



Publication

The ubiquity of PFAS: an emerging issue in decommissioning-

Three Haley & Aldrich authors have published an article in the fall 2023 issue of *Radwaste Solutions* on how [PFAS](#) can complicate [nuclear power plant decommissioning](#).-

In "[The ubiquity of PFAS: an emerging issue in decommissioning](#)," Principal Consultants [Jay Peters](#), [Nadia Glucksberg](#), and [John Xiong](#) discuss the growing regulatory and public attention on PFAS (also known as per- and polyfluoroalkyl substances), noting, "Consequently, there is an increasing chance that nuclear power plants that are (or will be) undergoing decommissioning will be forced to include PFAS in the characterization of environmental media." Already, they point out, under current state regulations, several nuclear power plants entering the decommissioning process will likely have to factor PFAS cleanup requirements into their planning.-

Jay, Nadia, and John describe potential on-site sources of PFAS at nuclear power plants: aqueous film-forming foam (used in fire suppression), septic systems, and landfills. Additionally, PFAS' ability to travel from off-site sources and their presence at low concentrations throughout surface water and surface soil – detected in several recent studies – mean that "it is not uncommon to detect PFAS during investigation activities," whether or not the facility has an on-site source. And given that regulations only permit relatively low levels of PFAS, achieving compliance can place significant burdens on a project, including:-

- Increased sampling and analysis costs, which the authors estimate could amount to tens of thousands of dollars.-

- The expense of treating PFAS-contaminated soil and groundwater, as well as the limits of current treatment technologies.-
- Complications for dewatering if PFAS is detected in groundwater.-
- The potential for the U.S. Environmental Protection Agency to classify media contaminated with both PFAS and radionuclides as mixed waste, which is more costly and difficult to dispose of than radioactive waste.-

In sum, note the authors, “[f]acilities undergoing decommissioning should anticipate increased costs and possible extension of decommissioning timelines to address PFAS.”-

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