



Southern Alliance for
Clean Energy

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

2/28/03

68 FR 9728

(62)

May 14, 2003

RE: NUREG-1767, Draft Environmental Impact Statement of the Mixed Oxide Fuel Fabrication Facility at the Savannah River Site Nuclear Facility

Mr. Lesar:

These comments are in addition to oral comments presented by Southern Alliance for Clean Energy (SACE) at the Savannah, GA public meeting on March 25, 2003. The oral comments were also submitted in hard copy form since the 5-minute speaking allotment was not sufficient to cover what we had prepared. If those comments have not been entered to the record in their entirety, we have attached them again to this document.

We are disappointed that an additional extension to the public comment period was not granted, as we had formally requested in our oral comments. SACE again requests an extension. We are also concerned that many of the important objections to the plutonium bomb fuel, or mixed-oxide fuel "MOX," program have been entirely dismissed by the U.S. Nuclear Regulatory Commission (NRC).

Plutonium Disposition Program General Concerns

Southern Alliance for Clean Energy believes that the NRC has only one option that would truly protect the public health: deny the license application request for the MOX fuel fabrication facility (or plutonium fuel factory) at the Department of Energy's Savannah River Site nuclear facility (SRS). We urge that the pursuit of developing a plutonium fuel economy be ceased in all sectors of government and private enterprise, as it will allow plutonium, a dangerous material, to enter civilian commerce and the international marketplace.

We thoroughly disagree with the NRC staff's preliminary decision in this report that the "overall benefits of the proposed MOX facility outweigh its disadvantages and costs." The NRC states on P. 2-37 four main points of consideration that brought them to this flawed decision and we will again touch upon several of them.

Significant Changes in Plutonium Disposition Program

At the public meeting in Savannah this March, the audience was told that "the national policy decision between Russia and the US to reduce surplus weapons plutonium" was a leading reason for the NRC staff's initial support of this plutonium bomb fuel program. This was used as a reason why the immobilization alternative, which is generally preferred as a cheaper, safer option that will result in less nuclear waste and potentially less impacts to the community, was not considered as an option to study

E-RFDS-ADM-D3

Call = T. Harris (TEH)
A. Lester (ACL1)

Template = ADM-D13

by the NRC. Yet, in the Department of Energy's Amended Record of Decision regarding the Surplus Plutonium Disposition Program that was released on April 17, 2003 [6450-01-P], *AFTER the public meetings on the plutonium fuel factory were OVER*, they state that the cancellation of the immobilization program was due to "budget constraints" – not conflicts with Russian/US policy.

The DOE statement goes on to say that the "program will dispose of 34 metric tons (MT) of surplus plutonium, including approximately 6.5 MT of the 17 MT of surplus plutonium originally intended for immobilization." This leaves us logically wondering, what will happen to the rest of the plutonium? Apparently it is destined for SRS but for what purpose and what assurances can the NRC provide that those many extra tons of plutonium will be safely stored, given that there are currently only plans to refurbish existing, old nuclear reactors to store one of the most highly sought after materials for use in modern nuclear weapons, a material with a hazardous radioactive life of over 240,000 years? We urge the NRC to demand that the DOE do a thorough supplemental environmental impact statement of this major change in policy BEFORE the NRC issues a final EIS on the plutonium fuel factory. The 13-page amended record of decision by the DOE is insufficient and the NRC deems to be obligated to protect the public interest, not another federal agency, nor domestic and foreign contractors.

Attached is a brochure from a recent event in Savannah, where staff from SRS addressed business leaders on various future missions, including the "Modern Pit Facility," which is essentially a new nuclear bomb factory. SRS is believed to be the preferred site for this plutonium trigger plant that will cost billions of dollars. Yet budgetary constraints within DOE were cited for canceling immobilization? The draft EIS on this new bomb-making facility is scheduled to be due out within the next month. Given this pursuit of a mission in complete contrast to our nation's supposed "disposition" of surplus weapons plutonium in a supposed parallel venture with Russia to reduce our nuclear weapons stockpiles, we question why the NRC cannot state the conflict within national policy and request that the issue be resolved prior to issuing a determination on the MOX plant? Also, the "unaccounted" plutonium that is coming to SRS but will not be used for MOX could very easily become feed material for the new Modern Pit Facility. The NRC needs to take this into account. SACE also requests the NRC to delay issuing a decision until the Modern Pit Facility draft EIS is issued and commented on—there is likely to be much overlap in the programs, along with several policy conflicts.

SACE still has not received answers to our concerns raised over the DOE's February 2002 *Report to Congress: Disposition of Surplus Defense Plutonium at Savannah River Site*, that essentially recommends the need to add at least two additional, unnamed nuclear reactors for plutonium bomb fuel (MOX) use. Our nearby Southern Nuclear Plant Vogtle expressed interest in the plutonium fuel program back in 1996 and we are concerned about the implications of the need for more nuclear reactors. How will the NRC address this need for more nuclear power plants in the final EIS for the MOX fuel facility?

