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To: <NRCREP@nrc.gov>
Date: Mon, Oct 24, 2005 3:37 PM
Subject: Docket no. 70-7004

9/8/05

70FR53396

(8)

Dear Nuclear Regulatory Commission,

I am submitting comments regarding the ACP plant by USEC in Piketon, Ohio.
Docket No. 70-7004.

Thank you very much.

Loraine McCosker

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CC: <charleswalker@frognet.net>

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59 Elmwood Place
Athens, Ohio 45701

October 24, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Mailstop T-6D59
U.S. Nuclear Regulation Commission
Washington, D.C. 20555-0001

Dear NRC representative,

I would like to submit comments on the Piketon Uranium Enrichment Plant in Piketon, Ohio.

Firstly, I found little in the way of independent investigation in the DEIS, and little to open the details of the project to public scrutiny from under classified information and proprietary information.

There is concern that the NRC staff has been negligent under 40 CFR 1503, not responding in a satisfactory manner to the scoping comments submitted by opponents of the ACP for the Draft Environmental Impact Statement.

The DEIS contradicts itself. The annual number of feed cylinders is different on page 2-22 than it is on page 4-47.

Health concerns

The DEIS displays that mortality rate in Pike County due to renal failure are between two and four times that of Ross and Scioto county. Renal failure may be associated with uranium poisoning although the DEIS suggests that this may instead be associated with diabetes and hypertension.

The DEIS compares potential ACP occupational injury rates to those from the obsolete Standard Industrial Classification. It uses occupational injury rates projected from years 2002-2003 of Piketon operations. Uranium enrichment operations at the DOE reservation in Piketon, Ohio ceased in May 2001!

Who will be responsible for the health care needs related to the uranium enrichment process of employees and residents of the Piketon area who are impacted? Will it be the responsibility of the company or federal government (NRC)?

Uranium is implicated in huge health risks. It appears unacceptable that the NRC approves of such a process and plant.

Water

What is happening to the quality of the water as a result of the previous USEC plant at Piketon? Are there testing procedures and reports regarding the quality of the water?

Transportation

The DEIS concluded that traffic on the highway near the plant will have a short term moderate impact. This is in comparison to other areas evaluated. All received a small environmental impact. What will the transportation problems be? Will hazard waste be transported on the highways of Ohio to the ACP? This is unacceptable.

Jobs

According to the DEIS, the ACP would cost about \$3 billion to construct the centrifuges. The Enterprise Zone program of the state of Ohio would expect about 15 thousand new jobs to be created for that scale of capital investment. It appears from the DEIS that there would be a net loss of jobs rather than an increase in jobs while jobs would be lost at Paducah. Please clarify this discrepancy. Will there be an overall loss of jobs with a great capital investment?

Safety

USEC's application seems to be the blueprint for the DEIS, not allowing for its own evaluation. The DEIS presents little evidence that it contains the results of independent investigation. For example, Piketon and Portsmouth Residents for Environmental Safety and Security (PRESS) have released the results of two analysis of radioactivity in Big Run Creek Water to cast doubt that DOE, USEC and Ohio EPA data from offsite sampling locations may be flawed. However, the DEIS uses data from these sources. Such discrepancies would encourage an independent evaluation of these waters and their radioactivity content.

Accidents

What are the plans for managing a radioactive accident? During this time of terrorism, how can we be assured that this plant will not encourage a terrorist act in our own rural backyard?

In conclusion, it is unknown whether there is any recognition by the NRC of the problems enriched uranium poses for the planet? It appears to be unknown how to make a safe product once it is enriched and used for energy or weapons. Depleted uranium lasts far into the future and can be contained only with vigilance.

I express my deep concern and disagreement with USEC's application for the American Centrifuge Plant at Piketon. I urge the Nuclear Regulatory Commission to further scrutinize and reject such an application.

Sincerely,

Loraine McCosker R.N., B.S.N.
Appalachian Ohio Group of the Sierra Club Chair