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September 30, 2002

Mr. Mike Lesar, Chief
U.S. Nuclear Regulatory Commission
Rules & Directives Branch
Division of Administrative Services
Office of Administration

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Dear Mr. Lesar:

Undoubtedly the Nuclear Regulatory Commission has received comments from many citizens regarding concerns associated with the proposed plutonium fuel factory at the Savannah River Site (SRS). I add my voice to that group with the following personal concerns:

1. Commercial nuclear reactors are not designed to use plutonium bomb fuel processed from surplus weapons plutonium.
2. The facility to make this fuel has not yet been approved or built.
3. SRS is already overflowing with radioactive waste and has the highest radioactivity content of any nuclear weapons facility in the nation in its on-site waste. Reprocessing plutonium results in discharges of large amounts of liquid radioactive waste and creates other radioactive wastes that pose environmental problems and safety and health risks. Additional waste created by a plutonium fuel factory at SRS will only exacerbate the existing problem.
4. The September 11th terrorist attacks reminded our country that we are citizens of a global society and are no longer isolated from such acts committed in other countries. Certainly the shipment of and an increase in the shipment of radioactive wastes to SRS offers terrorists increased access to dangerous materials. If those materials are shipped in secret, the safety of communities along transportation lines is comprised due to the lack of information.
5. Economic data does not point to MOX as a valuable fuel. Uranium is plentiful and cheaper thereby negating a need for MOX. Reprocessing itself is costly. According an Institute for Energy and Environmental Research February 2001 publication, "a huge and unjustifiably large sum – on the order of \$100 billion worldwide – has already been spent over the past five decades on attempts to create a plutonium economy. Much of this was on large breeder reactors, most of which are now shut."
6. Other countries are limiting or banning involvement with the nuclear industry. Germany has agreed to end reprocessing of nuclear fuel by mid-2005 and Germany and Belgium have decided to ban new nuclear plants.

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7. An economic analysis considering all the costs of the project is not being done. This type of analysis is a key element in evaluating the merit of projects under the review of other government agencies, including the U.S. Army Corps of Engineers. An economic analysis for the proposed project should include various government subsidies for the industry including fuel supply services, waste disposal, fuel reprocessing, research and development and the Price-Anderson Act limiting liability. ("Special Report: Nuclear Power" – The Economist May 19, 2001 issue)

Thank you for the opportunity to comment on and participate in the scoping process for this project.

Sincerely,

Teri Leffek

cc: Representative Jack Kingston
Senator Max Cleland
Senator Zell Miller