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PAMELA BLOCKEY-O'BRIEN, D23 GOLDEN VALLEY
7631 Dallas Hwy, Douglasville, GA 30134 USA

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Mr. Mike Lesar,
Chief of Rules and Directives Branch and Directives
Division of Administrative Services Branch
Office of Administration,
Mailstop T6D59,
US Nuclear Regulatory Commission,
Washington, DC 20555

Re: The NRC's Public Scoping for the Environmental Impact Statement (Draft) for the Mixed Oxides Fuel Fabrication Facility -Plutonium Fuel Fabrication Facility and the Environmental Report for the Mixed Oxide Fuel Fabrication Facility prepared by Duke Cogema Stone & Webster, who are the applicants/applicant for a license to possess and use Special Nuclear Material in this Mixed Oxide Fuel Fabrication Facility for the Department of Energy on the Savannah River NUCLEAR Site- better known as "THE BOMB PLANT" -and such license would be issued by the NRC. Duke Cogema Stone & Webster is to design, construct, functionally test, operate and ultimately "deactivate" the MOX facility, under contract with the D.O.E. According to information from Duke Cogema Stone & Webster Subcontractors are also involved.

The following are written comments for the Record concerning this entire wicked and deicietful scheme, and being submitted by Pamela Blockey-O'Brien, former Non-Governmental Organization Delegate to the United Nations Second Special Session On Nuclear Disarmament, 1982, and I.F.O.R. Member.

The US and Russia have no real disarmament policy - there is a "let's pretend" policy and a "teensy, weensy reduction" policy, and there is no real global nuclear disarmament policy either. As can be easily deduced from this current scheme, anything with the word "nuclear" vaguely attached to it should be preceeded by large dollar signs. The US and Russia and other nuclear weapons States, declared or undeclared, have absolutely no intention of killing the atomic goose that lays the golden eggs. It is hypocraasy to state that this scheme of using MOX fuel in commercial reactors will contribute to either disarmament or non-proliferation. As NRC well knows, more plutonium is being "created" from the U-238 among the uraniums in the uranium part of the fuel at the same time as the splitting of the plutonium atoms in the fuel are causing those atoms to cease to exist, while creating other products. The deadly "spent" MOX fuel can be re-processed, just as "spent" uranium fuel, to extract the plutonium. The fact of the matter, is, that a huge program of breeder reactors and reprocessing is being actively persued by various entitites, including the D.O.E. and Minatom., and reprocessing from this spent plutonium fuel is not prohibited it can be done subject to monitoring. Furthermore, something needs clarifying: the word "disposition". Group after group, along with the parties to the agreement - the US and Russia - are using the words "plutonium disposition" as if it means "to dispose of plutonium" - it does not, it means everything from "arrangement, mode of placing" and "specific use made of" to other similar things (look up the word "disposition") and the word "dispose" does not mean what people think it does either. The US/Russian Agreement was crafted by diplomats and others who specialize in

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saying things that mean something different from common usage of a given word. For Example : the Non-Proliferation Treaty - what it means, is that if a nation signs it and agrees they won't make a bomb (sort of) they can then order almost anything nuclear related that they want- including nuclear reactors - this enriches the nuclear industry and creates yet another nuclear power in the long run in the worst sense of the horrible words "nuclear power". The public thinks that the nuclear Non-Proliferation Treaty prevents others from getting the bomb. Nope.

The statements in the Environmental Report, that environmental impacts are outweighed by the reductions in weapons grade plutonium stockpiles in Russia and the US are false, nothing is changing with regard to the plutonium itself except the form it appears in , it's still there, and the little that is split (fissioned) in Mox fuel is going to be immediately replaced , so to speak, from the U-238. Plutonium forever, along with staggering additional amounts of radioactive crud created in the process.

Let us also clarify something else for the public, as this is public record:

This must be said OUT LOUD, THEN REPEATED SO IT SINKS IN "It is possible to eliminate certain hazards by suitable chemical or physical treatment. Harmful bacteria can be destroyed by heat or by suitable chemicals. An acid can be neutralized by a base. A capacitor can be discharged.

In contrast to this, **THERE IS NOTHING THAT CAN BE DONE TO A RADIOACTIVE MATERIAL THAT WILL CHANGE THE CHARACTERISTICS OF ITS RADIATION. ITS TEMPERATURE MAY BE RAISED OR LOWERED AND IT MAY BE SUBJECTED TO SEVERE MECHANICAL TREATMENT OR COMBINED CHEMICALLY WITH OTHER ELEMENTS, BUT IT WILL STILL CONTINUE TO RADIATE AS BEFORE. THERE IS NO SWITCH AVAILABLE WHICH CAN TURN THE RADIATION ON AND OFF. NO MATTER WHAT TREATMENT THEY RECIEVE, RADIOACTIVE MATERIALS WILL CONTINUE TO EMIT RADIATION IN ACCORDANCE WITH DEFINITE NATURAL LAWS.**" (W.W. Schultz, General Engineering Laboratory, General Electric Company, 1951,)

Even more to the point: Something radioactive must decay back to its natural, stable state this can take from fractions of seconds to millions of years, and some of the decay chain can generate other radioactive products that must do the same thing - burn it, and it goes out the stack or the particulates are trapped in filters or flyash which must bit around for forever,-dilute it, and it spreads it around,-evaporate the liquids and they go to the air,-chuck it in the creeks it contaminates water, soil, fish, sediment, the ocean. THE SAVANNAH RIVER NUCLEAR SITE IS ONE LARGE RADIOACTIVE BLOB FROM HELL AND WHAT IS ON IT, OR UNDER IT, OR IN SOME TIN CAN OR CARDBOARDS BOX OR DECAYING TANK IS THERE, PERIOD, IT IS NOT GOING ANYWHERE EXCEPT INTO THE AIR AND OFFSITE, OR INTO WATER AND ULTIMATELY, OR CURRENTLY, OFFSITE. THE TREES RECYCLE THE TRITIUM IN THE FOREST CANOPY, THE TREES ARE RADIOACTIVE. THE MIGRATING SPECIES BECOME CONTAMINATED, FROM BIRDS TO GEESE. THE ONSITE SPECIES ARE CONTAMINATED. THE FLOWERS, THE GRASSES, THE ARCHEOLOGICAL SITES, THE FISH, THE DEER THEY LET THE PUBLIC TAKE HOME LACED WITH CONTAMINANTS, AND THE WORKERS BECOME CONTAMINATED AND SO DOES THEIR BODILY FLUIDS AND THE SEWAGE . I could continue, but I think I've made myself clear. There is no "safe" level of radiation exposure whether natural or human made -but we can't do much about the natural- and this is not a matter of conjecture, but medical, scientific fact , which of course NRC knows because it admitted it back in the seventies by letter to (its) former Atomic Energy Commission star scientist, nuclear chemist, medical doctor and the man who shares two patents on the isolation of plutonium

