

Statement from GA State Representative Nan Grogan Orrock on the Mixed Oxide Fuel Fabrication Facility Environmental Impact Statement Public Scoping Meetings

April 18, 2001, Savannah, GA

I appreciate the opportunity to comment on the scope of the Environmental Impact Statement for the proposed MOX Fabrication Facility at the Savannah River Site across our border in Aiken South Carolina.

As a state legislator with a deep and long-standing concern for the health of the people and the environment of Georgia, I have kept close tabs on the activities of the Savannah River Site. Its past operations have resulted in radioactive water in the groundwater in Burke County and the downstream contamination from the plant is well known to the people of this community.

We have been reassured over and over that SRS is cleaning up its mess from 50 years of weapons production. But proposals such as the MOX fabrication plant fly in the face of those assurances. We are asked to comment today on the "scope" of the MOX plant EIS, and yet is it folly to pretend that this plant will exist in isolation from past operations, past radioactive releases, ongoing contamination, and plans for new plutonium processing missions.

Just last week Energy Secretary Spencer Abraham submitted a budget to Congress that would cut over \$150 million in clean-up funds from SRS while adding nearly \$40 million to MOX. We already know MOX will produce millions of gallons of new nuclear waste. So before the first 100 days of the Bush Administration have elapsed, the promises to Georgians and South Carolinians have been broken. The so-called dedication to cleanup vanishes in an instant when new plutonium processing missions -- and the MOX dollars to make them happen -- appear on the horizon.

It's a slap in the face to those who have already endured the contamination spewed by that plant. MOX has been sold to us with the promise that it will not jeopardize cleanup at the site.

But immobilization - the clean-up technology that could have handled plutonium in a less harmful way - has been canceled and now SRS takes the largest cut in cleanup dollars in the entire weapons complex. Thirty-four million gallons of waste remain on the site and groundwater contaminated with tritium continually seeps into our river. How many more babies in the womb will be exposed to that tritium and be irreparably damaged? How many will not be born for the contamination they receive in the womb? How many more inexplicable cancers will this community endure before we say enough is enough?

In some ways, the scope of the environmental impact of that MOX plant is impossible to measure. Tens of tons of plutonium shipments -- some in flammable, dispersible powder form -- will be passing through Atlanta -- my home, and the home to millions more (half of Georgia's citizens live in the Atlanta metropolitan area) -- and yet where are the scoping meetings there? Where are the scoping meetings in every town between here and the source of that plutonium -- in Texas and Colorado and Washington and California?

Statement from Rep. Nan Grogan Orrock --2

Virtually the entire stretch of the southern United States will be affected by MOX in some way. MOX fuel will be shipped on highways through Columbia and Rock Hill, South Carolina. Weapons parts from SRS will be shipped from South Carolina to Tennessee. Used MOX fuel would be shipped from North Carolina back to the west. MOX test shipments have already crossed the Great Plains on their way from New Mexico through Michigan and on into Canada.

And the scope is international as well. The MOX program signals a major policy shift in this country. It tells the world the US favors the commercial use of plutonium -- a message many have been eager to hear from us. A message that is a green light for plutonium fuel -- and thus plutonium fabrication and processing -- in every country with nuclear power capability.

Of course the Nuclear Regulatory Commission will not encompass all of this in its EIS. It has even admitted it will use as much material from existing EIS's as it can, even though earlier studies are already obsolete since the MOX plant has been redesigned since they were issued and the estimate of how much waste it will produce has increased. We are told it is to be expected that things will change from the documents provided to the public.

The point is that as we meet here today to offer our comments on just one aspect of this ill-considered plutonium policy -- as we weigh in on the specifics of the impacts of "just one more" plutonium facility at SRS -- we are completely blind to the global scope of the issue itself. What should the EIS consider? If it were to be a truly useful document, if it were to truly serve the public, it would question the wisdom of this entire project -- a luxury we have not been afforded. We are handed the crumbs around the edges after the decisions have been made and the papers signed and the ink dried on the multi-million dollar checks to the MOX contractors.

