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Date: 5/22/03 5:23PM
Subject: Comments NUREG-1767

2/28/03

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Attached are comments submitted by Environmentalists, Inc. (E.I.) for consideration by the Nuclear Regulatory Commission (NRC) in regard to the Draft Environmental Impact Statement (NUREG-1767, draft) for the MOX Fuel Fabrication Facility (MOXFFF) at Savannah River Site (SRS).

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Call - T. Harris (TEH)
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Template = ADM-013

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May 22, 2003

Tim Harris
US Nuclear Regulatory Commission
Washington, DC 20555
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Dear Mr. Harris:

These comments are being submitted by Environmentalists, Inc. (E.I.) for consideration by the Nuclear Regulatory Commission (NRC) in regard to the Draft Environmental Impact Statement (NUREG-1767, draft) for the MOX Fuel Fabrication Facility (MOXFFF) at Savannah River Site (SRS), one of the alternatives which the Department of Energy (DOE) described in its plan for Surplus Plutonium Disposition (SPD).

Comment No. 1

NUREG-1767, draft, is very clear about the NRC's role as an independent judge of the plan to build and operate a Mixed Oxide Fuel Fabricating Facility in South Carolina. The Department of Energy has chosen this MOX plant and other related activities as a way of addressing the countries excess plutonium problem. It is the NRC's responsibility to decide whether the overall MOX proposal could be carried out in a "safe and environmentally acceptable manner." (Page XVII, Executive Summary)

Comment No. 2

There are numerous process steps in the DOE's MOX plan. Figure 2.2, for example, identifies 13 steps in the Fuel Fabricating Process. The Aqueous Polishing Process has almost as many steps, according to Figure 2.1, however, less than half of them appear to involve plutonium. The PIT Disassembly and Conversion Facility (PDCF) and the Waste Solidification Building (WSB) both have a variety of operations which would take place. Added to all of these processing steps and related activities are those associated with transport between facilities, unloading, loading, and storage as well as the long-distance shipments of uranium and plutonium from seven different locations throughout the country.

It is imperative that a containment chapter be added to NUREG-1767, one which is devoted exclusively to addressing the need for preventing the release of plutonium "under all conceivable conditions." This new chapter would identify all the containment measures being proposed for maintaining a plutonium management approach of "absolute containment," with diagrams and written text explaining where containment design features are located, description of procedures for routine and off-normal conditions of operation, release levels expected under routine and accident situations, back-up systems such as those that are designed to prevent non-routine releases in the event of failure of glove box ventilation, maintenance requirements, frequency at which monitors are checked and read, etc.

** Both quotes are from the transcript of the NRC Proceeding, in the matter of Allied General Nuclear Services, Docket No. 50-332 (pages 4277 and 4321) November 4, 1974. (The choice of these is based on both statements being clear and concise.)*

Thank you for the opportunity to comment on this draft EIS, the process provided by the National Environmental Policy Act to insure that all possible alternatives are considered when a proposed facility will impact the environment.

Sincerely,

Ruth Thomas, President
Environmentalists, Inc.