

## EagleRockCEm Resource

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**From:** Peter Rickards [nifty1@cableone.net]  
**Sent:** Monday, September 13, 2010 7:42 PM  
**To:** EagleRockEIS Resource  
**Subject:** NUREG 1945: Official public comment on incomplete DEIS for Eagle Rock Uranium Enrichment facility...

### IDAHO FAMILIES FOR THE SAFEST ENERGY

The Eagle Rock Draft EIS appears incomplete, not addressing the technical scoping issues I submitted. I do see the actual issues listed as received, on pages 88 & 89 of 234 in the appendix section, but no actual answers were given.

Specifically, the criticality analysis does not address the microscopic particle size problem from criticalities, nor the "alpha recoil" problem with HEPA filters for normal operations, nor the fire problems with HEPA filters.

The SENES fluoride documents on underestimating fluoride impact at Oak Ridge was not answered, despite acknowledging "someone" asked about it. The SENES team does work for CDC, and underestimating the fluoride is unacceptable.

In addition...

1) We are not able to double check the downplaying of accidents and terrorism dose to the public. The Safety Analysis Report (SER) is NOT included in the DEIS! Instead vague summaries were used touting they would meet legal requirements.

In my history of 23 years of being lied to in EIS's, specifics are needed to demonstrate where you are misinforming the public to the potential REAL environmental impacts of the proposed plant. It is unacceptable to have an official draft comment period while withholding the MOST important details!

What the DEIS says on webpage 66 of 430 is "3 As noted in Section 1.4, some of these issues are analyzed in detail in the NRC's SER and are

4 only summarized in the EIS. For example, within the area of safety and security, the SER  
5 analyzes the probabilities and consequences of various accidents at the proposed EREF, as  
6 well as measures to prevent those accidents and mitigate their effects. This EIS does not go  
7 into the same level of detail, but provides, in Section 4.2.15, an accident analysis for the  
8 purpose of assessing the potential environmental impacts of accidents."

2) While the DEIS does not address disgruntled employee sabotage, it at least acknowledges that terrorism could happen, during transport and at the facility. On page 396/430 the DEIS actually admits that terrorism would equal the full release of a severe transportation accident. However, the DEIS refuses to estimate the probability of terrorism, allowing licensing by the usual trick of pretending a severe transport accident will never happen, using probability math. By hiding behind probability math, the high doses the public can receive are dismissed as acceptable risk.

While the public decides which energy policy is better for their families safety, windmills/solar/geothermal vs. nuclear power, hiding the profound devastating impacts of these accidents and terrorism is misleading and unacceptable.

3) While assuming the HEPA filters contain most of an accident nuclear criticality, the DEIS does admit that a citizen at the fence line could receive a 570 mrem dose, way above the 10 mrem annual limit! (Table 4-30, p 372/430). This dose seems not used when dismissing transport accidents in metropolitan areas.

4) Pages 397&8/430 claims an HF plume at the facility may effect 1,900 members of the public, but also claims no fatalities, which seems untrue without detailed explanation to justify the dismissal of severe impact, including death.

5) While I have found some great contradicting documents on the NRC website, I was unable to find details on accidents and problems at current uranium enrichment plants, including the Metropolis, Illinois Honeywell facility.

Please address the statement of Hydrogen explosions recently at the Honeywell uranium enrichment facility from the article pasted below. Page 370/430 lists only 5 accident types analyzed, which all seem to qualify for ignoring by probability math tricks. However, this article mentions locals hospitalized from inhalation problems from Dec 2003. While NRC likes to dwell on estimated death rates, the public needs to know ALL the potential impacts on their health, including these scenarios. The article mentions a long problem with compliance at Honeywell, which appears unaddressed as a potential REAL AND PROBABLE health impact. (See red highlights) On the NRC website I could see references to Honeywell problems, but the searches lead to long lists that obscured me finding the details.

