



**ECONOMIC DEVELOPMENT PARTNERSHIP**

Serving Aiken & Edgefield Counties

Fred E. Humes  
Director

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Rules and Directives  
**Statement for the Record**

**Draft Environmental Impact Statement**

**Construction and Operation of a Mixed Oxide Fuel Fabrication Facility at the Savannah River Site, South Carolina  
March 26, 2003**

Thank you for the opportunity to provide comments on the draft Environmental Impact Statement on the Construction and Operation of a Mixed Oxide Fuel Fabrication Facility at the Savannah River Site, South Carolina. My name is Ernest S. Chaput and I am the manager of special projects for the Economic Development Partnership of Aiken and Edgefield Counties, South Carolina.

Construction and operation of the Mixed Oxide Fuel Fabrication facility is an important part of our nation's international nuclear non-proliferation program. It is important that we do all possible to make surplus United States and Russian nuclear materials unusable for future use in nuclear weapons. We believe that the United States should continue to demonstrate moral leadership by expeditiously preparing to make these materials unsuitable for use in modern nuclear weapons.

We are pleased with the preliminary conclusion of the NRC staff that the overall benefits of the MOX facility outweigh its disadvantages and costs, and that unless safety issues mandate otherwise the action called for is the issuance of the proposed license. We agree that the proposed facility can be operated safely, and urge the NRC to issue the Construction Authorization Request in a timely manner.

We have reviewed the draft Environmental Impact Statement (DEIS) and offer three comments which result in additional support for your preliminary conclusion:

1. The safety and environmental risks associated with the No Action alternative have been significantly understated. The no action alternative assumes that DOE's surplus plutonium would remain in storage at seven DOE sites. The DEIS does not state the period of storage, and it appears that impacts are near-term and based on maintaining the status quo. We believe current methods of storage are only valid for a limited and finite timeframe; storage without subsequent actions is not realistic for timeframes of 100 years plus. At some time in the future actions will be required to either repackage or disposition stored materials. The no action alternative should assess the incremental added risk resulting from (1) actions to periodically process and repackage materials in long-term storage and (2) actions to eventually remove the materials from storage and preparation for disposition.

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Call - T. Harris (TEH)  
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2. The risk to offsite population in the hypothetical accident analysis is significantly overstated In analyzing the impact to off-site population from a hypothetical tritium release from the Pit Disassemble and Conversion Facility, the DEIS assumes and calculates a dose by ingestion during the one-year post-accident period. This scenario is simply not possible. An assumption that the South Carolina Department of Health and Environmental Control and the Georgia Environmental Protection Division would ignore contamination of agricultural products for one year is incredulous and an insult to their training, demonstrated performance and professional status. This impossible assumption must be eliminated and the analysis revised
  
- 3 The DEIS places unwarranted emphasis on impacts associated solely with the Pit Disassembly and Conversion Facility (PDCF) The PDCF facility is not solely required to support the MOX facility. PDCF has a broad capability to support a range of storage and disposition options for surplus nuclear weapon pits For example, the PDCF prepared the plutonium that was included in the cancelled Plutonium Immobilization Project. There has also been discussion that PDCF may convert surplus weapon components currently being stored as pits to oxide for long-term storage. By coupling the MOX and PDCF facilities in the draft EIS, NRC implies that impacts from the PDCF will not occur if the MOX construction authorization is denied. That is not the case PDCF and MOX are two separate actions, and the draft EIS should only analyze those combined impacts which result from the unique actions required solely to fabricate MOX fuel DOE has previously prepared an Environmental Impact Statement for the PDCF facility with a finding that the facility provides adequate protection to the public and environment. NRC should not subject the PDCF facility to NEPA “double jeopardy”

Thank you for the opportunity to comment on this important document.