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20 May 2001

Nuclear Regulatory Commission  
Attn: David Lesar  
Washington, DC 20555

Re: Scoping of EIS for proposed MOX fabrication facility at Savannah River Site

To whom it may concern:

The purpose of this letter is to provide a suggested scope of the environmental impact study for the proposed MOX fabrication facility at the Savannah River Site. The recommended scope shall include impact, both probable and possible, of the MOX facility and related activities.

As I understand it, the MOX fabrication procedure is nothing new. The chemistry involved is nothing new. The physics involved is nothing new. The type of material to be contained at various stages is nothing new. The proposed MOX facility will not be pioneering a new method; rather, it will be employing a technique that has been used in Europe for many years.

Inclusion of the Savannah River Site in the scope of the EIS is a given. Factors to be examined as they apply to the SRS include, but are not limited to:

- site security
- possible effects on the physical environment of the area
- impact on infrastructure: roadways, electrical supply, etc.
- reliability and expected lifespan of containment vessels
- the path taken by low-level radioactive waste from the facility to the point of disposal
- expected lifespan of all major components, and both replacement and disposal issues

At the public hearing on the scoping of the EIS in Charlotte, NC the issue of transportation was brought up several times by opponents of the facility. There is a valid concern, though not to the point that some indicated. It is standard procedure for shipment of hazardous materials to follow highway routings from the FHWA, which are based on need of a direct route balanced with risk of routing shipments through an area.

I hold that the shipment of materials to and from the SRS would be routed based on a similar procedure. The list of factors to be considered will no doubt be longer than that required for a tanker of gasoline, but the procedure would remain the same. For security reasons, the scope of inquiry into local conditions should include conditions along the route, as well as conditions along alternate routes and areas.

Template = ADM-013

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

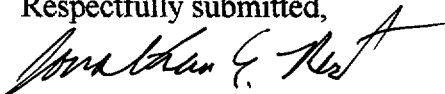
In addition, the endpoints of the materials' journey should be considered. These include the facility in which the material is removed from various weapons, as well as the various Duke Energy sites. Owing to their present pre-MOX activities, both of these locations have already had studies performed on them; I recommend that these studies be reviewed in light of the proposed MOX-related activities.

In summary, I recommend that the following be included in the environmental impact study:

- a thorough study of impact on the SRS location
- determination of proper criteria for routing of material to and from SRS
- review of studies of both the source of fuel and Duke Energy sites, in light of MOX

I feel that a study of this scope will be able to reasonably determine the impact of the proposed MOX facility, as well as related activities at the fuel source, Duke Energy, and points in between. A thorough EIS will no doubt determine impact during both normal and abnormal operations. Furthermore, an EIS of this scope would also serve as a solid tool to demonstrate to the general public both probable and possible impacts of the facility and related activities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jonathan E. Rast", written in a cursive style.

Jonathan E. Rast