tonium, namely Dr. John Gofman. The "allowable" radioactive releases are set to enable the industry to operate, and have nothing to do with any fictitious "safe" level. These emissions and releases must only be kept "ALARA" - or As Low As Reasonably Achievable- depending on what industry wishes to spend and the state of technology. It is impossible to completely contain all radioactive contaminants. I am well aware that I am repeating this sort of thing over and over at every testimony, but this must be passed down to future generations who otherwise will only know the lies fed to them by the International Commission on Radiological Protection - that self-serving bunch of radiation pushers accountable to no one, with no independent oversight. The NRC does not have a full picture of what has gone on at this Death Of the Earth squad (my name for the D.O.E.) site. This site has had far higher contamination often than Hanford. I would request that the NRC pay attention to what Dr. Karl Morgan, who I knew, who sat on the ICRP (and resigned from a division of it) said about ICRP - and Dr. Morgan was the "father of radiological health physics" - namely that "if all members of ICRP and NCRP resigned who worked for the nuclear industry, or receive research funds from it both would be ghost organizations with very few if any members" when he was arguing against D.O.E. using those standards as if they were gospel truth in the Final Safety Analysis/Final Environmental Impact Statement on the Continued Operation of K,L and P Reactors, Vol. II page 606 c. In that testimony he also laments that NRC uses the same stuff and laments "How many pieces of silver does it take to buy a health physicist?" Since he goes into detail in it on the enormous hazards of PLUTONIUM, all of which would be applicable in the current situation with MOX, I AM FORMALLY REQUESTING THAT THE NRC GET A COPY OF THAT ENTIRE TESTIMONY AND INDEED OF VOLUME TWO OF THAT "DOE/EIS-0147" AND READ DR. MORGAN'S TESTIMONIES. (You can read mine too, we're in the same volume.)

I am greatly concerned that the Environmental Report by Duke Cogema Stone & Webster says that they utilize, as appropriate, many of the evaluations already performed by DOE, as DOE conducted "extensive

environmental evaluations". AS Dr. Morgan stated in his 1990 testimony concerning Savannah River (NUCLEAR) Site, in the past "management has made claims that defy laws of physics and meteorology. How can we be assured things have changed; top management changes but some of the same group leaders, section chiefs and supervisors" still work there, and since Dr. Morgan wrote that, new actors, like BNFL who whose notoriety precedes it, have jumped on the bandwagon - little has changed it appears. Besides, as DCS&W is the applicant, and NOT the DOE, they should be required to do their own Environmental Report and that would require them reading about 10 years worth of material at a minimum on each facet of the Site itself, which is very important as without that knowledge, their ER is meaningless.

The ER says that the plutonium/Uranium fabrication/aka MOX facility will be located in "F" Area because the Death Of the Earth squad says it will be, and the other plutonium "disposition" facilities (translation: the pits and everything EVERY OTHER SITES SURROUNDING PUBLIC SCREAMED AND YELLED TO GET RID OF FROM THEIR AREA - LIKE PANTEX- BECAUSE IT'S SO AWFUL, BUT SOUTH CAROLINA AND GEORGIA POLITICIANS AND INDUSTRY, AND SACRIFICIAL LAMB WORKFORCE, SAID: SEND IT TO US

WE JUST LUUVE PLUTONIUM, WE DON'T UNDERSTAND WHAT IT IS BUT WE JUST WANT IT SO BAD, WE WANT EVERYTHING WE CAN GET THAT HAS THE ATOMOMIC SYMBOL ON IT, DON'T WE SCARLETT? AFTER ALL, WE'RE THE PEOPLE THAT BOUGHT INTO THAT HOGWASH ABOUT US WINNING THE COLD WAR, AND US MAKING ALL THAT STUFF HERE THAT KILLED. THOSE BABIES BACK THEN WAS JUST MADE UP, WASN'T IT SCARLETT? AND WE'RE AN ENVIRONMENTAL RESEARCH PARK AREN'T WE, AND THAT NUCLEAR BOMB SITTING SOMEWHERE OFF TYBEE ISLAND — WHY, SISTER, IT'S JUST AN ACCIDENT, AND THEY DO HAPPEN DON'T THEY SCARLETT? WHY, NEXT TIME, IF WE'RE THE LUCKY LITTLE AIKENITES I THINK WE ARE, WE JUST MIGHT GET US OURSELVES ONE OF THOSE CRITICALITY ACCIDENTS I HEARD ABOUT, WHAT WITH ALL THE NEW STUFF COMING IN, AND THOSE FRENCH WITH THAT FRENCH COMPANY, WELL I HEARD THEY REALLY KNOW HOW TO HEAT THINGS UP, EVEN THE OCEAN OFF FRANCE...AND WE MUST THROW A REAL SOUTHERN PARTY FOR THEM ALL AT OUR LOCAL NEWSPAPER, THEY JUST LOVE ATOMOMIC AND NUCLEAR THINGS TOO...ETC.) will also be located in "F" Area.

F Area contains a laundry list of radioactive and acid and chemical wastes in its seepage basins and retention basins. Groundwater is contaminated with everything from lead to radium 223, 224, 226, — radioactive liquids have leaked into groundwater below the tank farms — all this is according to SRS documents. The Mox facility looks like it will be suspiciously near (over?) one of the old seepage basins, near the Canyon building. F Area is so contaminated, workers will be severely contaminated just by using earth moving equipment and will be breathing in the contamination in airborne dust. Due to F Area having plutonium contamination from practices there, workers could be breathing it in. It is maintained under F Area Infrastructure upgrades (1-2) that there will be clearing and grading of all three surplus plutonium "disposition" sites. NRC is hereby requested to demand a full account of EVERYTHING on, in or below those site areas from the DOE, DEPONT and WESTINGHOUSE in order to establish what will surely be the most horrendous health and environmental consequences from such actions, including runoff into creeks that ultimately drain to the Savannah River from which downstream residents draw water and domestic animals drink and in which people unfortunately still swim.

