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William B. Mills
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May 19, 2001

Rules and Directives
Branch

Michael T. Lesar, Acting Chief, U.S. Nuclear Regulatory Commission
Rules and Directives Branch, Division of Administrative Services
Office of Administration
Mail Stop T6D59
Washington, D.C. 20555

cc: Sen. Richard Lugar, Sen. Evan Bayh

Dear Mr. Lesar:

Please consider the following comments on the EIS for the proposal to manufacture MOX nuclear reactor fuel at the Savannah River site, and to use it as fuel in four Duke Power reactors.

This proposal is billed as a way to dispose of surplus weapons-grade plutonium left over from the Cold War. However, the net reduction in the amount of plutonium will be very small, since some uranium is converted to plutonium during irradiation. Please stop making this deceptive claim.

Production and use of MOX fuel entails serious proliferation dangers. Not only does the transportation of the fuel in the US offer opportunities for theft, but Russia's plans to export MOX fuel to its allies is a serious national security threat. Export to Canada of surplus plutonium also entails proliferation dangers. If the government is really interested in disposing of plutonium, it should choose the least dangerous known method: immobilization in glass, mixed with highly radioactive spent reactor fuel.

Another major disadvantage of MOX production as a disposal method is the production of millions of gallons of high-level liquid waste. Similar liquid waste has already leaked out of tanks at Hanford, entering the ground water and threatening the Columbia River. There is no acceptable means of disposal of this waste, so let's not produce any more of it.

I urge the NRC to choose the no action alternative and deny licensing for the MOX production facility.

Sincerely,

William B. Mills

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