## STURGIS Project Update, September 19, 2014

This email is in response to Ms. Jodie Springer's editorial on Sept. 18, 2014, "Don't bring the Sturgis to Galveston." The editorial has several inaccuracies that may be helped by stating the facts of the project and clarifying information.

The STURGIS, a former World War II Liberty Ship, was converted into the first floating nuclear power plant in the 1960s. Before being shutdown in 1976, the STURGIS' nuclear reactor, MH-1A, was used to generate electricity for military and civilian use in the Panama Canal. The reactor was de-fueled, decontaminated, and sealed before being towed to the James River Reserve Fleet at Joint Base Langley Eustis, VA; where it has been stored and maintained since 1978.

This winter, the STURGIS will be relocated from Joint Base Langley-Eustis, Virginia to Galveston, Texas for decommissioning and dismantling. Safety is our number one priority, and the Corps of Engineers will use proven controls and precautions to address safety and other engineering details throughout the project.

## **Important Points:**

- \* All of the decommissioning work will take place in the Malin International Shipyard, Pier 40/41, which is part of the Port of Galveston located in an industrial area of Galveston Island. This shipyard is not located in the Strand Historic District and is more than 1 mile away from the Cruise Terminal.
- \* The STURGIS will be situated in a slip that is behind multiple fences and controlled by security. There will be no public access to the area. Primary access to the Port is controlled by the Port of Galveston Police. Additional security will be provided by the shipyard.
- \* The decommissioning process will be conducted in a contained area of the barge using proven industry standards.
- \* The MH-1A nuclear reactor, which is installed on the STURGIS barge, has no nuclear fuel.
- \* The residual radioactive materials are in the form of activated materials and contamination, and are located within the remaining primary reactor systems that pose no radiation dose risk to the public.
- \* The 2027 date referenced in the recent editorial was associated with the original 1977 National Environmental Policy Act (NEPA) document and was used to estimate future costs for safe storage. The safe storage period for decommissioning can range from 40 to 60 years. The determination to implement the decommissioning now is based on the fact that the low level radioactive waste classification will not change in the next 13 years. Additionally, the radionuclide that contributes the highest dose has decayed to 99.2% of the original activity and waiting an additional 13 years would only decay the activity an additional 0.6% of the original activity.
- \* The residual radioactive material will be removed inside the barge and placed in specialized, sealed containers. Then the containers will be taken to a licensed disposal facility, which is equipped to safely dispose of the material.
- \* There are normal project risks associated with this project, and the Corps of Engineers has detailed plans in place to reduce the risks throughout the project (i.e. weather, transportation risks, etc).

\* It is anticipated that the STURGIS will be in Galveston for 12-18 months.

## **Environmental Assessment and Health of the Community**

In 2013, the Corps of Engineers conducted an Environmental Assessment to evaluate potential ecological, cultural, water, public health and safety, and waste management effects associated with the proposed decommissioning and disposal of the STURGIS. During the Environmental Assessment the Corps of Engineers looked at four potential places: Galveston, Texas; Hampton Roads Metropolitan Area, Virginia; Baltimore, Maryland; and Charleston, South Carolina. A public notice was posted in all four major newspapers in the potential areas, announcing a 30-day public comment period, which ran from Jan. 27 to Feb. 25, 2014. No comments were received. The Environmental Assessment determined there would be no significant environmental impact at any of these locations.

When choosing potential locations, consideration was based on proximity to the Corps of Engineers offices, waste disposal facilities, areas that have supported previous work with nuclear vessels, shipyards, and/or ship breaking operations. Galveston was ultimately chosen because it met all of the criteria.

The Nuclear Regulatory Commission (NRC) completed a General Environmental Impact Statement (GEIS) on the decommissioning of nuclear facilities in 1988 and a supplemental document in 2002. The Corps of Engineers used this document when conducting the Environmental Assessment of the STURGIS Project. The Nuclear Regulatory Commission's General Environmental Impact Statement can be found here: <a href="http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0586/">http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0586/</a>

The NRC's GEIS looked at impacts to public health during the decommissioning of nuclear facilities and determined that the inhalation radiation dose to the public from airborne radionuclide releases is minor. According to the NRC GEIS, these minor exposures to the public would be offset by the benefit of permanently removing the waste from the vessel and properly disposing of it. The NRC GEIS concluded that decommissioning activities would not significantly impact public health and safety.

The Corps of Engineers is responsible for ensuring that the STURGIS is in compliance with the Army Reactor Office permit that incorporates by reference NRC regulations to ensure adequate protection for worker and public health and safety and protection of the environment. Controls are required in the decommissioning permit that will prevent the spread of contamination beyond the radiological exclusion zone. Therefore, no significant release of airborne or liquid contamination is anticipated during the project. The decommissioning permit also requires environmental monitoring to ensure controls are adequate to protect human health and the environment.

We have a highly skilled team of engineers, scientists, radiation safety specialists (health physicists), industrial hygienists, and contractors dedicated to the project. The contract employees, who will directly dismantle the STURGIS, are all trained in safely handling radioactive and hazardous waste. Additionally, the Corps of Engineers Radiological Health Physics Regional Center of Expertise is overseeing this project. This highly trained and

experienced team of health physicists provides radiation safety and technical support to the Corps of Engineers and other federal agencies across the United States and overseas for projects involving all aspects of radiological work. A member from the Center of Expertise will be on site in Galveston throughout the project.

We want the people of Galveston and the State of Texas to have the facts to understand the STURGIS Project. We are working closely with the Port of Galveston and a multitude of local and state stakeholders.

We urge the citizens, elected officials, and interested groups to seek accurate information on the project. More information is available on the project's website or by contacting Andrea Takash at <a href="mailto:andrea.m.takash@usace.army.mil">andrea.m.takash@usace.army.mil</a> or 410-962-2626.