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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of

Docket No. 50-160-Ren

ASLBP No. 95-704-01-Ren

GEORGIA INSTITUTE OF TECHNOLOGY
RESEARCH REACTOR
Atlanta, Georgia
Facility License No. R-97

GEORGIANS AGAINST NUCLEAR ENERGY
RESPONSE TO COMMISSION ORDER FOR HOUSEKEEPING STAY

Georgians Against Nuclear Energy (GANE) respectfully submits these comments for the Commission's consideration in weighing the safety issues brought before it concerning the Georgia Tech Research Reactor in downtown Atlanta, Georgia. We appreciate the aura of urgency you have given to keeping this proceeding moving in order to allow time for the appropriate actions to be taken to ensure the safety of the public from radiological sabotage during the Olympic Games.

As GANE understands it, a protective order would bind any parties from divulging Georgia Tech's security plan under penalty of legal repercussions. It is GANE's understanding that since Georgia Tech's security plan for the Neely Nuclear Research Center is unclassified and bears only the designation of confidential that the protective order is all that any party would be required to enter into in order to examine the plan. Perhaps this is one of the security plan's problems and it would be more secure to have the plan under higher classification.

At any rate, GANE is willing to discuss stipulations. We have already communicated the stipulations that follow to Mr. Sherwin Turk in his phone inquiry today, June 20, 1995.

GANE's stipulations are these: GANE will not need to see Georgia Tech's security plan, nor any of the other security plans that may be being developed by the FBI, CIA, National Guard, FEMA, GEMA, Atlanta Committee for the Olympic Games, International Olympic Committee, et

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al., for the Neely Nuclear Research Center if we secure a commitment from Georgia Tech to remove all radioactive and hazardous materials from the facility prior to the Olympic Games. GANE is not only concerned with the weapons-grade uranium at the facility, but with 250,000 curies of cobalt-60, 6,000 curies of cesium-137, spent fuel from the Georgia Tech Research Reactor, the fuel currently in the reactor, a load of fresh fuel that is rumored to be on the premises, the uranium fuel pellets from the subcritical (non-commissioned) reactor under the stairs, and all heavy water and radioactive and mixed waste which is stored in a sheet metal mobile utility building on the site. GANE believes that the entire inventory on-site at Georgia Tech may not actually be known to either the NRC or the other regulating authority, Georgia's Department of Natural Resources, Environmental Protection Division, and has a keen interest in bringing the inventory list out for the acknowledgement of all the decision-makers concerned with the important safety decision before us.

Beyond a commitment to remove the entire radioactive inventory from the Neely Nuclear Research Center (which includes the Georgia Tech Research Reactor, the Neely Nuclear Research Center and the Cherry Emerson Building), GANE stipulates that we remain party to the removal process to the extent of being kept completely informed about all contracts, timelines and arrangements for the removal of the materials. This information would include documentation and correspondence concerning points of destination, transportation, containerization, contracts and documentation of completion of removal by each contractor, names of person(s) directing the process(es), and all other personnel involved.

As you are aware, GANE has a second contention concerning management's ability to operate the facility safely under consideration with the Atomic Safety and Licensing Board. GANE is seriously concerned whether the current management of the Neely Nuclear Research Center can adequately undertake the planning and removal of Georgia Tech's large inventory of materials.

As to how long this removal would take, GANE consulted Mr. Bob Boyd, former Radiation Safety Officer for the Neely Nuclear Research Center, and current Radiological Safety Officer for Georgia State University. Mr. Boyd provided details and his expert opinion on what it would take to remove the materials prior to the Olympics. Mr. Boyd maintains that it would take a minimum of six months, and that would be if everything were to go off without a hitch.

First, as to the fuel, the process for acquiring the Type B cask that would be required for that task is rather complicated. First permission is requested and granted from the NRC to acquire a Type B cask, then, an actual cask must be located and acquired. The process for removing the fuel from the reactor to ready for transport is rather complicated. After the 11-foot rods are withdrawn from the reactor they must be transported without breakage to the cobalt-60 shielding pool, then transferred to the hot cell where the two-feet of uranium will be sliced from the entire rod so that it will fit in the cask. According to Mr. Boyd, this is a process which requires highly specialized skills. GANE is not certain whether Georgia Tech has personnel with the needed qualifications and experience. If not, outside specialists will have to be found and retained.

Another level of coordination that is required to successfully move the hazardous and radioactive materials is to arrange for shipping destinations for the elements. GANE believes the U.S. Department of Energy owns and is ultimately responsible for all the reactor fuel, spent, fresh and otherwise, and that the origin of the fuel was Oak Ridge National Laboratory so Oak Ridge may be the most likely destination for those materials.

It is GANE's understanding that Georgia Tech owns both the cesium-137 and cobalt-60. This fact may make it more difficult to find other parties that are willing to take even interim responsibility for these exceedingly large quantities of extremely hot gamma emitting substances. GANE believes that Savannah River Plant, a DOE nuclear weapons factory, was the source of the cobalt-60 so GANE is hopeful that Westinghouse and Savannah River Plant would help Georgia Tech by taking on that hazard. GANE is not sure of the cesium-137's origins, and has heard some loose talk about the possibility of Chem-Nuclear taking that inventory into the Barnwell dump in South Carolina. Although the immediate threat to public health would be offset by taking cesium-137, which by the way is the most vulnerable to sabotage of the above listed materials, out of the Olympic Village to Chem-Nuclear's landfill, GANE feels we must go on record as pleading that the cesium-137, and all the radioactive materials being discussed here, be placed in a retrievable state until our technology catches up with our nuclear waste needs.

In short, the cobalt-60 and cesium-137 do not appear to have the problems of containerization that the fuel has, but rather the difficulty in removing those materials seems to lie in finding homes for them.

We have commented on 10 C.F.R. § 50.13 in our response to Georgia Tech's and NRC Staff's appeal and reiterate that the rule is very old, dated 1967, and was probably written in response to the Cuban Missile Crisis, and that the later rule, 10 C.F.R. § 73.67 provides the exception that covers the inadequacies of the older rule. We reiterate, that the Olympic Games are a precise example of the sort of situation addressed in the newer rule which states "the Commission may require, depending on the individual facility and site conditions, **any** alternate or additional measures deemed **necessary to protect against radiological sabotage** at nonpower reactors licensed to operate at or above a power level of 2 megawatts thermal." (emphasis added)

GANE honors the Commission for its interest in these important questions, and begs you to allow this process to go forward towards a timely resolution that deals with the grave security threat that now casts a pall on the 1996 Olympic Games.

Respectfully submitted,

Glenn carroll

Glenn Carroll
Representative for GANE

Dated and signed June 20, 1995
in Decatur, Georgia

CERTIFICATE OF SERVICE - Docket No.(s) 50-160-REN

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