As a representative of the public in this state I will continue to raise these issues, whether the Nuclear Regulatory Commission, the Department of Energy, or the Savannah River Site contractors provide the forum or not. At a minimum, the NRC can begin to serve the public who will be most impacted by its decisions by drafting a truly comprehensive EIS -- one that considers the operating, safety and environmental records of the US and foreign corporations that will carry out this work. In their hands lies our health, the health of our children and even the health of generations to come. It is in your hands that the power to intervene on behalf of public health and safety lies. We will be watching to ensure you do exactly that.

Main Office:

427 Moreland Avenue, NE, Suite 100
Atlanta, GA 30307
+04-659-5675 (phone) 770-234-3909 (fax)
georg_@cleanenergy.ws



www.cleanenergy.ws

Savannah Office:

3025 Bull Street, Suite 101
Savannah, GA 31405
912-201-0354 (phone and fax)
savannah@cleanenergy.ws

**COMMENTS REGARDING THE PUBLIC SCOPING FOR THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR THE MOX FUEL FABRICATION
FACILITY**

**Submitted on behalf of Georgians for Clean Energy
April 18, 2001**

Georgians for Clean Energy is a non-profit, statewide membership organization that strives to protect our air and water resources by changing how energy is produced and consumed. We are based in Atlanta, Georgia and have a field office in Savannah.

In making comments to the U.S. Nuclear Regulatory Commission (NRC) at tonight's public scoping meeting for the EIS for the plutonium fuel factory, we bring attention to several issues that our organization urges the NRC to thoroughly evaluate and address in producing the draft Environmental Impact Statement. Let me begin by stating that we are deeply disappointed that the NRC today accepted the Construction Authorization Request from the international consortium, Duke, Cogema, Stone & Webster as we believe that many important issues have not been addressed and significant information has been wrongfully withheld from the public and deemed as "proprietary."

We ask that the NRC:

- 1) Consider the impacts of plutonium fuel on individual commercial reactors. Until this is done, and it needs to be done up-front during the Environmental Impact Statement process, the EIS is not completed. Nuclear Plant Vogtle, which is across from Savannah River Site, on the Georgia side of the river, was listed as interested in plutonium fuel. It is unacceptable to evaluate reactors generically as they all have different performance records, operating histories, etc.
- 2) None of the reactors in the country, including the Southeast region, were designed to use plutonium fuel. Generation of electricity with plutonium fuel is an untried experiment and nowhere in the world has plutonium fuel using weapons plutonium been used. In Europe, plutonium generated from nuclear reactors during their operation cycle, not from bombs, was used. Weapons plutonium increases the wear and tear on a reactor. This needs to be addressed as it relates to decommissioning plans, decommissioning costs, and public safety.

3) We understand that utilities or utility consortiums are looking to receive a "free" plutonium subsidy from the federal government for the plutonium fuel. Issues such as "Whose money is this?" and "Will utilities be paid twice for the same kilowatt-hour--once by ratepayers and once by the government or taxpayers?" need to be addressed. At a previous public meeting in Augusta which our organization representatives attended, the Department of Energy response to the subsidy question was that utilities will not pass any costs of using plutonium fuel onto ratepayers. With all due respect, we have heard that kind of statement before. Unfortunately, lack of sound cost estimates associated with the construction of nuclear plant Vogtle near the Savannah River Site resulted in the worst and most serious rate hike Georgians have ever experienced. Original estimates for a 4-reactor plant ballooned from almost \$500 million to more than \$8 billion.

4) A plutonium fuel subsidy unfairly advantages certain companies in a competitive utility market. This proposal to unfairly advantage nuclear energy suppliers through a subsidy is in sharp contradiction to the significant ongoing efforts nationwide to create a "level playing field" for power suppliers in an increasingly competitive utility market. Additionally, as nuclear power is not a truly clean or sustainable technology, this subsidy unfairly disadvantages clean, safe, innovative energy technologies, such as solar and fuel cells, which could actually benefit Georgia's environment and the health of its citizens.

