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Rules and Directives
Branch
USNRC

Facsimile Transmittal Sheet

To:

Tim Harris

From:

Judy Jennings

Fax:

Date:

5-23-01

Phone:

Pages:

1 + cover sheet

Re:

cc:

URGENT REVIEW COMMENT PLEASE REPLY PLEASE RECYCLE

Notes/Comments:

Re: EIS for max facility
at SRS

E-Mail Judy_Jennings@prodigy.net

Template = ADM-013

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

SEEC

Strategies for Environmental and Economic Concerns

May 23, 2001

Mr. Mike Lesar, Acting Chief
US NRC
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Washington, DC 20555

Dear Mr. Lesar:

Re: Comments for the development of an EIS for the construction of a MOX fuel fabrication facility at Savannah River Site

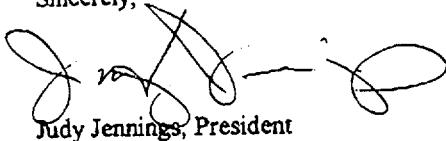
We emphasize to you the following points which we delivered to you during our oral comments at the April 18, 2001, Scoping Meeting in Savannah.

1. **"No Action:** Do not issue construction authorization for the MOX facility at Savannah River Site" should be a viable option in the evaluation of alternatives in the Environmental Impact Statement. We realize that not granting the permit would have political ramifications and could ostensibly be viewed as an attempt by the Nuclear Regulatory Commission, a regulatory agency, to pre-empt the Department of Energy's decision to locate the MOX facility at SRS; however, it is imperative that the NRC be able to make a public policy decision without fear of political pressure.

2. The United States possesses the technology to permanently immobilize plutonium and remove it from the human environment. Indeed, the DOE's Record of Decision outlines a plan for the secure disposition of approximately 17 metric tons of plutonium in the form of a ceramic. Meanwhile, uranium fuel is cheaply available. DCS can not justify producing MOX fuel for use at commercial nuclear power plants without huge public subsidies which should not be sanctioned.

Therefore, the EIS should contain a full economic analysis evaluating all costs and benefits to the public. Citizens should know that their tax dollars are producing the maximum net benefit for public good. Limiting the economic analysis to the socio-economic impacts is grossly inadequate for a project with such a large federal financial investment and tacit public policy implications.

Sincerely,



Judy Jennings, President

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