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FAX COVER SHEET

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NOTE Comments on MOK EIS  
Scope

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Attn. Tim Harris  
U.S. Nuclear Regulatory Commission  
Office of Administration  
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Re: Comments on MOX EIS Scope

MOX fails as a non-proliferation strategy. Putting weapons grade MOX into commerce is a major threat to our national security. This threat to our security is increased by the known Russian intent to export weapons-grade MOX fuel to their nuclear "client nations"--which includes some nations that are referred to by U. S. leaders as "rogue nations".

MOX fuel is very vulnerable to theft since it is not highly radioactive. Also, unlike uranium fuel, the plutonium can be separated chemically and is still weapons grade.

Claims that the use of MOX fuel will get rid of plutonium are false. The reduction of plutonium would be small since new plutonium is formed in the reactor at the same time.

At the present time, the NRC has no extensive experience or data to support their licensing action. We do know that plutonium fuel makes reactors harder to control and ages them more rapidly and therefore decreases the margin of safety against nuclear accidents.

The four reactors operated by Duke Power that have been chosen for this program have the weakest physical containment structures among U. S. reactors. The NRC should reject these flimsy ice condenser reactors from any further consideration in this program.

I support the "No Action Alternative" in this EIS, and ask the NRC to deny a licensed for the construction of the MOX fuel factory. Immobilization on site is the best way to handle plutonium fuel.

Evaluation of the use of plutonium fuel and reactor impacts should be site specific and not generic, since contracts clearly state which reactors will be used.

Making reactor fuel would require many more steps for purification than immobilization would. One of these steps generates millions of gallons of high-activity alpha-emitting liquid wastes. There is no plan for what to do

with this waste other than put it in tanks which have been found leaking in other regions. The NRC must include the disposition of all process wastes in their analysis to make it a valid EIS scope.

According to findings validated by the DOE, there is an increased potential for cancer deaths from a core breach accident with plutonium fuel use. Plutonium fuel greatly increases all nuclear liabilities, and will require a reevaluation of Price-Anderson Act liability limits.

The NRC has no credentials for the regulation and oversight of weapons grade plutonium. That in itself should be reason enough for them to select the No Action alternative.

Respectfully submitted by

A handwritten signature in cursive script, reading "Mary P. Sinclair".

Mary P. Sinclair

Member, Sierra Club National Energy Policy Committee