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**FAX COVER SHEET**

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Enclosed please find comments from *Women's Action for New Directions* on the Scoping of the Mixed Oxide Fuel Fabrication Facility Draft Environmental Impact Statement.

Sincerely,

Pat Ortmeier  
Field Director for Nuclear Waste Issues

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## Comments on the Scope of the Mixed Oxide Fuel Fabrication Facility Draft Environmental Impact Statement

Submitted by Pat Ortmeier, Field Director for Nuclear Waste Issues  
 Women's Action for New Directions

Mike Lesar, Acting Chief  
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May 21, 2001

The scope of the MOX Fuel Fabrication Facility (MOX FFF) Draft Environmental Impact Statement should encompass the following:

1. The EIS should consider the impacts of long-term use of the MOX FFF beyond the stated mission of disposition of surplus military plutonium. Two recent pieces of legislation and the President's recently-released energy plan suggest the reprocessing of spent fuel and use of plutonium fuel in commercial reactors in the US (so-called "commercial MOX"), which assume the presence of a MOX plant to fabricate the fuel. As these plans are already underway, the EIS will be seriously deficient if not irrelevant if it fails to consider the long-term use of the plant. Further indication of long-term use of the plant is the reference to "deactivation" of the plant at the end of the disposition mission rather than "decontamination and decommissioning."
2. The EIS should consider the environmental impacts of new reprocessing missions at SRS which will be triggered by the construction of a MOX FFF. Commercial reprocessing is proposed in legislation in Congress and the current ban on commercial reprocessing is being reviewed by the Bush Administration with an eye toward the development of commercial MOX. Both are triggered by the existence of a MOX FFF.

3. The EIS should consider the ability of the MOX FFF to fully contain and handle all wastes, especially high-activity alpha wastes. It should not rely on existing waste treatment and storage at SRS. Recent tank leakage and shortage of tank space at SRS, as well as the site's lack of experience managing high-activity alpha waste undermine its ability to adequately handle waste from the MOX FFF. A back-up storage, treatment, and management plan for waste related to MOX fabrication must be considered as part of the EIS.

4. The EIS should consider proliferation impacts of constructing a MOX FFF, which if allowed to proceed, violates a long-standing US policy of separating civilian from military nuclear technology. It also invites, if not encourages, reprocessing (see above), which has serious proliferation consequences. A US MOX program, whether pursued for plutonium disposition or for the use of commercial plutonium fuel, will encourage other countries to develop the same, causing serious plutonium proliferation concerns. These must be analyzed before a MOX FFF is built.

5. The EIS should give full consideration of the "No Action Alternative" (that is, no issuance of construction authorization for the MOX FFF), including consideration of: (a) the costs and programmatic requirements of a plutonium disposition program where 100% of declared surplus plutonium would be immobilized; (b) cost savings from not pursuing the MOX program; and (c) short- and long-term storage and monitoring requirements of plutonium pits and oxides until immobilization is completed.

6. Consideration should be given to the impacts of construction of a MOX FFF in the possibility that the MOX program is indefinitely suspended or canceled altogether if the US-Russian political situation changes. What will be the impacts of constructing a MOX plant if its disposition mission is later canceled? What are the impacts of keeping the plant on cold standby? In such a scenario, a likely outcome is use of the plant for other purposes, such as commercial MOX fabrication, which, as mentioned above, should be part of the scope of this EIS.

7. The US-Russian agreement on the disposition of surplus military plutonium, upon which the MOX program is based, states that if disposition cannot move forward in Russia, the entire program will be "reconsidered." It is very possible that the disposition program will be suspended or canceled if the Russian program cannot be funded (a very real possibility), stalls for other reasons (such as liability issues currently plaguing the program), or if a change in US-Russian relations cancels the program, as mentioned above. Therefore, the EIS process should be suspended until it is certain that a disposition program is certain.

8. The EIS should consider Dept. of Energy experience with plutonium processing, specifically the use of HEPA filters. DOE studies have illustrated a phenomenon where through alpha decay, tiny plutonium particles can be broken off of larger particles trapped in HEPA filters. The particles are small enough to escape even four layers of HEPA filters. HEPA filters also perform very poorly when wet, a likely condition in a fire situation when sprinkler systems have been triggered. For this reason, DOE has stated a preference for the use of sand filters. In the Construction Authorization Request for the MOX plant the use of HEPA filters is assumed. The EIS should consider the impacts of a fire that threatens the release of plutonium, comparing the

performance of HEPA versus sand filters in terms of effectiveness of preventing off-site releases of respirable plutonium.

9. The NRC states the EIS will consider reactor use of MOX only generically. However, the reactors that are slated for weapons MOX use are well known and have been for some time. The use of MOX in these reactors should not be considered generically but on a reactor-by-reactor basis in a separate EIS process.

10. The EIS should consider the environmental, safety and health records of all contractors involved in the MOX project, particularly Cogema, about which little data has been released. Assumptions about safety at the plant cannot be based on conjecture or wishful thinking about Cogema's anticipated performance. Data gathered from independent sources about Cogema's operating record, especially as it relates to safety and health, must be considered in the EIS.

11. The EIS should consider the possible use of the "polishing" portion of the facility for missions other than purifying plutonium for MOX use. As polishing is a small-scale reprocessing technology, it must be considered for its proliferation impacts.

Thank you for ensuring these issues are covered in the scope of the MOX FFF Draft EIS.

Sincerely,



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