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**CAROLINA PEACE RESOURCE CENTER
FAX TRANSMITTAL**

To: Mr. Tom Harris

From: Harry Rogers

Date: 5-21-01

Pages: (including cover) 2

Re: MOX Fuel Fabrication Facility EIS

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Template = ADM-013

E-RIDS = ADM-03
Cdd = T. HARRIS (TEH)

Subject: Comments on MOX Fuel Fabrication Facility

Dear Mister Tim Harris

These are my comments for the record on the EIS for the MOX Fuel Fabrication Facility.

1. I am very disappointed the Nuclear Regulatory Commission denied our request to hold meetings in Columbia SC and Atlanta GA. I formally request that you extend the comment period in order to address this concern.
2. The rapidly changing circumstances surrounding MOX reprocessing, especially those involving Cogema and its environmental track record and the Department of Energy's request to zero out the Immobilization option of plutonium disposition represents further need to extend the EIS comment period.
3. During Hurricane Hugo in SC it became necessary to pass a law, making price gouging of bottled water a criminal offense. Duke Energy's exploitation of the California energy crisis is just as egregious. I submit that Duke Energy leaders would knowingly endanger its workers and the public in a search for greater profits and its shareholders care no more about how they make their money than pimps or drug dealers. I strongly feel you should treat the Duke Cogema Stone Webster relationship with the NRC as adversarial and more weight should be given to independent oversight.
4. Between the MOX option and the Immobilization option of the plutonium disposition, the Immobilization offers the safest and most environmentally intelligent choice. Using this criterion would certainly be consistent with NRC's mandate to protect the public. This definitely should factor in your decision-making.
5. I know that you are aware of the Sandia study about ice condenser containment as well as Ed Lyman's study using your software and protocols, which show even if MOX were a good option, using MOX in these reactors, would be the worst choice.
6. Licensing a fabrication facility before considering the reactor consequences is in itself probably a deliberate attempt to negatively impact the fairness of the reactor EIS when it happens.
7. This EIS has to be looked at in the context of other Department of Energy decisions, notably its desire to increase weapons and production missions while cutting environmental cleanup. The SRS cut alone was requested to be 150+ million dollars. MOX will add millions of gallons of highly radioactive liquid waste to an already failing infrastructure at the Savanna River Site.
8. Price Andersen implications should be a part of the process. Who bears the increased liability of using MOX fuel.

In closing, as a nuclear worker I am troubled by the increasing role of the NRC as a supporter and advocate of nuclear power and the lessening of its role as an independent regulatory agency.

Harry Rogers
Nuclear Issues Coordinator
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Columbia, South Carolina