



Public Statement at the March 6, 2025, Public Scoping Meeting for the DOE SSFL Area IV Supplemental Environmental Impact Statement (SEIS)

Good evening Josh, Wendy and Pam and to everyone else on Zoom. My name is Phil Rutherford. Many of you know me.

I am a retired Boeing employee. I worked in Area IV for 25 years and have lived within three miles of the site for 37 years. However, I do not speak for Boeing this evening.

In late December 2024, I submitted my detailed comments on the Supplemental EIS to the Department of Energy. The principal comment was a proposal for a new alternative for radiological remediation based on existing and established DOE policies and directives.

In 2023, DOE issued a Technical Standard, entitled “Implementing Release and Clearance of Property Requirements”, DOE-STD-1241-2023. The standard specifies cleanup standards for soil and buildings, consistent with the decommissioning standards of the Nuclear Regulatory Commission.

DOE developed this Technical Standard to assist in meeting release and clearance requirements provided in DOE Order (O) 458.1, entitled “Radiation Protection of the Public and the Environment”, Chg. 4 (2020).

This new release/clearance technical standard is mandatory at all DOE sites nationwide, including sites far more heavily contaminated



than ETEC and Area IV, such as Hanford, Oak Ridge, Los Alamos, Savannah River, Sandia, etc. The Department of Energy should implement this “DOE Release/Clearance Standard” for the relatively minor remaining radionuclide contamination at ETEC and Area IV.¹ There is no rational reason why ETEC should be the only DOE site requiring the 2010 AOC cleanup-to-background mandate.

Last month, I also petitioned the new Secretary of Energy, Chris Wright, to support this DOE standard for ETEC. I also urged Secretary Wright to revoke DOE’s former agreement to the Hirsch-Brausch 2010 AOC.

Alternatively, those supporters of the 2010 AOC could petition Secretary Wright to apply the AOC to all DOE sites nationwide. Don’t hold your breath waiting for that to ever happen!

Thank you.

¹ Page five of the NOI includes the statement, “*Prior building demolition and soil remediation efforts resulted in removal of much of the chemical and radioactive material from Area IV.*”