From: Maggie Hess
To: Docket, Hearing; Paul Bollwerk; Sue Abreu; William Froehlich
Subject: [External_Sender] Proposed License Amendment Request, Nuclear Fuel Services, Docket No. 70-143
Date: Thursday, January 26, 2023 3:05:52 PM

Honorable ASLB Judges:

I am writing to object to the Board's failure to provide clear instructions as to how non-parties to this license amendment proceeding are allowed to provide comments to the Board. The August 31, 2022 Federal Register notice referred non-parties to an ADAMS document which was not hyperlinked, and the notice contained zero explanation that persons would be allowed to provide public comments to the Board at the time of the December 12, 2022 hearing.

NRC regulations at 10 CFR § 2.315(a) state, "A person who is not a party . . . may, in the discretion of the presiding officer, be permitted to make a limited appearance by making an oral or written statement of his or her position on the issues at any session of the hearing or any prehearing conference within the limits and on the conditions fixed by the presiding officer." This was not done with regard to the Nuclear Fuel Services prehearing on December 12. I thus object and request that the Board place my below comments into the record of this proceeding and be deemed properly submitted pursuant to 10 CFR § 2.315(a).

- There are eight new accident scenarios associated with this

process: Anhydrous Hydrogen Fluoride Release; Anhydrous Ammonia Release (both chemicals are new to NFS operations); Nuclear Criticality (nuclear chain reaction); Uranium Hexafluoride (UF6) Release; Uranium Solution Release; Natural phenomena; and Security Emergencies;

- Navy fuel – the product that NFS historically produced --

is enriched to 20% U-235, the fissile isotope. Uranium for nuclear weapons is enriched to 96% U-235. Buzz Davies, a retired nuclear quality control engineer who is an ECAN member, said “it’s one thing to work with 20% high-enriched uranium for fuel, but yet another to process 96% uranium for weapons.”

- The impact of extreme weather events fueled by climate

change – such as protracted drought or heavy rain or snow -- that affect the flow of the Nolichucky have not been addressed. Nor has the impact of recent sinkhole activity in Erwin on the flow of groundwater been assessed;

- Erwin municipal water supplies are drawn from wells and

springs. Erwin Utilities’ “Railroad Well” is within a mile of NFS;

- Plumes of TCE, PCE and of uranium in groundwater are known

to exist. But the extent to which they have migrated off site and have impacted Nolichucky water quality and Erwin's drinking water have not been studied.

/s/ Maggie Hess
Bristol, TN

Hess is More