Water Concerns

The NRC concluded that there are minimal environmental impacts if plutonium fuel is produced at SRS. We disagree and will highlight our water concerns, which were raised in our oral comments. Water resources are limited and debates on how this precious resource should be protected is under heated debate currently in the Southeast. The link between energy and water resources is profound. At the national level, the electric industry follows closely on the heels of irrigation as the largest water user in the U.S. Yet, there is no discussion in the draft EIS on the impacts of nuclear power production, which the MOX program will support the possible advancement of, on the region's water supply.

Nor does the draft EIS clearly account for how much ground and surface waters will be used additionally by the MOX plant. Currently, SRS requires enormous amounts of surface and ground water, in the tens of billions of gallons, *just to support currently established operations*. The draft EIS was nearly impossible to decipher what the rates of consumption (actual water loss) are now on site for various operations and in the future, for the MOX plant. This accounting needs to occur before deciding that water impacts by the proposed facilities are “negligible.”

Accidents

The original draft included significant errors in the calculation of latent cancer fatalities if there were an explosion at the MOX facility—estimating nearly 400 deaths; the new calculations result in less fatalities, but we still consider 100 deaths to be significant and important enough to warrant denying approval.

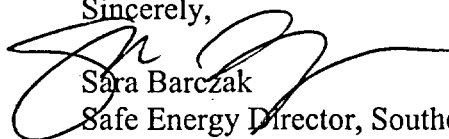
Summary

Southern Alliance for Clean Energy believes that the NRC must address the full impacts of the plutonium bomb fuel program—how this scheme is likely contributing to the eventual production of nuclear weapons components at SRS and the use of the site for permanent nuclear waste burial. A full accounting of what and how much plutonium is coming from where and being used for what project when it arrives should be done and made public.

We have included copies of petitions SACE recently collected and would like to at least alert people to the fact that many people do not want this project and though they may not be capable of making formal, written comments, that their opposition should be noticed and considered. Though the NRC staff said that general comments and claims of basic opposition are not helpful to them, we believe that these names are helpful to policy makers, who ultimately have the power to make a positive difference by working to protect the region, and these very citizens, from further exploitation.

We suggest that after the NRC has reviewed all of the comments on the draft and does more research, they should deny the license request or at least recommend that the “no action alternative” is more advantageous to health and safety than the MOX program. Instead, other programs that appear to be more environmentally sound, safer to workers, less expensive, and could prevent the circulation of nuclear weapons materials, such as immobilization of surplus plutonium, should be funded and supported through further research and development. Though not a perfect technology, it is far cheaper than other options and appears to have less risks overall than the currently encouraged technologies.

Sincerely,



Sara Barczak

Safe Energy Director, Southern Alliance for Clean Energy
3025 Bull Street, Suite 101
Savannah, GA 31405
(912) 201-0354

cc: U.S. NRC Commissioners, Governor Sonny Perdue, Governor Mark Sanford, U.S. Senator Zell Miller, U.S. Senator Saxby Chambliss, U.S. Rep. Max Burns, U.S. Rep. Jack Kingston, U.S. Rep. Sanford Bishop, Jr., U.S. Rep. James C. Clyburn, GA Senator Regina Thomas, GA Rep. Nan Orrock



Southern Alliance for Clean Energy

PUBLIC COMMENTS REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE MIXED OXIDE FUEL FABRICATION FACILITY FOR THE MARCH 25, 2003 SCOPING MEETING IN SAVANNAH, GA

My name is Sara Barczak and I am the Safe Energy Director for Southern Alliance for Clean Energy, formerly, Georgians for Clean Energy, in our Savannah field office. We are a regional non-profit conservation and energy consumer organization. We have members throughout Georgia and the Southeast and have focused on energy policy, including nuclear concerns, for over 20 years.

From the outset, we would like to state that the current draft Environmental Impact Statement (EIS) now before us leaves much to be desired and we are likely going to resubmit and restate all of our past concerns again. In a sense, it appears that many of the important objections to the plutonium bomb fuel, or "MOX," program have been entirely dismissed by the U.S. Nuclear Regulatory Commission (NRC).

For example, at the scoping meeting here in Savannah last September, many people were concerned about terrorism and wanted to know how terrorism would be addressed in the draft report. On P. I-29 the section on "Impacts from Terrorism" dedicates two sentences to this issue, stating, "Many commenters raised a number of different issues concerning terrorism. The draft EIS will not address terrorism, because these impacts are not considered to be reasonably foreseeable as a result of the proposed action."

That is not acceptable given the repeated concerns that we, along with NRC staff, heard voiced back in September. It is hard to believe that transporting tens of tons of weapons plutonium across the country to one single location, the Department of Energy's massive Savannah River Site nuclear facility that is about 90 miles upstream from Savannah, does not constitute an action that terrorists might want to take advantage of. Isn't plutonium a highly toxic substance with a hazardous radioactive life of 240,000 years and is a key component to modern nuclear weapons—and that one only needs several pound of it to make a bomb? Though in numerous federal agency meetings on various nuclear-related topics, the issue of terrorism is supposedly going to be addressed in separate guidelines and under "top-to-bottom" agency reviews, it is extremely pertinent and vital to address terrorism concerns and security measures in *this* DEIS.

