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To: <teh@nrc.gov>
Date: 5/14/03 8:52PM
Subject: Comments about the MOX proposal at Savannah River Site

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68 FR 9728
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(Note: I would appreciate it if this note could be forwarded by the NRC to the appropriate official(s) in the Department of Energy, inasmuch as some of the issues are more logically in their sphere)

Today is the due date for registering concerns with the NRC over the controversial, dangerous plutonium bomb fuel (MOX) experiment that is slated for our upstream neighbor, the Dept. of Energy's Savannah River Site nuclear facility.

I have attended meetings in Savannah where NRC's role was discussed, and their impact statement drafts reviewed. Throughout, I have had these reactions: (1) The NRC representatives seemed eager to get community input and were sincere in their attempts to deal with questions and concerns; (2) The meetings were sparsely attended and not particularly well covered in the local media; (3) A good many of the issues raised by citizens were essentially outside the purview of the NRC --- these related to the wisdom of the selection of Savannah River Site (which comes with a legacy of nightmarish environmental and public safety problems), and the even larger issue of why this is a good public policy proposal at all, no matter where it is done.

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I will defer to others having stronger technical backgrounds to challenge the environment impact work done by the NRC. Frankly, as well intentioned as the review meetings were, a great deal of the content in the report proper is hard for a layman to form impressions about. But people whose judgement and expertise I trust are not satisfied the research is adequate --- and there seems enough uncertainty (and changed direction) about what the actual process, parameters, and scope will be, that the NRC analysis might need to be redone as future decisions unfold if the report is to be fully responsive to the proposed actions.

Frankly, I believe public hearings would have been more useful if conducted by the DOE and those private consortiums working with the DOE on the plutonium conversion proposals. In such a venue, the frustrated concerned citizens (and most were definitely that) could have presented the questions that are in their hearts and at the heart of the matter. It seemed like were debating the cart, and not being able to evaluate the horse pulling it.

Important questions the NRC is not in a position to answer include: Why is this process a good idea? --- and, what are the alternatives and why did this emerge as the preferred one? Further, are we being targeted for this development because there are some political and/or socioeconomic and demographic characteristics of our area? Why is it that one of the collaborators in this is a French company with a very shaky record on environmental matters in Europe -- couldn't we do better that that? And, finally: why would anyone be so presumptuous and have such blinders on as to choose the Savannah River Site for this work without simultaneously addressing the question of why that particular site has been neglected in terms of cleaning up the mess we already have there?

IF it is to be that we will have a MOX plant at Savannah River Site, like it

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or not (and right now I have no reason to feel I should like it), then is this not the time to hold "feet to the fire" about making that facility "squeaky clean" in all respects. The NRC can say, with some justification, "that's not what we are charged to study and rule on." But that doesn't change the fact that we have a radioactive time bomb as our neighbor, and we don't see any urgency about addressing THAT very very nasty fact.

I urge the NRC to use its influence on others in policy-making roles to look carefully at what is being proposed, and redirect it in a way that addresses the legitimate concerns, and indeed fears, of those of us living downstream from the Savannah River nuclear site. Thank you.

Sincerely,

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