

**Marian Whitney**  
**Public Comment**  
**October 31, 2016**

For a long time I've been concerned about controlled burns and grass fires at Rocky Flats because radioactive contaminants can be in the plant tissues. I have two different scientific papers that show that plants take up plutonium.

An eleven-year study done at DOE's Savannah River Site in South Carolina demonstrates that plutonium in subsurface sediments at that site moved upward from the buried source material. The authors of this study conclude "that the upward movement was largely the result of invading grasses taking up the plutonium and translocating it upward," producing a "measurable accumulation of plutonium on the ground surface."<sup>[1]</sup> By contrast, the AME study at Rocky Flats concluded that "uptake into plant . . . tissues is minor."<sup>[2]</sup>

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<sup>[1]</sup> D. I. Kaplan et al., "Upward Movement of Plutonium to Surface Sediments During an 11-Year Field Study, SRNL-STI-2010-00029, January 25, 2010. <http://sti.srs.gov/fulltext/SRNL-STI-2010-00029.pdf>

<sup>[2]</sup> Kaiser-Hill Co., *AME Pathway Analysis Summary Report*, ER-108 (April 2004), p. 28; see p. 24.

This is an EPA study that describes plant uptake of Plutonium:

<https://nepis.epa.gov/Exe/ZyNET.exe/9101AEK6.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1976+Thru+1980&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C76thru80%5CTxt%5C00000026%5C9101AEK6.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>