Main Office:
427 Moreland Avenue, NE, Suite 100
Atlanta, GA 30307
404-659-5675 (phone) 770-234-3909 (fax)
georgia@cleanenergy ws

www.cleanenergy.ws

Savannah Office:
3025 Bull Street, Suite 101
Savannah, GA 31405
912-201-0354 (phone and fax)
savannah@cleanenergy.ws

PUBLIC COMMENTS REGARDING THE REVISED DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE MIXED OXIDE FUEL FABRICATION FACILITY FOR THE SEPTEMBER 18, 2002 SCOPING MEETING IN SAVANNAH, GA

My name is Sara Barczak and I am the Safe Energy Director for Georgians for Clean Energy in our Savannah field office. Georgians for Clean Energy is a statewide non-profit conservation and energy consumer organization. We have members throughout Georgia and have focused on energy and nuclear concerns for 18 years.

We already submitted formal written comments to the U.S. Nuclear Regulatory Commission late last month. These comments supplement our previous ones and are more general in scope.

Plutonium Disposition Program General Concerns

The Department of Energy's Savannah River Nuclear Site is approximately 90 miles upstream from Savannah, Georgia along the Savannah River and is a federally listed Superfund Site with more than 500 separate hazardous sites. The massive complex is over 310 square miles in size and was built in the early 50s to help produce plutonium for our nation's nuclear weapons program during the Cold War.

Georgians for Clean Energy would like to make it clear from the outset that we strongly oppose the production of any type of plutonium bomb fuel for a variety of reasons: it is an experimental program that has never been pursued at this scale; poses a risk to workers and the surrounding communities at both the production and reactor sites; will increase the volumes of hazardous, radioactive waste streams at a location already plagued by enormous quantities of dangerous waste and previous contamination; raises complex consumer and rate-payer concerns over government subsidies unfairly favoring a destructive type of energy production over environmentally friendly and safe alternatives; increases the negative health impacts to communities in cases of severe accidents at reactor locations; and blurs the division established between military and civilian nuclear programs.

We believe that the U.S. Nuclear Regulatory Commission (NRC) has only one option that would truly protect the public health: deny the license application request for the MOX fuel fabrication facility (or plutonium fuel factory). We urge that the pursuit of developing a plutonium fuel economy be ceased in all sectors of government and private enterprise as it will allow plutonium, a dangerous material highly sought after for use in nuclear weapons, to enter civilian commerce and the international marketplace

Significant Changes in Plutonium Disposition Program

Georgians for Clean Energy, along with many other organizations and citizens, is very concerned about the number of significant changes that have occurred in the plutonium disposition program planned for the Savannah River Nuclear Site (SRS). We urge the NRC to fully investigate these changes and

support the need for the Department of Energy to conduct a Supplemental Environmental Impact Statement (SEIS) immediately.

We are gravely concerned about the recent amended Record of Decision (ROD) filed by the Department of Energy (DOE) listed in the Federal Register on April 19, 2002. In this ROD, the DOE:

1. cancelled the immobilization portion of the program;
2. selected immediate implementation of long-term storage at SRS of surplus weapons plutonium now stored at Rocky Flats in Colorado.

Additionally, the DOE's February 15th *Report to Congress: Disposition of Surplus Defense Plutonium at Savannah River Site*, essentially recommends the need to add at least two additional, unnamed nuclear reactors for plutonium bomb fuel (MOX) use. Our nearby Southern Nuclear Plant Vogtle expressed interest in the plutonium fuel program back in 1996 and we are concerned about the implications of the need for more nuclear reactors. How will the NRC address this need for more nuclear power plants? How will additional reactors be selected? Will the public be involved in this process?

Furthermore, even though our nation is supposedly engaged in a program being performed under the guise of "disposition" of surplus weapons plutonium in a supposed parallel venture with Russia to reduce our nuclear weapons stockpiles, the Department of Energy's National Nuclear Security Administration issued a press release on May 31, 2002 announcing that it would begin design work for a facility to manufacture plutonium pits, also known as "triggers" for nuclear weapons, a critical component. Rocky Flats—the site in Colorado that is now shipping its plutonium to SRS, had carried out this function up until 1989 and is now closing. SRS is believed to be the preferred site for this plutonium trigger plant that will cost billions of dollars.

