

August 21, 2007

Rev. Charles N. Utley  
3417 Sutton Place  
Augusta, GA 30906

**Comments on the Plutonium Fuel Factory**

Thank you for the opportunity to speak to you today.

Despite numerous requests to evaluate the technical aspects of immobilization by people at public meetings in North Augusta, South Carolina; Savannah, Georgia; and Charlotte, North Carolina, the NRC steadfastly refuses to accede to the wishes of the citizens most directly affected by the proposed plutonium dismantlement operations at SRS. A comprehensive analysis of the impacts of the plutonium-MOX facility must needs include a side-by-side comparison with immobilization.

Acts of Sabotage Have Not Been Evaluated

Perhaps the most stunning flaw is the failure to even consider possible environmental consequences of terrorist acts on plutonium-MOX fuel fabrication and transportation. The NRC said:

The Scoping Summary Report stated that the EIS would not address the impacts of terrorism because these impacts are not considered to be reasonably foreseeable as a result of the proposed action. However, following the events of September 11, 2001, the Commission decided to consider the question of whether NEPA requires the evaluation of such impacts. By order dated December 18, 2002 (CLI-02-24), the Commission ruled that NRC has no obligation under NEPA to consider intentional malevolent acts in conjunction with the licensing of the proposed MOX facility. [February 2003 DEIS, 1.4.1 Scoping Process]

Because the plutonium-MOX fuel plan necessitates shipping nuclear weapons-usable plutonium over enormous distances, it might well increase the likelihood that such material could fall into the hands of terrorists. The U.S. National Academy of Sciences stated that shipments of plutonium fuel will require security measures equivalent to those needed for transport of nuclear weapons. Harvard Law School and the United Kingdom Royal Commission on Environmental Pollution have also raised concerns about the security measures needed for plutonium commerce.

Radiation Increases

The overall dose of radiation would increase as a result of operations at the plutonium fuel facilities at SRS.

"The surplus plutonium disposition facilities would cause the cumulative dose to the public from all Savannah River Site activities to increase by about 2.6%. ... The cumulative dose [to the public]...associated with mixed oxide fuel shipments...is estimated to be 9.98 person-rem." <sup>1</sup> (Environmental Report, p.ES-6)

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The NRC falsely minimizes these impacts by saying that “the environmental impacts are outweighed by the benefit of enhancing nuclear weapons reductions.”<sup>1</sup> (ER p.ES-7) But last year US Department of Energy announced plans for production of new plutonium pits for weapons, perhaps at the Savannah River Site. The so-called benefit of nuclear weapons reductions appears to be a fiction.

The Environmental Report proceeds from its false premise of weapons reduction and subsequently dismisses the effects of radiation exposure on the people living within a ten mile radius of the plutonium fuel factory.

“This analysis shows that no radiological fatalities are likely to result from implementation of the proposed action.”<sup>1</sup> (ER page C-2, Analysis of Environmental Justice)

The ER also concludes incorrectly that since there are no health effects there can be no disproportionate effects based on racial, ethnic, or economic factors.

#### Death Rates in Aiken and Barnwell Exceed State Average, Heart Disease Largest Factor

Annual health statistics compiled by the state of South Carolina reveal above average mortality rates in the two counties within the ten mile radius of SRS. The overall statewide death rate in 1998 was 9.1 per 1000 population.<sup>2</sup> Aiken County's death rate was 9.2 per thousand and Barnwell County's was 10.9 per thousand; **the Barnwell death rate is 19.8% higher than the statewide rate.**<sup>3</sup> The two highest mortality rates by a large margin in each county are for heart disease and cancer. The leading cause of death in Aiken and Barnwell counties is heart disease: 243 per 100,000 population. The second highest cause of mortality is cancer: 216 and 209 per 100,000 in Aiken and Barnwell, respectively.<sup>3</sup> In Aiken County annual heart disease death rates are greater than all deaths combined for stroke, chronic lung disease, accidents, diabetes, alzheimers disease, and pneumonia. In the same period Barnwell County heart disease mortality exceeded the combined deaths from stroke, accidents, kidney disease, and pneumonia.

#### Conclusion

The heart disease and cancer rates in the communities surrounding SRS may be just the tip of the iceberg; additional contributors to morbidity and mortality must not be permitted. The legacy of a half century of radioactive contamination is certainly contributing to this epidemic. The cumulative impact of past contamination from plutonium facilities at Barnwell is not small and amounts to devastating consequences on the people of this area. Moreover, it cannot be “outweighed by a benefit” which does not exist.

