GE STOCKHOLDERS' ALLIANCE, TUCSON, AZ,
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GE Stockholders' Alliance
for a sustainable nuclear-free future

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June 7, 1996

Office of Fissile Materials Disposition
U.S. Department of Energy
P.O.Box 23786
Washington, DC 20026-3786

Re: OPPOSITION TO USE OF MIXED OXIDE FUEL FOR COMMERCIAL REACTORS

Dear Sirs:

We strongly oppose the use of mixed oxide fuel (MOX) as a fuel for commercial reactors. 1/08.03.01

For many years the U.S. has staunchly maintained a policy of separation of civilian use and military use of radioactive materials. This policy should be retained and strengthened. 2/01.00.00

While it may be tempting to use the plutonium waste from dismantled nuclear weapons as a source of fuel for commercial reactors, we believe the negative factors outweigh the positive.

1. Use of MOX would greatly increase the availability of plutonium for proliferation use since the plutonium would be easily separated from its other components. 3/01.06.00

2. Use of MOX would greatly increase the volume and radioactivity of waste generated. We don't know what to do with the radioactive waste already generated. Use of MOX would exacerbate an already severe problem. 4/09.11.08

3. Because of its proliferation potential, used MOX fuel would require military escorts in transportation to waste sites, and military surveillance during storage of the fuel..."forever". 3/01.06.00 cont.

We believe it would be more responsible of the DOE to vitrify the plutonium waste from dismantled weapons, and in the long run would cost the taxpayer much less. 5/08.03.01

PLEASE DO NOT CONSIDER USING MOX FOR COMMERCIAL REACTOR USE!

Sincerely,

Patricia T. Birnie

Patricia T. Birnie, Chair

M-273

08 03 01 Comment Number 1

The Department of Energy acknowledges the commentor's opposition to the Reactor Alternative using MOX fuel. Decisions on disposition of weapons-usable fissile materials will be made based upon environmental analyses, technical and economic studies, national policy considerations, and public input.

01 00 00 Comment Number 2

Comment noted.

01 06 00 Comment Number 3

The safeguards and security of storage of the weapons-usable fissile materials will continue to follow existing applicable regulations and requirements. Furthermore, the facilities would be inspectable by IAEA, as appropriate. Transportation impacts are discussed in Section 4.4 and Appendix G of the PEIS. Armed nuclear materials couriers carefully selected and highly trained to operate tractor-trailers and communication systems would be used. These couriers would also be authorized by the AEA to carry firearms and make arrests in the performance of their duties. No military personnel would be used in DOE's management of weapons-usable fissile materials.

The President's Nonproliferation Policy says the United States will not recycle Pu. Burning weapons Pu in reactors does not utilize the recycling process because the Pu in the spent fuel from this process will not be extracted for reuse in new fuel. This is consistent with U.S. policy since no Pu is being recycled. After a once-through fuel cycle, the Pu would be converted to a nonproliferation form as spent reactor fuel.

09 11 08 Comment Number 4

The MOX Fuel Option is a means of converting weapons Pu to a form that is difficult to retrieve and reuse in weapons. The MOX Fuel Options does not increase the volumes and radioactivity of waste from existing reactors. It replaces the spent fuel that would have been fabricated from other materials

and displaces the spent fuel that would have otherwise been created by other sources of fuel supply. The spent MOX fuel is essentially the same as existing commercial reactor spent fuel. Therefore, it meets the same criteria as other commercial reactor spent fuel in terms of being accepted for placement in a repository. The PEIS acknowledges the fact that constructing and operating a MOX fuel fabrication facility would increase the wastes generated at any sites selected for analyses. The wastes generated for the MOX fuel fabrication facility are presented in Section E.3.2.3. The impacts associated with operating the MOX fuel fabrication facility are presented in Section 4.3.5.1.10.

08 03 01 Comment Number 5

The Department of Energy acknowledges the commentor's support for the Immobilization Alternative. Decisions on disposition of weapons-usable fissile materials will be based upon environmental analyses, technical and economic studies, national policy considerations, and public input.