From: bobbie@georgiawand.org
To: Rowley, Jonathan

Cc: Sara Barczak; Diane Curran
Subject: RE: MOX meeting follow-up

Date: Thursday, October 18, 2012 11:47:56 AM

Mr. Rowley -

Thanks for your email.

Yes, I was confused about who to contact. Common problem for more of a visual learner over an audio learner.

I serve as Executive Director for Georgia Women's Action for New Directions (Georgia WAND). I was on the call for the allowed time for "the public."

My questions concerned several issues regarding the development and usage of weapons grade plutonium fuel, i.e. WG MOX.

First of all I wanted to know more about the lack of customers for the MOX fuel - fuel that is expected to be produced at the federally funded MOX facility at SRS. I was not happy that i was told that this part of the discussion was being moved into the proprietary session. Why should it be so? Billions of federal tax dollars are involved and the public has a right to know if this project, now escalating in cost from \$1.4 billion to \$6 billion and projected by some to rise to \$17.5 billion, will end up as another 'bridge to nowhere.'

Is it only TVA that *may* be interested in taking this fuel? Why wasn't this key factor considered and firmed up before risking billions on such a costly project? Having attended the recent Brown's Ferry public meeting on Pu disposition I did not see enthusiasm on TVA's part to accept such fuel for an already problematic and aging reactor such as Brown's Ferry. And all members of the public who spoke rejected the idea of MOX fuel coming to this Alabama site.

Secondly, I challenged the NRC to state that this fuel is, indeed, a <u>new fuel form</u>. There seemed to be much discussion about whether the NRC or AREVA considers it so. Finally, towards the end of the public part of the call, I heard you say (or someone say) that since this weapons grade plutonium fuel know as MOX (WG MOX) has never been used in commercial reactors it is, indeed, a new fuel. Do you stand by that comment?

Thirdly, I talked about the Global Nuclear Fuels' presentation to the NRC this past August that concluded that it would take about 6 years for adequate testing of MOX fuel before it could safely run in commercial boiling water reactors. Although the AREVA people would probably strongly disagree with that assertion it would be good to know from the NRC why you would think that 6 years is <u>not</u> needed - or if it is. AREVA's presentation clearly was a sales pitch meant to dispel any such claims.

Fourth, I asked about what one of your staffers had brought up - accidents. I was eager to know if AREVA had included accident or disaster scenarios in its planning of use of WG MOX fuel in commercial reactors. I don't feel as though I received a clear answer to that question and if there was one, I do not remember any details. Your same staffer also remarked about the confusion that exists between WG MOX and other MOX. ("There is MOX and then there is MOX." was what I heard him say.) This is critical for the public to understand. For *everyone* to understand and clarify for others - up front. Currently, the use of the word MOX generally lacks clarity. As AREVA was claiming an extensive history of using MOX fuel it needs to be said which MOX fuel we are talking about, in which

country and at which site, and to understand the issues involved at each site - good or bad.

I also have concerns about waste produced from a WG MOX reactor. Mr Lyman referred to this briefly in his question about additional heat or problems of WG MOX in spent fuel pools. In planning for WG MOX use has the industry been challenged to consider the waste problem UP FRONT instead of what I heard on the call..."that will be a part of the application process?"

As it is widely known, our nuclear waste problem is a number one issue evidenced by the President's creation of the *Blue Ribbon Commission on Nuclear Waste* (quickly retitled *BRC on America's Nuclear Future*). If we cannot clean up after ourselves after 60 plus years of supporting this mature industry that creates waste with long lasting isotopes why do we continue to give the green light to industries to exacerbate the problem? If this is an agreed upon serious problem that spans the entire nuclear weapons and power industry why don't we place it *up front* as new designs, missions, programs are encouraged and/or introduced? It is obvious that we have kicked this can down the road far too long. But we are still doing it and, as I see it, the DOE and the NRC are failing to lead responsibly on this issue.

I also asked about the run up of the fuel to better understand how it reacts. I am concerned that all situations are as closely simulated as possible before unleashing such a dangerous fuel into our civil society. And that disaster scenarios are given equal weight as the future of this new fuel is developed.

I look forward top hearing back from you.

Sincerely,

Bobbie Paul

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FYI: Our Georgia WAND membership spans Georgia and our office is located in Metro Atlanta.

We are a 501 c 3 organization and affiliated as a chapter of our national organization known simply as Women's Action for New Directions. We have existed as a women-led peace organization - focusing on nuclear weapons issues and civic engagement - for 28 years. We received 501 c3 status in 2006. One of our special areas of interest is the remediation of Savannah River Site and the health and safety concerns of the complex's surrounding communities in both South Carolina and Georgia. Georgia WAND is also an active member of the Alliance for Nuclear Accountability.

----- Original Message ------ Subject: MOX meeting follow-up

From: "Rowley, Jonathan" < <u>Jonathan.Rowley@nrc.gov</u>>

Date: Thu, October 18, 2012 7:29 am

To: "bobbie@georgiawand.org" <bbbeloegeorgiawand.org>

Bobbie

I received your email address from Tony Mendiola. It appears that you believed that you needed to send him your questions asked during the meeting. I request that you send me those questions and inform me of your affiliation.

Thank you for your participation in the meeting!

Jonathan Rowley, Project Manager U.S. Nuclear Regulatory Commission (NRC) Office of Nuclear Reactor Regulation (NRR) Division of Policy and Rulemaking (DPR) Licensing Processes Branch (PLPB)

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