Before I proceed with more details on the actual facility, I want to comment on the companies involved and subcontractors, as NRC must consider their past in order to be able to evaluate future performance. I mean, if a group is going to be designing, constructing, operating and so forth what is meant to be the equivalent of the Ritz among plutonium/MOX facilities, one would hope that the NRC is, & would be interested in what Duke Cogema Stone & Webster refer to in their handout as "THE TEAM".

It says Duke Engineering is an affiliate of Duke Energy and Duke Power is an affiliate of Duke Energy, and it is Duke Power that will use the MOX fuel in its McGuire and Catawba "nuclear stations". (A "Nuclear STATION" seems to be the new word for nuclear power plant, presumably so the public won't make the connection between nuclear power PLANTS like Three Mile Island, or Chernobyl, and think they are

some type of railroad station that gets a visit now and again from trains carrying nuclear material - which will be the case in the future due to waste transports(!) and is already happening to some degree.) It says Duke Power operates "record-setting" nuclear stations. Which record? For NRC Violations? For LER's and PNO's listing mess-ups? For reactor Trips? Manual SCRAMS? Contamination events?

They list Framatome as part of their team. Framatome has a place in history for building both a nuclear reactor and helping to build a huge uranium enrichment facility for the racist, fascist government of South Africa under Apartheid.

Cogema is a subsidiary of the French Atomic Energy Commission with undeniable government connections according to Dr. Bertell, which managed/manages uranium mining and milling in France as well, and France cared so little for its workers that allowable levels for radon gas emissions from these processes were set 10 times higher in France than even the notorious ICRP recommended. The Cap de la Hague Plant has a history that is so terrible, and the contamination so massive, and the pollution of the ocean into which some of the effluent is dumped via massive pipeline, so well known in the region that workers refer to themselves as "radiation fodder" according to published reports. The process of having deadly radioactive wastes in proximity to ancient cultural archeological sites, as already happens at Savannah River Nuclear Site and will happen again with the construction of the MOX facility, as it will also destroy a prehistoric site, also happens in France at La Hague where some of the barrels of deadly waste are buried deep in the ground near a site believed to be a Celtic necropolis. Such historic sites become lost, as they are so contaminated. Sites on SRS are also contaminated, and any site in F Area is probably highly contaminated and any artifacts or remains probably should be handled with lead lined gloves in a hot cell. Note: while discussing Native American Resources p.4-31, the applicants show the sensitivity of a busload of drunks towards the Native Americans, when they state: "During the early 1800's, most of the remaining Native Americans residing in the region were relocated to the Oklahoma Territory." I underlined "relocated", - to call the infamous "Trail of Tears" forced foot journey during which thousands perished, being "relocated", is odious. One of the Historic PRE-Historic sites in F-Area - Site 38AK757 (p.4-30) - was identified AFTER DOE sent Native Americans letters on the subject. . To give Native Americans back what would probably be contaminated artifacts or remains, would be the modern "smallpox" gift equivalent - only radioactive contamination is the gift that damages DNA as well at a whole other level. Wrecking yet another Native American Site, even if it is already contaminated, is like pouring salt in the wounds of the genocide perpetrated against the Native Americans. It is NOT Environmental Justice.

If all of this racist, fascist, insensitive, loutish behavior and attitude - not to mention polluting operations - is an indicator of what is to come, which seems likely, on these issues NRC could deny a license. But, the Best Is Yet To Come - well, similar.... They boasted how Cogema and BELGONUCLAIRE are tied to Cogema Inc. We must go back some years to what used to be called "The Belgian

Congo" - a place writer Joseph Conrad based "Heart of Darkness" on, originally the play-toy of King Leopold of Belgium, where in the scramble to force the Africans to enrich the coffers of the outfits Leopold and pals gave concessions to, to "carry out the vilest scramble for loot that ever disfigured the history of human conscience and geographical exploration" (Conrad, quoted in "East Along the Equator" by Winternitz, 1987, Atlantic Monthly Press) the hands of the populace who did not make the quotas for rubber, or minerals, were chopped off and smoked and this was proof someone had been punished and payment was made. Huge banking and mining concerns followed, giant multi-nationals for the diamonds, copper, uranium, cobalt and everything imaginable, the giant being Union Minière du Haut Katanga with its huge connections to industrial, financial and other outfits in Europe and the US. Via torturous linkages through banking giants and Belgian and Canadian petrochemical companies and the giant bank Société Generale de Belgique and joint ventures, Union Carbide, at the time the boys who brought SRS to life via the enriched uranium, supplied via their gaseous diffusion plants at Paducah etc. got some of that uranium for THE BOMBS from the Congo - cheap, dying African labor and cheap, dying Native American labor in the uranium mines out West helped give the fat-cat scientists and Dupont and what became DOE and NRC their paychecks and all the others through whose corpse like fingers nuclear fuel passes, or weapons. Société Generale de Belgique has its own nuclear outfit, tied to Union Minière interests, its called BELGO NUCLEAIRE. The BOAST THAT Cogema and Belgonucleaire are world leaders in design, construction and operation of MOX fuel fabrication facilities, operating three industrial scale MOX fuel plants in France and Belgium, must be measured against the history of plunder, ruin, environmental catastrophe, human health disasters and the consequences of propping up dictators like Mobuto for decades (the Belgian Congo became Congo and Zaire) to satisfy the greed and keep giant consortiums involved in mining etc. in Africa going and provide various raw materials other than uranium used in the arms race, space race and military desires of half the known world going. To have words like "Environmental Justice" come out of any document tainted by the presence of outfits like Belgonucleaire, documents that pretend to be interested in minority populations, is enough to make any decent person throw up, let alone completely distrust anything they have to say on the environmental justice issue. Does NRC think African American workers at SRS would feel comfortable with this lot? Most of them are a "captive workforce" as few companies in their right mind would move anywhere near SRS, so there are few places to work, same goes for poorer Whites.

Then there is Stone & Webster - did they declare bankruptcy or didn't they?

