April 29, 1996
304 Manor Drive
Sautee, GA 30571

U.S. Department of Energy
Office of Fissile Materials Disposition
Washington, D.C. 20026-3786

Statement for the record: Weapons Usable Fissile Material PEIS

I am unable to attend the April 30 PEIS on the disposition of weapon grade Plutonium in Augusta and wish this written statement to be interested into the record in my absence.

First, I oppose any plan to dispose of Plutonium by turning it into MOX fuel. In other words, I oppose burning Pu in a reactor. I oppose reprocessing of any kind because of it sends the wrong message internationally. | 1/08.03.01 | 2/01.00.00

The U.S. is the leader of the free world. We should not deviate from our commitment not to reprocess commercially. I want to point out that this commitment was made by President Jimmy Carter who was trained in nuclear technology, served aboard a nuclear submarine, and was in a better position than any world leader to understand the implications of reprocessing.

Second, I protest the PEIS system itself as it pertains to this decision. By holding these hearings at DOE sites around the country in cities where the public has a strong economic interest in perpetuating DOE related jobs, the outcome is biased. While I applaud the DOE's efforts to establish and support a Citizens Advisory Board and thereby encourage public input, I question its effectiveness in reaching the general public. | 3/08.02.00

I attended the CAB forum in August on April 25 but feel it was slanted toward a preconceived outcome. I also protest the relatively short time allowed for written comment following the PEIS. Seven days (deadline May 7th) is not enough time for the general public to absorb the information and express their concerns. | 4/08.01.00

I am aware of the urgency in this matter, but I am convinced that we must secure all fissile material as best we can without being rushed into long-term solutions that can possibly lead to even greater problems in the future. If we burn fissile Pu in reactors, we have no guarantee that the process will stop there and that we will not continue to depend on MOX as a source of energy.

Our biggest long-term problem is what to do with radioactive waste from reactors in the U.S. and around the world. This problem was not even addressed at the CAB meeting on April 25. I asked this question and so did others I spoke to, but we had to ask in writing and the panel choose not to answer. The MOX option only exacerbates this problem and is a primary reason why it must be opposed. | 5/15.00.00

Sincerely,

Joan O. King

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M-200

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

The specific purpose of DOE's PEIS effort is to evaluate alternatives for the disposition of surplus weapons-usable Pu that would render the Pu as inaccessible and unattractive for reuse in nuclear weapons as the much larger and growing quantity of Pu that exists in spent nuclear fuel from commercial power reactors. This condition is referred to as the Spent Fuel Standard. If an alternative using MOX fuel in reactors is selected, the surplus Pu would eventually be contained in spent fuel and, by definition, the Spent Fuel Standard would be achieved.

While the PEIS discusses the generation of spent fuel as an indirect result of potential disposition actions, any subsequent reprocessing and extraction of Pu from that spent fuel is beyond the scope of the PEIS and the fundamental nonproliferation purpose of the disposition effort. The fact that the PEIS evaluates disposition of surplus weapons Pu through use in MOX fuel, but does not further evaluate reprocessing of the spent fuel, does not foreclose policy or technology options, nor does it prejudice future decisions regarding the management or disposition of the spent fuel.

08 02 00 Comment Number 3

Comment noted.

08 01 00 Comment Number 4

At the request of several organizations and individuals, the public comment period was extended to a total of 92 days.

15 00 00 **Comment Number 5**

Comment noted.