Plutonium Disposition Program General Concerns

Southern Alliance for Clean Energy would like to make it clear from the outset that we strongly oppose the production of any type of plutonium bomb fuel for a variety of reasons: it is an experimental program that has never been pursued at this scale; poses a risk to workers and the surrounding

communities at both the production and reactor sites; will increase the volumes of hazardous, radioactive waste streams at a location already plagued by enormous quantities of dangerous waste and previous contamination; raises complex consumer and rate-payer concerns over government subsidies unfairly favoring a destructive type of energy production over environmentally friendly and safe alternatives; increases the negative health impacts to communities in cases of severe accidents at reactor locations; and blurs the division established between military and civilian nuclear programs.

We believe that the NRC has only one option that would truly protect the public health: deny the license application request for the MOX fuel fabrication facility (or plutonium fuel factory). We urge that the pursuit of developing a plutonium fuel economy be ceased in all sectors of government and private enterprise, as it will allow plutonium, a dangerous material, to enter civilian commerce and the international marketplace.

We thoroughly disagree with the NRC staff's preliminary decision in this report that the "overall benefits of the proposed MOX facility outweigh its disadvantages and costs." The NRC states on P. 2-37 four main points of consideration that brought them to this flawed decision:

- The national policy decision between Russia and the US to reduce surplus weapons plutonium;
- The minimal radiological impacts of and risk to human health posed by the construction, operating, and decommissioning of the plutonium fuel factory;
- The minimal environmental impacts the plutonium fuel project would pose; and
- The economic benefit to the local community.

On that same page, the NRC states that the most significant potential impact is if there were a large accident at the proposed fuel factory but narrowly concludes that though the consequences of an accident "would be significant, the likelihood of such an accident occurring would be very low (highly unlikely)." We believe that the "No Action Alternative" the NRC was mandated to study is a better choice overall.

We will touch upon errors we have found with the four points and will follow up with more detailed written comments prior to the May 14th deadline. Which leads us to formally request an additional extension of the public comment period, beyond the recently adjusted May deadline. This program is a federal action, and given the state of our nation, and the degree to which Congress and the general public is distracted by events unfolding in the world, we find this request reasonable. Additionally, errors in NRC calculations allowed for the initial extension, and since they are not yet clearly understood, and one cannot be sure of what else may be incorrect, it seems to follow that the public should have more time to research and respond.

Significant Changes in Plutonium Disposition Program

We will first comment on the policy decision to reduce plutonium stockpiles in the US and Russia.

Plutonium Bomb Fuel (MOX) and Nuclear Bomb Factory Overlap

Even though our nation is supposedly engaged in a program being performed under the guise of "disposition" of surplus weapons plutonium in a supposed parallel venture with Russia to reduce our nuclear weapons stockpiles, the Department of Energy's National Nuclear Security Administration issued a press release on May 31, 2002 announcing that it would begin design work for a facility to manufacture plutonium pits, also known as "triggers" for nuclear weapons, a critical component. Rocky

Flats—the site in Colorado that is now shipping its plutonium to SRS, had carried out this function up until 1989 and is now closing. SRS is believed to be the preferred site for this plutonium trigger plant that will cost billions of dollars.

Southern Alliance for Clean Energy is concerned about the overlap or parallels that may occur between the plutonium mixed oxide fuel program (MOX) and the Modern Pit Facility program. At the October 2002 public meeting, DOE staff said that “synergies” would be evaluated in their draft EIS. We believe that the NRC should also give a very close look to the possible use of the same buildings by both programs, the exact amounts and types of waste generated by each and how those wastes will be “dealt with,” the thorough tracking of plutonium into and out of both facilities, the possible overlap of contracting partners, etc. All of this information should be made available to the public and should be reviewed prior to issuing a final decision on the MOX plant.

The NRC should deny the plutonium fuel factory license application request based on the obvious conflict within the national policy on surplus weapons plutonium—what really is our national policy? Is it to bring weapons plutonium to SRS to secure it or to bring it here to help us build new nuclear weapons? There is enough public information available to show there is a major discrepancy. Since many of the decisions in this draft EIS are based on not wanting to conflict with foreign policy agreements, such as the unfortunate cancellation of the cheaper and possibly safer immobilization option, it appears that that in itself is a flawed argument since there is no cohesive policy on what we, the US, intends to do with our plutonium stockpiles.

We are very concerned about the number of significant changes that have occurred in the plutonium disposition program, such as the cancellation of immobilization and the implementation of long-term plutonium storage at SRS. We again urge the NRC to request that the Department of Energy conduct a Supplemental Environmental Impact Statement immediately, especially before the NRC issues its own final EIS on the plutonium fuel factory.

Additionally, the DOE’s February 2002 *Report to Congress: Disposition of Surplus Defense Plutonium at Savannah River Site*, essentially recommends the need to add at least two additional, unnamed nuclear reactors for plutonium bomb fuel (MOX) use. Our nearby Southern Nuclear Plant Vogtle expressed interest in the plutonium fuel program back in 1996 and we are concerned about the implications of the need for more nuclear reactors. How will the NRC address this need for more nuclear power plants? How will additional reactors be selected? Will the public be involved in this process?

