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704 Camellia Dr.
LaGrange, Ga. 30240
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Chief, Rules & Directive Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

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Comment on: Tennessee Valley Authority: Notice of Consideration of issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Considerations Determination and Opportunity for a Hearing

The NRC proposed finding of "No Significan Hazards" is based on TVA's application for a license amendment to allow the cogeneration of tritium, radioactive hydrogen for the US Nuclear Weapons program, along with the production of electricity, received by NRC on August 20, 2001, 22 days before the Sept 11 attack on the World Trade Center in New York City.

According to the Federal Register notice "The Commission has made a proposed determination that the amendment request involves no significant hazards consideration - - that means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety."

I would like to take issue with (2) above. Since TVA's analysis was made before September 11, they did not consider the probability or consequences of a fully fuelled jetliner being used as a missile and purposely being crashed into a nuclear power plant.

By changing the purpose of Watts Bar and/or Sequoyah from purely commercial nuclear power plants to cogenerators of material for nuclear weapons, the probability of such an attack increases from 1 in 103 nuclear plants to number 1 of 103. Changing Watts Bar and/or Sequoyah to cogenerators of nuclear weapons material, tritium, changes them from civilian targets to military targets.

Template = ADM-013

E-RIDS = ADM-03
Add = B. Clayton (BAC2)
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The NRC and TVA should include the increased consequences of an accident involving a fully fuelled jetliner crashing into one to three fully fueled nuclear reactors each containing 2304 tiitium producing burnable absorber rods, 193 fuel assemblies, with each assembly containing 264 fuel rods. The analsyis should include the worst case scenario. The 2304 tritium producing rods should be assumed to have been in the reactor for the maximum amount of time and the reactor should be considered to be nearing time for refueling, so that 1/3 of the fuel rods would have been in the reactor for 3 years, 1/3 for 2 years, and 1/3 for 1 year. Also, the higher concentration of radioactive nuclides should be considered since the higher enrichment of uranium will be used in the fuel rods to begin with. Considering the proximity of the cooling pools, their contents should also be taken into consideration.

What would be the maximum exposure to what size population that would be affected, bearing in mind that Sequoyah is on the edge of Chattanooga and that Knoxville Tn. is upwind from Watts Bar? In considering Knoxville, calculate that the accident could coinside with a University of Tennessee home football game, with a usual attendance of approximately 100,000.

Pidgeon Forge and Gatlinburg are tourist attractions just north east of Knoxville. The Boy Scouts have a facility on Watts Bar Lake that is used extensively in the summer. Consider that this accident could occur when Pidgeon Forge, Gatlinburg, and the Boy Scout Camp are filled to capacity.

What are the monitoring plans, and are monitors installed that can detect tritium. TVA has historically asked for and received exemptions from NRC. Has NRC developed new stricter guidelines for monitoring?

What are the evacuation plans? Has NRC developed new and enhanced evacuation rules and has TVA complied with these standards?

Remembering that the cow-milk-child pathway is the most critical pathway to people, and considering the number of dairies in the possibly affected area, how would the inclusion of 2304 tritium producing burnable absorber rods increase the radiation dose to people, in routine and maximum accident conditions? Please include the models that you use to calculate the doses, and the assumptions that you use in your calculations.

Include other pathways to man, including, but not limited to inhalation, drinking water, eating fish, and other food contaminated by routine emissions and emissions from maximum accident conditions.

Consider the consequences of increasing the threat of nuclear war that this action poses. The United States has repeatedly objected to other nations using their commercial nuclear power plants to produce material for nuclear weapons. Will we not be seen as speaking with forked tongue if we say, "You can't use your nuclear power plants to produce nuclear weapons material for military purposes, but we can."

This action increases the area of possible harm far beyond the 10 mile "area of interest" of your regulations, even beyond the 50 miles that you have historically limited your boundary of possible harm. The wind knows no artifical boundaries, and the rivers flow past state markers.

I respectfully request that you consider all my comments, and also that you widen your definition of interest past the 10 mile artificial boundary that you have arbitrarily imposed. Expand "interest" to mean more than financial. Include concern for mankind. Using these new standards of interest, I believe that you will agree that I qualify to become an intervenor, and do hereby request that you so rule.

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