



SIERRA CLUB
SAVANNAH RIVER GROUP
P.O. BOX 3434
AUGUSTA, GA 30904

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Rules and Directives
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April 14, 2001

Chairman Richard Meserve
Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Chairman Meserve,

In response to your request for public input on the development of the Environmental Impact Statement (EIS) for the construction, operation, and deactivation of a Mixed Oxide (MOX) fuel fabrication facility, the Georgia Chapter of the Sierra Club has the following concerns:

- The creation of additional waste.
- The risk associated with the transportation of plutonium.
- The excessive amount of taxpayer expense involved.
- The risk associated with an untried process.
- The vulnerability of the Savannah River to contamination.
- The transfer of funds from the Savannah River Site cleanup to plutonium production.
- The questionable environmental record of the French company, Cogema.

The plutonium contained in nuclear bombs is one of the most toxic substances known to humankind with radioactive properties that last for centuries. There is no doubt it must not enter the environment where it can poison our drinking water and virtually everything else with which it comes in contact. The Savannah River Group of the Georgia Sierra Club is located on the Savannah River within the twenty mile radius of the Savannah River Site. The Georgia Chapter of the Sierra Club regards plutonium as a dangerous liability and not as an energy resource. We are strongly opposed to the commercial use of plutonium in MOX or any other fuel form. Of extreme concern is the creation of radioactive waste, a byproduct of the plutonium purification process. The proposed plant would add more than four million gallons of liquid waste, over its twenty year life span, to the SRS. Some thirty-five million gallons of radioactive waste still remains at the site despite years of clean up activity. Should that waste find its way into the Savannah River the results would be disastrous. If the DOE doesn't have a fail safe method for the disposal of nuclear waste, certainly it would be unconscionable to continue to generate it.

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Add = T. HARRIS (TEH)
T. Johnson (TJ)



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Billions of gallons of groundwater beneath the 310 square miles of the Savannah River Site are contaminated with radioactive materials. Radioactive materials have been found in animals on the site. Advisories warn people to limit fish consumption on certain stretches of the river because of contamination. Fish near the plant are so radioactive that they may be dangerous to eat. Traces of tritium have been found in shellfish as far away as Savannah Georgia. **THUS THE PRIMARY MISSION OF THE SAVANNAH RIVER SITE MUST REMAIN CONTAINMENT AND CLEANUP OF TOXIC CONTAMINATION.**

Another area of great concern is the problem of transportation, along with the opportunity of terrorist activities. Also plutonium fuel must be transported to the reactor site at great expense, and the transportation of plutonium would necessarily increase the risk of accidents and terrorist groups.

There are safer cheaper options. Plutonium should be kept in as few places as possible, isolated from the environment and not transported or processed unless for safety or ultimate disposal. Plutonium can be immobilized in glass ceramics and buried or stored to prevent its release into the environment. The governments own documents show immobilization would be faster, cheaper, safer, and the environmental impact would be considerably lower than the MOX approach.

We are also concerned about the French company, Cogema Inc., which has a history of severe neglect on environmental and health plans. Duke, Cogema, Stone and Webster (DCS) have not reported their compliance history, and are basing their license application on the experience of the Savannah River Site. The NRC must reject this approach because the SRS is not the licensee.

The NRC licensing decision will effect our planet literally for hundreds of thousands of years to come. Ground, water, and air borne radiation will continue for countless generations. The disasters of Three Mile Island and Chernobyl must always remain in our minds. To expose humanity to even an infinitesimal risk of catastrophic exposure is reprehensible. The Georgia Chapter of the Sierra Club calls upon the Nuclear Regulatory Commission to honor its mandate to protect the public's health and safety by denying the licensing of the proposed MOX plant at the Savannah River Site.

Respectfully submitted,

Susan Bloomfield

Nuclear Issues Chair

Georgia Sierra Club

(706) 736-4348 sbloomfield@webtv.net



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Nike Lessor, Acting Chief
U. S. Nuclear Regulatory Commission
Rules & Directives Branch
Division of Administration
Mail Stop T6059
Washington D.C. 20555