Radiological Risk

The NRC concluded that there are minimal risks to human health if plutonium fuel is produced at SRS. We will comment on this in more detail in our written comments but wanted to point out that from our perspective this project represents a real and unacceptable risk, especially to workers. The report states that “credible” accidents will be studied in either the EIS or the Safety Evaluation Report. What is the NRC’s definition of a “credible” accident? Are there no risks of harm to human health if a “non-credible” accident occurs?

Why does the NRC choose to use the less-protective health standard of 1 in 10,000 “accepted deaths” rather than the EPA’s 1 in 1 million? Has anyone here accepted their death already from events occurring up at SRS?

Many of the mitigation procedures that are identified in the draft EIS seem lacking in their ability to protect workers and surrounding communities. For instance, the report states that, “issues related to general emergency preparedness of communities are outside the scope of this EIS.” That was one of the main concerns raised by Savannah residents in last September’s meeting. The report also mentions that, “consequences on human health would be mitigated by following SRS emergency procedures.” We formally request a copy of the SRS emergency procedures. Will citizens in Savannah and other communities throughout the Savannah River corridor also receive a copy? Why don’t we know what this is? How do we know whether we are going to be protected?

The entire environmental justice section needs to be reviewed again due in part to NRC-acknowledged incorrect accident consequences. Additionally, there seem to be numerous contradictions within the report of what will and what will not be studied in terms of environmental justice. For instance, environmental justice impacts apparently will not be studied along MOX transportation routes but elsewhere in the document it states that transportation will be studied in terms of environmental justice.

We are concerned about the health of SRS workers at the proposed plutonium fuel factory. We recommended that both sand and HEPA filters be used. In the report, it mentions that only HEPA filters will be used. We again hope that a combination of both can be recommended by the NRC to enhance worker protection.

Environmental Concerns

The NRC concluded that there are minimal environmental impacts if plutonium fuel is produced at SRS. We disagree and will highlight just two concerns tonight.

Nuclear Waste Concerns

SRS has a severe nuclear waste problem and the plutonium bomb fuel is only going to make it worse. The site currently has the 2nd largest volume of high-level liquid nuclear waste (more than 30 million gallons) and wins the gold medal for having the most amount of radioactivity at any DOE site in the nation. The future is less than encouraging as the DOE projects that 95% of future high-level radioactive waste generation will occur at SRS. The plutonium fuel program is slated to bring more dangerous nuclear waste to this site—in some instances, waste streams that the site currently has no experience with. As the NRC may remember from the September meetings in Savannah, nuclear waste issues are of grave environmental concern locally. The draft report does not do a good job describing and tracking the various waste streams that will be created by the MOX process. We request that a process flow diagram be developed to clearly show what wastes are being generated where and where those resulting wastes will be eventually stored or treated.

Water Concerns

Water resources are limited and debates on how this precious resource should be protected is under heated debate currently in Georgia and elsewhere. Currently, SRS requires enormous amounts of surface and ground water, in the tens of billions of gallons, *just to support currently established operations*. It was difficult to discern what additional water use will be required and what additional water contamination will be generated by the plutonium fuel factory, over its entire operating life, versus the proposed “no action alternatives,” including immobilization? In the report, it does state that

groundwater beneath the site is listed as a Class II drinking source by the EPA, meaning it has potential for existing and future drinking water needs. It later states that contamination is present beneath the entire site. Which is it? And regardless, isn't placing any additional burden on this resource considered more than just a minimal impact?

Economic Benefit

The NRC stated that the positive economic benefit to the local community was part of their preliminary decision to recommend the plutonium fuel plant. We are gravely concerned that this perceived economic benefit is being unfairly promoted to the expense of others. This is an extremely expensive program that is estimated to cost nearly \$4 billion, nearly doubling original estimates. And this is only for the program in the U.S. and does not include ALL the costs. The costs for developing this infrastructure within Russia is also staggering. The U.S. taxpayer is footing this bill. Is it fair for a local community like Aiken, SC to prosper at the expense of others...and that that advantage be used as a reason to recommend the project by the agency mandated to evaluate the merits of the license application?

How is Duke Cogema Stone & Webster going to benefit economically from this endeavor? Why is this not part of the review process? Are they deemed a local benefactor, or correctly as an international consortium?

How does a city like Savannah benefit from plutonium fuel? How are our lives improved if there is a severe accident or a leak to the surrounding environment?

Additional Concerns for DEIS

Due in large part to the errors in the calculation of latent cancer fatalities if there were an explosion at the MOX facility, we alert the NRC to sincere concerns on credibility in all of their calculations.

We also request that full scoping comments be provided instead of just a summary of scoping comments, as was done for this draft in Appendix I. This allows for the reader to see whether their original question was answered and also whether others asked the same item and received a similar or differing response.

We also suggest that if questions or comments are raised that will be addressed in the Safety Evaluation Report, that those comments be transferred over to the proper contacts within the NRC and that the commenter be placed into the pool of interested participants in the SER process. The division between the EIS and SER is very confusing and needs to be simplified in some way.

We again ask that the environmental and safety records of the individual contractors involved in the international consortium, Duke Cogema Stone & Webster (DCS), be studied thoroughly by the NRC. At a time when the French are not currently America's favorite partner, it is suspect that our government is not concerned with Cogema's (a French government owned company) previous track record in handling commercial plutonium and nuclear waste—we are after all giving them proposing to allow them to handle a highly dangerous material and one sought by numerous rogue nations and terrorists. DCS did not exist before this proposed plutonium fuel project came to light—how do we know they will do it right?