Sincerely, Dr Peter Rickards DPM

## **Explosion Rocks Honeywell Uranium Facility Run by Scab Workers**

Tuesday 07 September 2010

[by: Mike Elk | The Huffington Post | Report](#)



(Image: [Lance Page / t r u t h o u t](#); Adapted: [Jan Michael Ihl](#), [TimScott](#), [Angela Wolf](#))

Union workers have been locked out at the uranium enrichment facility in Metropolis, Illinois for two months now after [contract negotiations broke down over Honeywell's demand](#) that workers give up their retiree health care coverage and pension plans. The Metropolis uranium facility is the only one in the United States that can convert U308 into the extremely deadly UF6.

Because the plant is the only conversion facility of its kind in the United States, familiarity with the Metropolis plant, and not just generic experience in the field, is essential to ensuring the plant's safety. Concerns have been raised by local community members and union officials that replacement workers at the Honeywell facility cannot safely operate the plant since they have no site-specific experience in this type of conversion facility.

Workers claim that Cote is far more interested in keeping his record profits high than actually protecting workers and the surrounding community. They believe that Honeywell CEO David Cote is willing to risk nuclear fallout in order to demand that uranium workers cut their retiree health care and pension plans.

On Saturday, nuclear regulators allowed Honeywell to start up core production at the facility, where core production had been shut down for over two months due to concerns about the training of replacement workers. The Nuclear Regulatory Commission delayed reopening the plant for several days after questions were raised about the [unusually high levels of uranium that were appearing in the urine tests of several nuclear workers.](#)

The following day, a hydrogen explosion rocked the plant. The blast shook the ground in front of the plant and could be heard a mile away, according to local reports. State Trooper Bridget Rice said that police were called to investigate to the scene of the explosion after receiving several phone calls reporting an explosion at the plant. Nuclear Regulatory Commission spokesman Roger Hannah also confirmed that there was indeed "a small hydrogen explosion that was very loud" at the Metropolis facility.

The plant splits hydrofluoric acid into hydrogen and fluoride. The hydrogen then gets scrubbed and released into the atmosphere and fluorine goes into the process. If the hydrogen and fluorine recombine, it can be very reactive and cause a non-radioactive hydrogen explosion. On Saturday, hydrogen was accidentally recombined with fluorine causing a massive explosion that could be heard a mile away and leading to the plant being temporarily shut down.

Honeywell Spokesman Peter Dapel released this statement: "There was a noise at Metropolis Works yesterday that occurred as a result of the normal venting of one of our systems.... The union workforce is very familiar with the procedure that caused yesterday's noise, having executed similar processes on at least two occasions earlier this year prior to the work stoppage with the exact same outcomes. It is common to plants that work with fluorine, and characteristic of plants that are following correct procedures."

However, union spokesman John Paul Smith claims that the workers who worked at the plant for decades said very minor explosions had occurred, but no explosion of such a magnitude that it could be heard outside of the plant. State police also could not cite an incident where they had been called to the plant to investigate an explosion at the Metropolis facility that had been reported to them by local community members.

Workers and local community members see this explosion as evidence that the quickly trained replacement workers are not qualified to operate the plant.

Local union officials claim that the workers are not properly trained to work in the plant. In a statement released last week USW Local 7-699 claimed, "The Union workforce was required to have extensive on-the-job training on running units from qualified trainers for several months prior to being qualified. We have recently learned that several Fluorination workers were deemed 'qualified' by company personnel after one week of training. Furthermore, Union employees were required to have been a qualified operator for six months on a running unit before they were allowed to begin to train another employee. The company is currently training their own employees with people who themselves are not qualified."

Additional concerns have been raised about the safety records of the replacement workers at the Metropolis facility who are employed by the Shaw Group. In 2009, a subsidiary of the Shaw Group was [made to pay \\$6.2 million to the federal government](#) for forcing its workers not to report safety and site violations when working on nuclear plant sites in Alabama and Tennessee.