5) The issue of who is going to buy electricity generated plutonium bomb fuel must be addressed. Polls around the country show consistently that when given a preference, the majority of people want to invest in clean, innovative technologies and energy efficiency and conservation, not fossil fuels and more clearly, not nuclear power. So, if a commercial nuclear reactor were to use the proposed MOX fuel, consumers essentially have to buy that fuel by the fact that their utilities would receive electricity from the same electric grid.

6) As an organization representing members that live downstream and downwind of SRS, and personally as a resident of Savannah, I call attention to the fact that the site is already heavily contaminated from over 50 years of nuclear weapons-related activities. The cumulative impacts that the Savannah River Corridor communities are already facing from past, current, and now future operations at SRS need to be evaluated within that context.

7) In a City of Savannah proclamation, adopted and approved on April 2, 1992, the Mayor and Alderman of the City of Savannah specifically requested that, "...the restart of the K-reactor cease and a full scale clean-up operation of the Savannah River Site begin immediately." We do not believe this proclamation has been upheld by the Department of Energy and do believe that if the NRC licenses this plutonium fuel factory, which will generate new waste streams and increase amounts of current waste streams, add to already overwhelming volumes and radioactivity levels at the site, and increase the threat of accidents and releases to the environment and surrounding communities, the NRC will be in violation of this proclamation as well.

8) According to the 5/23/2000 DOE FY2000 Environmental corporate database, future high-level waste generation volumes within all DOE sites across the nation, shows 95% of the generation from 2000-2070 to be from SRS. What percentage of that will be from the plutonium fuel production mission? What percentage will be from the plutonium fuel factory itself? The NRC needs to look at the larger picture even though they are not required to license every facility involved in this process.

9) Cost estimates for the plutonium fuel factory have skyrocketed due to the addition of the plutonium "polishing" (reprocessing) facility to the MOX plant - to remove gallium (alloy) and americium. How will these projected cost overruns impact this facility? Any cost increases here will likely impact U.S. funds available for Russia and perhaps has implications for big cost increases in Russia. Environmental Management program budget cuts at SRS are slated to occur. We urge that you not support the channeling of funds into a program that will create more waste and more contamination ~~is beneficial~~^{is not} to our community.

In conclusion, we urge the NRC to consider more wisely and more strategically a decision of whether to license this facility at all. As we see it, the plutonium fuel program should be stopped and the NRC is in the position to protect citizens and the environment by denying the license request.

Respectfully submitted on behalf of Georgians for Clean Energy,

Sara Barczak
Safe Energy Director



Fred E. Humes
Director

Statement for the Record
Mixed Oxide Fuels Fabrication Facility
Environmental Impact Statement Scoping Meeting
Nuclear Regulatory Commission
April 18, 2001

My name is Ernest S. Chaput and I represent the Economic Development Partnership of Aiken and Edgefield Counties, South Carolina. The Aiken community has a long and rich history of supporting nuclear programs at the Department of Energy's Savannah River Site and the EDP has often provided comment on nuclear activities proposed for our area. We have long supported the Department of Energy's Surplus Plutonium Disposition program and the MOX facility in particular. While we have been frustrated with the slow pace of this priority program, we are pleased that the facility has now entered the licensing phase.

The Aiken community is proud of our important role in winning the cold war by producing plutonium and tritium for national defense, however the job is only half done. Now that 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.
- Plutonium that is recovered from spent fuel is much more difficult to fabricate into a crude nuclear explosive device than plutonium that has not been irradiated, and
- Plutonium that is recovered from spent fuel is significantly less effective in producing a nuclear explosion 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. It is our responsibility to future generations to achieve that goal.

Our government and the government of Russia have wisely chosen the mixed oxide fuel cycle to render excess plutonium unusable for weapons of mass destruction. Our

government has also wisely selected the Savannah River Site (SRS) for the conversion and fabrication of excess plutonium into MOX fuel assemblies that will be used to fuel nuclear reactors. 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 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 be 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 be 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.