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

RECEIVED
2003 OCT 27 PM 4:17
Rules and Directives Branch

Re: NUREG 1767

Dear Mr. Lesar,

I am writing in response to the Nuclear Regulatory Commission's Draft Environmental Impact Statement (DEIS) on the proposed plutonium fuel factory (MOX) at the Department of Energy's Savannah River Site nuclear facility. There are several areas in which I think the DEIS is inadequate:

The DEIS only addresses the construction of the MOX facility and not the operation of the facility. Environmental aspects of both must be considered.

The DEIS must address the reasonable alternative to MOX-plutonium immobilization. Immobilization would effectively achieve the MOX program's stated goal to safeguard weapons-grad plutonium. The DEIS only provided continued storage, as an alternative to the construction of the MOX factory for disposition of the plutonium. This would be an unacceptable security risk. Like the MOX factory, immobilization would also provide a large number of jobs. Its waste stream is negligible compared to MOX, and it is cheaper than MOX. The DEIS should have addressed ALL alternatives, including immobilization.

The DEIS should produce verifiable projections of waste volumes as well as discuss the environmental risks and consequences of DOE failure to implement MOX waste management.

The issue of a possible terrorist attack on the proposed MOX factory was not at all adequately addressed. We know that since September 11, 2001, what used to be unlikely incidents are more likely than ever. The environmental and public health impacts of an attack on this facility are unacceptable to the people of the Southeast.

Please address these problems with the DEIS.

Sincerely,

Jeri Jaeger Blincoe — 10-13-2003
(Signature) (Date)

Jeri Jaeger Blincoe
(Print Name)

416 Nelson Fenyrd Decatur GA 30030
(Address)

E-RIDS = ADM-03
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