



Patricia A. Marida, Chair
36 West Gay Street Suite 314
Columbus, OH 43215
614-890-7865

1-18-05

Nuclear Regulatory Commission
Scoping Meeting
Environmental Impacts of a Proposed Uranium Enrichment Centrifuge
Pike County, OH

I am the Chair of the Central Ohio Sierra Club. The Group has over 5,000 members in the Central Ohio, including members in Pike County.

I would like to ask that the deadline for comments on the scoping be extended. First, the information on the Environmental Report was removed from the web for security purposes and was only recently reinstated. Second, none of us who have been currently involved in this issue were notified of the public meeting on Nov. 9 where USEC's record of accidents and contamination releases was discussed. Third, some of the information that was discussed at that meeting has been classified as confidential for security reasons, so we do not have access to it. Fourth, we have had a great deal of difficulty viewing the rest of the material concerning the violations on the web. Information on Reportable Events that was supposed to be on the web could not be accessed by our computers. Fifth, questions that we asked at the public meeting Dec. 2 have not been answered. I gave a list of questions to Bill Murphie, and I have not as yet received a reply. So we respectfully request an extension of the comment deadline for at least 30 days beyond the current deadline of Feb. 1.

At this meeting I will comment briefly on a few subjects that we think should be addressed in developing an Environmental Impact Statement.

First, there is debate over whether this facility is needed. *The Carnegie Report: A Strategy for Nuclear Security* states that there are sufficient stocks of enriched uranium to fuel existing reactors for several years. Weapons are being disassembled that could provide a good deal of reactor fuel. The report states that production of even LEU could have a destabilizing effect on nuclear treaties and initiate a stepped-up arms race. The cost to the public coffers, the environment, and political stability mandates that there must be a pressing need for such a facility.

Second, the public must be intimately involved in the preparation of and comments on a Draft EIS. The public must agree upon the need for the facility. The ~~NRE~~ should actively incorporate and respond to public comments and questions throughout the process, and must give replies to questions on a timely or even immediate basis.

Third, it is critical that the proposed licensee, United States Enrichment Corporation, be financially viable. ~~NRE~~ must verify the actual and complete resources of this company. Given

BDM secured
2/7/05

10/15/04
69FR 61268

9

SISF Review Complete
Template = ADM-013

E-RIDS = ADM-03
add = M. Blerine (MXBL)
Y. Faraz (YHF)

their past history, how can we have any degree of certainty that they will remain viable as a for-profit entity? ~~NRC~~ must tell us what will happen if USEC declares bankruptcy. Will operations be able to continue? What agency would continue the operations? Will the public be asked to foot the bill? For past operations? For ongoing operations?

The public must have more answers to questions on performance review of past USEC operations. For instance, the *Nuclear Criticality Safety Non-Compliance* graph of the Environmental Report apparently deals only with releases or incidents that could cause a nuclear reaction or critical event. Therefore, dangerous non-critical releases and their sources are not addressed. I see what appear to be a number of gaps in the NRC evaluation of the data. We would like to have information on where the contamination came from and how it was addressed. Accidental releases and deliberate venting must be fully explained and evaluated. In the graph of *Contaminated Feed Cleanup Project Dose Trend*, an increase in worker exposure to UF₆ as time went on was not an encouraging trend, and we would like to see an explanation for this.

Worker and public health must be addressed. Will workers be monitored by daily urine tests before and after work? Will such monitoring be done by an independent entity? Will accidental and deliberate releases be made immediately known to the public? At what level will a public alert be triggered? What mechanism will be utilized for notification? What training will be made available, and to what entities? Will drills be conducted by the personnel that have been trained?

Of course, as the Environmental Report states, continuing education of employees and closer monitoring by management CAN BE USED to help alleviate incidents. While obviously true, such a statement is too generic to be meaningful. Was anyone fired on account of incompetence? Were people given warnings? Will incident reports be written in the future, or will they be considered a security risk? Will the public have access to past and future incident reports? At what interval after they occur?

Alternative uses for the site must be developed and publicized. Will further contamination of the site make it less qualified for an alternative use?

Waste management must be addressed. Where will DU from the process go? Will it be left on the site? What plans are there for disposing of the DU that is generated?

Many questions are outside the scope of a 5-minute statement. Site contamination, water contamination and air releases, as well as use of water and electricity must be addressed.