Summary

From what has already occurred, it appears that the Department of Energy has decided that SRS will be the centralized, long-term plutonium storage dump, using the plutonium “disposition” plan as justification to bring the plutonium here and that the NRC is doing its part to allow that to unfortunately happen. We should remember that the storage of plutonium at SRS could create one potential source of feed for any new pit plant.

Southern Alliance for Clean Energy believes that the NRC must address the full impacts of the plutonium bomb fuel program—how this scheme is likely contributing to the eventual production of nuclear weapons components at SRS and the use of the site for permanent nuclear waste burial. A full accounting of what and how much plutonium is coming from where and being used for what project when it arrives should be done and made public.

We suggest that after the NRC has reviewed all of the comments on the draft and does more research, they should deny the license request or at least recommend that the “no action alternative” is more advantageous to health and safety than the MOX program.

Southern Alliance for Clean Energy believes this controversial nuclear energy program threatens national security. Support of the plutonium fuel program could lead to the development of a plutonium economy that would threaten nuclear non-proliferation goals and would increase already excessive volumes of deadly, highly radioactive nuclear waste at SRS.

Instead, other programs that appear to be more environmentally sound, safer to workers, less expensive, and could prevent the circulation of nuclear weapons materials, such as immobilization of surplus plutonium, should be funded and supported through further research and development. Though not a perfect technology, it is far cheaper than other options and appears to have less risks overall than the currently encouraged technologies.

Thank you to the staff for holding this meeting in Savannah.

Thank you.



The Modern Pit Facility

*A potential new mission for the Savannah River Site
in support of America's national security needs*



THE NEED

A "pit" is a hollow sphere of plutonium material and is a critical component of a nuclear weapon. The pit functions as a trigger to allow a modern nuclear weapon to operate properly.

Because pit production was shut down in 1989 at the Rocky Flats plant, *the United States is the only nuclear power without the capability to manufacture a plutonium pit.*

The proposed new facility, called the Modern Pit Facility (MPF), will reestablish the capability to manufacture all pit types in the nation's current nuclear stockpile and meet any future requirements in an environmentally compliant manner.

In May 2002, the National Nuclear Security Administration (NNSA) announced that it will begin conceptual design work for the MPF. The conceptual design work will be done at the Savannah River Site, supported and directed by the NNSA and a multi-site team.

Depending on the production capacity of the MPF, the project is estimated to cost between \$2.2 and \$4.1 billion and would require about 1,000 operations personnel.

THE BACKGROUND

Plutonium continually undergoes radioactive decay. As the plutonium pits age, physical degradation occurs. This impairs the ability of the weapon to operate correctly and potentially places the nation's nuclear deterrent at risk. The MPF will maintain the stockpile by manufacturing replacement pits before they reach the end of their useful lifetimes.

The decision to proceed with the design and planning for a modern pit facility is the latest development in NNSA's pit program. The NNSA's interim pit production and certification facility at Los Alamos National Laboratory has met all pit production and certification milestones and is on track to manufacture a certifiable pit in FY 2003. Although that facility cannot support long-term stockpile needs, it will allow NNSA to meet its current manufacturing requirements and provide valuable information for the new pit facility design.

A significant investment in new state of the art technology is planned for the MPF to improve production efficiency and agility, reduce environmental impacts, and enhance safety and security.

The MPF project will also consider automated systems and modular facility approaches that are demonstrated to be safe and reliable and are expected to be consistent with more modern manufacturing methods.

The Savannah River Site is one of several sites to be considered for the location of the MPF.

ATTRIBUTES, IMPACT AND TIMING

- **High tech, state-of-the-art processing and manufacturing facility**
- **Safe secure operation, minimum impact on the environment**
- **Minimal waste generation**
- **After completion of construction, existing pits will be received from the Pantex Plant in Amarillo, Texas, and processed into new pits which will be shipped back to Pantex**

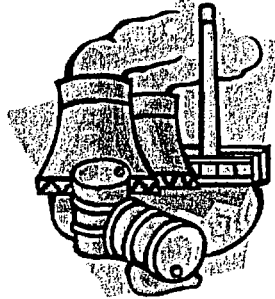
- **May 2002: NNSA approval to proceed with Conceptual Design**
- **September 2002: Begin the formal process to evaluate and select a preferred site**
- **April 2004: Earliest possible National Environmental Policy (NEPA) Record of Decision (site selection)**
- **Start of Construction and Operation: To be determined by NNSA based on scientific conclusions about the lifespan of existing pits**

- **Facility Cost: Preliminary Estimated Range of Cost: \$2.2-\$4.1 billion**
- **Staffing: 800-1,000 operations personnel and 300 support personnel, plus 2,100 jobs expected in the private sector**

THE REPORT

The Congressional Panel to Assess the Reliability, Safety, and Security of the United States Nuclear Stockpile, chaired by Dr. John S. Foster, in their report to Senator Carl Levin, Chairman of the Committee on Armed Services, reported that "we currently do not have all the capabilities essential for sustaining the stockpile." The panel cited the need and sense of urgency to move forward with the conceptual design of a pit production facility.

