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Rules and Directives  
Branch

704 Camellia Dr.  
LaGrange, Ga. 30240  
January 14, 2002

12/17/01

66 FR 65000

(4)

Chief, Rules & Directive Branch  
Division of Administrative Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Reg: Dec. 17, 2001 Federal Register Vol 66, Number  
242, Pages 65000-65010

Comment on: Tennessee Valley Authority: Notice of Consideration  
of issuance of Amendment to Facility Operating License,  
Proposed No Significant Hazards Considerations Determination  
and Opportunity for a Hearing

The NRC proposed finding of "No Significant Hazards" is based  
on TVA's application for a license amendment to allow the  
cogeneration of tritium, radioactive hydrogen for the US  
Nuclear Weapons program, along with the production of  
electricity, received by NRC on August 20, 2001, 22 days  
before the Sept 11 attack on the World Trade Center in  
New York City.

According to the Federal Register notice "The Commission has  
made a proposed determination that the amendment request  
involves no significant hazards consideration - - that means  
that operation of the facility in accordance with the proposed  
amendment would not (1) involve a significant increase in the  
probability or consequences of an accident previously  
evaluated; or (2) create the possibility of a new or different  
kind of accident from any accident previously evaluated; or (3)  
involve a significant reduction in a margin of safety."

I would like to take issue with (2) above. Since TVA's analysis  
was made before September 11, they did not consider the  
probability or consequences of a fully fuelled jetliner  
being used as a missile and purposely being crashed into a  
nuclear power plant.

By changing the purpose of Watts Bar and/or Sequoyah from  
purely commercial nuclear power plants to cogenerators of  
material for nuclear weapons, the probability of such an attack  
increases from 1 in 103 nuclear plants to number 1 of 103. Changing  
Watts Bar and/or Sequoyah to cogenerators of nuclear weapons  
material, tritium, changes them from civilian targets to  
military targets.

Template = ADM-013

LE-RIDS = ADM-03

Add = B. Clayton (BAC2)  
M. Padovan (LMP)

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The NRC and TVA should include the increased consequences of an accident involving a fully fuelled jetliner crashing into one to three fully fueled nuclear reactors each containing 2304 tritium producing burnable absorber rods, 193 fuel assemblies, with each assembly containing 264 fuel rods. The analysis should include the worst case scenario. The 2304 tritium producing rods should be assumed to have been in the reactor for the maximum amount of time and the reactor should be considered to be nearing time for refueling, so that 1/3 of the fuel rods would have been in the reactor for 3 years, 1/3 for 2 years, and 1/3 for 1 year. Also, the higher concentration of radioactive nuclides should be considered since the higher enrichment of uranium will be used in the fuel rods to begin with. Considering the proximity of the cooling pools, their contents should also be taken into consideration.

What would be the maximum exposure to what size population that would be affected, bearing in mind that Sequoyah is on the edge of Chattanooga and that Knoxville Tn. is upwind from Watts Bar? In considering Knoxville, calculate that the accident could coincide with a University of Tennessee home football game, with a usual attendance of approximately 100,000.

Pidgeon Forge and Gatlinburg are tourist attractions just north east of Knoxville. The Boy Scouts have a facility on Watts Bar Lake that is used extensively in the summer. Consider that this accident could occur when Pidgeon Forge, Gatlinburg, and the Boy Scout Camp are filled to capacity.

What are the monitoring plans, and are monitors installed that can detect tritium. TVA has historically asked for and received exemptions from NRC. Has NRC developed new stricter guidelines for monitoring?

What are the evacuation plans? Has NRC developed new and enhanced evacuation rules and has TVA complied with these standards?

Remembering that the cow-milk-child pathway is the most critical pathway to people, and considering the number of dairies in the possibly affected area, how would the inclusion of 2304 tritium producing burnable absorber rods increase the radiation dose to people, in routine and maximum accident conditions? Please include the models that you use to calculate the doses, and the assumptions that you use in your calculations.

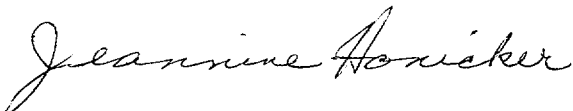
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Include other pathways to man, including, but not limited to inhalation, drinking water, eating fish, and other food contaminated by routine emissions and emissions from maximum accident conditions.

Consider the consequences of increasing the threat of nuclear war that this action poses. The United States has repeatedly objected to other nations using their commercial nuclear power plants to produce material for nuclear weapons. Will we not be seen as speaking with forked tongue if we say, "You can't use your nuclear power plants to produce nuclear weapons material for military purposes, but we can."

This action increases the area of possible harm far beyond the 10 mile "area of interest" of your regulations, even beyond the 50 miles that you have historically limited your boundary of possible harm. The wind knows no artificial boundaries, and the rivers flow past state markers.

I respectfully request that you consider all my comments, and also that you widen your definition of interest past the 10 mile artificial boundary that you have arbitrarily imposed. Expand "interest" to mean more than financial. Include concern for mankind. Using these new standards of interest, I believe that you will agree that I qualify to become an intervenor, and do hereby request that you so rule.

A handwritten signature in cursive script that reads "Jeannine Honicker". The signature is fluid and elegant, with the first name and last name clearly distinguishable.

Jeannine Honicker  
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