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Comments on the Scope of the Environmental Impact Statement (EIS) in regard to the licensing of a MOX fuel factory at the Savannah River Site

1. We ask that the scoping period for the EIS on the MOX plant be extended, as the subject of plutonium disposal is rapidly changing. The *Bulletin of the Atomic Scientists*, for instance, published in it May/June issue an article suggesting that "off-spec" MOX be made and stored rather than burned. This idea deserves serious consideration and, if adopted, would obviously impact the MOX factory.

2. Below we mention a few of the subjects that should be analyzed in the EIS on MOX production.

--The environmental impact on the proposed MOX production facility should include a thorough analysis of the waste that will be produced by the facility. This means that details should be provided for each waste, on: the chemical and radiological character, the quantity, the treatment methods, the destination. The EIS should include the same type of details on secondary waste (waste produced by the treatment of the original waste) as on primary waste. Gaseous and liquid effluents as well as solid waste should be presented in detail. Water that picks up radionuclides during the decontamination process, for instance, needs consideration as does the release of radioactive particles to the air.

--Transportation of radioactive materials to and from the plant, with any possibilities for accidents and intervention by terrorists need to be accurately analyzed.

--The qualifications of the companies Duke, Cogéma, and Stone and Webster should be presented, along with their operating histories, including the impact on the environment of existing facilities that they have built and operated. The operating histories, if they are to be meaningful, would appear to be too detailed for printing in their entirety in the EIS. In this case, they should be cited and readers told how to access the complete documents.

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--Any consideration of the use in reactors of the MOX produced, should be specific to the reactors in which the fuel would be loaded. MOX fuel is more difficult to use safely than is uranium oxide fuel. The public must know that the specific reactors in which it will be used are equipped to handle it and are able to cope as safely as possible with any incidents/accidents that occur. A generic treatment of this subject would be inadequate.

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