Secretary of Energy Spencer Abraham stated, "We need to have the capacity to manufacture certified pits to maintain the safety, security, and reliability of the U.S. nuclear deterrent in the future." What is really going on? We would like to enter that press release into the record.

And just last Friday, in an article from the Augusta Chronicle, it was reported that the DOE is officially announcing its plans to build the nuclear weapons trigger plant and that public meetings could be held beginning as early as October 29, 2002. A president of a division of the Washington Group, parent company of Westinghouse, Savannah River Company, the contractor charged with managing the site, stated that SRS is the best location for plutonium trigger production and that the community's support is crucial. According to the paper, at the meeting in Aiken he said, "Trust me, the community that embraces it is more likely to get it than the community that embraces it less." We request that article be entered into the record as well.

Nuclear Waste Concerns

And there's more for the NRC to understand about this plutonium fuel scheme. SRS has a severe nuclear waste problem. The site currently has the 2nd largest volume of high-level liquid nuclear waste (~38 million gallons) and wins the gold medal for having the most amount of radioactivity at any DOE site in the nation. The future is less than encouraging as the DOE projects that 95% of future high-level radioactive waste generation will occur at SRS. The plutonium fuel program is slated to bring more dangerous nuclear waste to this site—in some instances, waste streams that the site currently has no experience with. There's not enough space on site now and many of the huge nuclear waste tanks have already experienced leaks. The nuclear waste issue is of grave environmental concern to the region and

has to be fully studied by the NRC. We are including a resolution from the City of Savannah from 1992 that requested that, "a full scale clean-up operation of the Savannah River Site begin immediately." Well, more than ten years have passed and the site is far from "clean."

This month, the U.S. Energy Department's inspector general actually publicly recommended burying millions of gallons of radioactive waste in underground vaults at the Savannah River Site—which could essentially create a national nuclear sacrifice zone over one of the most important water recharge areas on the East Coast. This was supposedly due in part, to the cancellation of the immobilization plan. The NRC therefore should still address immobilization as an alternative to plutonium fuel production.

We would encourage the NRC to contact the DOE as well on research that Georgians for Clean Energy did on past nuclear waste storage proposals at SRS. We found that decades ago several deep rock bore holes were drilled on site, some as deep at 4000 feet, which could potentially serve as pathways for contamination to pass into deep aquifers that the region relies on for drinking water. The ultimate reason for these boreholes—to assess whether or not the site could store highly radioactive waste underground. A special meeting with DOE was called to address our July 2001 letter. All this, including the bore hole map, can be found at our website www.cleanenergy.ws or feel free to contact Jim Setser and Jim Hardeman with the Georgia Environmental Protection Division who attended the meeting with us. We would like to enter our original letter of concern to the DOE on this matter, a copy of the borehole map, and a letter of concern from the EPA to the record as well. The proposed plutonium fuel facility would be near some of these boreholes and possible contamination or spills/leaks from the facility could occur. The NRC should study this further.

From what has already occurred, it appears that the Department of Energy has decided that SRS will be the centralized, long-term plutonium storage dump, using the plutonium "disposition" plan as justification to bring the plutonium here. The storage of plutonium at SRS could create one potential source of feed for any new pit plant.

Georgians for Clean Energy believes that the NRC must address the full impacts of the plutonium bomb fuel program—how this scheme is likely contributing to the eventual production of nuclear weapons components at the Savannah River Nuclear Site and the use of the site for permanent nuclear waste burial. A full accounting of what and how much plutonium is coming from where and being used for what project when it arrives should be done and made public.

These substantial changes, among many others, underscore the need under National Environmental Policy Act (NEPA) regulations for the Department of Energy to prepare a supplemental environmental impact statement. This statement needs to be completed prior to the shipment of any more plutonium to SRS, which is now being so hotly protested by South Carolina's own Governor Jim Hodges along with other citizens. We urge the NRC to request that the DOE submit the supplemental environmental impact statement *before* the NRC attempts to issue its version of the draft environmental impact statement. The DOE should conduct their *own SEIS to figure out exactly what they are actually doing and why* and then fill the rest of us in—including the NRC staff.