**Local community members are claiming that Honeywell is also not properly reporting safety violations at the nuclear facility in Metropolis. A recent report by Nuclear Regulatory Commission (NRC) says**

**Honeywell has failed to notify the NRC of 37 reportable unplanned, uranium contamination events at its Metropolis facility between January 2008 and January 2010.**

**The Metropolis facility had previously been shut down after a release of deadly toxic UF6 gas in December of 2003, which hospitalized four community members and lead to evacuations of dozens of residents near the plant. This was only the second time in American history (the first being the infamous Three Mile Island disaster) where a site area emergency forced the evacuation of a community surrounding a nuclear power facility. The Nuclear Regulatory Commission at the time found that Honeywell "failed to implement some parts of its emergency response plan and did not provide sufficient information to local emergency responders".**

The Environmental Protection Agency has also been very critical of the safety record of the uranium enrichment facility. According to the report by Sam Trantum of Uranium Intelligence Weekly, in May of 2009 the EPA listed the Metropolis facility as being "in significant noncompliance - a high priority violator" of the Clean Air Act and that the Metropolis facility had been in violation of the Clean Air Act for the nine months prior to that. Also, the EPA found that the Honeywell Metropolis uranium facility had been violating the Clean Water Act for about two years, but returned to compliance in December of 2009.

A federal grand jury has been convened to look into criminal violations of federal environmental laws. Honeywell initially tried to cover up the grand jury investigation to local community and union members. However SEC reports forced the company to reveal they were under grand jury investigation. According to Sam Trantum of Uranium Intelligence Weekly:

Details of the investigation are being kept under tight control by the relevant authorities, including the Environmental Protection Agency (EPA) and the Department of Justice (DOJ), but the existence of a grand jury probe was confirmed by Honeywell International's most recent 10Q filing to the Securities and Exchange Commission. It stated that the EPA and DOJ are investigating "whether the storage of certain sludges generated during uranium hexafluoride production at our Metropolis, Illinois facility has been in compliance with the requirements of the Resource Conservation and Recovery Act [RCRA]," adding that, "The federal authorities have convened a grand jury in this matter."

Honeywell's long history of safety violations, the poor training of replacement workers at the Metropolis facility, and Saturday's hydrogen explosion, have lead local workers and community members to call on the Nuclear Regulatory Commission to shut down production until the contract dispute can be resolved. "This just simply isn't normal, what's happening at the plant," said union member John Paul Smith.

Workers are also calling on President Obama to put pressure on his close economic adviser Honeywell CEO David Cote to settle the safety and contract issues at the plant. They are asking President Obama to remove David Cote from the President's Deficit Commission if he does not resolve the safety and contract issues.

Last week, the 350,000 members of the Steelworkers Organization of Active Retirees called on President Obama to fire Cote from the so-called Deficit Commission. They released a [statement saying](#):

Mr. Cote's cruel and calculated behavior towards workers at its hexafluoride plant in Metropolis, Ill. clearly illustrates that he's unqualified and inappropriate to help decide issues such as whether to reduce the federal deficit by cutting programs like social security or by upgrading the faulty military contracting process, from which Honeywell benefits.

Mr. Cote should be evicted from the so-called Deficit Commission immediately before he can use that position to harm all Americans the way he is injuring Honeywell workers in Illinois.

Follow Mike Elk on Twitter: [www.twitter.com/MikeElk](https://www.twitter.com/MikeElk)

*Mike Elk is a labor journalist based in Washington, D.C. Mike Elk is a third-generation union organizer who has worked for the United Electrical, Radio, and Machine Workers, the Campaign for America's Future, and the Obama-Biden campaign. Also, Mike conducted research on barriers to communication between middle class and working class activists at the Instituto Marques de Salamanca in Rio de Janeiro, Brazil. He has appeared as a commentator on CNN, Fox News, and NPR, and writes frequently for In These Times, Huffington Post, Alternet, and Truthout. When Mike is not reading twenty blogs at a time, he enjoys golden retrievers, crab bakes and playing horseshoes.*

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