Then there is the notorious Nuclear Fuel Services. Talk about scraping the bottom of the nuclear waste barrel. Lets see: fires, contamination on and offsite including of the Nolichucky River, uranium that dusts the Appalachian Trail, a place so bad the workers struck, a place so bad even NRC says its awful, NFS walked away from West Valley, leaving the taxpayer holding the bag. NFS of Erwin, Tennessee involved in the Russian HEU scheme, the one involving downblending. Shouldn't the General Accounting Office and the NRC Inspector General be looking into all these deals? First HEU, now MOX, a bit much isn't it? NFS providing safeguards? Don't make me laugh, ask them about all the problems they've been having concerning a little something called

"criticality monitoring", Remember all that uranium they supposedly "lost" ? As in : past the fence line . READ THEIR DOCKET. READ EVERY WORD. Their record speaks for itself, it's so bad, when you read it you'll understand where producers get their ideas for horror movies from.

They all need their environmental records looked at, because NRC can deduce from them how they all would perform with this facility, and the prospect is as bleak as the view of the desolate abandoned towns around Chernobyl, based on past performance. NRC should not grant any license.

On page 1-2 they speak of fluorides being removed among impurities. The terrible effects of fluorides are very well documented, the major effect from a large release is something called DEATH. Such a release must be evaluated in great detail in all available literature. On p. 2-1 they say the plutonium in Mox fuel would be irradiated and become part of the spent fuel that will be disposed in a geologic repository. Which repository ? Where ? Yucca Mountain is in trouble - water IS a problem .

P. 3-2 Unclassified Controlled Nuclear Information and security - the entire site can be photographed by satellites and stuck on CNN like was done with the downed US plane on Chinese soil recently. The entire facility could also be attacked by some crazed group using long range rockets they can buy at any arms trade fair. The location is relatively close to the site perimeter. This would be catastrophic . Some of the weaponry seen on television is precision guided and could perhaps drop something down the stack of the MOX Fuel fabrication building. NRC's regulations governing security are woefully inadequate as it is - I spend a large amount of time complaining about it, and as NRC is aware sent a copy of a complaint concerning NRC's allowing spent fuel to be stuck outside in casks making them visible terrorist targets , to the Pentagon recently. How is NRC going to address this issue ? DOE is asleep at the wheel on the issue too, what with its tours of SRS and drive through of roads that were once more controlled and I think they even allow overflights still. Security is a huge concern.

p.3-2 The words designed to withstand "design basis earthquakes" is not reassuring . The Charleston Earthquake was felt so it shook buildings in northwest Georgia, it is stated in records of Douglas County from where I write. Between 350 and 400 miles away I would guess. The Charleston Earthquake is overdue. Could the facility withstand a more severe earthquake than the last Charleston earthquake ? If not, why not ?

P.3-2 Stormwater runoff. The site is radioactive, the buildings will become so from airborne deposited. The stormwater will be radioactive. It must be captured, not released to creeks, from retention basins.

p3-3 says the Reagent Process Building has roof vents to allow for venting in emergency situations - each roof vent would need a series of filterbanks including HEPA, charcoal and sand filters AND THE SAME FILTERING SYSTEMS WOULD BE NEEDED THROUGHOUT THE MOX FUEL FABRICATION BUILDING. EVEN THE DEATH OF THE EARTH SQUAD, THE DOE, PUT IN SAND FILTERS EVENTUALLY IN ADDITION TO HEPA FILTERS , to help contain plutonium releases. Waste chemicals from the "aqueous polishing area" will be contaminated . The chemicals transferred from the Reagent Process

Building are going to the aqueous polishing area via piping in a concrete, below grade trench between the buildings. The acids etc. will eat through the pipe. If the same pipe transfers the chemical/now radioactive waste back, the radiation will degrade the pipe and the cement. Sooner or later there'll be a pipe break, the entire system is inadequate. Here are some of the health effects of the chemicals involved in the MOX enterprise and aqueous polishing :

Tributyl Phosphate attacks the eyes, skin and respiratory system.

Hydrazine causes tumors of the lung, liver blood vessels and intestines, attacks the central nervous system, can cause temporary blingness, pulmonary edema, and convulsions. It can also ignite spontaneously in contact with oxidizers or porous materials like earth, wood and cloth.

Oxalic acid causes kidney damage, convulsions, cyanosis, collapse and also eye burns.

Silver Nitrate is caustic, corrosive, poisonous, can cause blindness also attacks nasal septum, skin and eyes period.

Hydrogen Peroxide attacks eyes, skin respiratory system, causes corneal ulcers.

These are just a few of the chemicals - now toss in the plutoniums, americium-241 the uranium, the earlier mentioned fluorides that attack bone and cause osteoporosis among other things, - and add the huge amounts of diesel fuel nearby and imagine a fire and explosion.... there is not a fire department in South Carolina or Georgia that could put that out if you rolled them all into one.

HOW MANY DOCTORS DOES SRS HAVE ONSITE ? HOW MANY CHERNOBYL TYPE SUITS?

For the applicants to state that no measurable gaseous emissions are expected from activities within the Reagent Process Building is not very believable - perhaps the key lies in the word "measurable" as, if they are not being measured, technically they wouldn't be there. Of course there will be gaseous emissions.

Under the section "Plutonium Polishing" on p.3-8, it says after the extracted plutonium is washed with nitric acid and so on and so forth: " Uranium impurities are removed from the organic solvent with dilute nitric acid (see Section 3.2.2.3). CRITICALITY IS AN ISSUE BECAUSE OF THE HIGH URANIUM-235 CONTENT OF THE STREAM". So, they have to add Depleted Uranium to perform an isotopic dilution to reduce the U-235 concentration to below 30 % .

NRC should know that the combination of aforementioned chemicals coupled with the radioactive contaminants must be evaluated both singly and in combinations and that what it all amounts to is a death potion for workers over time, even with top notch protective gear, and to the environment on SRS yet another assault, and to the offsite environment and population likewise. In the event of a criticality accident, as everything is so close together, unforeseen, unanalyzed situations could easily happen including explosions and fires spreading through floor drains, piping, and vents, waste collection tanks, and filtration systems. The place could become a raging inferno of chemicals, and radioactive to boot, explosions lofting material so that burning chunks fall in other nearby areas. Air-borne moving rapidly offsite.

p.3-9, there is no description of where all the unused distillates go. Back to p.3-8 There should be detailed discussion of the health and environmental effects of the manganese used, and the main filters

should include the aforementioned filterbanks including the sand filters,

The Process Ventilation Offgas Treatment system is totally inadequate, both for the radioactive chemical soup going out the MFFF stack and the calcination furnace. Also, glovebox filtration via HEPA filters only, is absurd.