Additional Concerns for SDEIS

In our formal comments we talked about many additional concerns regarding worker exposures, process changes, waste generation, and others. We'd like to highlight a few tonight.

We recommend that the NRC conduct a "no action alternative" in the true sense of that statement (i.e., study what would occur if the plutonium in question remained at the various DOE facilities and did not travel to SRS, despite current reports stating that some plutonium at Rocky Flats, CO have already been shipped to SRS).

Water resources are limited, as recent droughts across the nation, particularly in the Southeast, have demonstrated. Currently, SRS requires enormous amounts of surface and ground water, in the tens of billions of gallons, *just to support currently established operations*. What additional water use will be required and what additional water contamination will be generated by the plutonium fuel factory, over its entire operating life, versus the proposed "no action alternatives," including immobilization?

If this bad scheme goes forward protections such as the use of both sand and HEPA filters in the facility will be necessary in order to provide the greatest protections to workers and the surrounding community.

Summary

Thank you to the staff that allowed for the extension of the public comment period through to September 30, 2002 and for holding this meeting in Savannah—the epitome of a downwind, downstream community. For those of you that are genuinely concerned about the plutonium fuel program, we support your efforts in highlighting them whenever possible.

Georgians for Clean Energy believes this controversial nuclear energy program threatens national security. It is well documented that it will generate more dangerous nuclear waste. The transport of plutonium in dangerous forms across our country is irresponsible anytime, but especially in the midst of heightened terrorist activity. An accident or attack on a shipment could result in devastating losses. Support of the plutonium fuel program could lead to the development of a plutonium economy that would threaten nuclear non-proliferation goals and would increase already excessive volumes of deadly, highly radioactive nuclear waste at SRS.

Instead, other programs that appear to be more environmentally sound, safer to workers, less expensive, and could prevent the circulation of nuclear weapons materials, such as immobilization of surplus plutonium, should be funded and supported through further research and development. Though not a perfect technology, it is far cheaper than other options and appears to have less risks overall than the currently encouraged technologies. Thank you.

The Augusta Chronicle
AugustaChronicle.com

SRS vies for new nuclear facility

Web posted Friday, September 13, 2002

By Eric Williamson
South Carolina Bureau

AIKEN - The Department of Energy will formally announce today its plans to build a nuclear weapons trigger plant. The notice of intent will mark a significant departure from U.S. policy, which suspended trigger production in 1989.

Savannah River Site is said to be a leading contender for the project, which will cost $2 billion to $4 billion to construct. More details about the project, which could add more than 1,000 jobs to the region, and the locations under consideration are expected with today's DOE notice.

At a gathering of community leaders Thursday night in downtown Aiken, SRS officials reiterated their belief that their site is the most qualified to handle the mission. They said community support is crucial, however.

"Trust me, the community that embraces it more is more likely to get it than the community that embraces it less," said Ralph DiSibio, the president of the Energy and Environmental Business Unit of Washington Group International in Aiken.

Washington Group is the parent company of Westinghouse Savannah River Co., the contractor charged with managing operations at SRS.

After the announcement, the site selection and environmental impact research will begin, said Bob Pedde, the president of Westinghouse Savannah River.

The plutonium-based, spherical triggers, or pits, will replace outdated ones in the U.S. arsenal.

Critics have pointed out that the mission seems contradictory to the mixed-oxide project at SRS, which would turn weapons plutonium into reactor fuel as part of an arms reduction agreement with Russia.

The mixed-oxide fuel plant is slated to complete its mission at SRS by 2019.

The pit assembly plant would begin production in 2020 if SRS is chosen as the permanent site.

An interim production site in Los Alamos, N.M., is scheduled to have its first triggers complete in fiscal year 2003.

Mr. Pedde said this area's first public meeting on the proposed plant will be Oct. 29.

Reach Eric Williamson at (803) 279-6895 or eric.williamson@augustachronicle.com.

