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Bill Mottel
30 Glenmoor Place
Hilton Head Island, SC 29926
Phone: 689-2787

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Rules and Directives

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2/28/03

**Comments For NRC on MOX
Draft EIS, 3/24/03**

68 FR 9728
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My name is Bill Mottel. I have lived for the past 10 years on Hilton Head Island, which is just a few miles north of Savannah, GA, and the Savannah River. I am now on the Hilton Head Island Town Council and the Lower SC Council of Governments. I had many years of experience on nuclear assignments, first in the U.S. Armed Forces nuclear weapons program and later with DuPont at the Savannah River Plant, where I was the Plant Manager. After retiring as DuPont's Director of Safety and Occupational Health, I served as Chairman of the National Safety Council.

I am mailing this statement to you because a conflict prevents me from attending the public meeting in Savannah on March 24.

I have great confidence that Duke Cogema Stone & Webster, DCS, working Westinghouse and with the Nuclear Regulatory Commission are very well qualified to fulfill this mission, and will do it safely and efficiently. Cogema has a long and distinguished record of manufacturing mixed oxide, MOX, fuel for the more than 30 commercial power plants in Europe that use MOX fuel. And, both Duke Power and Stone & Webster have long histories of excellence in the design, construction, and operation of nuclear facilities. Savannah River Site's record of safety is legendary, and both DOE and SRS will work with DCS to maintain that outstanding safety performance.

The recent Draft Environmental Impact Statement, which included both the MOX plant and the Pit Disassembly and Conversion Facility, did not contain sufficient detail to allow an independent assessment of their analyses. However, its worse-case incident, which occurred in PDCF, not the MOX plant, seems grossly exaggerated. A fire in a modern plutonium cabinet or glove box would be unlikely to generate either the heat or the releases of plutonium and tritium that was assumed. Any plutonium in such a fire, if it occurred, would not dissipate to the public. Also, I cannot imagine why the assumption was made that the government would not collect the contaminated food to keep it from being eaten. Surely this hypothetical incident scenario is supposed to be at least remotely possible. I do not think that this one is.

This draft EIS needs significant revision.

W.J. Mottel

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3/25/03

Date

E-RIDS = ADM-03

Add = T. Harris (TEH)
A. Lester (ACL)

Template = ADM-013