I am concerned about the cavalier way the plutonium issues are passed over. Plutonium released to the atmosphere is deposited through wet and dry deposition to soil and surface water, can sorb to soil and sediment particles or bioaccumulate in terrestrial and aquatic food chains. Everything coming off Savannah River Nuclear site hits river systems like the Savannah River and the Edisto., then to the Atlantic. The fish are already contaminated with plutonium, all the new processes will add to that. Plutonium transferred from soil or plants to grazing animals. It enters the body via inhalation, food, water, and via cuts and wounds. Plutonium can be excreted in the milk of nursing mothers.

Downstream towns, including Savannah will be affected from increased airbornes, as well as through their water intakes. Primary targets for plutonium are bone, liver, lungs, gonads, though any organ can be affected. All this is detailed in available medical and research literature. The consequences are profound. Dr. Gofman and others should be brought in to assess all this, because NRC only has one doctor, and dose calculations are meaningless as they are not only essentially a guess, the fact is, at the moment of irradiation a cell is damaged, essentially irreversibly. Furthermore, the fact that radiation is a powerful suppressor of the immune system response has far reaching consequences, all of this is basically ignored by NRC, DOE and outfits like ICRP. This must change.

The acids involved in the entire process are also going to attack welds, hoods, ducts etc. and of course the vessels (p 3-12.)

p.3-13 mentions the systems are designed to withstand a "credible fire" - what does this mean? If something can catch fire, or will burn, it must be assumed it will, sooner or later.

3-14 Under Waste Management: it's all going to be guided by good ol' ALARA, i.e. planned deaths. The Applicants state that "NO HLW (high level waste) WILL BE GENERATED BY ANY OF THE FACILITY OPERATIONS." THIS IS A MATERIAL FALSE STATEMENT AND FOR THIS REASON THE LICENSE SHOULD BE DENIED. They are generating a liquid high alpha activity waste in excess of LLW (low level waste) limits. The F area Tank farms contain deadly high level waste, wastes from this facility are going to go through a "dedicated pipeline" to the tank farm, as is other waste. They are trying to get around all this by saying that "classification of the waste is deferred until further processing by SRS" in the footnote on p.3-15. Nope, I don't think so, nor do others, this high level waste is generated by this process itself. High level waste headed for high level waste tanks. There was an old pipeline in the area, if I remember it broke, leaked etc. Is that the one they want to use? It better not be the one. It is their project, they should be handling their own waste anyway, are they trying to transfer any liability from accidents involving high level waste onto the DOE? What's going on? They say they'll send "spent solvent" to a SRS facility - where? Which one? whose paying? What are the impacts, where would it drain to? They want to dump some of the

10.

acid distillate streams down the sewers (p. 3-15) NO. the sewers ultimately will be eaten through, and contaminated, -contaminated even more.-,

3-17 Under non-hazardous liquid waste : waste from urinals, water closets etc. that have been used by workers is contaminated as their bodily excreta becomes contaminated. , therefore should be handled differently. (NO land application of sludges either, nor incineration)

Under Solid TRU waste : just because high level waste (some of it) got reclassified doesn't mean its not high level waste. The TRU contact surface dose rate of 200 mrem/hour maximum, means that in half an hour the maximum exposure allowed to the public FOR AN ENTIRE YEAR FROM A NUCLEAR FACILITY IS EXCEEDED. . A breached container could have serious consequences. The drums should be encased in cement over-packs capable of withstanding a hand held rocket launched against it.

Under Solid ^{Mixed} ~~Mixed~~ TRU waste : re: the lead lined gloves. These should be classified as solid TRU/high level waste, not mixed. Via legal loopholes, such "mixed" waste can either wind up in local landfills, or be incinerated - or, ~~g~~ hastily thought, smelted.

p. 3-18 Exactly WHERE all the solid low-level waste is meant to be going to is not defined. It should be.

The mixed Low- level waste includes solidified solvents contaminated with plutonium, HOW is this solidified ? Where ? By whom ? It also includes scintillation vials from the lab. Where is all this going? The words "will meet SRS requirements " are being tossed about like confetti - as SRS has such an awful track record, how about, that all legal requirements be met under all laws governing nuclear waste, and let it be remembered that lab vials can wind up in the possession of recyclers of glass, by accident, or design, with grim consequences.

It is stated on p.3-18 that plastic and glass etc. is sent offsite for recycling.

I also want to mention that federal law prohibits the incineration of plutonium contaminated ANYTHING,, and if SRS is doing that, action should be taken .

p. 3-50 concerning the huge amount of argon that will be onsite/used: if the pressurized container/s get dropped or something happens that can cause sudden release , the pressure will send metal fragments slamming all over the place with great force. The argon can also cause suffocation.

p.4-1 The applicants were too lazy to do their own research it seems, so they relied on the GENERIC Safety Analysis Report for facilities at t SRS, plus a couple of recent SRS reports. This is unacceptable.

To develop an understanding of what has gone on at SRS and what has happened in various areas including the canyons, I HEREBY FORMALLY REQUEST THAT THE NRC ACQUIRE A COPY OF THE ACADEMY AWARD NOMINATED DOCUMENTARY, CALLED "BUILDING BOMBS."

11.
"Building Bombs" was produced by Mark Mori and Susan Robinson. The NRC must be aware of the reasons that thousands of people are concerned about this new plutonium/MOX enterprise, because they are aware history can repeat itself, just in slightly different ways, but no less serious, than in the movie.

On p 4-1 they do not mention that when the land was set aside for THE BOMB PLANT/ aka Savannah River Nuclear Plant site, hundreds of families were made to leave, the "three counties in which SRS is located have not zoned any of the site land" according to Duke Cogema Stone and Webster (p4-3) is a statement that is so stupid and insensitive even I was surprised. Let us now pause and pray. Who for? The brother and sister who refused to move from their little family farm, who were declared insane and shut away, so that the truly criminally insane could produce the slow Death Of the Earth and contaminated what was once a beautiful part of God's Creation.

The applicants forget to mention that deer, hogs and wild turkey are contaminated, yet DOE/SRS is wicked enough to let public hunts take place, so the people take contaminated food to their families. There should be NO Cesium -137 or Strontium-90 in deer and hogs and turkeys. Regular releases from this new facility will add to existing animal contamination.

Where is the boundary going to be set at? The area next to the MOX facility would be the boundary. Air emissions must not exceed 10 millirem a year, (EPA).

There are schools not far from the SRS boundary, not far from the MOX area, A major release and/or explosion would affect the children. As those sorts of events happen quickly (e.g. a criticality event) they could not be evacuated quickly from the plumes bearing radioactive death on the wind.

