



**SIERRA  
CLUB**  
FOUNDED 1892

**South Carolina Chapter**

P. O. Box 2388

Columbia, SC 29202

803-256-8487 • Fax 803-256-8448

May 30, 2003

Michael T. Lesar, Chief  
Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T-6D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

2/28/03  
68FR9728  
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JUN -6 PM 8:57  
Rules and Directives

**Re.: DEIS on MOX**

Dear Mr. Lesar:

The following comment is being submitted by The South Carolina Chapter of the Sierra Club for consideration by the Nuclear Regulatory Commission in regard to the Draft Environmental Impact Statement (NUREG-1767, draft) for the MOX Fuel Fabrication Facility at the Savannah River Site, one of the alternatives which the Department of Energy described in its plan for Surplus Plutonium Disposition.

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, and frequency at which monitors are checked and read.

Thank you for the opportunity to comment on this draft EIS.

Sincerely,

Dell Isham  
Chapter Director  
SC Sierra Club

cc: SC Chapter Steering Committee

E-REDS=ADM-03  
Add=T.Harris (TEH)  
A. Lester (ALST)

Template=ADM-013