THE CITY OF SAVANNAH
GEORGIA

Resolution

WHEREAS, on December 22, 1991, a leak of radioactive tritium occurred at the Savannah River site; and

WHEREAS, said leak of tritium flowed into the Savannah River and the Savannah River is the source of raw water for the City of Savannah's Industrial and Domestic Water Supply System; and

WHEREAS, the leak caused a concern resulting in the ceasing of shellfish harvesting and the shutdown of food processing plants; and

WHEREAS, said leak was caused by insufficient precautions taken by the Department of Energy and Westinghouse, the operator of the Savannah River Site; and

WHEREAS, on January 30, 1992, a public hearing was held in Chatham County, wherein representatives of Westinghouse and the Department of Energy stated there was contamination of the ground and environments of the Savannah River Site; and

WHEREAS, estimates to obtain a 100% clean-up of the site range from 30 to 50 years at the cost of several billion dollars; and

WHEREAS, the present need for tritium is unclear in light of the recent cancellation of the production of nuclear warheads; and

WHEREAS, the continued operation of the Savannah River Site has a negative economic impact on the City of Savannah, as well as the potential for leaks in the future which could affect the health and well being of the residents of the City of Savannah;

IT IS HEREBY RESOLVED, that the Mayor and Aldermen of the City of Savannah specifically request that the restart of the K-reactor cease and a full scale clean-up operation of the Savannah River Site begin immediately.

ADOPTED AND APPROVED APRIL 2, 1992

Susan S. Weiner

SUSAN S. WEINER, MAYOR

Dyanne C. Reese

DYANNE C. REESE, CLERK OF COUNCIL

Main Office
427 Moreland Avenue, NE, Suite 100
Atlanta, GA 30307
404-659-5675 (phone) 770-234-3909 (fax)
georgia@cleanenergy.ws

Savannah Office
3025 Bull Street, Suite 101
Savannah, GA 31405
912-201-0354 (phone and fax)
savannah@cleanenergy.ws

www.cleanenergy.ws

Secretary Spencer Abraham
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

RE: Request for investigation of deep bore holes at the Department of Energy's Savannah River Nuclear Site

July 3, 2001

Dear Secretary Abraham:

Georgians for Clean Energy would like to draw your attention to the fact that eleven (11) deep bore holes were drilled at the Department of Energy's Savannah River Nuclear Site (SRS) near Aiken, SC decades ago with the intention of disposing nuclear waste in them. We have a map of where they are located. Many of them are in areas that are extremely contaminated from SRS operations, including reprocessing.

As you should know, in all probability, contamination has seeped into these bore holes or externally along the bore shaft and can carry the contamination down to great depths where it can seep into different aquifers that the bore holes pass through or are near.

SRS sits on top of the greatest water recharge area on the Southeastern seaboard. Contamination from SRS is migrating offsite underground and through surface pathways. This is an established fact. We want to see how far the contamination has gone through these boreholes because it would impact two states—Georgia and South Carolina. In simple terms, we request to know what the levels of contamination are within the deep rock bores, the external bore shaft casing, and the corresponding deep rock bore water wells (DRBWW) measured at every 100 feet, along with the investigation of where the contaminants found in and around the bores and wells are going and/or seeping. Obviously, the most advanced and non-polluting technology should be employed to carry out this request.

The Department of Energy should fund ***independent*** contractors to perform the work. ***Under no circumstances should any current or past SRS contractors be used due to possible conflict of interest*** (e.g. no work should be done by Dupont or Westinghouse, or their sub-contractors).

Georgians for Clean Energy awaits your response to this most serious issue. If you have any questions or concerns, or need further information, please do not hesitate to contact us. Thank you for your time and consideration.

Sincerely,

Sara Barczak
Safe Energy Director
Georgians for Clean Energy

cc: EPA Administrator, Christine Whitman
Acting Director of US Fish & Wildlife, Marshall P. Jones, Jr.
Governor Roy E. Barnes
Director of Georgia EPD/DNR, Harold Reheis

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 27 2001

OFFICE OF
AIR AND RADIATION

Ms. Sara Barczak
Safe Energy Director
Georgians for Clean Energy
427 Moreland Avenue, NE, Suite 100
Atlanta, GA 30307

Dear Ms. Barczak:

We appreciate the concerns that you raise in your July 3, 2001, letter concerning the deep boreholes that have been drilled at the Department of Energy's (DOE) Savannah River Site (SRS).