There is a fifty mile evacuation requirement along the plume path, not only the 10 mile radius "everybody-out-and-after-that-you-are-on-your-own-buddy" evacuation zone. Of course, as Chernobyl proved, all this is a couple of hundred miles too little, minimum. In the event of a catastrophic accident with a large explosion, thousands of people will be trying to flee on the smaller roads that border SRS, also on the Georgia side. I formally request NRC to drive from Savannah to Augusta using the small roads following the Savannah River: 21 north through Springfield, Shawnee, Kildare to Newington, Hunters, Farmdale, Sylvania, then, then via 23, changing to 24 to Sardis, then 23 to Girard, Telfair Woods, McBean, then 56 to Mechanic Hill, then past Bush Field to Augusta. Then Go back to Savannah on 25 via Hephzibah, Waynesboro, Millen and Statesboro. On the South Carolina side, drive around the entire site perimeter include Hattieville, Dunbar Store, Millet, Martin, Patterson Mill, Snelling, Barnwell, places like Cowden, Jackson, Hollow Creek, Dry Branch, New Ellonton (NEW, because the original Ellenton is no more, the Death of the Earth squad swallowed it) College Acres and Montmorenci, Toss in Spiderweb, Elmwood Park, Couchton, Aiken Beech Island. Real people live in these places, Come the next Charleston earthquake, or when one of the tank farms explode, or the MOX facility explodes and there's a huge fire, these are the people who will die, or be injured, these are the people one could not evacuate quickly.

On page 5-36 the applicants DCS&W have decided that explosions and releases of radioactive materials is highly unlikely, plus "remote

and speculative and need not be considered under NEPA." Such a statement is a disgrace. It must be considered. They maintain the MFFF processes are designed to preclude explosions through the use of reliable engineering features and administrative controls. They don't think there'll be simultaneous failures of design features and administrative controls. I don't think they thought there would be similar sorts of failures when Challenger exploded either. And look at all the problems at Framatomes' Cattenom-3 PWR with cracking and leaking fuel rods, and problems at Framatome subsidiary Cesuz last year, with everyone running around like chickens with their heads cut off, jumping from one thing to another trying to understand what's going on.

The only "explosion event" (their words- not mine) they considered was one that occurred in an aqueous polishing process cell - as can be imagined, they decided that's no big deal either.

They take the same sort of attitude towards criticality accidents and chemical releases (pages 5-38, 5-39) and much else besides and this is not acceptable and NRC must evaluate absolute worst case scenarios and far beyond design basis accidents. They should include a plane crashing -purposefully or accidentally - onto the facility, or near it and ploughing into it, insider sabotage, missile attacks, Oklahoma City type truck bomb attacks, and events happening in other nearby areas that could ripple this facility.

P. 4-7 goes into some of the geology that shows a facility like SRS should never have been built over these sorts of soils (and about the most significant water recharge area in the Southeast) and describes "soft zones", "bad ground" and "void". Moving on to p4-10 and 4-11 an unbelievable fact is disclosed -unbelievable because of what they intend to put this entire enterprise over :

THEY FOUND SOFT SOIL ZONES RELATED TO PAST SOLUTION AND DEPOSITION ACTIVITY ON THE MFFF SITE AND MOVED AROUND THE PLANNED LOCATIONS OF HEAVY LOADED STRUCTURES SUCH AS THE MOX BUILDING TO MINIMIZE THE POTENTIAL IMPACT OF THE SOFT ZONES, AND SAY "THIS ADJUSTMENT WAS NECESSITATED BY THE POTENTIAL OF THE SOIL TO LIQUEFY UNDER CERTAIN CONDITIONS FORCING FOUNDATIONS TO FAIL." FURTHER DOWN THEY SAY THE GROUNDWATER LEVEL AT THE SITE WAS GENERALLY ENCOUNTERED 60 feet OR MORE BELOW GRADE AT THE TIME OF EXPLORATION AND THAT THE WATER TABLE IS EXPECTED TO FLUCTUATE SEASONALLY. It fluctuates a great deal in the region, and heavy downpours that often cross the site and huge thunderstorms contribute. It could rise much higher under the facility. Much of the facility is interconnected with pipes, wiring etc. **WHAT IS THE WEIGHT OF THE ENTIRE FACILITY ? INCLUDING ALL SUPPLIES EQUIPMENT, STAFF, EVERYTHING ? WHAT HAPPENS IF HALF OF THE PLUTONIUM/ MIXED OXIDE FUEL FABRICATION FACILITY DROPS DOWN A DAMNED SINKHOLE ? THE APPLICANTS , DUKE COGEMA STONE & WEBSTER MUST BE STARK, STARING, RAVING MAD TO WANT TO PUT THIS FACILITY OVER THIS TYPE OF GEOLOGY, AND IF THEY ARE NOT MAD, THEY ARE VERY, VERY, VERY WICKED AND EVIL.**

THE NRC CANNOT AND MUST NOT GIVE THEM A LICENSE FOR THIS ENTIRE FACILITY.

p.4-9 and 4-10 also covers the earthquake risk situation, with the applicant using the tired old DOE attitude of : sure we have earthquakes but don't worry about them. They seem to have ignored that one of the faults is under L-reactor, there was an earthquake basically under K-reactor which was felt 100 miles away, . DOE has always maintained the Pen Branch Fault is not considered capable, , even though DOE does not know how it might move, besides, the Pen Branch fault overlies the Dunbarton fault. The applicant admits to the

problems with some fault areas on p.4-7 which are related to "soft" zones

noted above.

Lets talk about some of the "seepage basins" on site from not too long ago, a few of which have been "remediated" - There were 68 seepage basins on SRS that were admitted to. A seepage basin meaning an ~~un~~ unlined hole in the ground into which chemicals, raw chemical waste and radioactive contaminants were/are dumped. Strontium-90 migrating from F-Area reprocessing seepage basins reached concentrations in the near surface groundwater and in a creek 42,000 times EPA's lousy drinking water standards (SR-90 should not be in water, it's man-made).

P. 4-12 Water Use : the staggering water use of SRS is well known, but what the applicant fail to mention is that the water returned to the River through discharges to various tributaries" is RADIOACTIVE. Every creek on site is contaminated, all the huge creeks that drain to the Savannah River are contaminated, the fish in them are contaminated, the sediment is contaminated, and the consequence is that the Savannah River has contaminated water, sediment and fish. Contaminants include : Tritium, Tritium, Cesium-137, Strontium-90, Americium-241, Plutonium-238, Plutonium-239, elevated RA-226 Cobalt-60, and Iodine-129, This is a matter of public record.