DON'T brand the Southeast "PLUTONIUM ALLEY"! We don't want plutonium fuel!



Chairman Richard Meserve
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Meserve:

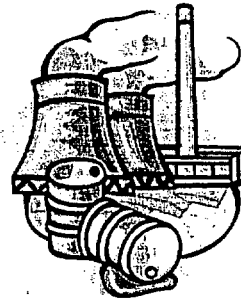
The proposed plutonium bomb fuel factory puts our nation, and especially this region at great risk. From the transport of plutonium across the country to the need to safely secure it upon arrival, we are also burdened with an unacceptable scheme that will increase contamination at the already extremely polluted Savannah River Nuclear Site. This proposal, also known as "MOX," is not safe, affordable, or sustainable. We again urge the Nuclear Regulatory Commission to deny the license request.

Sincerely,

Name	Address	Zip Code
Rowland Huddleston	419 Woodland St Nashville TN	37206 rowh@worldnet.att.net
Azelle Kushner	319 Wynnton Lake Circle Atlanta GA	30510 azellek@earthlink.net
DR Linda TROUT	382 Montford Asheville NC	28804
Vijaya Chopra	44 Pinnacle point Asheville NC	28805
Ryan Alkins	235 S. Limston Lexington, Ky	40508
Zivanna Elc'An Ancl	120 Elm Dr Asheville NC	28805
Amanda Womac	908 Shingle Chattanooga TN	37409
DAVE JACOBS	POB 7664 Asheville NC	28802
RUTH CLARK	266 Merrimon Av. Asheville NC	28801
ANNA GAFFNEY	11400 White Bluff Rd (3) SAVANNAH, GA	31419
CRISTINA NEGREA	704 E 4TH ST Savannah GA	31405
Jane Miller	114 Hopewell Ave Law. Ga	31406
Ernestine Dougherty	4606 Springhill Rd Nor. Ga	31409
ANN P. CONNEFF	1907 Brogdow St. SAV. GA.	31406
Harriet C. Gaudry	Bacon Park Dr., SAV. GA.	31406

DON'T brand the Southeast "PLUTONIUM ALLEY": We DON'T want plutonium fuel!

United States Nuclear Regulatory Commission
Honorable Commissioners
Washington, D.C. 2055
Re: NUREG-1767



Dear Commissioners:

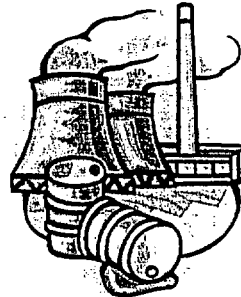
The proposed plutonium bomb fuel factory puts our nation, and especially this region, at great risk. From the transport of plutonium across the country to the need to safely secure it upon arrival, we are also burdened with an unacceptable scheme that will increase nuclear waste at the already extremely polluted Savannah River Site nuclear facility. This proposal, also known as "MOX," is not safe, affordable, or sustainable. We urge the Nuclear Regulatory Commission to deny the license request in order to protect our communities.

Sincerely,

Name	Address	Zip Code
<i>Jimmy Jackson</i>	1406 East 53 rd St	Sav, GA 31404
<i>Jimmy M Hall</i>	313 W. Hall St. Apt B	31401 Savannah, GA
<i>Jeremy Ballard</i>	509 East Duffy	Savannah Georgia 31401
<i>ZEPHREN TURNER</i>	217 E. 37 th St	31401 Savannah, GA
<i>Rachel Williams</i>	1229 Liberty St.	31401 Savannah, GA
<i>Adam Jacobs</i>	225 E. Taylor St. Apt. C	Sav, GA 31401
<i>ZACHARY LAUB</i>	415 E. Jones St.	31401
<i>KEVIN TORRES</i>	410 KENTUCKY AVE.	SAVANNAH, GA - 31401
<i>Mary Cooper</i>	103 Decker Dr.	Greenwood SC 29646
<i>Keith Smith</i>	608 Granville	Sav GA 31410
<i>Justin Smith</i>	608 Park Ln	Sav GA 31410
<i>Eric Smith</i>	608 Park W.	Sav. GA 31410
<i>Stephen Smith</i>	521 E. Park Ave	31401
<i>John Smith</i>	711 E 40 th	31401

DON'T brand the Southeast "PLUTONIUM ALLEY": We DON'T want plutonium fuel!

United States Nuclear Regulatory Commission
Honorable Commissioners
Washington, D.C. 2055
Re: NUREG-1767



Dear Commissioners:

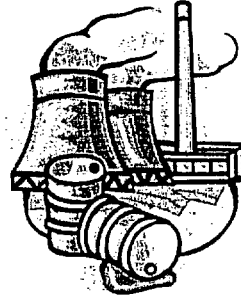
The proposed plutonium bomb fuel factory puts our nation, and especially this region, at great risk. From the transport of plutonium across the country to the need to safely secure it upon arrival, we are also burdened with an unacceptable scheme that will increase nuclear waste at the already extremely polluted Savannah River Site nuclear facility. This proposal, also known as "MOX," is not safe, affordable, or sustainable. We urge the Nuclear Regulatory Commission to deny the license request in order to protect our communities.