It is our understanding that your letter to the Secretary of Energy has prompted DOE to investigate the current status of these wells and the potential for them to act as conduits for spreading radiochemical contamination to deeper aquifers. DOE has informed the Environmental Protection Agency (EPA) that they will determine whether radiation or other hazardous substances are present in the deep wells. DOE is coordinating this effort with the South Carolina Department of Health and Environmental Control and EPA Region 4 Federal Facilities Branch in Atlanta. Experts from our Region 4 office will be independently evaluating the technical adequacy of DOE's proposed strategy for monitoring the deep wells as part of EPA's general oversight of the SRS environmental restoration program.

Staff at EPA Headquarters Federal Facilities Restoration and Reuse Office and the Office of Radiation and Indoor Air will stay apprised of DOE's progress and will provide assistance to the Region 4 office as necessary. If you need additional information, please contact Ken Feely, the EPA Region 4 Federal Facilities Agreement Project Manager for the Savannah River Site at (404) 562-8512; feely.ken@epa.gov or Tim Mott in Headquarters Federal Facilities Restoration and Reuse Office at (202) 260-2447; mott.timothy@epa.gov.

Sincerely,

N Brenner (for)

Jeffrey R. Holmstead
Assistant Administrator

National Nuclear Security Administration
U.S. Department of Energy

NEWS

NEWS MEDIA CONTACT:
Lisa Cutler, 202/586-7371

FOR IMMEDIATE RELEASE
May 31, 2002

Department of Energy Certifies Need to Build a Modern Pit Facility

The National Nuclear Security Administration (NNSA) today announced that it will begin conceptual design work for a facility to manufacture plutonium pits for nuclear weapon. Pit production was shut down in 1989 at the Rocky Flats plant, and no pits have been produced since then. The NNSA's plans call for the new facility to be on line by 2020.

The United States is the only nuclear power without the capability to manufacture a plutonium pit. A pit is a critical component of a nuclear weapon and functions as a trigger to allow a modern nuclear weapon to operate properly. The new facility will reestablish the capability to manufacture all pit types in the nation's current nuclear stockpile and meet any future requirements in an environmentally compliant manner.

The action supports a recommendation in the Bush Administration's Nuclear Posture Review (NPR). The NPR says that having the ability to produce pits is important to ensure the future viability of the Nation's nuclear deterrent. The lack of a pit production facility has also been identified as a critical defense readiness gap by Congress, the Department of Defense and outside experts, including the Chiles Commission and the Foster Panel.

NNSA Administrator John Gordon determined that NNSA's mission required construction of a modern pit facility and Secretary of Energy Spencer Abraham approved a decision document to allow the planning to begin.

"The Department supports the nuclear weapons needs established by the Department of Defense," said Secretary of Energy Spencer Abraham. "We need to have the capacity to manufacture certified pits to maintain the safety, security and reliability of the U.S. nuclear deterrent into the future."

While conceptual design work will begin immediately, the NNSA will start the site evaluation and selection process required under the National Environmental Policy Act (NEPA) in September 2002. Any Department of Energy site that will be considered for this facility will need to meet the Department's criteria for experience with nuclear materials and be in a remote location.

Depending on the production capacity of the facility, the project is expected to cost between $2.2 and 4.1 billion.

(more)

