

# **Public Perspectives on Fuel Facility Oversight Process Revisions**

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# **Sierra Club is largest grassroots public-interest environmental group**

Sierra's concerns are the same as the public's -- the wholesomeness of

- the air we breathe,
- the water we drink, and
- the land on which we raise our food

## **Sierra Club stands with labor & community groups working for safe, healthy communities**

- Blue/Green Alliance works for good jobs, a clean environment & a safer world
- Nuclear Issues Activist Team serves Sierra entities & community groups like Erwin Citizens Awareness Network

## **Sierra is encouraged by Chairman Jaczko's public statements**

- 07July09: "A Fuel Facility Oversight Process or even a more comprehensive Materials Oversight Process would allow us to improve the openness and transparency of radioactive materials safety and security. In addition, we need further development of regulatory infrastructure in the area of materials security."
- **18Dec09: "Safety culture is not a simple issue, but it is vital to the NRC's mission of protecting the public's health and safety".**
- 11Jan10: "Our mission of ensuring public health and safety and protecting the environment is best served by promoting public participation, providing high-quality and timely information, making decisions in a transparent manner, and building accountability into everything we do".

## **Part II: The view of fuel facility oversight revisions from Atomic Appalachia**

- **Aerojet Ordnance** - Jonesborough, TN: manufactures depleted uranium weapons
- **Nuclear Fuel Services** - Erwin, TN: down-blends HEU to LEU for TVA reactor fuel; manufactures Naval reactor fuel
- **Studsvik** - Erwin, TN: processes & “volume reduces” nuclear waste

**While also heartened by  
Chairman Jaczko's leadership,**

- Public still greatly concerned that licensing & enforcement decisions are “stovepiped” -- revealing disconnects between NRC divisions
- Letters to the Editor (LTEs) can be useful measures of public opinion

## **Samples of recent LTE headlines in Erwin-area papers**

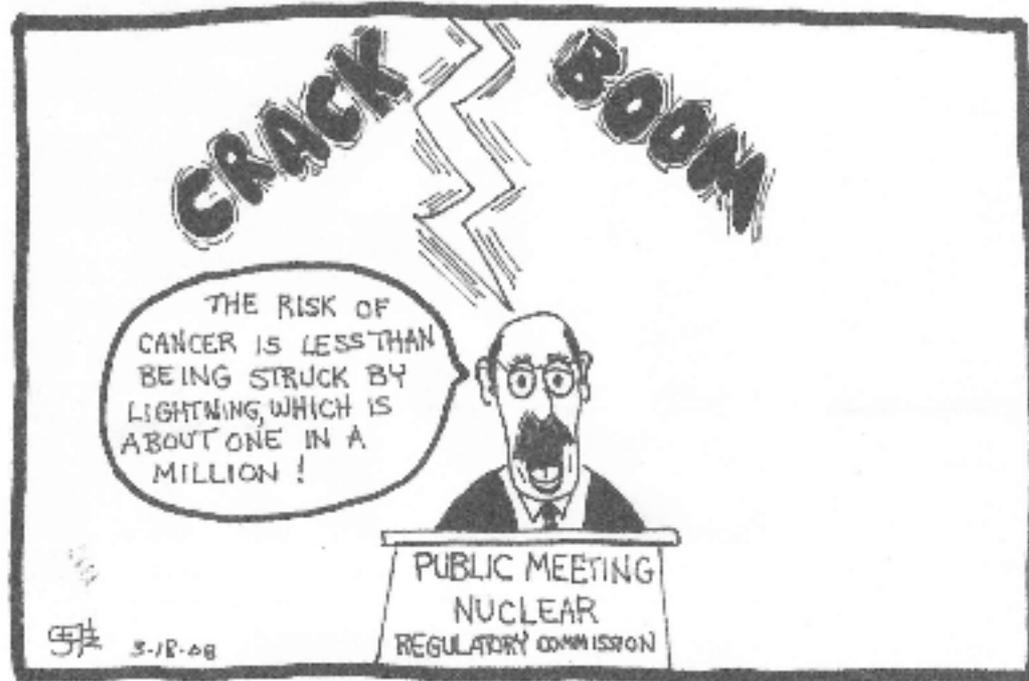
- “Dangerous exposure”
- “NRC didn’t live up to promise”
- “NFS, Nuclear Regulatory Commission don’t understand disclosure”
- “Security doesn’t come in hiding info from those an accident might affect”
- “Putting 42 chemicals into river isn’t polluting?”