F-Area drains to Upper Three Runs and Fourmile Creek mainly. The elevated alpha radiation in sediment at Upper three Runs Creek outfall into the River on 10/14/97 was 52,000 pCi/Kg dry weight, the elevated beta was 45,000 pCi/kg, Tritium at Upper Three Runs outfall water 1/18/99 was 22,000 pCi/L . On 6/29/99 at Four Mile Creek Outfall tritium (H_3) 32,000 pCi/L. Cesium-137

was 1,900 pCi/Kg dry weight in sediment . and the Strontium -90 in large mouth bass on 9/11/97 was 700 pCi/kg fresh weight.

Upper Three Runs Creek outfall to the Savannah river the plutonium 239 in sediment was 22pCi/Kg dry weight on on 10/22/98.

These are State of Georgia figures. and it should be noted that the PEOPLE DOWNSTREAM IN SAVANNAH AND BEUFORT - JASPER WATER USERS GET A STEADY DIET OF TRITIUM(H_3) in their water and due to the body burden and biological half-life of tritium, are, at best having their bodies used as a tritium dump. Tritium crosses the placenta. Exposure to radiation not only depresses the immune system response, but can cause spontaneous abortion. . The embryo and developing fetus are extremely sensitive to the effects of radiation. Interestingly, spontaneous abortion/stillbirths are generally not required to be reported prior to 20 weeks gestation, and therefore the suffering and anguish of countless women (and their families) who suffer a miscarriage prior to 20 weeks don't show up in statistics.

The fact of the matter is this : All the radioactive crud from 50 odd years of SRS operations has hit, and will continue to hit the Savannah River and downstream communities and it oozes from that awful place - adding the MOX facility and all the other Facilities the DOE is running in conjunction, is going to increase the existing burden yet again.

FURTHERMORE, DOCUMENTS EXIST THAT SHOW THAT THE SAVANNAH RIVER NUCLEAR SITE ITSELF AND SURROUNDING COMMUNITIES, CREEKS, WILDLIFE, FISH ETC. WERE CLEAN AND VIRTUALLY DEVOID OF RADIOACTIVE CONTAMINATION, AT ALL EXCEPT TRACE AMOUNTS HERE AND THERE FROM BOMB TEST FALLOUT, I.E. THERE WAS NO "BACKGROUND TO SPEAK OF, AND THAT WITHIN A YEAR OF EVEN SOME OF THE OPERATIONS, ALL HELL WAS BREAKING LOOSE, AND THE DIATOMS WERE CONCENTRATING URANIUM FROM THE DISCHARGES. ON TOP OF THAT,

THE FOLLOWING WAS STATED : " Most plants utilizing radioactive material or nuclear fission occacasionally release quantities of radioactive wastes to effluent streams or to the atmosphere. THE QUANTITY OF DISCHARGE~~D~~ ACTIVITY MUST BE MINUTE BECAUSE OF THE SEVERE TOXICITY OF RADIOACTIVE MATERIALS AND THE CONCENTRATING ACTIONS OF VARIOUS ORGANISMS. FOR CERTAIN RADIOISOTOPES THE (back then) APPROVED MAXIMUM PERMISSIBLE CONCENTRATION IS WITHIN A FACTOR OF TWO OF WHAT IS FOUND IN NATURE. THUS, SUCH A DETERMINATION OF THE BACKGROUND PRIOR TO PLANT STARTUP IS DESIRABLE BOTH FOR THE ESTABLISHMENT OF PLANT CONTROLS AND FOR PROTECTION AGAINST ANY FUTURE LITIGATIONS. "

THIS WAS "RESTRICTED SECURITY INFORMATION" ISSUED BY DUPONT UNDER CONTRACT WITH THE U.S. ATOMIC ENERGY COMMISSION, AND WAS UNCLASSIFIED IN 1956. THE DOCUMENT DOES NOT MENTION, THAT AT THE TIME OF THE BACKGROUND SURVEY, FUEL FABRICATION BEGAN AND ALSO HEAVY WATER EXTRACTION, WHICH WOULD HAVE SLIGHTLY INFLUENCED EVEN WHAT THEY DID FIND.

WHATEVER SRS OR DOE OR THE APPLICANT SAYS IS "BACKGROUND" NOW, IS GARBAGE. MILLIONS OF CURIES OF RADIOACTIVE CONTAMINANTS HAVE BEEN RELEASED FROM THIS SITE. THESE RELEASES HAVE AFFECTED GEORGIA AND SOUTH CAROLINA, AND HAVE RESULTED IN PEOPLE HAVING TO DRINK AND USE RADIOACTIVELY CONTAMINATED WATER AND EAT CONTAMINATED FOODS, AND BREATHE IN TRITIUM CONTAMINATED AIR, AND BE SUBJECT TO RADIOACTIVE DEPOSITION IN RAIN MEASURABLE FOR MILES. IF I WERE THE STATE OF GEORGIA, THE CITY OF SAVANNAH, THE BEAUFORT-JASPER WATER AUTHORITY, I WOULD NOT ONLY SUE THESE BASTARDS, I WOULD BE LINING UP TO SUE THE APPLICANTS IF THEY GET THE LICENSE THE MOMENT THEY ADD TO THE EXISTING CONTAMINATION, THIS SITE HAS CAUSED ENOUGH DAMAGE, NRC DOESN'T NEED TO GRANT A LICENSE THAT WILL LEAD TO MORE DAMAGE.

The fact that all groundwater in the vicinity of SRS is classified as GB (suitable for domestic drinking water) by South Carolina, and as Class IIa (current or potential source of drinking water) by EPA according to the applicants , only shows that both are not public health advocacy agencies and/or don't understand and/or have not read the extent of the contamination on the site and how it is moving offsite.

4-15 They must not boast about NPDES permits. Such permits do not cover radioactive contaminants where Special Nuclear Materials are involved as NRC well knows. It is dectieful to infer that NPDES discharge permits are some sort of protection, when speaking of SRS. Besides, any agency that really cared, would not issue any permit for anything occurring on this site.

