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618 McLaws Street  
Savannah, GA 31405  
October 31, 2002

Rules and Directives  
Mr. Jay Rose, Document Manager  
NA-53, Forrestal Building  
U.S. Department of Energy/NNSA  
1000 Independence Avenue, SW  
Washington, DC 20585

Re: Supplement to the Programmatic EIS on SSM for a Modern Pit Facility Comments  
**MOX Is The Pits**

Sir:

I am opposed to the Department of Energy's plan to build a plutonium pit production plant at the Savannah River Site (SRS). The site is one of the most contaminated Superfund sites in the country. In Savannah, we have had to deal with the various leaks from SRS over the years, large and small, reported and unreported. It has polluted our air and water with nuclear waste. Making plutonium pits there will add more waste to the site's already overburdened waste stream. After over fifty years of generating nuclear waste there, enough is enough. The Department must keep its commitment to clean it up.

If the pit plant is built at SRS, many more shipments of plutonium will be sent there to keep the plant going. Although secret shipments are being made from Colorado by truck, some plutonium may have to come in by ship, and the most convenient ports for the site would be the Georgia Ports Authority terminals in Savannah and Garden City. I do not believe the longshoremen at the port would be comfortable offloading the most toxic substance known to mankind. Worse still, this would put a terrorist target squarely at our front door. In case of an attack or an accident involving one of these shipments or the fabrication facility how and where 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. I submit that it would be virtually impossible to evacuate the over 200,000 people in Chatham County under this scenario. Savannah, being the ultimate downwind and downstream community in relation to SRS, must be included in evacuation plans for accidents or terrorist attacks. All of the problems in trying to evacuate without warning people living in the immediate vicinity of SRS in addition to those in Augusta, Savannah and perhaps even Columbia should be grounds enough not to build the modern pit facility. None of us is expendable.

At the October 15 public scoping meeting, the Department admitted that there were connections between the plan to build a plutonium pit facility and the one to make mixed oxide (MOX) plutonium bomb fuel for commercial power reactors.

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E-RIDS = ADM-03  
Add = T. HARRIS (Teh)

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Since that is the case, public comments and concerns regarding the MOX facility should also be considered for the modern pit facility. I am also concerned that no matter what ends up being included in the EIS, all or part of it may be deemed classified in the name of national security. The public deserves to know and must know all of the dangers associated with this facility. Not revealing these dangers using the all-inclusive excuse of national security is unacceptable, therefore I urge the Department to resist this strong temptation.

Not only am I opposed to a modern pit facility being built at SRS-I oppose building such a facility anywhere in the United States. The Department claims that our nuclear weapons need new plutonium pits to keep them "useable" as part of Stockpile Security and Maintenance. In reality, this is just a plan to build more and new nuclear weapons, such as "mini-nukes" with yields equivalent to the Hiroshima bomb, robust nuclear earth penetrators and dial-a-yield bombs. Our country does not need these new weapons nor do we need to make more of the nuclear weapons we already have. If this program is allowed to go forward, the United States will launch a new nuclear arms race because other countries will feel threatened by the increase in our arsenal. We will appear to be trying to rule the world through intimidation. Being an intimidator helped the late Dale Earnhardt win seven NASCAR national championships but it is a terrible strategy for fostering international good will. It also does not help that we are violating international law by making more nuclear weapons. I specifically would like to cite our obligations under Article 6 of the Nuclear Non-Proliferation Treaty to cease "the nuclear arms race at an early date and to [achieve] nuclear disarmament". Perhaps this and other considerations of international law are but an afterthought to the Department. This kind of thinking makes others see our country as a war mongering rogue nation, the exact same way President Bush wants us to see each of the countries he identified as an "axis of evil". It would also unnecessarily increase our risk for another devastating terrorist attack on our soil.

No community deserves to be up to its armpits in plutonium pits, especially when one realizes that the end result of the bombs containing these pits is the worst environmental impact of all: the total destruction of all life on our planet many times over. Believe it or not, this is your planet too. That being the case, the choice is crystal clear. THIS INSANITY MUST STOP NOW! I therefore strongly urge the Department to choose the no action alternative, treat the plutonium at SRS as waste, not a commodity, immobilize it using the existing nuclear waste instead of making MOX and clean the site up.

Respectfully submitted,



Jody Lanier

C.C. Mr. Mike Lesar  
U.S. NRC  
Rules & Directives Branch