HERRING, STEVE, IDAHO FALLS, ID
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Dr. Steve Herring
298 Call Avenue
Idaho Falls, Idaho 83402-3040

May 6, 1996

DOE-Office of Fissile Materials Disposition
c/o SAIC-PEIS
P. O. Box 23786
Washington, DC 20026-3786

I attended the hearing held in Idaho Falls and have since studied the draft PEIS in more detail. I would like to add the following comments:

1. A critical requirement for any alternative is that it must assure that the weapons-usable material cannot be clandestinely fashioned into a weapon for centuries to come. The NAS study established the "spent fuel standard" as a criterion by which to judge disposition alternatives. According the spent fuel standard," the plutonium is in a form from which it is as difficult to recover as the plutonium contained in spent LWR fuel. One assured way of meeting the "spent fuel standard" is to incorporate the plutonium in LWR fuel and then to use that fuel to high burnup. 1/08.03.01

2. Disposal of the Pu through burn-up use in commercial power reactors provides a "Peace Dividend" for weapons-useable materials. Commercial reactors already produce considerable plutonium (concurrent with burning it up via the fission process). A number of commercial nuclear plants including WPPSS-2 have expressed an interest in using weapons Pu in their plant as a way to lower overall fuel costs.

3. All of the long term storage options seem to be acceptable from the standpoint of safety and environmental impact; however, the option for the Collocation of the Plutonium and Highly Enriched Uranium receives my support as the most favorable alternative. I also believe that any of the Long Term Storage sites proposed could be designed to be acceptable. 2/08.03.01

4. According to the EIS, some forms of Pu may not lend themselves to MOX fabrication. For these forms, the INEL should play a major role, probably through the ANL-W Electrometallurgical process. 3/08.03.01

5. The environmental impacts of the various alternatives are difficult to sort out of the EIS Summary Document. These impacts are not likely to significantly exceed the impacts of existing/on-going activities 4/09.00.08

I thank you for the opportunity to comment on this draft Programmatic Environmental Impact Statement.

Sincerely yours,

J. Stephen Herring

M-194

08 03 01 Comment Number 1

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

08 03 01 Comment Number 2

The Department of Energy acknowledges the commentor's support for the Collocation Alternative. DOE agrees that all long-term storage options are accepted from the standpoint of safety and environmental impacts. Decisions on storage alternatives will be based upon environmental analyses, technical and economic studies, national policy considerations, and public input.

08 03 01 Comment Number 3

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

09 00 08 Comment Number 4

Based on comments received, the Summary of the Draft PEIS was revised. Text in the Summary was revised to clarify the comparison of impacts and to delete the reference to "adverse" impacts.