

(2 pages total)

H/24/02
6/27/2002



Pamela Blockey-O'Brien
D23 Golden Valley
7631 Dallas Highway
Douglasville, GA 30134 USA

Mr. Mike Lesar,
Chief, Rules and Directives Branch,
Division of Administrative Services,
Office of Administration,
Mail Stop T-6D59,
U.S. NRC,
Washington, D.C. 20555

RECEIVED

2002 AUG 29 PM 2: 50

Rules and Directives
Branch
USNRC

August 21st, 2002

Comments regarding plans for the Draft Environmental Impact Statement to accommodate the changes in the Death Of the Earth (DOE) squad and Duke COGEMA Stone & Webster AKA DCS and their appalling plans related to the Mixed Oxide Fuel Fabrication Facility and the Death Of the Earth squad deciding not to immobilize the plutonium after all...(Surprise !!!)

- 1) There are enough foreign owned entities involved in the project now to preclude any license being granted for anything. Personnel are said to be now employed by Framatome - the bastards who supplied/built the nuclear reactor at Koeberg for the Nazi-like former South African government - who will be working on the MOX project. It is not up to the NRC to question the applicant on this issue, it is up to the NRC to employ investigators etc. to determine the extent of the foreign ownership, because NRC law says under section 10 CFR Ch. 170.40 that a license may NOT be issued to the Corporation if the Commission determines that: "a) the Corporation is owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government;....." and Framatome (French government connected) etc. fall under that. And COGEMA poses a problem too in all probability.
- 2) The fact that the PUREX process is one of the most deadly and environmentally polluting process known and that it will be employed is ghastly, the "red oil" issue is a HUGE issue - the whole thing can EXPLODE and we all know it, and even more liquid waste would be involved now, additions to aqueous polishing to remove CHLORIDES and other salts, and there is an increase in the types of impurities now as well. It is stated that airborne effluents will contain "trace amounts of chlorine, well below regulatory levels" - Oh, really? Define "Trace". Hell no, with the staggering Curie quantity of Tritium (H₃) coming off SRS daily, the combination of the chlorine and the tritium will result in radioactive hydrochloric acid wafting over the site and Georgia and South Carolina.
- 3) The entire process changes to remove Chloride were developed in the NOTORIOUS Cap de la Hague plant - WHERE ARE THE DETAILS? We don't want their polluting methods. Also, it is stated that "precise impurity characterization may not be available" concerning the "Alternate Feedstock" General Material Characteristics. This is an outrage. How can one know the consequences if its not known what's in it? It should not be allowed.
- 4) there will be a major increase in the footprint of the Aqueous Polishing (AP) Purification process. This will likely guarantee that it falls down a sinkhole in that area. The area could liquefy too.
- 5) How much insurance is going to be taken out for all this? How many billions? To my knowledge this doesn't fall under that useless Price-Anderson thing. Both SC and GA would be affected if there was a catastrophic accident and/or fire.
- 6) DOE/SRS allows all sorts of people to visit the site, including students, because they don't care. The workers on SRS who have nothing to do with all this, such as construction workers etc, and the visitors are all members of the public. They must not be exposed, period.
- 7) What about the SAND FILTERS? As I stated in previous comment, DOE itself added sand filters because only the combination of HEPA AND SAND FILTERS REDUCE THE Plutonium and other particulate contamination. Furthermore, re: waste issues/liquids, have all the breaks and holes in the B-Line been fixed below ground? ANSWERS NEEDED.
- 8) In terms of an alternative - There can be a "NO ACTION ALTERNATIVE". The material

Template = ADM-013

E-RTDS = ADM-03
add = T. HARRIS (Teh)

and pits can stay where it is- they can cut up the pits under heavy oil, and pour the oil, the pit chunks and a quick-set cement into lead-lined nuclear grade steel canisters; place those containers in 10 foot thick cement tubes, waterproof the exterior of the cement tubes, encase the tubes in a granite outerpack. Keep them in temperature controlled 20 foot thick bunkers under heavy guard, all until an underground repository in a bone dry area is ready. There Never was any need to bring any of it to Srs - not the pits, not the radioactive garbage and scrap etc. There is no need to turn it into MOX - besides, CATAWBA, one of the decrepit ice-condenser plants they want to use MOX in, has big problems already. I presume everyone understands that in the case of ice-condensers, if there's a station blackout and a meltdown, the bloody thing will not only meltdown, it will EXPLODE. BYe-Bye to the Carolinas.....

9) The increased liquid waste volumes are absolutely unacceptable. Existing problems due to liquid radwaste are legendary and well documented.

10) What does it take to get the Death of the Earth squad's Chief Weasel to grasp that the Savannah River Nuclear Site is over the most significant water recharge area in the S.E. and the last thing needed is for all that radioactive garbage to be added to the mix from elsewhere - and furthermore, what does it take for the NRC to grasp that in case of a major accident, there is not a hospital for miles that could deal with a radiological disaster of the type that could happen here - that is, an equivalent of a Class Nine accident, The most severe documented historical events for the site are related to earthquakes at the New Madrid fault and the Charleston Earthquake, both of which affected what is now the site. And tornadoes. This facility could withstand neither, in particular if they were worse.

10) Last; but not least : the terrorism issue remains.. There are many types of weapons some maniac could launch from the nearest boundary --if you don't believe me, ask the military, I don't want to detail them here..

This entire enterprise should not be licensed, it is contrary to the public good, contrary to the safety of the US, contrary to protecting the public and the environment - all it is, is a way for the nuclear boys to make some more money. It must be stopped NOW.

Pamela Blockey-O'Brien

Pamela Blockey-O'Brien.