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**Public Comment Form**  
**Draft Environmental Impact Statement**  
**for the Proposed National Enrichment Facility in Lea County, New Mexico**  
**NUREG-1790**

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9/17/04

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**Comment:**

The Los Alamos Education Group wishes to thank the NRC and the citizens of Lea County for the opportunity to comment on the proposal to build the National Enrichment Facility.

The Los Alamos Education Group is a small non-profit organization consisting mostly of retired Los Alamos staff members who have spent their careers pursuing various aspects of nuclear research and who maintain an active interest in the development and expansion of nuclear energy. Several of our members have had previous contacts with the NRC related to reactor safety. These contacts include the Advisory Committee on Reactor Safeguards and the Presidents Science Advisor's Office of Energy R&D Policy. Our principal activity is providing verifiable facts and arguments to refute exaggerated and misstated claims in opposition to nuclear energy development. We have no economic interest in the National Enrichment Facility but regard it as a crucial step in acquiring energy independence for the nation as well as an asset to the State of New Mexico. Clearly, the dependence on foreign energy sources is increasing and the condition is not likely to improve because of competing energy demands by emerging economies such as China and India.

To submit your comment, please give this form to an NRC representative at tonight's meeting, or mail to: Chief, Rules and Directives Branch, Division of Administrative Services, Mailstop T-6D59, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001

Your comments should be mailed in time to reach the NRC by November 6, 2004

E-IDS = ADM-03  
GAL = A. Bradford (PHB1)  
F. Johnson (TCS)

Template = ADM-013

We agree with the findings of the NRC on the draft Environmental Impact Statement for the National Enrichment Facility and can speak authoritatively on several features of the draft EIS and the deteriorating energy supply situation. It is enormously important that alternatives to escalating imports of both nuclear fuel and petroleum be found as quickly as possible. Expanding energy requirements will outstrip supply or the economics will become prohibitive in the near future and nuclear technology is the only established approach that has the potential to supply the vast amounts of energy required to avert severe perturbation of the economy. There isn't much time to start fixing the problem.

Because of the extremely slow decay rate of U-238, the radiation hazard associated with the NEF is small under any circumstance but because of the remote site is virtually nonexistent. The measurable potential exposures are well below protection limits and the claim of "deadly radioactive waste" is a gross exaggeration.

Finally, the suggestion at this meeting that NEF could somehow contribute to proliferation or terrorism fails to recognize that the NEF license limits enrichment to 3 to 5 percent depending on customer requirements. To exceed that degree of enrichment jeopardizes the license and would result in shutdown of the NEF as soon as the violation was detected under extant monitoring conditions. Highly enriched uranium, useful in a nuclear weapon, would require a more complex plant design. Theft of the byproduct, depleted UF<sub>6</sub>, is impractical because the material is too heavy to steal and not nearly radioactive enough to be used in a dirty bomb.