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Subject: Comments on Environmental Impact Statement for MOX Facility at SRS

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May 14, 2003

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

Comments on Environmental Impact Statement for MOX Facility at SRS

Dear Sir:

The limited alternatives presented and evaluated in the Draft EIS result in misleading conclusions, and are structured in an artificially truncated way. As set forth in the DEIS, the only two alternatives are the MOX processing 'project' and the no-project alternative, in which enormous amount of water would be required to store plutonium at the SRS site. By failing to include a third alternative, namely stabilization of plutonium in a ceramic medium, known as "immobilization," the approach reduces the assessment to an undesirable choice between two fundamentally flawed options. Structuring the assessment in this way is little more than a veiled leap from preconceived notions to foregone conclusions. The lengthy technical analysis of MOX in the DEIS clouds the essence of more elementary questions, which are both unasked and unanswered, or if addressed, done so in an incomplete way.

- o According to the DEIS, MOX processing would use far less water in the process itself. But by producing radioactive fuel for continued production of electricity at nuclear power plants, the project would extend use of water-intensive and toxic technology that imposes major long-term social, environmental, and economic costs.
- o Furthermore, nuclear power plants consume huge volumes of water in cooling processes. Nearby Plant Hatch on the Altamaha River withdraws 57 million gallons a day and returns only 24 million gallons a day. The difference, 33 million gallons daily, is not returned to the river, presumably due to losses to steam. With ever-rising demands for water supply in this rapidly growing state, particularly during extended drought, such water-intensive practices are increasingly unjustifiable, imposing avoidable burdens on many other sectors.
- o Fresh water flow in Georgia's five coastal rivers is essential to highly productive inter-tidal estuaries. Though Georgia's Atlantic coastline is relatively small (~ 100 miles), one-third of the remaining tidal marshes on the nation's eastern seaboard are within this state. Relative to our shoreline, Georgia has six times the area of tidal marsh compared the average ratio in the Atlantic states. These marshes are vital habitat for a diverse variety of species that compose the food web for marine ecosystems, so much so that the National Marine Fisheries Service designated Georgia's estuaries as Essential Fish Habitat under federal law. Biologists estimate that at least 75% of marine species depend on this ecosystem. Processing nuclear fuels seriously threatens these vital resources, yet assessments such as this DEIS undervalue these risks and their potential irreversibility.
- o Further loss of fresh water, or contamination of it, could have devastating adverse impacts on remaining ecosystem functions in the lower reaches of Georgia's five coastal rivers and the vast estuaries and nature-based economy they support. The latter includes some 40,000 jobs in coastal Georgia alone, about one out of five jobs here, generating more than \$1 billion a year in revenue annually. Risks such as those linked to nuclear fuel processing, storage, handlings, transport, use, and conversion to electricity, each of which pose serious threats to these resources and the businesses they support.
- o Further, nuclear fuel itself presents an elevated risk due to terrorism, as well as the 'conventional' risks of transport, handling, and storage, each of which introduce unjustifiable threats to largely unwitting third parties (namely, the public). While the DEIS acknowledges the potential for risk, the basis for concluding that this risk is acceptable is derived from highly subjective assessment of the probability of accidental or subversive (terrorist) events that could cause major threats to public health and the natural environment, both short-term and long-term. Even if it is assumed that assessment of accident probability is reasonably accurate, recent simulations of terrorist attacks strongly suggest that conventional methods for defending nuclear facilities are inadequate, and therefore it is reasonable to conclude that risk assessment strategies are woefully insufficient as a basis for making decisions such as those inherent to the proposed MOX facility.

For the above reasons, the Center for a Sustainable Coast opposes the proposed MOX facility at SRS, in large part because we believe that the DEIS is flawed in both its assumptions and in various critical aspects of analysis. Unless assessment of plutonium immobilization is considered as a legitimate alternative to the project, we feel strongly that the whole approach is fundamentally flawed and fiscally irresponsible. With this finding, we conclude that the MOX facility assessment to date in the DEIS is unacceptable, and certainly insufficient to support a decision having such enormous federal financing burdens and long-term implications for the public welfare.

Sincerely,

David Kyler, Executive Director

Cc: Senator Saxby Chambliss

Senator Zell Miller
Congressmen Jack Kingston

Congressman Max Burns
Congressman Nathan Deal

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