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618 McLaws Street
Savannah, GA 31405
September 26, 2002

Mr. Mike Lesar, Chief
U.S. Nuclear Regulatory Commission
Rules & Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T-6D59
Washington, DC 20555

Rules and Directives Branch
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Sir:

Please accept the following as a supplement to the oral comments I gave at the September 18 public meeting in Savannah, GA regarding the proposed MOX fuel fabrication facility at the Department of Energy's Savannah River Site (SRS). Thank you.

I am opposed to the plan to build a MOX fuel fabrication facility at the Savannah River Site. SRS is overburdened with nuclear waste from over fifty years of operation stored in tanks that leak into the ground and water. I particularly recall the tritium leak of December 1991, which shut down Savannah's industrial water supply for about two weeks. It makes no sense to generate new waste laced with plutonium when the existing waste has yet to be cleaned up. Instead, the waste should be made into glass logs and used to immobilize the plutonium so no one will be able to get at it. Despite the Energy Department's decision to cancel the immobilization program, I believe it must remain an option whether you consider it a "no action" alternative or not. In light of the federal budget deficit it makes fiscal sense to spend our tax dollars on the cheaper and less risky immobilization process instead of the more expensive MOX fuel program. I would rather there not be any plutonium at SRS but as long as the Energy Department insists on shipping it to the site I would prefer it be immobilized and not made into MOX fuel.

I understand that the licensees for the MOX fuel facility plan to use Cogema's MOX fabrication process used in France as the basis for the process the plan to use at SRS. Cogema has had problems both with making and using MOX fuel in France and they should not be using what they know is a flawed process. To do so puts all of us in Savannah, Chatham County and the surrounding area unnecessarily at risk. It also demonstrates a reckless disregard to human life. Therefore you should carefully review their safety record when arriving at your final decision.

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The proposed MOX fuel facility also represents a terrorist risk to Savannah. Although the Energy Department is using secret truck shipments to bring plutonium to SRS, an operational MOX plant may require some to be brought in by ship through the Georgia Ports Authority terminals, our gateway to the world and one of our main economic engines. This puts a terrorist target right at our front door. In case of an attack on such shipments or the fabrication plant where and how would we evacuate? During the Hurricane Floyd evacuation it took me five hours to go from Savannah to Pembroke, a distance of about thirty miles. We also had between 24-36 hours advance warning before the storm threatened. There has been no mention of evacuation plans for nuclear emergencies in Savannah news media since the September 11, 2001 terrorist attacks. When I called the Chatham Emergency Management Agency they could not provide any information about nuclear emergencies. Having a tested and certified evacuation plan in place must be a prerequisite to going forward with the licensing process and it is the responsibility of the licensees and the Energy Department to come up with this plan. The plan must also include areas downwind and downstream of the proposed facility, such as the metropolitan Savannah area. If the licensees and the Energy Department do not come up with such a plan you should summarily deny their license application. Period.

We in Savannah have had to put up with contamination from SRS for over fifty years. The site should be cleaned up immediately. To not do so AND generate waste that is even more radioactive and toxic on top of that is completely unacceptable. I therefore strongly urge you to deny the application for the proposed MOX fuel fabrication facility.

Respectfully,



Jody Lanier