



Two States One Future

April 26, 2001

SAVANNAH RIVER REGIONAL DIVERSIFICATION INITIATIVE

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66 FR 18823

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Mr. Mike Lear, Acting Chief
U.S. Nuclear Regulatory Commission
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T6D59
Washington, DC 20555

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Rules and Directives
Branch
USNRC

Dear Mr. Lear:

The Savannah River Regional Diversification Initiative (SRRDI) is the Department of Energy designated community reuse organization for the Savannah River Site (SRS). The SRRDI Board of Directors consists of representatives from five counties in the two state South Carolina - Georgia area adjacent to SRS. We often comment on potential actions involving the SRS that are of interest to our local communities and citizens. Your licensing action to prepare an Environmental Impact Statement in connection with establishing a Mixed Oxide Fuel Fabrication Facility on SRS is of great importance to our community.

The Central Savannah river Area is proud of our role in winning the cold war by producing plutonium and tritium for national defense, however the job is only half done. Now that the we no longer need the large numbers of nuclear weapons to assure the peace, it is equally important that excess fissile materials be rendered unusable for use in weapons of mass destruction to the maximum extent possible. Using excess plutonium as the fissile fuel in a nuclear reactor is the only practical way of significantly reducing plutonium's effectiveness in a nuclear explosive device:

- Compared to other forms of disposition such as immobilization, recovery of residual plutonium is significantly more difficult when it is in the form of spent nuclear fuel, and
- Plutonium that is recovered from spent fuel is much more difficult to fabricate into a crude nuclear explosive devise than plutonium that has not been irradiated.

Disposing of the excess plutonium as spent fuel presents the most difficult path for reclaiming the residual, degraded fissile material for malevolent uses. A single pass mixed oxide fuel cycle provides us with the greatest opportunity for assuring that excess plutonium will not reappear as a headline announcing an act of nuclear terrorism or nuclear blackmail.

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The Savannah River Site has the most modern and complete nuclear infrastructure in the United States. Its large limited access land area and best in class security forces provide the highest level of protection for these sensitive materials. Locating the MOX fabricating facility on the SRS closely couples the recovery of plutonium from dismantled weapons and the storage of excess plutonium to the fuel fabrication process - further enhancing an already safe and secure activity.

As you prepare the scope of the environmental Impact Statement for construction and operation of a mixed oxide fuel fabrication on the Savannah River Site, we recommend that the following items be included:

1. The benefits of a MOX fabrication facility are of worldwide importance. A "no action" alternative is unacceptable. If a "no action" alternative must be considered, then we recommend that it include the environmental and human impacts resulting from an act of nuclear terrorism.
2. That maximum credit is given to the Department of Energy's process for retaining a competent world-class industrial team for building and operating this project.
3. That appropriate consideration is given to the extensive and modern nuclear infrastructure within which the MOX facility will be placed. The safety, environmental and security programs at SRS set the Standard for excellence.

Thank you for the opportunity to provide input to your very important activity.

Sincerely,



Tim N. Dangerfield
Chairman