## **Editorial cartoons also reflect public opinion**

- Provide insight into public's perception of NRC regulation
- Introduce distinguished, new Commissioners to problems in "Atomic Appalachia"

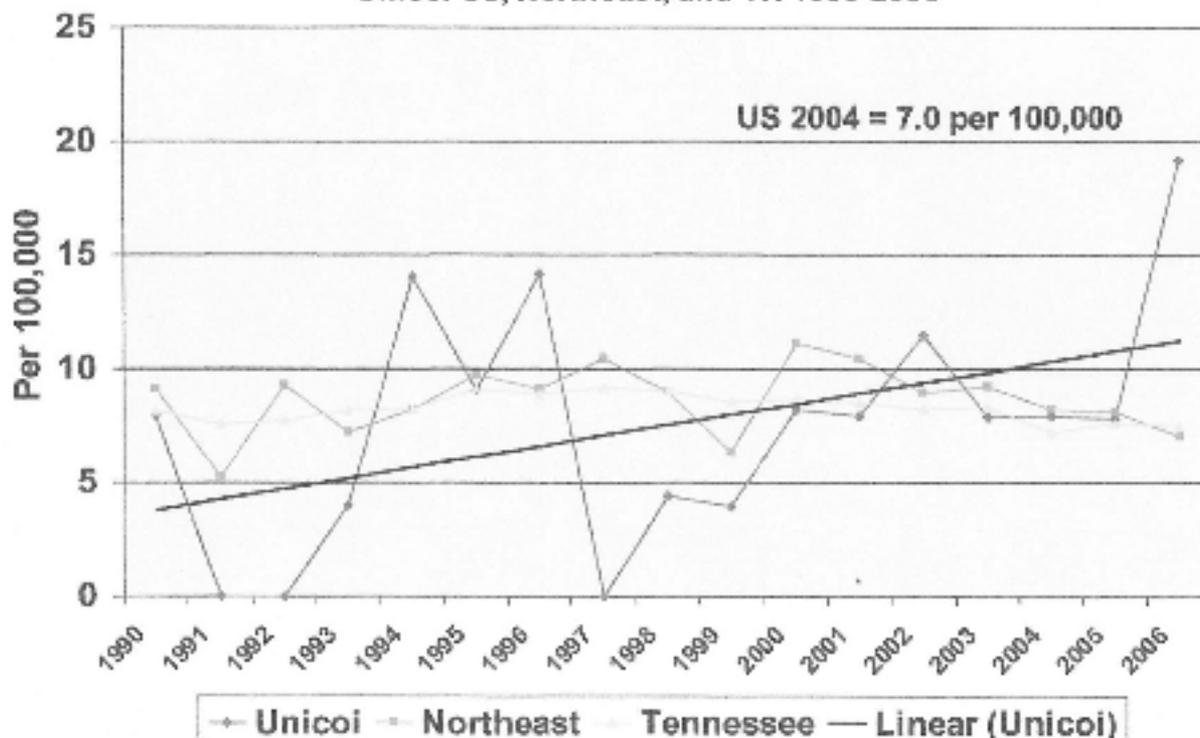
Public's primary concern is for their health, especially cancer prevention

**ON THE DRAWING BOARD** with Charles E. Holt Jr.



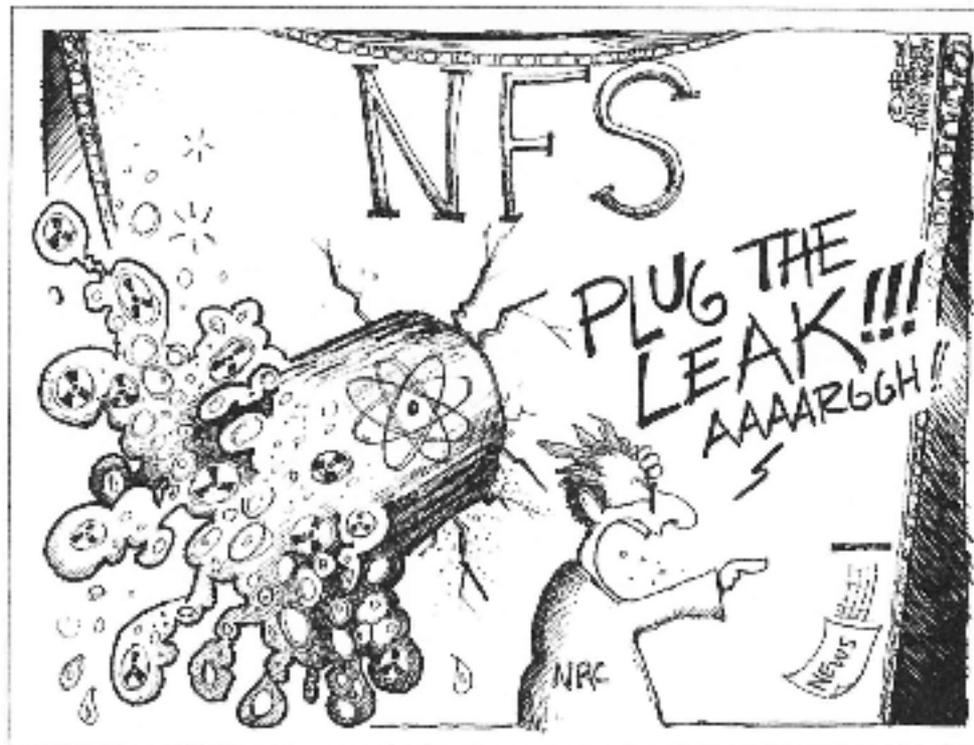
# We see cancer deaths rising

Age-Adjusted Non-Hodgkin's Lymphoma Cancer Death Rates per 100,000, All Races, All Ages, Both Sexes  
Unicoi Co, Northeast, and TN 1990-2006



