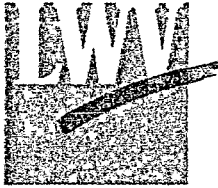


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**Statement for Nuclear Regulatory Commission Public Meeting
Re the DEIS for the proposed MOX Fabricating Facility at SRS
N. Augusta, SC, March 26, 2003**

My name is Mary T. Kelly, representing the League of Women Voters of South Carolina. We appreciate the opportunity to comment on the current Draft EIS for the building of the MOX manufacturing facility.

Our comments and concerns can be summed up as follows:

Failure to hold meetings in a variety of places in South Carolina, but especially in the state capitol, Columbia. This meeting is being held to fulfill requirements of the National Environmental Policy Act, a law that is aimed at including the average citizen stakeholder in the process through which major decisions are made. You are proposing to build a factory that is essentially a heavy chemical manufacturing plant with potential for contaminating the air and water with a wide variety of substances only some of which are radioactive. Areas far beyond a fifty or sixty mile radius could be affected. We know that tritium spills have affected communities far down stream and ground water contamination is flowing towards Georgia.

Meetings in the N. Augusta/Aiken area tend to be dominated by those who see any and every proposal for the Savannah River Site in economic terms alone, a situation that at some other meetings has prevented valid information and concerns from being presented. Yet the experience of Chernobyl proves how far reaching the effects of a major accident can be. Not only are we all in danger but as tax payers, we all have a stake.

The failure of this DEIS to deal with possible terrorist acts or a criticality accident.

The failure of this DEIS to confront such issues is in line with the failure of the Homeland Security administration to acquaint the public with the dangers of such accidents for SRS and for nuclear power plants in this state. There is danger in ignorance. People need to know what they can do to protect themselves, and what to do if they have to evacuate. We are much better prepared for hurricanes.

Under NEPA a range of other options including no action should be presented. This DEIS offers only the preferred option versus no option. The same should be true for the choice of the F area.

The wisdom of concentrating so much plutonium at one site. SRS has to be one of the world's most inviting terrorist targets, even without the added plutonium. As the old

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saying goes, "Never put all your eggs in one basket." Having so much plutonium in one place also increases the prospect of a criticality accident.

Should we be transporting plutonium and uranium around the country in a time of war and international hostility to the US? Some of that plutonium will be in the form of plutonium oxide powder, a highly reactive and flammable substance. Depleted uranium in the form of gaseous uranium hexafluoride, a nasty substance, will be transported to a processing plant in Wilmington, NC, solidified as uranium dioxide, and then transported to SRS.

This DEIS estimated 400 deaths in the minority community based on computer modeling and is now coming back to revise that to 50. Although modeling is a valid technique for estimating the unknown, it must be based on realistic choices of variables and not too many of them. The assumptions need to be justified. A lot more information is needed about how you got your numbers.

It is distressing that a truly valid study of the impact of SRS operations on public health has never been completed. The Dose Reconstruction Project was dropped by the CDC and DOE for lack of funding just as it was beginning to interpret the results of all the data collection. Since DOE proposes further operations at this site, you owe it to the people of South Carolina who have and will be placed at risk to complete this study.

The weather discussion in this DEIS is inadequate and doesn't cover enough years and doesn't take into account some special South Carolina background. Hurricane Hugo showed how hurricanes and the accompanying tornadoes follow river courses. Charlotte, NC was heavily impacted by Hugo, a surprise to people, including me, who had taken refuge there. It came in just north of Charleston and followed the rivers through Sumter and up the Wateree to Charlotte.

The impact on the health of citizens should cover more than a fifty to sixty mile radius.

There should be more discussion about the backgrounds of the entities composing DCSW, from the standpoints of their financial status and history and their environmental and safety records. It is extremely troubling that one party to this consortium is COGEMA a French company, owner and operator of sites like La Hague that have bad environmental and safety records. It may not be possible to get adequate information about COGEMA since France is far less open than the US about its nuclear operations.

If the Russian MOX program does not proceed according to plan - it is reliably reported that it will not - how will the US program be affected? It could well mean that the MOX program will be delayed or aborted and that the surplus plutonium will be stored at SRS with no place to go.

I appreciate the opportunity to present these views and trust that all the views expressed by the participants at these meetings will be given careful consideration.