

Comm-001



# Utah Medical Association

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February 1, 2010

Dane Finerfrock  
Executive Secretary  
Radiation Control Board  
State of Utah  
Division of Radiation Control  
P.O. Box 144850  
Salt Lake City, Utah 84114-4850

Re: Depleted Uranium Rule R313-25-8

Dear Mr. Finerfrock,

The Utah Medical Association (UMA), on behalf of the physicians in Utah, urge you to continue to push for a moratorium on the importation of Depleted Uranium into the State of Utah. We strongly believe there are probable public health risks to any importation and storage of Depleted Uranium (DU).

More than 2000 studies have examined DU toxicity. Considerable uncertainty exists regarding the safety of surface storage of DU as proposed by Energy Solutions. At best, limited modeling exists on the impact of DU inhalation or absorption that could occur following geological events (e.g. flooding, earthquakes, erosion) which could compromise DU canisters stored at the Utah site. Likewise, given an anticipated peak radioactivity in about 1,000,000 years, there is limited understanding of the impact of DU on future generations of Utahns. Clearly, there still exists uncertainty and much concern about future health impacts and toxicological outcomes of DU exposure. This uncertainty brings the strong possibility of unknown health and environmental impacts of radioactive storage.

The UMA Environmental Health Committee has carefully reviewed this issue. After careful review of the committee's conclusions and existing UMA policy, we have concluded that we must offer public comment against allowing importation of DU into the State of Utah. We ask the Utah Radiation Control Board to continue its rule-making process and quickly implement proposed rules that would prohibit the importation of DU while allowing for further study of the issues involved.

Physicians who care for and about the people of Utah

Currently, with the first shipment of DU arriving in Utah in December of 2009, Utah does not have anything in place to limit the importation of DU into the State. This must be accomplished in the rule-making process and must happen quickly.

We support the citizens of Utah who are also concerned about this issue. We remind the Board of the The Salt Lake Tribune article on January 15<sup>th</sup>, 2010, which reported that the majority of Utah's citizens oppose the importation of DU. In addition, United State Representatives' Matheson and Chaffetz have proposed a bill in Congress that would ban imports of low level radioactive waste like DU. It is rare to see such bipartisan support on issues pertaining to the environment. Representative Matheson, also, opposes Energy Solutions' plan to mix DU with less radioactive atomic waste, which he and others feel may be a "sneaky way" to get hotter DU into Utah.

Given the unknown health and environmental effects of DU disposal, the Utah Medical Association urges the Radiation Control Board to enact a moratorium on the importation of DU until further study can be completed and assurances made as to the absence of any health risk. We must consider Utah's future generations, as we look back at the effects of radioactive testing on Utah citizens, when the long term effects of such testing was not appreciated. We feel this is the most prudent, wise and health conscious approach to protect the citizens of Utah.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in cursive script that reads "David G. Morrell". The signature is written in dark ink and is positioned above the typed name.

D. Glen Morrell, M.D.  
President  
Utah Medical Association