

MFFF, the purpose of this submission is to reinforce our own earlier comments about how additional construction, operation and waste generation at SRS might cause the Site to exceed current regulations. We find that the BREDL submission, and the supporting documents referenced offer additional substance to our assertion, and ask that you consider it in detail.

It is clear to us that the accident analysis NRC did for the MFFF and PDCF likely apply to many other accident scenarios --and actual accidents that have occurred -- from current and past operations at SRS. If this is the case, then the environmental justice concerns that apply to any future accident apply to the impacts associated with violating emission limits and other standards. We believe that it is a violation of the principles of equal protection under the law for NRC to grant additional licenses to additional activities at SRS that will exacerbate an existing problem of environmental discrimination and injustice.

Finally, we would like to bring to the Commission's attention the issues being considered at Erwin, Tennessee's Nuclear Fuel Services

(see:

<http://www.gate5.access.gpo.gov/cgi-bin/waisgate.cgi?WAIISdocID=442311280+10+0+0&WAIISaction=retrieve>)

NFS is applying for a license amendment to reduce the source term at their site, since they are digging up soil that no longer meets applicable standards, and sending it to Utah. NFS is cleaning up waste burial grounds because they are not licensed to be a nuclear waste dump. NIRS would like to submit to NRC that there is no reason to think that sending waste over the fence line into an unlicensed burial ground at Savannah River Site is any different than Nuclear Fuel Services burying waste on their own site. In both cases it is wrong, it is bad for ground water, surface water, workers, wild life and any other living thing you want to mention. It is a disgrace...and yet, that is the answer that DOE and Duke COGEMA Stone offer us...just dump it next door, out of NRC's regulatory space. This is not adequate or acceptable...and the environmental impacts of doing so should be explicated in detail in this document, not merely stated that the SRS has waste capacity to take it.

Respectfully Submitted,

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