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*2/7/05*

**Public Comment Form  
USEC Inc. Proposed American Centrifuge Plant  
Piketon, Ohio**

*10/15/04*

*69 FR 61268*

**Name:**

ELISA YOUNG

**Address:**

48360 CARMEN RD

RACINE, OH

45771

*20*

**Comment:**

PLEASE SEE ATTACHED.

301-415-~~85~~5397  
(301)-415-7864

To submit your comment, please give this form to an NRC representative at tonight's meeting, or mail to: Chief, Rules and Directives Branch, Division of Administrative Services, Mallstop T-6D59, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

Your comments should be mailed to the NRC by February 1, 2005 to ensure full consideration.

*SISP Review Complete  
Template*

*E-RIDS = ADM-D3  
Call = Mr. Blevins (MXB6)  
Y. FARAZ (YHF)*

Elisa Young  
48360 Carmel Road  
Racine, Ohio 45771

February 1, 2005

Chief, Rules and Directives Branch  
Division of Administrative Services  
Mailstop T-6D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Fax: 301-415-5397

RE: Nuclear Regulatory Commission Scoping Meeting  
Environmental Impacts of USEC's Proposed ACP Uranium Enrichment Centrifuge  
Piketon, OH

I am a resident of Southern Ohio, and recently attended the NRC scoping meeting in Piketon. I did voice concerns at the meeting, but would prefer that you consider these written comments for the scoping process.

**Extension of Comment Deadline**

I would like to request an extension for the comment deadline. The application was not made available to the public to allow sufficient time to review it before the scoping process started. The original version was over 1000 pages long and available only briefly before being taken off line to censor out information for "security" reasons. The final 350-page version was only released 3 weeks before the scoping meeting. If the NRC had that amount of time to review it, with a full-time team dedicated to that process, I think the public should have similar consideration.

After the scoping meeting, I was told that as someone who was working on a petition to intervene that I was eligible to receive a full copy of the petition. I requested this from the NRC by phone and e-mail, and have not received response or copy of the full application as of February 1, 2005, the date our comments are due.

Similarly, we were told that if we submitted our names to the NRC that we would be informed of all upcoming NRC meetings. We did not receive notice of the NRC/USEC meeting on November 9 to review USEC's compliance/violations record. This information is applicable to the scoping process, for public comment. I requested a copy of the meeting minutes from the NRC, and was told the information was "sensitive" and could not be released in full. They did eventually send some graphs relating to the meeting, but without translation or written narrative. If we had been given notice of this public meeting, we would have had access to all of USEC history.

**Clean up Costs**

I am concerned about responsibilities and financial impacts to taxpayers. There needs to be a study done into total clean-up, waste storage and decommissioning costs, and have USEC create a performance bond or escrow account sufficient to pay for clean up in advance of any licensing, so that taxpayers do not have to take on the responsibility of subsidizing clean up. I understand that

USEC is renting the land from the Department of Energy, which is tax-funded, and that USEC is not in the best financial condition. I'm concerned that if USEC does not set aside the money in advance, tax payers will have to fund the clean up.

I believe I was told at the initial NRC meeting preliminary to the scoping process that the largest bond required by the NRC to date had been \$1 billion. The Department of Energy's budget for maintaining the Piketon facility in 2004 was almost \$300 million, with a comparable budget for 2005. Over a decade after the facility was shut down, taxpayers are still paying. This is money that could be used to invest in clean, sustainable energy research and development - solar, wind, geothermal, hydrogen.

### Waste Storage

A significant amount of radioactive waste has accumulated at the Piketon site from former plant operations. When the UDS conversion facility was recently licensed, there was no contract in place for longer term depleted uranium waste (if the conversion facility is not successful) or for the massive amounts of uranium oxide byproduct that would be generated from the operation of the conversion facility.

Before any licensing is granted to USEC to operate the ACP centrifuge (which would create more depleted uranium waste), the NRC should require USEC to have contracts in place for shipment and long-term storage of DU, uranium oxides, or any other radioactive waste tails generated from USEC's endeavors. There should also be studies done on safety issues relating to the transportation and storage of quantity of uranium being shipped in and the waste being shipped out, including environmental risk assessments for communities the radioactive material would be traveling through en route.

Businesses such as gas stations and dry cleaners are not allowed to store toxic chemicals on site for greater than 90 days, and I think USEC should be held similarly accountable for radioactive tails. I would like there to be fines set up in advance for storing the waste on site for any time longer than that dictated by the EIS safety research, and fines should be sufficient to motivate USEC to comply by removing waste from the site as opposed to paying a minimal fine and leaving it sit on site so that our state does not become a sacrifice zone for the nuclear industry.

### Water Safety

I would like to know what water source will be used for operations?

How much water will be used?

Where will the water be released?

What radioactive concentration limits are set for those releases and who will be monitoring them?

What action will be taken if the release limits are exceeded? It needs to be sufficient to motivate USEC not to exceed the predetermined limits.

Will Ohio residents living along the streams and rivers formerly contaminated have input into the permit and monitoring process?

In the Netherlands URENCO was shut down for exceeding release limits. What is the NRC doing differently in the situation in Ohio to protect health, safety and the integrity of the environment?

Alternative: I think a closed lid system should be used that does not release contaminated water back into the environment.

**Cumulative Effects**

Is the NRC considering that this site already has existing contamination in their studies and that workers and community members have already had exposure?

**Wildlife**

In the Department of Energy's 2003 Environmental Assessment of existing conditions from former operations, it stated that there had been uranium and plutonium contaminated fish found in the waterways around the plant. There was also a deer included in the report that was hit by a car and studied for radiation levels. There was uranium found in its liver and the deer hunt was canceled that year. I wrote to the DOE and Bechtel Jacobs to find out what has happened in the years since, but did not receive a response. One local resident told me that he has seen eagles catching prey from the landfills. What will be done differently now to ensure that wildlife does not become contaminated traveling across site boundaries and carrying additional contamination into the outlying community? I know some of the boundaries currently have nothing more than a three strand barbed wire fence.

**Decommissioning**

When the plant decommissions, who will monitor the radioactive landfills? Can there be a written agreement in advance to avoid creating a sacrifice zone?

**Safety/Terrorist Threats**

What is being done to increase security? When we took a site tour last year, we were told by Bechtel Jacobs employees that people are currently able to cross site boundaries in four-wheelers (but that "Abduhl hasn't broken down the gate yet.") I saw parts of the perimeter that were only protected by barbed wire fence. Study needs to go into safety and terrorist risks and to make appropriate changes.

**Transportation Issues**

Studies need to be done on the safety, accident rates, and road conditions that uranium being shipped in and waste being shipped out will be traveling.

**Historical/Cultural Impacts**

I first asked the Department of Energy for information on archeological/historic findings a year ago, and have not received it. I understand that the original centrifuge was constructed on top of an extensive Adena mound/earthworks. The Scioto Valley is at the heart of mound building activity, and should be preserved. In a RBES meeting with the Department of Energy, Bill Murphy pointed to sites on the map for the proposed centrifuge and stated that they were Indian mounds. I have never been able to get a report on confirmation on this from them or the Ohio Historical Society, and an investigation into these impacts should be included in the EIS.

Again, I would like to ask for an extension of time for the scoping process as information has not been made available to us from the organizations involved in this process.

Sincerely,  
Elisa Young