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June 6, 1996

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TO: Department of Energy
Office of Fissile Materials Disposition
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P.O. Box 23786
Washington, D.C. 20026-3786

RE: Storage and Disposition of Weapons-Usable Fissile Materials Draft Programmatic Environmental Impact Statement dated February 1996

The League of Women Voters of South Carolina appreciates the opportunity to comment on this EIS. As residents of the state that is home to the Savannah River Site we have a major stake in the outcome of the decisions you are trying to formulate. We also appreciate the extension of the time for commenting on this most important EIS and for the efforts that have been made to educate the public on the issues involved. However, we regret that important educational efforts such as the Plutonium Forum held in N. Angusta were not done in a more timely manner and did not stress rather than minimize - aside from bomb making potential - the dangers inherent in plutonium. To mention just one point, never once was the term criticality used or defined. 1/08.02.00

In general we endorse the recommendations of the National Academy of Science although with serious reservations about the use of MOX fuel and the openness to possible deep bore hole disposal. Deep bore holes at SRS should only be done, if at all, based on new geologic studies and attention to possible earthquakes. 2/08.03.01

LWVSC joins with the League of Women Voters of Hilton Head Island and Dr. David Jordan in pointing out the serious dangers of inhalation from plutonium oxide and the problems inherent in creating new wastes during the process of fuel manufacture. Reprocessing the spent fuel rods would magnify the waste burden. As you well know, water soluble reprocessing waste has been a major danger and source of contamination at both Hanford and at SRS. It is only beginning to be addressed through use of the Defense Waste Processing Facility at SRS. Total confidence in the operation of that facility has yet to be achieved. 3/09.11.08

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08 02 00 Comment Number 1

Comment noted.

08 03 01 Comment Number 2

The Department of Energy recognizes the commentor's concern with the Borehole Alternatives. Decisions on the disposition alternatives will be based upon environmental analyses, technical and economic studies, national policy considerations, and public input.

09 11 08 Comment Number 3

The potential human health impacts from the proposed Pu storage and disposition alternatives are evaluated and presented in this PEIS for facility normal operation and anticipated accidents. The analysis considered all major potential exposure pathways including the inhalation of Pu oxide emitted from the facilities.

The manufacture or MOX fuel assemblies would create TRU and a minimal amount of mixed TRU wastes as described in Section 4.3.5.1.10. This waste would be treated and packaged in either a facility constructed with the MOX fuel fabrication plant or in an expanded central facility. The waste would be staged in storage facilities until it would be shipped to a Waste Isolation Pilot Plant (WIPP) for disposal, depending on whether DOE decides to operate the WIPP. 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.

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We would like to stress the following points:

*The MOX fuel option - This was made to sound simple at the N. Augusta forum when in fact it is not. The down side of this needs to be clearly laid out for the public to understand. It should not be driven by utility or jobs pressure.. To quote Dr. Jordan's statement "...burning MOX fuel looks like a pork-barrel program for electric utilities." As pointed out in the NAS report, with the passage of time, spent fuel rods cool radioactively and can be more safely handled by a future generation of rogue nations or terrorists bent on recovering plutonium. 4/06.00.08

*The Department of Energy should stop the hard sell in promoting programs on the basis of jobs creation, a potent weapon in getting the people and political structure of South Carolina to accept things that may not be in their or the nation's best interest. Your decisions should be based on hard scientific evaluations, in the overall interests of national security and the goal of non-proliferation.. It is particularly disturbing to read in THE STATE of June 6 that Secretary Grumbley himself told a group of South Carolina and Georgia lawmakers that if all the projected missions came to South Carolina, employment could grow to 19,000 by the year 20002. As you are well aware the Yucca Mountain site has run into major citizen opposition. It is highly likely that other states will have similar reservations about accepting proposed new missions. Sad to say, major, major decisions re our nuclear future are viewed by too many politicians and SRS workers and contractors as just one more form of economic development. 5/01.06.00

We wish you well as you wrestle with these necessary decisions which we agree, need to be made and implemented expeditiously. However, we hope that in so doing clean up and environmental remediation do not take a back seat. 6/11.00.06

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06 00 08 **Comment Number 4**

Whereas it is true that the radioactivity does decay with time, the process is relatively slow, progressing with an approximately 30-yr half-life. If terrorists, or others could get access to the Pu in spent fuel, recovery of that Pu from spent fuel is a non-trivial challenge, even after the radiation field has decayed somewhat. Pu in spent fuel is not directly weapons-usable. To make it weapons-usable requires extracting the Pu from the spent fuel which is expensive and technologically complex. Once the surplus Pu is rendered to the Spent Fuel Standard it is no more attractive or useful than the Pu in already existing quantities of spent fuel.

01 06 00 **Comment Number 5**

The purpose of the Proposed Action is, in part, to establish the technical and program infrastructure that will enable the United States to take unilateral action or negotiate reciprocal actions with other nations for the disposition of surplus weapons-usable Pu. This PEIS addresses the environmental impacts of the reasonable alternatives for DOE's Proposed Action. Analyses of the cost, schedule, technical, and Nonproliferation Policy impacts are described in separate documents to support DOE's ROD. The documents related to technical, cost, and schedule analyses were made available for public review beginning in July 1996. The nonproliferation analysis was made available to the public beginning in October 1996. DOE also conducted a series of public meetings, prior to the issuance of the Final PEIS, to discuss the analysis of the Nonproliferation Policy as it relates to the Proposed Action and alternatives.

11 00 06 **Comment Number 6**

Comment noted. Decisions on storage and disposition of weapons-usable fissile materials will be based on environmental analyses, technical and economic studies, national policy considerations, and public input.