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Subject: Comment on NEF (NUREG-1790)

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Tucson Branch of the
Women's International League for Peace and Freedom
Patricia Birnie
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Attn: Anna Bradford
To Chief, Rules Review and Directives Branch
United States Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

Re: Comments on the Draft EIS for the proposed National Enrichment Facility in Lea County, New Mexico (NUREG-1790); Docket No. 70-3103

To the Commissioners and Staff:

We are dismayed that the NRC could conclude that the proposed NEF would have "small" or "low" impact on a variety of considerations that we feel have received grossly inadequate review.

First, the NEED for the facility is far from proven. We have heard no information that indicates that there will be an increase in demand for low-enriched uranium since no new U.S. reactors have been ordered since the 1970's, nor are the banks keen on loaning money for new construction. With many reactors facing an end to their legal operating lives, with doubtful renewal expected, the logical conclusion is that there will be a diminished demand for low-enriched uranium. This same would apply in case the promoters are planning to offer LEU for sale abroad.

Second, the site selection process was greatly flawed, with a number of the criteria ignored or are in obvious conflict. These include seismic activity (Lea County is located over a geologic fault), the historical preservation assessment (Lea County has seven archeological sites within the area proposed for the NEF location), and costly relocation of existing service provisions (the high-pressure carbon-dioxide gas line that would have to be relocated). The site selection process used gives the impression that politics had more influence rather than scientific weighing of the criteria. We believe the site selected has too many risk factors involved for it to be given NRC approval.

Third, the availability of water for use at the proposed NEF, as reported in the DEIS, totally ignores the assessment of the Lea County Regional Water Plan, which projects a doubling of water usage by 2040, warning that there is not enough water in the Basin to maintain an annual diversion of this magnitude (since water is being withdrawn at a greater rate than it is being recharged). Droughts are becoming more common in the Southwest, especially as we are feeling the effects of global warming. It is irresponsible to build a new project that would be a water-intensive user under these circumstances.

Fourth, we are concerned about toxic emission of the proposed plant, both air and water discharges, and disposition of toxic solid wastes. Have there been adequate studies conducted about the health impact of the atmospheric emissions, and whether their impact affects minority residents (or workers) (environmental justice issues). Are there plans to mitigate these toxic emissions? Would water contaminants leach into the groundwater (would liners for wastewater basins retain their integrity for the duration of the plant's operation)? Has the NRC made a ruling about the waste classification of depleted uranium, DUF6, and how it should be properly isolated? Or is DU being considered a "resource?" Please clarify this for us. From definitions we have read in other materials, DU is considered a radioactive waste, and must be disposed of in a manner consistent with regulations for other radioactive waste. In addition,

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Add A. Bradford (AHB1)
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we feel that possible accidents, releasing toxic hexafluoride (UF6) to the area is an unacceptable risk. We are concerned about the health and welfare of workers and residents within the air shed of the proposed facility. Why endanger these people when there is no demonstrated need for the product which is proposed to be processed and made at the NEF.

Next, we are concerned that the economic impact on the community would be less favorable than the impression given in the DEIS. Since the NEF would be tax exempt for its life, the main benefit to the community would be from the salaries earned by the employees. Yet, the number of jobs generated appear to be half of what other types of businesses would create. It appears to us, on a practical level, that just on economic terms, it would be disadvantageous to have NEF located in Lea County. That coupled with probable health costs due to toxic emissions and toxic waste, adds up to an undesirable cost to the community, rather than an economic benefit.

Even if the Cultural Resources, or cultural impact, were the only criteria of importance, it is unacceptable to destroy the seven archaeological sites that are within the proposed project area. Each of these sites is eligible to be listed in the National Register of Historic Places.

IF the NEF is needed, there are too many objections for it to be located in Lea County, New Mexico.

The NRC is supposed to protect the lives of the public, not be advocates for the nuclear industry. Too often we have interpreted the rulings of the NRC as being industry-supporting, at the expense of protecting the health of the public.

Thank you for the opportunity to comment on the proposed NEF.

Patricia Birnie, Legislative Chair, Tucson Branch
Women's International League for Peace and Freedom

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