



**SIERRA
CLUB**
FOUNDED 1892

South Carolina Chapter

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May 30, 2003

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

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Rules and Directives
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Re.: DEIS on MOX

Dear Mr. Lesar:

The following comment is being submitted by The South Carolina Chapter of the Sierra Club for consideration by the Nuclear Regulatory Commission in regard to the Draft Environmental Impact Statement (NUREG-1767, draft) for the MOX Fuel Fabrication Facility at the Savannah River Site, one of the alternatives which the Department of Energy described in its plan for Surplus Plutonium Disposition.

It is imperative that a containment chapter be added to NUREG-1767, one which is devoted exclusively to addressing the need for preventing the release of plutonium under all conceivable conditions. This new chapter would identify all the containment measures being proposed for maintaining a plutonium management approach of "absolute containment," with diagrams and written text explaining where containment design features are located, description of procedures for routine and off-normal conditions of operation, release levels expected under routine and accident situations, back-up systems such as those that are designed to prevent non-routine releases in the event of failure of glove box ventilation, maintenance requirements, and frequency at which monitors are checked and read.

Thank you for the opportunity to comment on this draft EIS.

Sincerely,

Dell Isham
Chapter Director
SC Sierra Club

cc: SC Chapter Steering Committee

E-RIDS=ADM-03
Add=T. Harris (TEH)
A. Lester (ACL)

Template=ADM-013