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Date: 5/22/01 12:10AM
Subject: EIS Scoping comments

66 FR 13794
3/7/01

(40)

Michael T. Lesar, Acting Chief
U.S. Nuclear Regulatory Commission
Rules & Directives Branch
Division of Administrative Services
Office of Administration

I urge the U.S. Nuclear Regulatory Commission engaged in licensing the MOX fuel fabrication facility (MFFF) at the Savannah River Site in SC to take the "No Action Alternative". There is no sound reason to incur the increased risks and costs of disposing a fraction of the surplus plutonium in this manner when other more effective means are available.

As part of the EIS I assert that the NRC should:

Evaluate and disclose the full environmental impact of the waste stream generated by the MFFF on the MFFF site, the surrounding DOE site and the local environment including aquifer, river and other surface waters shared by Georgia and mandate full NRC oversight of the radioactive waste management;

Evaluate and disclose the costs of waste stream disposition on the MFFF site rather than releasing it to the central waste handling facility of SRS and evaluate and disclose the full environmental impact of this waste stream on the MFFF site, the surrounding DOE site and the local environment including aquifer, river and other surface waters shared by Georgia;

Evaluate and disclose costs of and mandate an emergency management plan for any incident at or releases by the MFFF to the surrounding DOE facility and/or the public environment greater than the average annual $\text{C}\text{E}\text{background C}\text{E}$ radiation doses;

Evaluate and disclose the costs to individuals, industries and municipalities of reduced land values along plutonium and waste transport routes;

Evaluate and disclose the costs to municipalities, industries, and individuals for all incident and non incident related latent cancer fatalities occurring due to the operation of the MFFF or transportation of fuel components or waste, greater than 1 in 10,000;

Evaluate and disclose the full costs of total recovery from a worst case criticality accident at the MFFF and all financial impacts to municipalities, industries and individuals, including assumptions of parties responsible for those remunerations;

Evaluate and disclose the full costs of total recovery from a worst case criticality accident at any reactors targeted for MOX fuel and all financial impacts to municipalities, industries and individuals, including assumptions of parties responsible for those remunerations;

Template = ADM-013

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

Evaluate and disclose the full costs of total recovery from a worst case transportation accident involving plutonium oxide in Atlanta, Georgia and all financial impacts to municipalities, industries and individuals, including assumptions of parties responsible for those remunerations;

Evaluate and disclose the full costs of effective onsite and offsite (20 mile radius) alpha radiological monitoring at a daily frequency of air, rain water, surface water, and ground water and weekly frequency of vegetation, soil, and livestock;

Evaluate and disclose the full costs of fully equipping first and emergency responders for a worst case transportation accident involving plutonium oxide in Atlanta, Georgia;

Evaluate and disclose the full costs of fully equipping first and emergency responders for any worst case accident at any reactor targeted to use MOX fuel.

These requested evaluations are only a sample of the topics that should be investigated and reported to the public regarding this fallacious endeavor.

Please apply prudent standards and adopt the "No Action Alternative".

Sincerely,
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