Sincerely,

Name	Address	Zip Code
ELLEN AXLEN	104 MONTGOMERY ST. #1	SAVANNAH GA. 31401
Diane Foley	600 Waters Ave #15	Sav. GA 31406
Louis Clausi	655 E Henry St	" " 31401
Brian Coome	630 Ks wags Hollow Ln.	Clifton, Ga. 30525
Carol Johnson	22100 Ridgely	Almaden, Mi. 48005
Charles Ann Butler	108 Dry Ditch	Sav. GA 31410
Don Jones	3 Hanger Road	SAV GA 31410
John High	1306 Hwy 20 W Apt 1010	Radcliff GA 31408
Mildred Miller	720 Maupas Ave	Sav. GA 31401
ROBERT Mollard	341 Aurora Blvd	Blountville GA 31302
Teri Schell	14 Bright St	Tybee Island, GA 31328
William	1000 PO 2500	Sav GA 31410
John	1000 PO 2500	31420

DON'T brand the Southeast "PLUTONIUM ALLEY": We DON'T want plutonium fuel!

United States Nuclear Regulatory Commission
Honorable Commissioners
Washington, D.C. 2055
Re: NUREG-1767



Dear Commissioners:

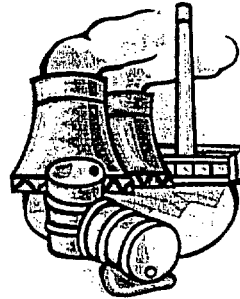
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Sincerely,

Name	Address	Zip Code
E. VICTOR MERESKI	1132 MERIDIAN DRIVE, SAV, GA	31406
RANA BISHARA	317 HB W. PATEL AVE	31401
Whitney Erin Lamb	408 W. Duffy St. Sav. GA	31401
Brian Paul	227 Elizabeth St NE ATL	30307
Kelli Pearson	723 E Maunus Ave	31401
Heather Flagle	2008 Whitaker St.	31401
Katie Vosler	524B E. 31 st	SAV, GA 31401
MATTHEW AKESS	600 GODLEY RD. ST. HELENA, SC	29920
CHARLES E. POWELL	P.O. BOX 1804 TYBEE ISLAND, GA.	31328
Melinda Powell	PO BOX 1804 Tybee Island GA	31328
LORIE J CORBUS	723 East Henry St. Savannah, GA	31401
Gregory M Geller	723 East Henry St Savannah, G.	31401
Kelli	549 E. Huntington St, Sav GA	31401

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Honorable Commissioners
Washington, D.C. 2055
Re: NUREG-1767



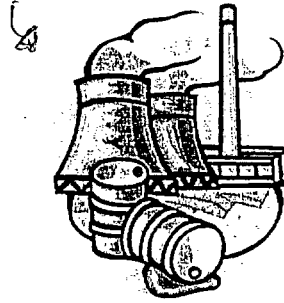
Dear Commissioners:

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Sincerely,

Name	Address	Zip Code
Tom Hollman	309 E. Henry St. Savannah, GA	31401
Jeffrey	306 E. Henry St. Sav. GA	31401
Walter Helle	102 S. MULBERRY ST. STATESBORO, GA.	31568
Clay Beardshear	27. W 5th St Savannah, GA	31405
Gene Smith	408 E 66th St Savannah GA	31405
Scott Justice	400 Exley Rd. Pincon	31320
D. L. Bowers	POB 1002, Savannah, GA	31402-1002
Pamela Mundy	102 E Liberty St #705 Sav GA	31401
Karee Bell	606 E Park Lane Savannah GA	31401
MR. JAMES STYRON	415 Hummingbird Ln Springfield GA	31329

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Honorable Commissioners
Washington, D.C. 2055
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Dear Commissioners:

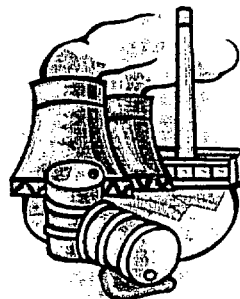
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Sincerely,

Name	Address	Zip Code
Laurie Fawcys	8 Lightenstone Ct Sav GA	31411
Whitby Lomb	408 W. Duffin	Sav Ga 31401
Tracy Concha	203 W. Lott	SAV 31401
Mark Williams	936 Trafford Ln	Sav 31410
Andrea Murrell	708 E. 51 st St	Sav GA 31405
Randy Lewandowski	708 E. 51 st St	Savannah GA 31405
AL KREBS	418 E. JONES ST	" 31401
Joni Saxton-Giusti	222 E. Gwinnett	Sav 31401
Celine Jaffer	15 E. Jones St	Sav GA 31401
Quincy Blum	508 E 58th	Sav 31405
Brian Kiser	201 W. Oglethorpe #223	Sav 31401
Shaun Hicks	311 W. Waldburg	Sav 31401
Veronica Delafuente	416 E. Gwinnett	Sav 31401
Kenny Willis	140 East 39th	Sav 31401
Alex Spinney	110 1/2 W DUFFY ST	SAV GA 31401

