

**From:** kcumbow <kcumbow@greatlakes.net>  
**To:** <teh@nrc.gov>  
**Date:** 8/30/02 2:05PM  
**Subject:** Comment for MOX EIS and request to extend comment period

August 30, 2002

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

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Attn: Tim Harris

Dear Messrs Lesar and Harris,

Three days ago, citizens at a public NRC meeting in North Augusta were alerted to the fact that the comment period for the MOX Environmental Impact Statement expires August 30.

We would like for you to grant an extension of time for public comment, especially since it has been noted that MOX might possibly be used in a generic midwestern reactor and midwestern citizens would like to be brought up to speed in these crucial matters. We also request that you designate the EIS meetings scheduled in North Augusta, South Carolina (September 17); Savannah, Georgia (September 18); and Charlotte, North Carolina (September 19) as official scoping hearings and record them as such.

This is the first plutonium processing program undertaken in this country in more than a generation. We also do not understand the January decision to cancel immobilization, as it includes an additional 6.4 tons of pretty nasty, impure plutonium in the MOX program. This alone suggests the utmost care and deliberation in creating the environmental impact statement about this unprecedented undertaking to turn weapons-grade plutonium into a nuclear fuel, (which could easily be utilized by terrorists, at many points along its trail).

Once alerted to the fact that a Federal Register Notice had been made about the opportunity for public comment, it was still an effort to find it, titled "Notice of Delay in Issuance of the Draft and Final Environmental Impact Statements for the Mixed Oxide Fuel Fabrication Facility." Since the community that is focused on MOX was well aware of the delays to the MOX program, this title did not announce itself as containing urgent information. Additionally, since the applicant's supplemental Environmental Report was not filed until July and the supplemental Construction Authorization Request is not expected before the end of October, beginning public comment on the draft MOX EIS in April, well in advance of those key documents, is neither logical nor obvious.

Finally, the DCS ER is not readily available to the public and it has not yet been posted to the NRC's website. Without the ER and the CAR there is an unreasonable void in the basis for public comment.

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E-RIDS = ADM-03  
 Call = T. Harris (teh)

We believe that these are compelling reasons to extend the public comment period for the MOX EIS, and suggest the comment period be extended to 45 days from the time that the NRC is able to post the ER on its website.

We appreciate your consideration in our requests.  
Sincerely,

Kay Cumbow, Board Member  
Citizens for Alternatives to Chemical Contamination  
c/o Box 27, Emmett, MI 48022