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August 27, 2001

Mr. Michael T. Lesar, Chief
Rules and Directives Branch (MS T6 - D59)
Division of Administrative Services
US Nuclear Regulatory Commission
Washington, DC 20555-001

Dear Mr. Lesar:

Thank you for the opportunity to comment on the application for the 5-year extension of the University of Missouri-Columbia's Research Reactor (MURR), NRC Docket No. 50-196. I understand that there is also the expectation of applying for an additional 20-year license after that.

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I am a graduate of UMC and a former employee of the UMC School of Medicine which is near the MURR. I am also a frequent visitor to the Columbia area as I have relatives who live there. I use to drive past the reactor to visit my sisters who use to live in a neighborhood south of the campus near 163 and Niphong Blvd. It is amazing how Columbia has grown in every direction. And it is a matter of great concern that it has grown around the MURR facility and that there are three hospital facilities not to mention the UMC campus and dormitories in such close proximity.

Clearly continued operations of the reactor would have an environmental impact on the surrounding community and should require an environmental impact statement (EIS) both at the time of the five year renewal request and if MURR requests an additional 20-year extension.

The MURR uses highly enriched uranium (HEU) (about 93%) as compared to a commercial reactor which uses only 4.3% enriched uranium. Since HEU can be used to manufacture nuclear weapons it requires special security regulations to protect against sabotage and terrorism at the reactor and in transporting "spent fuel" out of town. This creates an increased risk for the facility and for the community around it. Theodore Taylor, a nuclear physicist, testified in 1984 at an NRC hearing that there was "no excuse" for HEU to be used on the UCLA campus and said that ordinary burglar alarm would not be effective in protecting such a payload. I also have concerns about the routine venting and purging of the noble gasses and tritium for the exhaust stack and releases in liquid effluent. Hinkson Creek flows right by the facility and south and west on its way out of town. I remember the creek was always an attraction for students and children. What are the consequences of contamination from regular operation or of accidental releases to the air and water.

The problem of storing high level radioactive waste continues to be controversial. There is no consensus that the repository at Yucca Mountain can isolate the irradiated fuel from the environment for as long as it will remain lethal. MURR has had problems in the last two years because of a dispute between the state and federal government over the

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transport of foreign research reactor fuel across Missouri's highways. As a result the Department of Energy refused to accept MURR fuel rods at Savannah River which almost caused a shutdown of the MURR because it had no more storage space for its "spent fuel." South Carolina is now concerned about becoming a permanent dumping ground for high level waste and the governor had threatened to bar other high level waste from the state. What are the consequences to MURR and Columbia if in the future South Carolina refuses to accept MURR's waste.

The whole scenario of transporting high level was by rail and highway through populated areas all across the United States will present more and more risks as waste continues to be generated, especially if reactors, including MURR, are granted extensions of their licenses.

MURR continues to have significant management problems. In 2000 there were two violations related to refueling, and there have been allegations of discrimination and retaliation by an employee who raised concerns about the safe operation of the facility.

The NRC, commenting on one of the refueling violations, concluded that "The event brought into question the effectiveness of MURR's shift turnovers, management and staff communications, attention to detail, and general awareness of facility conditions." (NRC Inspection Report #2000-203). During the other incident, the NRC reported that there was a lack of communication between the workers. During an unscheduled shutdown one group of workers removed part of the shielding wall adjacent to the storage pool leaving no protection to the fuel element's intensely penetrating radiation while another group of workers was moving fuel rods. Neither group knew what the other one was doing.

Currently MURR has become a commercial facility raising questions of conflict of interest. In a related instance the former director is suing two retired scientists for defamation of character.

Such management problems certainly increase the chance of a serious accident at the reactor and increase the danger to the surrounding community. These problems and the possibility of similar future problems and human error will put residents of Columbia at risk.

MURR is reportedly the largest university research reactor in the world. Over half the universities in the United States have closed their research reactors. Yet I understand that MURR wants to triple the size of its reactor. What will this mean for the city of Columbia which surrounds this facility. The risks are enormous to this growing community and to the students and faculty at the University.

These issues require the utmost attention of the NRC. I request that the NRC prepare an environmental impact statement for the proposed extension of the MURR's license.

Thank you for your attention to these concerns.

Sincerely,

A handwritten signature in black ink that reads "Rebecca M. Wright". The signature is written in a cursive style with a large, stylized initial "R" and a long, sweeping tail.

Rebecca M. Wright
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