

CALIFORNIA RADIOACTIVE MATERIALS MANAGEMENT FORUM

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The Honorable Joe Simitian, Chairman and
Members, Senate Environmental Quality Committee:

The California Radioactive materials Management Forum (Cal Rad) is in strong opposition to SB 990, "Hazardous waste: Santa Susana Field Laboratory."

Cal Rad supports consistent and effective, science-based regulation of the use of radioactive materials, management of facilities where radioactive materials are — or have been — used, and management of radioactive wastes. We do not believe the provisions of SB 990 reflect good science or consistent regulation.

The California radiation control program is located in the Department of Health Services in the Health and Human Services Agency pursuant to agreement with the U.S. Nuclear Regulatory Commission (NRC) by which California is designated an "Agreement State" under the federal Atomic Energy Act. SB 990 would place supervision of the cleanup of the Santa Susana Field Laboratory (SSFL), including cleanup of radioactive contamination, under the Director of Toxic Substances Control in Cal EPA. This is not where the State's expertise in radiation health and safety protection lies. Therefore SB 990 would establish a bad precedent, and the jurisdictional issue invites compromise of California's Agreement State status.

Cal Rad believes that the NRC's dose-based standards, not EPA's CERCLA-type standards, are the appropriate and scientifically based standards to use for cleanup and decommissioning of facilities where radioactive materials have been used. In this regard, SB 990 would add another bad precedent to State law.

Cal Rad believes the changes proposed by SB 990 are unnecessary and unwise.

Sincerely,

Alan Pasternak