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Chief, Announcements and Directives Branch
Division of Administrative Services
Office of Administration, Mail Stop TWB-05-B01M
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

SUBJECT: Docket ID NRC-2009-0435: Comments on Draft Environmental Assessment and Finding of No Significant Impact for Nuclear Fuel Services, Inc., Erwin, TN, Request for 40-year License Renewal

Dear Ms. Bladey:

I am commenting as a resident of Erwin who lives within a mile of Nuclear Fuel Services, Inc. I may provide more comments if an extension of time is granted.

I am beginning my response and challenge to the Draft Environmental Assessment (DEA) for Nuclear Fuel Services (NFS) request for a 40-year license renewal with the request for an Environmental Impact Statement (EIS).

The 2,800 residents that live within one mile of the facility (as identified in the DEA) need an honest, scientific study of what has already impacted our air, soil, water, and health in the last 53 years of operation at NFS, and an honest, well-researched evaluation of those impacts with any further well-defined impacts from the three options.

An objective, scientific study has never happened here and the DEA does not even come close to following the scientific method.

The conclusions reached in the DEA are based on data from one source, NFS, the facility being assessed!!! How convenient for NFS and what a biased (from the Dark Ages) approach to reaching any kind of reliable, believable results. This community knows the deceptive game that is going on here.

There are no independent assessments of anything in the DEA. The assessment of impacts or options is not supported with any scientific investigation to check the validity of anything.

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Add = J. Park (SRP)*

The DEA is nothing but the influence of a circle of self-interested parties to push an agenda of an unprecedented 40-year license renewal with only a minimal fill-in-the-blanks document to slightly cover NEPA requirements. Talk about an obvious attempt to just slide by!

I don't know what kind of an air-brain anyone would have to be to believe the statement on page vi: "the staff determined that the site operations and the types of potential impacts during a 10-year license renewal period would be the same for the proposed 40-year license renewal period." The same?!!! Just 40 years of more dosing exposures, more toxic effluents in the air and water, more accidents from a mismanaged facility lacking a documented safety culture, more run to failure operations, more cover-ups, more, more, more. Get the point?

A press release on November 11, 2010 from Dr. Michael Ketterer, Professor of Environmental Chemistry, states that the water and sediment from the NFS Outfall into the Nolichucky River has isotopes that can be no other than from NFS enriched uranium. He sampled and evaluated water and soil.

One of the most alarming of his finds was that of enriched uranium in an offsite spring, indicating movement of underground contamination in our water and also flowing towards the River. One source of the Town of Erwin's drinking water is only 0.5 miles from NFS. The testing wells from NFS are not reliable or we are not being informed. We need a team of independent hydrologists (not your lackey government contractors) to assess the possibility of enriched Uranium in our aquifer, the plumes flow and any threats to our drinking water. Our drinking water is blended and now we know why alpha and beta is being monitored in the Railroad Well for the Town of Erwin. How much is there?

Dr. Ketterer found the NFS isotopic fingerprint, at least, 40 miles downstream in the water and sediment. I would certainly call this an uninvestigated, if not a covered-up impact, of radioactive and other toxins in the River.

The discharge of enriched Uranium into the River has been kept from the public (but the NFS workers knew) for the last 53 years until just recently when local citizens began having the Outfall tested. There is extensive offsite contamination with too many unknowns according to Dr. Ketterer.

The public deserves to know about any potential harm and only an impartial, uninfluenced EIS could begin to supply any kind of public confidence in a NRC license renewal action.

The DEA is full of "estimates, believes to be, should be, simulated and potential" answers that are not facts. The entire assessment boils down to guessing conclusions that leads to 90 pages of repetitions, unsubstantiated and untraceable maybes supplied by NFS and endorsed by the NRC. This is not the scientific method.

With such a brief assessment, obviously there was a pre-determined conclusion of a 40-year renewal made long before the 'fill-in-the-blanks assessment' was even started. Did this go along with the terms of the recent purchase of NFS?

As far as the assessment's use of the categories of Small and Moderate being "not detectable"...well, just who is out there detecting? And just what does Small and Moderate actually apply to?

On Page 3-29, you reference NFS as calculating the dose to the MEI instead of relying on radioactive emission measurements from the stacks. Could there be a big difference between so-called calculations and what's really coming out of the stacks, as well as the Outfall pipe, the plumes, and the ponds?

With the DEA mention of the ridiculous, hollow health study by the Agency for Toxic Substance and Disease Registry (ATSDR), the only conclusion reached was Indeterminant Public Health Hazard for lack of appropriate data from NFS and the Erwin Utilities.

I personally challenged Dr. Paul Charp of the ATSDR at a public meeting for an initial conclusion of No Apparent Public Health Hazard and he agreed with me that he did not have sufficient data to draw a conclusion of No Health Hazard. And, of course, no radioactive study was allowed to Dr. Charp. Again, no data, control of impact information and no honesty allowed to the public. The DEA was really grasping at straws to even use an inconclusive study as some kind of verification of operations and health.

All this assessment is asking the public to do is to trust NFS, the DOE, and the NRC – and that is not going to happen in this community. Again, I ask for an honest EIS – one without a pre-arranged conclusion.

Chris Tipton