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SRS Retiree Association Presentation at the March 26, 2003 NRC Public Meeting to Discuss Draft Environmental Impact Statement on Proposed MOX Nuclear Facility

Presentation by: ^{Rules and Directives} C. David Cowfer
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Hello, my name is Dave Cowfer, and I am the Chairman of the SRS Retiree Association Board of Directors

I have 40 years collective experience in Federal Government and commercial nuclear industries and today, I would like to say that I, as well as the SRS Retiree Association that I represent, strongly support the construction and operation of the MOX facility. I hold a fellow grade membership in the American Society of Mechanical Engineers (ASME), an award I achieved by 30 years participation in non-government Boiler Codes & Standards developing committees. I have interacted with Nuclear Regulatory Commission (NRC) personnel for 30 years as Codes and Standards, and Federal Regulations Owner/User. I continue to interact with NRC personnel on standards developing national committees in my retirement. I am, you would say, very familiar with the NRC regulatory function.

I believe that the MOX facility can be constructed and operated safely, not-with-standing some concerns about NRC's worst case scenario in the subject EIS.

My understanding from having reviewed the EIS and spoken with some folks whom I believe to be independent from this process is that the evaluation that the NRC performed is not only very conservative, but actually makes assumptions that I believe to be incredible.

- I am concerned about the perception that this kind of evaluation generates in the public eye with respect to the perceived dangers of such a facility. For the NRC to publish a scenario that breaches 1) at least 2 levels or more of containment, 2) site boundary monitors and 3) goes undetected for one year is preposterous. This scenario also disregards MOX Facility equipment engineered safety features and operating procedures mandated by Federal Regulations, enforced by several levels of regulators. I have worked at SRS and I can tell you the redundancy in facility safety basis and operations does not stop with Regulatory minimum requirements.

- We've seen over the years opponents of nuclear technology overstate the risks associated with this technology.

- The NRC is neither an opponent nor a proponent, but an objective regulator; I would expect the NRC to be even-handed and not overly dramatic in its assessments.

- Even if the NRC acknowledges that the assumptions they have used are conservative, and even if they acknowledge that their evaluation does not give credit for protection that we know will be in place, those kinds of statements can easily get lost in

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the cloudiness that gets generated over the numbers that fall out of the conservative evaluations.

- I hope that the NRC heeds this concern, and ensures that their final analysis portrays the risks associated with this program in the proper context.

Sincerely,


C. David Cowfer
Chairman, SRS Retiree Board of Directors

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