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807 E. Rollingwood Rd
Aiken, S. C. 29801
May 6, 1996

U. S. Department of Energy
Office of Fissile Materials Disposition
P.O. Box 23786
Washington, DC 20026-5156

Dear Sir:

Re: Comments on Draft PEIS "Storage and Disposition of Weapons-Usable Fissile Materials"

I would like to provide the Department my comments on the recent PEIS. I have a single comment on my view of what alternative should be selected. I have several comments on the materials presented in the PEIS and how they should be modified to improve the quality of the document.

Proposed Action.

The Department should select the MOX alternative for the proposed action. My judgment is based upon the following points.

- The surplused plutonium has large fuel value and should not be discarded. My view is that this plutonium should be fabricated into fuel and used to produce electrical energy. Recycle of the irradiated MOX-SNF should be used again to produce more energy, etc.. As the Department of Energy has indicated the U. S. dependence on imported oil has increased from ~33% to ~67% over the last 15 years. This plutonium should be used to help turn-around this dependence on imported fuel by this country.
- Use of the plutonium can be accomplished in a safe and secure manner. This use will not increase proliferation. It can be safeguarded; all we need do is to turn our energies to developing this approach. This development can be accomplished in the same time that production of MOX fuel takes. Other nations have safely used this recycled plutonium while safeguarding it. 1/08.03.01
- This turning from an illogical posture (that of not reusing all of our energy sources) will show the world that the United States understands world needs and is prepared to help with premier approaches that meets all of the needs for energy and provides a tight safeguard system to ensure that the surplused weapon materials are not stolen and pose clandestine threats to world security.

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08 03 01 Comment Number 1

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

- The cost-effectiveness of this alternative should include the cost of replacing the energy generated by using the surplused plutonium with fossil fuel at todays oil prices and also at the cost of this replacement oil in say 20-years. Consideration should also be given to costs if the foreign oil producers decide to limit pumping of this oil to raise prices.

Specific Comments.

- Revise the last sentence of the summary to show that when used properly these stocks of weapons-usable materials do not poise a threat to world security. | 2/09.00.08
- Page S-4 the PEIS references DOE-STD-3013-94. Please have a copy of that standard sent to me.
- In several places in the PEIS (see page S-18 as an example), the statement is made that "because of the high percentage of minority and low populations in certain counties surrounding SRS, the potential exists for these populations to be disproportionately affected by an accident." This statement is not incorrect when all of the information presented in the PEIS is used but it does not apply only to SRS, it applies to most if not all DOE sites. At best, it is inflammatory to the minority residents and points out that in the areas surrounding SRS, minorities are at risk. From my understanding of the executive order pertaining to this subject, it requires DOE to evaluate "highly adverse" and " disproportant" impacts. This PEIS did not evaluate either of these. Revise to place in perspective and apply to all of the DOE sites in the PEIS. | 3/09.08.08
- The PEIS assumes a threshold of 100 person-rem as some standards below which analysis is not required or given. The source and intent of this <100 person-rem floor is unclear. | 4/09.09.08
- The schedule for implementing the various alternatives should play a more important roll in the PEIS. It is clear to me that the large driver for this PEIS is the need to get this weapon-usable plutonium under strict control as soon as possible. This raises several questions not addressed with sufficient clarity near the front of this PEIS. Several related points that need addressing early in the report are: | 5/01.00.00
  - Safeguarding of U. S. governments Pu.
  - Safeguarding of other governments Pu around the world. As I see it the prime justification for these actions is the Pu stored in the former Soviet countries. If this is the case, the PEIS should show how actions in the U. S. will affect these other countries' protection of their Pu.
- The deep borehole technology described in the PEIS seems to be in a very early stage of development and not sufficient for it to be a viable alternative in this PEIS. As I have seen in other projects, a proponent of a new technology underestimates the task of bringing such a technology to fruition and underestimates the associated risks. This section should discuss this items in sufficient detail that the reader can assess the alternative. Environmental affects of this alternative assume only technical risks. What about political risks and stakeholders concern of "disposal - not in my state". The Department has been hung-up on these disposal issues at Nevada for many years. | 6/04.00.00 | 7/04.03.00

Sincerely
W. Lee Poe
W. Lee Poe, Jr.

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09 00 08 Comment Number 2

By meeting the Stored Weapons Standard, the storage of weapons-usable fissile materials managed by DOE will not pose a threat to world security.

09 08 08 Comment Number 3

The PEIS evaluates demographic data for all of the candidate DOE sites. SRS has potentially affected minority and low-income populations within 80 km (50 mi) of the site. Although the health analysis for SRS indicates that there would be no significant adverse health impacts from operational and accidental releases of hazardous and radioactive materials, the PEIS acknowledges the possibility that dispersion of radioactive emissions could flow in the direction of minority or low-income populations. This could happen if an accident occurred and the wind conditions were unusual. However, the PEIS notes that the probability of such an accident is low and that under average meteorological conditions (based on the prevailing wind direction), accidental release of radiation would not lead to a disproportionate exposure to these populations.

09 09 08 Comment Number 4

The Final PEIS has been corrected. 100 person-rem is not a standard below which analysis is not given or required for NEPA purposes. Proposed 10 CFR 834 (see 58 FR 16268) would require that potential annual population dose be limited to ALARA and generally total effective dose equivalent be limited to 100 person-rem/yr from all pathways combined for DOE activities. The radiation exposure to the public is limited by the maximum individual dose of 100 mrem/yr.

01 00 00 Comment Number 5

Analyses of the cost, schedule, and proliferation impacts are discussed in separate documents to support DOE's ROD. The cost, schedule, and technical analyses were made available for public review beginning in July 1996. The nonproliferation analysis was made available to the public beginning in October 1996. A series of public meetings to discuss the proliferation analysis were conducted by DOE prior to issuance of the Final PEIS.

04 00 00 Comment Number 6

More detailed information on a borehole technology is available in the Technical Summary Report and related borehole alternative summary reports made available to the public beginning in late July 1996.

04 03 00 Comment Number 7

As described in Section 1.5 of the PEIS, environmental considerations, technical, economic, domestic and international policy, and schedule analyses will support the ROD.