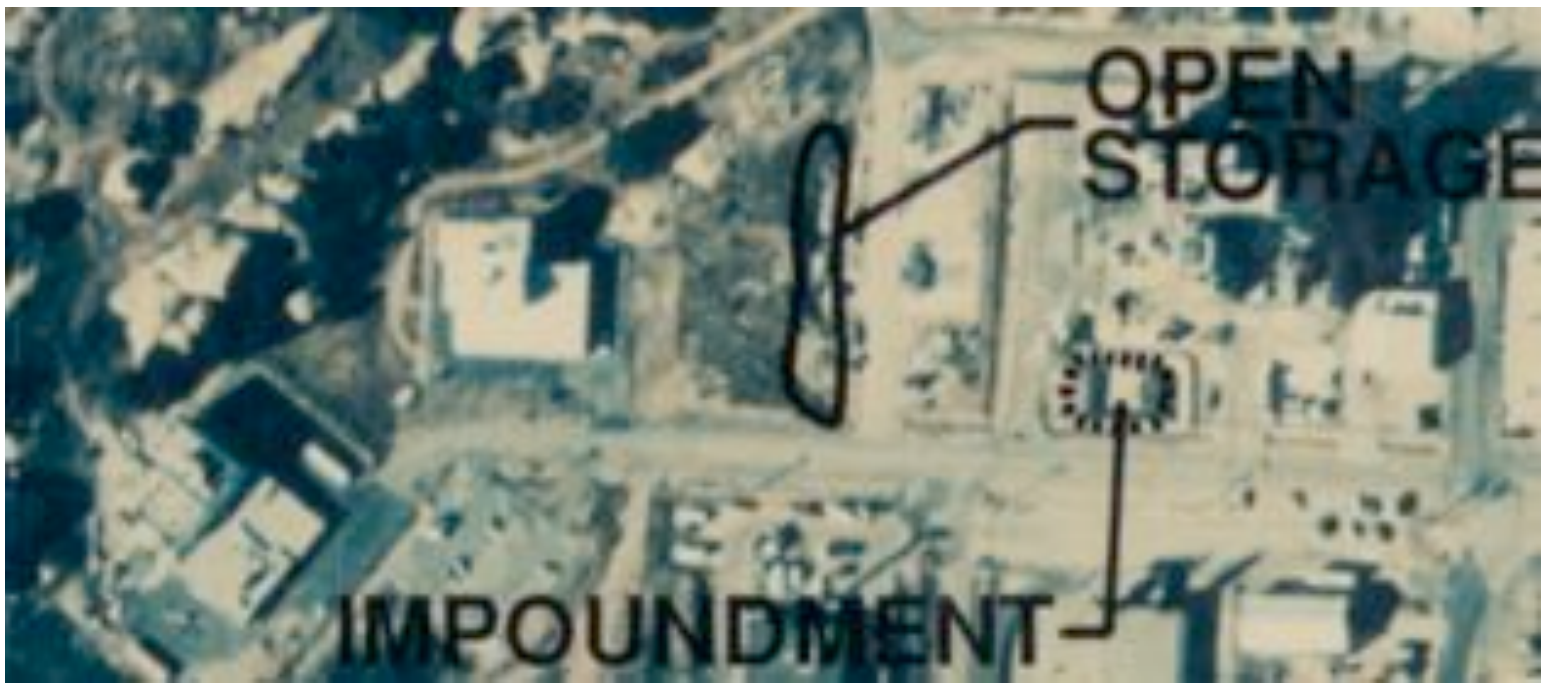


Here, a portable iridium-192 source is being used for gamma graphing of weldments on field installations. It also has a 3½-curie cesium gamma graphing apparatus, and also has a 5-curie cobalt-60 source, for the examination of dense materials.

I would like Gregg to explain the process in the above photo and if it's a concern.



The pond next to concrete pad 4662 of the SPTF is a concern and should be noted more with further investigation needed. In the above photo it appears to be Unlined.



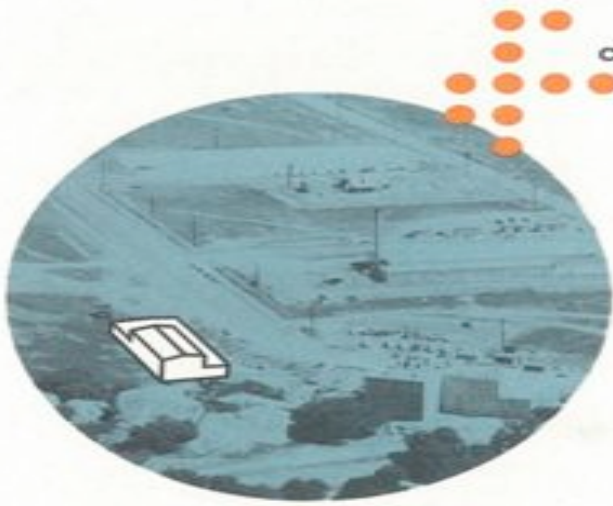
The Above photo shows the pond next to concrete pad 4662 of the SPTF noted as IMPOUNDMENT. We also see OPEN STORAGE, which could be the area of the Building 100 Trench. The exact location of the building 100 Trench should be noted as it has been disputed over the years.

On Page 64 it should be noted that the Computerized Tomography (CT) Scanner is the property of NASA and was featured in a National Geographic program where a dinosaur was investigated with this machine.

<http://news.nationalgeographic.com/news/2007/12/photogalleries/dinosaur-pictures/photo4.html>



Building 100 was also used for the Advanced Epithermal Thorium Reactor (AETR).



critical experiments

Critical experiments are planned to establish the validity of the analytical data and provide experimental data on the nuclear performance of the AETR. Due to a limited supply of U^{235} Atomics International has developed a novel critical assembly design for use in the AETR program.

In closing, the last two pages of the Draft HAS (Summary of Subarea HAS-5C Sites) should not have conclusions of "None Specifically Identified" in the areas of Potential Radiological Contaminants of Concern.

Thank you in advance for the consideration of my comments.

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