Age Adjusted using the 2000 Standard Population (2005 Estimation Method)  
Source: Death Certificate Data (Tennessee Resident Data) Tennessee Department of Health

**Public expects “tension” between  
NRC & licensees, but perceives  
accommodation instead**



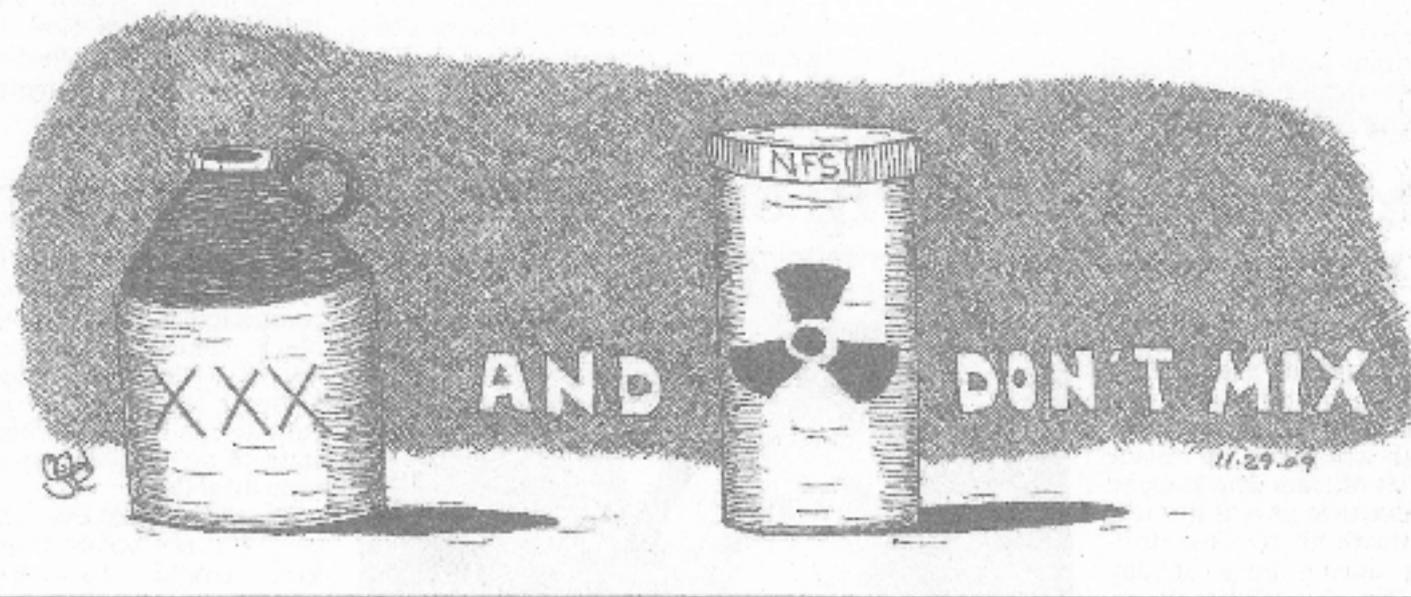
# The public recognizes that NRC is trying to regulate for safety

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# But RII enforcement actions seem ineffective for serially non-compliant licensees

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## **Part III: A fresh approach focused on safety culture**

- Public expects a culture of safety in companies handling hazardous chemicals and fissile materials in their towns
- Public expects NRC to promptly, strictly & effectively enforce safety regulations

## **Proximity of the public to licensee matters**

- NEI: “a criticality...can happen here”
- DOE: “The largest calculated MEOI dose from down-blending activities would ... occur at NFS primarily due to the much closer proximity of the MEOI”

## **Background radiation matters**

Where the public is subjected to high background radiation due to elevation & geology, will the new regs require fuel facilities to eliminate man-made exposures?

## **Not one ounce lost**

- The public expects licensees to protect their families' safety and our country's security
- As Joseph Cirincione said on NPR, "We have never lost an ounce of gold from Fort Knox. We shouldn't lose an ounce of enriched uranium"

## **Not one offsite body trespassed**

- By radiation exposures
- By chemical exposures
- By exposures to mixtures of radioactive & chemical toxins which could have compounding adverse health impacts

## **Not one radioactive chemical cocktail poured**

“Because the contaminants present in the groundwater are a mixture of many volatile organic compounds, health effects of mixtures may be an issue”.

Source: ATSDR, Public Health Assessment for NFS, 29May07,  
p.25

## **Why not zero ...**

- Occupational oral ingestion?
- Occupational inhalation?
- Effluent concentrations in air?
- Effluent concentrations in water?
- Releases to sewers?
- Inventory differences for SNM?

# **Sierra Club thanks Chairman Jaczko & distinguished Commissioners**

- For acknowledging public concerns
- For considering Sierra Club views, &
- For working for elimination of chemical and radiation exposures to workers & public from nuclear fuel facilities

