

EDO Principal Correspondence Control

FROM: DUE: 05/25/00 EDO CONTROL: G20000250  
DOC DT: 05/08/00  
FINAL REPLY:

Laurel M. Suggs  
Mary T. Kelly  
League of Women Voters of South Carolina

TO:

Chairman Meserve

FOR SIGNATURE OF : \*\* PRI \*\*

CRC NO: 00-0322

Chairman

DESC:

ROUTING:

Schedule Meetings Regarding the Proposed MOX  
Facility of Savannah River Site and Proposed  
Use of MOX Fuel at Commercial Reactors Within  
South Carolina

Travers  
Paperiello  
Miraglia  
Norry  
Blaha  
Burns  
Lohaus, STP  
Reyes, RII  
Cyr, OGC

DATE: 05/17/00

ASSIGNED TO: CONTACT:

NMSS

Kane

SPECIAL INSTRUCTIONS OR REMARKS:

OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

Date Printed: May 15, 2000 14:26

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**PAPER NUMBER:** LTR-00-0322 **LOGGING DATE:** 05/15/2000  
**ACTION OFFICE:** EDO

**AUTHOR:** LAUREL SUGGS  
**AFFILIATION:** SC  
**ADDRESSEE:** RICHARD MESERVE  
**SUBJECT:** DRAFT NUREG-1718 AND MAY 9 ROCKVILLE, MD MEETING

**ACTION:** Signature of EDO  
**DISTRIBUTION:** RF

**LETTER DATE:** 05/08/2000  
**ACKNOWLEDGED:** No  
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**DATE DUE:** 05/30/2000 **DATE SIGNED:**

EDO --G20000250

**League of Women Voters of South Carolina  
P.O. Box 8453  
Columbia, SC 29202  
(803) 699-1112**

May 8, 2000

To: Honorable Richard A. Meserve, Ph.D.  
Chairman, U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

From: Laurel M. Suggs, President, LWVSC  
Mary T. Kelly, Ph.D., Associate Director for Natural Resources *MSK*

Contact: Mary T. Kelly, 4018 Sandwood Drive, Columbia, SC 29206 803-782-8410

RE: Draft NUREG -1718 and May 9 Rockville, Md. meeting

We very much appreciate the assistance that we and other concerned citizens and public interest groups have received from your document department and the fact that arrangements were made to have the May 9 meeting re Draft NUREG 1718 available via telephone line. However, we regret that better advance notice of the May 9 Rockville, Md. meeting was not given and that arrangements were not made to hold a well-publicized meeting or meetings within South Carolina, at a site or sites more readily accessible to the people most directly affected by the proposed actions.

The League of Women Voters on all levels is committed to the informed participation of citizens in governmental policy and decision making. We have a long and positive history of involvement with nuclear affairs. Members of LWV South Carolina, residents of a state so heavily committed to all things nuclear that it is often referred to as "the nuclear state," have an especially strong commitment to this issue. Consequently, we are joining with Environmentalists Inc., the Sierra Club, and others in requesting that in-state meetings be held to discuss the proposed MOX facility at the Savannah River Site and the proposed use of MOX fuel at commercial reactors within this state.

We would like to see meetings held at several locations in this state and possibly in Georgia, but if only one is held, we urge you to conduct that meeting in Columbia. Not only is Columbia the media and transportation center of the state but it is the state capitol. It is also a place where it is easier to get the testimony of independent experts to balance the well-organized lobbying efforts of those with vested interests and those who want "jobs at any cost." We would hate to see a repeat of the kind of meeting that occurred in August of 1998 in N. Augusta, SC dealing with the Surplus Plutonium Disposition Draft EIS. A copy of a letter we submitted to the Department of Energy after that meeting is enclosed and illustrates the problem.

Therefore, in the spirit of the National Environmental Policy Act, we urge you to schedule meetings for South Carolina, the state most seriously affected by governmental decisions relating to plutonium, the manufacture of MOX fuel at the Savannah River Site, and the burning of MOX fuel in South Carolina civilian nuclear power reactors.

*Enclosure: Sept. 11, 1998 Letter to DOE re Surplus Pu Disposition EIS*

FYI re MOX mtgs.

