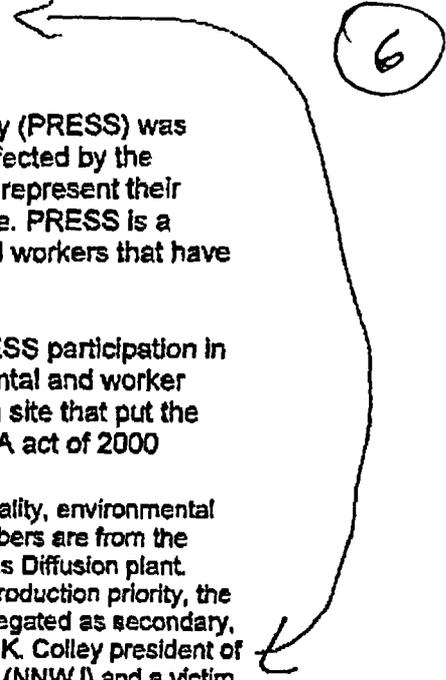


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Release January 18, 2005



Portsmouth/Piketon Residents for Environmental Safety and Security (PRESS) was formed to educate, organize and empower residents and workers affected by the Portsmouth Uranium Enrichment site, locate in Piketon, Ohio and to represent their interest in economic vitality, environmental quality, health, and justice. PRESS is a nonprofit organization 5013c. Members are from the community and workers that have been affected by the Portsmouth Gaseous Diffusion plant.

We watchdog the activities of the Piketon Plant. Members of PRESS participation in local meetings, which have help, get the plant to admit to environmental and worker exposure. Press's documents help exposed the deadly Plutonium on site that put the worker in harms way in which started the compensation bill EEOICPA act of 2000

PRESS was formed in the late 60's to represent the Interest in economic vitality, environmental quality, health, and justice. PRESS is a nonprofit organization 5013c. Members are from the community and workers that have been affected by the Portsmouth Gaseous Diffusion plant. Portsmouth Gaseous Diffusion plant has been operating under a policy of production priority, the safety of workers, and near by resident, and the environment have been relegated as secondary, leaving a legacy of uncertainty for working and living conditions. I am Vina K. Colley president of PRESS and Co-Chair of NATIONAL NUCLEAR WORKERS FOR JUSTICE (NNWJ) and a victim of past practices and I know first hand about the poor safety practices from the contractors working for the Department of Energy and the Department of Defense.

January 18, 2005

NRC

EIS scope

USEC's request for ACP plant license

Pursuant to the Federal register notice by NRC

The purpose of the National Environmental Policy Act (42usc4321etseq) is to promote efforts to prevent or eliminate damage to the environment and biosphere and stimulate public health, as well as enrich the understanding of the workings of ecological systems and natural resources. NEPA requires the preparation of and EIS for all major federal actions having a significant effect on the quality of the human environment.

The President's Council on Environmental Quality describes an EIS as an "action forcing device," whose purposes are to provide "full and fair discussion of significant environmental impacts" and to "inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse

R-REDS = ADM-03

*Call = M. Blevins (MXB4)
Y. Faraz (YHF)*

*EIS Review Complete
Template = ADM-013*

impacts or enhance the quality of the environment." (40cfr1502.1) These impacts and alternatives must be addressed before action is taken, "rather than justifying decisions already made." (40CFR1502.2g)

The scope of NRC'S Environmental Impact Statement should be expanded to include the following issues not adequately covered in USEC'S Environmental Report1) DOE wants to relax its site-wide cleanup standards on the presumption that the site will be dedicated to new nuclear production under the USEC agreement. Therefore the USEC project must be considered as having the impact of the relaxation of these standards, since with no ACP, the old standards would have to be honored for the sake of community reuse. NRC should examine the impact of ACP on site-wide cleanup standards.

2) If ACP proceeds, it will close the whole site off to alternate use because of required security restrictions. This will change or eliminate possibilities for cleanup and reuse of certain facilities outside of USEC's lease agreement, for example the old shops and warehouse facilities at the GDP site, public use of the perimeter road, or opening undeveloped parts of the site to public use.

3) In the section that describes the "no action alternative," USEC states that if the ACP is not built at Piketon, the site will be unaffected this is simply a lie and it undercuts USEC's credibility on every other issue. The whole projected DOE end-state for the site is based on new nuclear production—just look at the highway signs for ACP. By telling this lie, USEC avoids discussion of the benefits to the site and community from early project cancellation.

4) Whether ACP succeeds or fails, it will turn the rest of the site into a dumpsite by encouraging DOE to invite in waste from other sites. This has already started. In the last two years, DOE has transferred uranium waste in large quantities to Piketon from three other sites—Fernald, Oak Ridge and Paducah. These transfers would not happen without ACP, and that is the real impact of ACP because the project will likely fail, and all that transferred waste would be its legacy.

5) NRC must examine the relationship between DOE (a government agency) and USEC (a supposedly private company), a relationship that is unclear, unexamined, and untested. USEC makes constant reference to the privatization legislation and to "Congressional intent" as if it had nothing to do with creating that legislation—a circular argument. In its licensing process, NRC should therefore examine the entire DOE-USEC relationship and the full range of impacts that the relationship entails.

6. PRESS supports the need for a separate cultural resource assessment by NRC, with its own scoping process. That is required because DOE has never complied with the National Historic Preservation Act at the Piketon site, and the site has tremendous historic and prehistoric value that has never been studied.

7. Because USEC's future and ACP's future are both extremely uncertain, NRC must examine the impact of the project's failure at various future dates. For example, if the project proceeds through the next four years, with contamination of the existing building from the Lead Cascade, and the construction of two new buildings for ACP, and then USEC collapses after the next presidential election, where does that leave the community? DOE already allowed the contamination of those centrifuge buildings in 1985 by a "test run" of uranium, even after Congressional funding for the GCEP project was cut. NRC cannot allow the same thing to happen again.

We would like to thank you for this opportunity to comment and look forward to reviewing the report that will come next. Please send us what is published next so we have time to review for input.

Sincerely

Vina K Colley

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