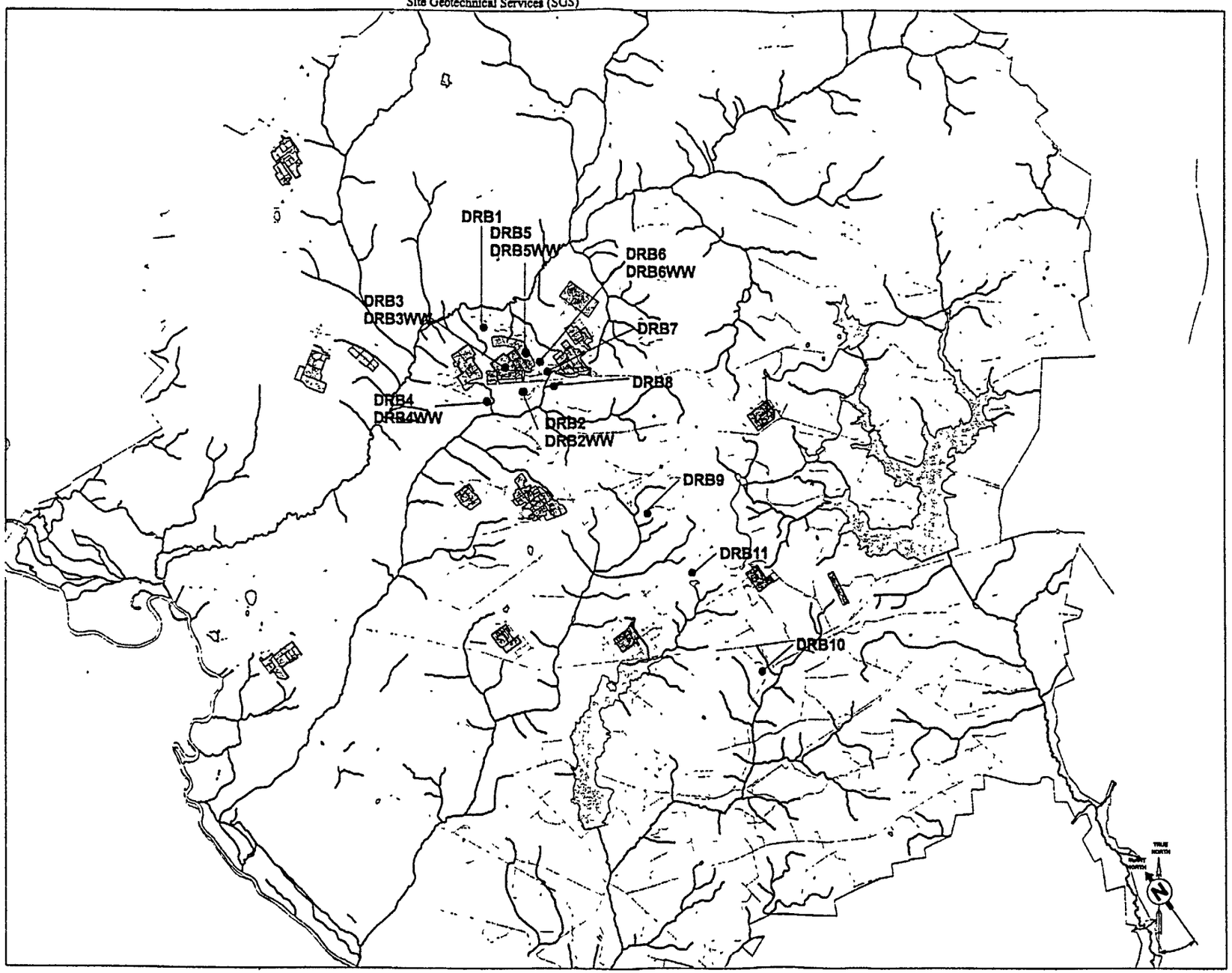
The decision to proceed with the design and planning for a modern pit facility is the latest development in NNSA's pit program.

The NNSA's interim pit production and certification facility at Los Alamos National Laboratory has met all pit production and certification milestones and is on-track to manufacture a certifiable W88 pit in FY 2003. Although that facility cannot support long-term stockpile needs, it will allow NNSA to meet its current manufacturing requirements and provide valuable information for the design of the new pit facility.

-NNSA-

NA-02-12

Prepared by
Site Geotechnical Services (SGS)



Legend:

- DRB Borings
- Streams & Creeks
- Roads
- Water
- SRS Areas
- SRS Boundry

savannah river site
where excellence is achieved

SRS

Projection: Universal Transverse Mercator
Datum: North American Datum 1927
Zone: 17

To place on the North American Datum 1983, move the projection from 10 meters south and 10 meters west.

Disclaimer

This product was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately owned rights.

1 0 1 Miles

0.5 0 0.5 1.0 1.5 2.0 Kilometers

Savannah River Site
Aiken, South Carolina

United States Department of Energy

SRS

DRB Boring Locations

DRB Boring Locations