**League of Women Voters of South Carolina**

**P.O. Box 8453  
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Date: September 11, 1998

To: U.S. Dept. of Energy  
Office of Fissile Materials Disposition  
P.O. Box 23786  
Washington, D.C. 20026-3786

From: Mary T. Kelly, Ph.D., Natural Resources Specialist, LWVSC  
4018 Sandwood Drive, Columbia, SC 29206  
(803) 782-8410

Re: Surplus Plutonium Disposition Draft EIS

The League of Women Voters of South Carolina has been following Savannah River Site activities, its various missions, and its environmental problems for some twenty-five years. We agree that solutions must be found for eliminating the risk posed by surplus plutonium. We appreciate the opportunity to make these comments

We commend DOE for holding forums on the Surplus Plutonium Disposition Draft EIS in various parts of the country. However, the session on the afternoon of August 13, 1998 in N. Augusta, SC, made a mockery of the public participation process. It was supposed to be informational with time for discussion groups. Instead it was a highly organized and structured lobbying effort on the part of the many supporters in the area who view all proposals as one big jobs/economic development opportunity for the Aiken/Barnwell/Augusta, Georgia area. I believe that the main contractor, Westinghouse, is also part of the lobbying effort. One is reminded of President Eisenhower's caution about the military/ industrial complex.

Supporters cheered after every speaker. It was intimidating for many with reservations about the proposals and not an atmosphere for sharing valid objections counter to the mood of the 600-member crowd. The few who did speak at the tail end should be commended for their courage. One speaker questioned why anyone not from the area should care. The fact that many millions of taxpayer dollars are at stake and that we all share in the risk SRS poses did not seem to occur to him.

We heard numerous references to the SRS safety record, one that belongs not to the current contractor, Westinghouse, but to the previous contractor, DuPont. Westinghouse in fact has little or no production record at this site, and there is some doubt as to whether Westinghouse will be the contractor when the proposed facilities are built and operated. And does the large pool of experienced workers so often mentioned exist? Many are too old and others have dispersed away from this site. There has been no production since 1988 when the last tritium-producing reactor was shut down for safety reasons.

The fact that nuclear technology is very, very dangerous seems to have escaped the majority of speakers. A nuclear accident has the potential of contaminating a multi state area. We live in a dangerous world. On the one hand, the proposals being offered are intended to keep fissile materials out of the hands of terrorists. On the other, we seem willing to consolidate almost all of the nation's fissile materials in one place, making South Carolina and the SRS site perhaps the world's prime one shot- target for a massive military strike. Is it really smart to concentrate so much at one site?

To comment on the exact proposals:

\*How will the burning of MOX in commercial reactors affect foreign policy and our non-proliferation stance? Turning the excess plutonium and highly enriched uranium into fuel for *commercial* reactors is in contradiction with our carefully thought out strategy of many years standing - do not mix military and civilian nuclear efforts. We have maintained this posture through thick and thin. It was the

justification in the atoms for peace days for allowing American companies, including Westinghouse, to sell nuclear technology abroad.

We have criticized other countries for using commercial reactors to produce weapons grade material. Witness our condemnation of Pakistan and India for their bomb making activities.

\*Will commercial reactors really be available to burn this fuel? The nation's commercial reactors are aging and in the process of, or planning for, decommissioning. We are now hearing that the forty-year license period was chosen to coincide with the terms of the financing lenders would extend. However, the fact of the matter is that these aging reactors are becoming increasingly unsafe and very expensive to operate. Essential parts are too highly irradiated to be safe to operate or to approach to replace. Given the past difficulties in restarting reactors at SRS this problem shouldn't be minimized.

\*Will the public accept the use of this type of fuel in commercial reactors located relatively close to significant populations?

\*If a commercial reactor is chosen and retrofitted to burn MOX what will be the licensing process? Will it be similar to that now used to license commercial plants? Who will regulate?

\*What will be the nature of the waste and how will it be handled if the permanent repository is not ready? This is a big problem for commercial reactors now.

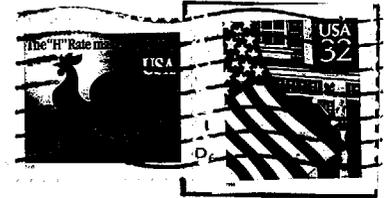
\*With the coming of deregulation, states and stock holders are being faced with the problem of stranded costs for commercial reactors, mainly unpaid debt. This is very high for nuclear utilities and will no longer be recoverable through regulated rates. Some entity - the federal government, each state, taxpayers, stockholders - will have to assume this burden. How will this affect that problem? Or will the federal government assume the obligation?

We continue to be concerned about how new initiatives at SRS will affect the environmental clean up now going on and still far from complete, especially as the new initiatives will produce additional waste. Although we are strong advocates of objective decision making we have to have a degree of skepticism towards any and all planning, based on the lack of stability in the political leadership at the highest levels of DOE, and the arbitrary changes that Congress may make. We have seen three different DOE Secretaries in the last few years. Nevertheless, we wish you well as you make these decisions, so important for the peace of the world.

LEAGUE OF WOMEN VOTERS OF SC



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Columbia SC 29202



Honorable Richard A. Meserve, Ph.D.  
Chairman, U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Re: NUREG-1713

20555/0001