4-20/21 /22 Meteorology/wind. Bush Field is not the Savannah River Site. Weather conditions can be somewhat different on different areas of the site, as it is so large, at the same time. Onsite and offsite data should be used because what's onsite moves offste. A thirty year wind rose for the area should be used, and all data ever collected on site should be analyzed to see trends. To use a meteorological database for five years only is inadequate and foolish.

4-25 Ecology : what a bad joke. Every living thing on that site is contaminated. There are vast records. What didn't get contaminated from operations, they purposefully captured animals and birds and irradiated them, torturing them in the process and then watched them die - or somehow survive. It may interest those who read this to know, that animals stop eating, can't stand upright (the central nervous system collapse begins) get diarrhea and then "oral and/or rectal bleeding" - also that "bobcats exhibited the most severe symptoms at the lowest dose levels." I can assure the NRC and the public, that having ploughed through countless pages of documents on tests concerning radiation on animals not only at SRS but other places, (all done despite the fact that Hiroshima and Nagasaki showed us the results,) that radiation really does kill, maim, damage your genes, cause mutations and generally ruins your day. Also that if scientists can stoop lower than the basest criminal, many of them will not hesitate to do so - which sort of explains the horrors many perpetrated under Hitler and Stalin. Plus, they take detailed notes on the process. Your taxes at work.

The applicants blather about Upper Three Run creek supporting a large variety of insects - insects are the most resistant to radiation, so that's no surprise. They speak of important commercial species of fish in the Savannah River as including the American shad and striped bass - there is just a problem, according to fisheries staff, there is great concern because they have declined so much - they go up river into side creeks to spawn - big mistake to go up one of the SRS creeks....The situation will only worsen if this facility and all the DOE associated plutonium work happens.

4-36 NRC needs to ask how many doctors are there within 50 miles of SRS that specialize in the medical effects of radiation and have experience in dealing with patients suffering serious radioactive contamination, and radiation burns, and which hospital has a unit that can deal with such injuries, as to my knowledge, the best facility in the world is in Japan for this sort of problem.

5-2 The pipeline meant to carry the liquid high alpha waste is to be constructed by DOE 1) it is not their project 2) the pipeline could spring leaks, or break in an earthquake at stress points 3) is NRC sure that this is not the old F Area degraded pipeline? It doesn't exactly say DOE is going to construct a pipeline, only that the facilities will be connected by one.

5-5 The USFish and Wildlife Service obviously doesn't understand what is going to take place here fully, but they do understand that an inadequate assessment was made and say so. PLUS, USFWS RAISES THE QUESTION ON "DISPOSING LARGE QUANTITIES OF IMMOBILIZED PLUTONIUM IN GEOLOGIC REPOSITORIES AT SRS" (P.A-23) AND ARE MOST CONCERNED.

YEARS AGO, SRS WANTED TO GET RID OF DEADLY WASTE BY PUTTING IT DEEP UNDERGROUND AT THE SITE ALL HELL BROKE LOOSE. HOWEVER, ELEVEN EXTREMELY DEEP SO CALLED "DEEP ROCK BORINGS" WERE DONE ON SITE, EXPLORATORY BORINGS. I HAVE THE DOCUMENTS FROM SRS. THE BORES ARE CAPPED, BUT DO NOT SEEM TO HAVE BEEN FILLED IN. THIS RAISES TWO QUESTIONS, 1) CONTAMINATED WATER CAN MOVE BETWEEN SOIL TYPES AND AQUIFERS VIA THESE BORINGS - HAS THAT HAPPENED? 2) DOES DOE, OR THE APPLICANTS, OR DOE CONTRACTORS INTEND TO STUFF PLUTONIUM BEARING WASTES SUCH AS CONTAINERS OF THE PLUTONIUM IN GLASS DOWN THESE SHAFTS, OR THE GROUT FROM THE SALTSTONE FACILITY OR ANY OTHER HIGH, TRANSURANIC OR LOW LEVEL WASTE DOWN THEM? THIS MUST BE ANSWERED, BECAUSE MANY OF THE BORES ARE AROUND F, E, H, and S AREA. I KNOW FOR A FACT THAT GEORGIA IS TOTALLY AGAINST

ANYTHING LIKE THAT HAPPENING, AND FOR GOOD REASON, AS IT WOULD ALSO IMPACT GEORGIA IN THE FUTURE. APART FROM BEING AN INSANE IDEA TO PUT, FOR EXAMPLE, THE STUFF IN THE GLASS DOWN THERE WHERE IT WILL COME INTO CONTACT WITH WATER INTRUSION AND HAVE HORRENDOUS CONSEQUENCES.

I must stop, because I am exhausted, not because there are not many more things wrong with the Environmental Report. One last thing is this : the waste that goes to the high level tanks is being evaporated out of those tanks to the environment to reduce the levels - this is outrageous -I mean reduce the amount of liquid. The same will happen with this high alpha activity waste. This must be prohibited.

NRC must, just this once , protect the public and the environment and deny this application. It must also understand, that the location used for the Maximally Exposed Individual p.5-15 is not correct, as there is not a huge variation in wind direction in that area, it can be to the southwest, on the other hand, many releases have also gone north, northeast, and other directions also. It is a ridiculous calculation in that it assumes the entire population in a 50 mile radius is comprised of adults. Doses to all age groups and life stages should have been "guessed" at. Soil particles would be resuspended. Food is irrigated with water upon which SRS airborne deposition falls. The list is endless, I am too tired to continue. NRC is not obligated to license this facility, it is not NRC's mission to implement joint , misguided, US/Russian Agreements but to act to do what is in the public interest and what protects them and the environment, although I admit that NRC actions often cause me great displeasure on other issues. This issue is out of the ordinary. It is very serious and will expose workers, public and the environment to great risk and probable deadly consequences. What is also behind this whole scheme, (according to IEER) is also that Minatom, wants a new generation of breeder reactors, and General Atomics, Framatome with the DOE Minatom and Fuji Electric are researching that terrible Gas Turbine Modular Helium Reactor potentially for MOX use. Then there is also that awful "PRISM" reactor that GE and the DOE are all tied up in that NRC knows all about - the one that can explode - also needs plutonium . This is about greed and sheer wickedness. NRC does not have to participate, nor should it. NRC must deny the license for the Mixed Oxide Fuel Fabrication Facility, and protect the public and the environment from potential catastrophe.

Think of the children, deny this license application by DCS&W.
Thank you,

Pamela Blockey-O'Brien.

Pamela Blockey-O'Brien.