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United States Nuclear Regulatory Commission
Honorable Commissioners
Washington, D.C. 2055
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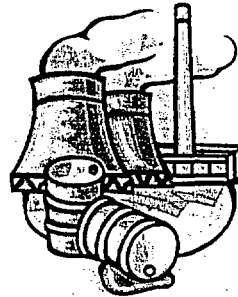
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Sincerely,

Name	Address	Zip Code
Cynthia Passolunghi	385 Lakeside Dr Rosell	1c 60172
Jaklyn Brillo	275 W Ridgewood Ave	Ridgewood NJ 07470
Paul Schwartzkopf	201 W Oglethorpe Ave Rm 638	31401
Andre Entersmann	111 Bordeaux Ln SAV, GA	31419
Stephanie Woods	1321 Jefferson Pk	31401
Stendean Bruhan	3910 Fauquier Ave	Richmond VA 23227
Wilde Cormican	179 W Gordon St	SAV GA 31401
Rebecca Salsman	201 West O-House	SAV 31401
Larry Williams	617 E. 40th St.	SAVH, GA. 31401
Bob Felt	320 W. Peach Ave	SAV. GA 31407
Barbara Harrison	6 W BACK ST	SAV GA 31419
Tracyhan Maxlone	1513 E. 54th St.	Sav-GA 31407
J. Colvitt	111 E. Gwinnett	GALV. GA 31401
Joshua Gabriel	PO BOX 1446 Brunswick	GA 31521.
KOA Luni Porch	Eric Woodell	"

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Honorable Commissioners
Washington, D.C. 2055
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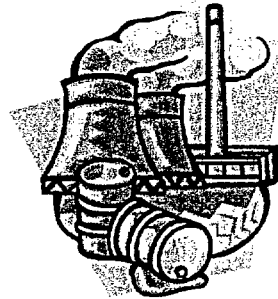
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Sincerely,

Name	Address	Zip Code
Alex Spinnay	110 1/2 W. DUFFY ST.	31401
Abby Schomaker	17 B. West Duffy St.	31401
Tiffany Johnson	409 B E. Waldburg St	31401
DAVID ZALESKI	515 E. HARRIS ST.	31401
H. M. Arnold	PO BOX 9622 CLT NC	28299
XXXXXXXXXX	XXXXXXXXXX	XXXXXX
A.M.J. Sarabia	109 E. Park Ave. Apt C	31401
BRIDGET YINGER	440 BOLI	31401

DON'T brand the Southeast "PLUTONIUM ALLEY"! We don't want plutonium fuel!

Chairman Richard Meserve
United States Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Chairman Meserve:

The proposed plutonium bomb fuel factory puts our nation, and especially this region at great risk. From the transport of plutonium across the country to the need to safely secure it upon arrival, we are also burdened with an unacceptable scheme that will increase contamination at the already extremely polluted Savannah River Nuclear Site. This proposal, also known as "MOX," is not safe, affordable, or sustainable. We again urge the Nuclear Regulatory Commission to deny the license request.

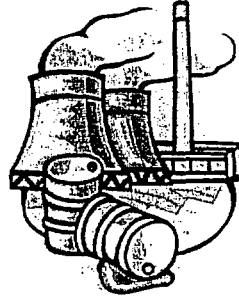
Sincerely,

Name	Address	Zip Code
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The Indigo Girls - Amy Ray & Emily Saliers	315 W. Ponce de Leon, Ste 755, Decatur, GA	30030
Ann Fuller	207 E. 49th St. Savannah, GA	31405
Jody Lanier	618 McLaws St. Savannah, Ga.	31405
Frank Madelmar	1825 East Whitsett St. Savannah, Ga	31404
Youth For A Cleaner Environment	119 Alpine Drive Savannah, GA	31405 - Janice James
Marjaret Betz	938 Moss Dr SAV GA	31410-2710
Jeana Aguado	3 Pinewood Ave. SAV GA	31406
Kate Voser	524 B E. 31st SAV. GA	31401
Louise J. Jirmanen	313 Montclair, Blvd Savannah, GA	31419
Lindsay Bodanza	333 Drayton St. Savannah GA	31401
Sandra Pitts	224 S. 1st St. Sav. Ga	31401
Mary R. DiBueno	332 E. Taylor, " " "	" " "
Heleen Meinscher	1402 E. 53rd St. Sav. GA	31404
Judy Jennings	7609 La Roche Ave Savannah GA	31408
Janice Broadwell	9 Flinn Dr Savannah GA	31406
Wells Eshen	814 Wenden St Durham NC	27701

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Honorable Commissioners
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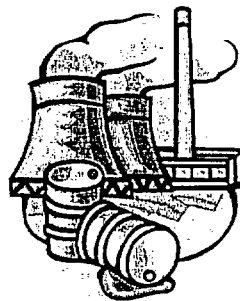
Sincerely,

Name	Address	Zip Code
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Anna Bliss	538 E 60 th St.	31405
Andrew Schroeder	637 Suncrest Blvd.	31416
S. Payne	304 Manor Dr	31406
Nicole Grammett	231 E. 52 nd St.	31408

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Sincerely,

Name	Address	Zip Code
Martie Krubman	Bloomington, GA	31302
Jim Edwards	Tybee Island, GA	31328
Sumya Gangathar	Savannah, GA	31405
Michael H. Hill (Habeas Corp)	Savannah, GA	31405