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**Statement for Nuclear Regulatory Commission Meeting
re Proposed EIS for a MOX Fabricating Facility at SRS
N. Augusta, SC September 17, 2002**

I am Mary T. Kelly representing the League of Women Voters of South Carolina. I appreciate the opportunity to speak tonight on the proposal to build a MOX fabricating plant at the Savannah River Site to manufacture fuel rods for irradiation in the old Catawba and McGuire reactors commercial reactors in Charlotte.

There are many here tonight who are giving technical evaluations and raising technical questions that have a great deal of merit. While we agree with those who have grave reservations about the technical merits of this project, especially the plan to use the rods in the old Duke reactors in the Charlotte area, we want to comment briefly on some of the basic governmental issues and processes involved. The League of Women Voters has established a unique niche among non profit organizations in our dedication to both the governmental process that is at the heart of our American democracy and to ensuring that all citizens get to enjoy their rights of participating in that process. We also recognize that to participate effectively, citizens must have a base of knowledge on both the issues and the process.

With that in mind I would like to call your attention to the following:

We urge you to comply with the National Environmental Policy Act to the fullest extent of the law. We see in what is going on throughout the whole plutonium disposition/ spent fuel disposition process/ MOX process and reinstitution of new plutonium trigger program a short changing of this process. There are constant changes, some so fundamental new EISs should be prepared for some of the proposals that have already been accepted.

We would like to see a real clarification of the role of EPA, the NRC, DOE, DOD and state agencies in all aspects of the proposed programs. Where does the jurisdiction of each begin and end, how do they interact, etc. It is certainly being glossed over that there are areas where you cannot proceed if you do not get permits from the SC Department of Health and Environmental Control.

We wonder how, when, and if the manufacturing process for MOX gets underway the role of the Nuclear Regulatory Commission, the Departments of Energy and Defense, and the state agencies will be defined and respected.

We find it a matter of great concern that the commercial/civilian aspects of nuclear material manufacturing and use are being mingled with the military. This has been a time honored separation that has served this nation well, even though it has had an aspect of unreality. It was this separation that permitted public acceptance of nuclear power for the generation of electricity and the commercialization of the weapons research of World War II and the Cold War, paid for by American tax payers. People in that era had a well founded and healthy respect for the dangers of nuclear operations.

Children of the fifties remember the bomb shelters in back yards and cellars and sheltering under school desks during periodic nuclear drills. Before September 11 all of that seemed overkill to be joked about. Now as a South Carolinian I am greatly concerned about the lack of information about steps being taken to avoid an attack on SRS or one of our many nuclear reactors and further, to help the general population mitigate the effects of an attack. Such information needs to be shared with the public, not withheld in an effort to prevent panic or tamp down concerns about this state's excessive vulnerability to everything nuclear.

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As one simple example, what is being done about the distribution of potassium iodide tablets? True, they protect against thyroid uptake from only one short lived isotope of iodine but those in the vicinity of nuclear installations need them and need to know what to do with them. Information from Chernobyl shows what happens to children who don't get them fast.

With thanks for your consideration of these views,
Other matters that trouble us include the following:

The accelerated clean up plan: This was announced recently by DOE Secretary Spencer Abraham. This is supposed to save money but will it? Both EPA and SCDHEC have expressed their intent to ensure that the site is cleaned up to standards required by environmental law and regulations. The history of SRS is full of projects undertaken and aborted after the expenditure of millions of dollars, one would suspect because they were pushed forward without adequate scientific research and pilot testing, and because of the vagaries of federal funding.

New plans for handling the high level liquid waste in those forty-nine deteriorating tanks: And yes, we know that two of those tanks have been emptied but they are still in place with grout having been added to the irremovable residue. These have been a source of worry to both South Carolinians and Georgians for many years. The new plans drastically change the ones now being implemented that include separation of the various components and vitrifying the high level component for disposal at a permanent waste site. I assure you that mixing all of this with cement and leaving it in place is not going to fly with the people of South Carolina. Already this has elicited very negative responses from major environmental groups and South Carolina and Georgia officials. Cement isn't forever - it is leachable and frangible and will age in a very short time. Chemical processes will continue even within the cement including the evolution of heat from the decaying radioactive isotopes.

Think about the bridges and elevated highways that were built in the lifetimes of many of us that are now history. Think about the danger to the ground water and the Savannah River.

The lack of a truly independent epidemiological study, using data going back to the beginnings of Savannah River Site operations: The Center for Disease Control under the direction of Paul Reynard of the CDC and Dr. John Till of the Radiological Assessments Corporation was embarked on such a study. Dr. Till's organization was able to access previously classified material and painstakingly construct a data base based on dose information reconstructed from original sources. The study came to a halt due to lack of funding just as the final step of interpreting the data was about to begin. That process needs to be resumed under the direction of highly qualified, independent scientists. The federal government owes it to the people of South Carolina and Georgia.

The Nuclear Regulatory Commission is the independent oversight agency that the public depends on for its protection. We urge you to do a thorough, conscientious, and independent job using the best science available.

Above all, we urge you to make certain that the National Environmental Policy Act is obeyed and enforced and that you continue to listen to the public in reaching your conclusions in the upcoming Draft Environmental Impact Statement.

Sincerely,

Mary T. Kelly, LWV