



CITY OF SAVANNAH - Office of the City Manager

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66 FR 13794  
3/7/01

(1)

May 11, 2001

Mr. Mike Lesar, Acting Chief  
United States Nuclear Regulatory Commission  
Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Washington, DC 20555

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2001 MAY 22 AM 8:51  
Rules and Directives  
Branch  
USNRC

RE: Mixed Oxide Fuel Fabrication Facility Environmental Impact Statement (EIS)  
City of Savannah, Georgia Comments

Dear Mr. Lesar:

This letter is in regards to the Environmental Impact Statement Scoping meeting held on April 18, 2001, in the City of Savannah Georgia, concerning the development, construction, operation, and deactivation of a proposed mixed oxide (MOX) fuel fabrication facility at the Savannah River Nuclear Site. Please consider this letter as the official statement from the City of Savannah for this meeting.

The City of Savannah would first like to express its appreciation to the Nuclear Regulatory Commission for holding this meeting, and to further express its appreciation to have the opportunity to give this statement about its concerns. Being located downstream from SRS, on the banks near the mouth of the River, the City is always concerned about development at SRS. The past history (i.e., SRS's 1991 tritium spill) of events which have occurred at SRS has caused the City to take a proactive stand to thoroughly investigate operations and any development which will occur at SRS.

Both the economy and the development of the City of Savannah and surrounding area has and in the future, will be determined by what happens and effects the River ecosystem as a whole. As was just mentioned, the 1999 Tritium spill had a drastic effect on the River environment and caused major concerns for public safety all along the River route to the Atlantic Ocean. These concerns are still being felt today and include the following:

Template = ADM-013

E-RIDS = ADM-03  
Add = T. HARRIS (TEH)  
T. Johnson (TJS)

- ☐ increased levels of tritium in the River
- ☐ any effects which would contaminate the Floridan Aquifer
- ☐ radio-nuclides and isotopes thereof which will last in the River bottom / muds for extended periods
- ☐ effects on fish and wildlife and their habitat
- ☐ economic effects
- ☐ public health

The City of Savannah, Georgia, along with Beaufort / Jasper County of South Carolina, depend on the Savannah River as a major potable water source, so any detrimental effect will prove to be a major environmental disaster to the area. The City, therefore, requests answers to the following specific questions concerning the Mixed Oxide Fuel facility that is being proposed at SRS:

1. What radio-nuclides and isotopes will be produced in the MOX process and what will be their cradle to grave path in the environment?
2. How will the quality of the Savannah River be effected from the MOX facility?
3. What is the probability of contamination of the Floridan Aquifer?
4. What air contaminants will be released in the MOX process, how are they removed and scrubbed from the air stream, and what will be the probable path of contamination spread through the air?
5. What is the worst case scenario of an accident at the MOX facility and the probability of it occurring?
6. What will be the most probable 'accident' which may occur?
7. What kind of advanced warning and monitoring system is being planned and what will be the emergency procedures as a whole in the case of any accident? Should these facilities be implemented at SRS, the City must have an active role in the monitoring program for effects down-river, along with monitoring the flows being received at the City I & D Surface Water Treatment Plant. This monitoring program, including Plant monitoring, must be totally funded (or reimbursable to the City) by the DOE.

8. The City must further obtain a list of all of the constituents in the MOX process so it can be assured that all of the appropriate monitoring is completed. The costs for this monitoring (including I&D Plant monitoring) must also be funded by the DOE or be reimbursable to the City.

Sincerely,

A handwritten signature in cursive script that reads "Michael B. Brown".

Michael B. Brown  
City Manager

cc: Harry Jue, Water and Sewer Bureau Chief