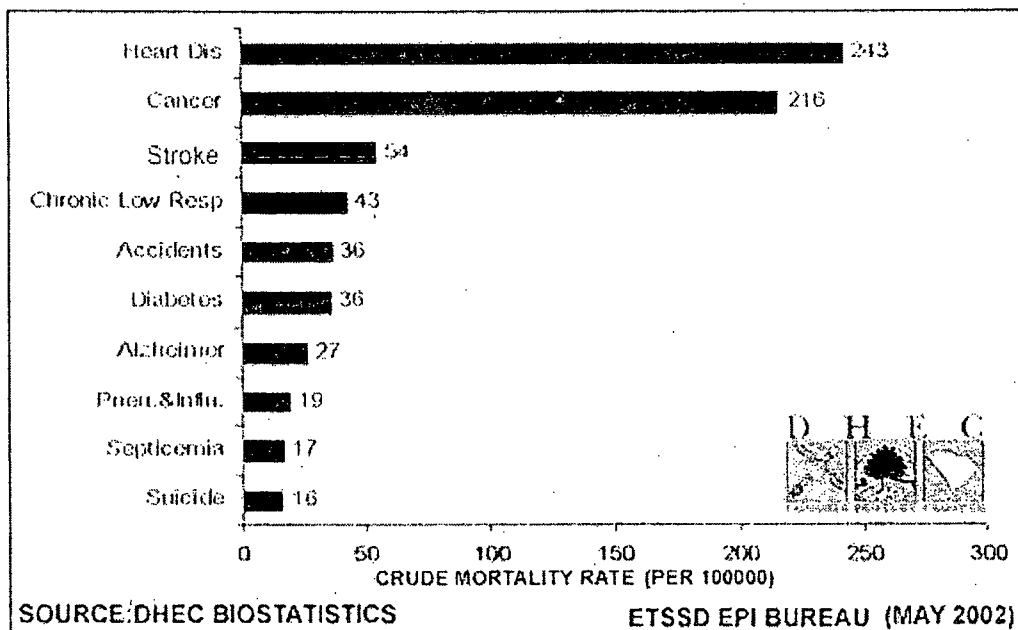
#### footnotes

1. *Mixed Oxide Fuel Fabrication Environmental Report, Revision 1 & 2*, Duke COGEMA Stone & Webster, 11 July 2002

2. *South Carolina Vital And Morbidity Statistics 1998*, Volume I, Division of Biostatistics, SC Department of Health and Environmental Control, December 1998

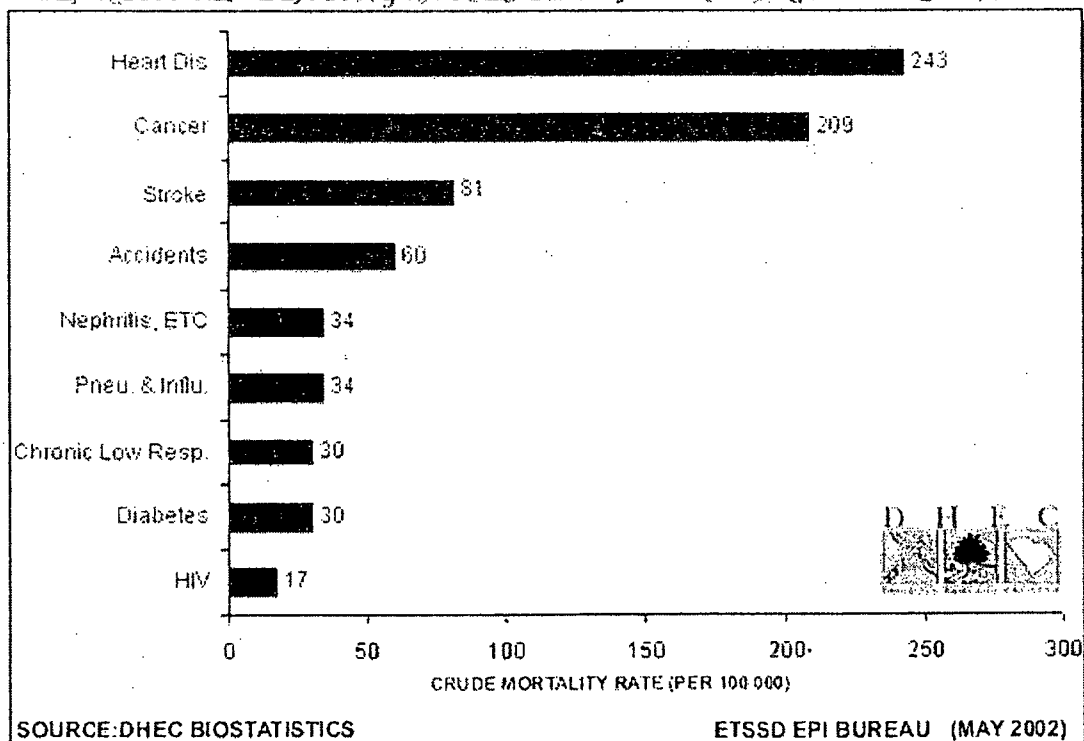
3. Bureau of Epidemiology website, SC Department of Health and Environmental Control  
[http://www.scdhec.net/HS/epi/county\\_reports.htm](http://www.scdhec.net/HS/epi/county_reports.htm)

### YEAR 2000 TEN LEADING CAUSES OF DEATH IN AIKEN COUNTY

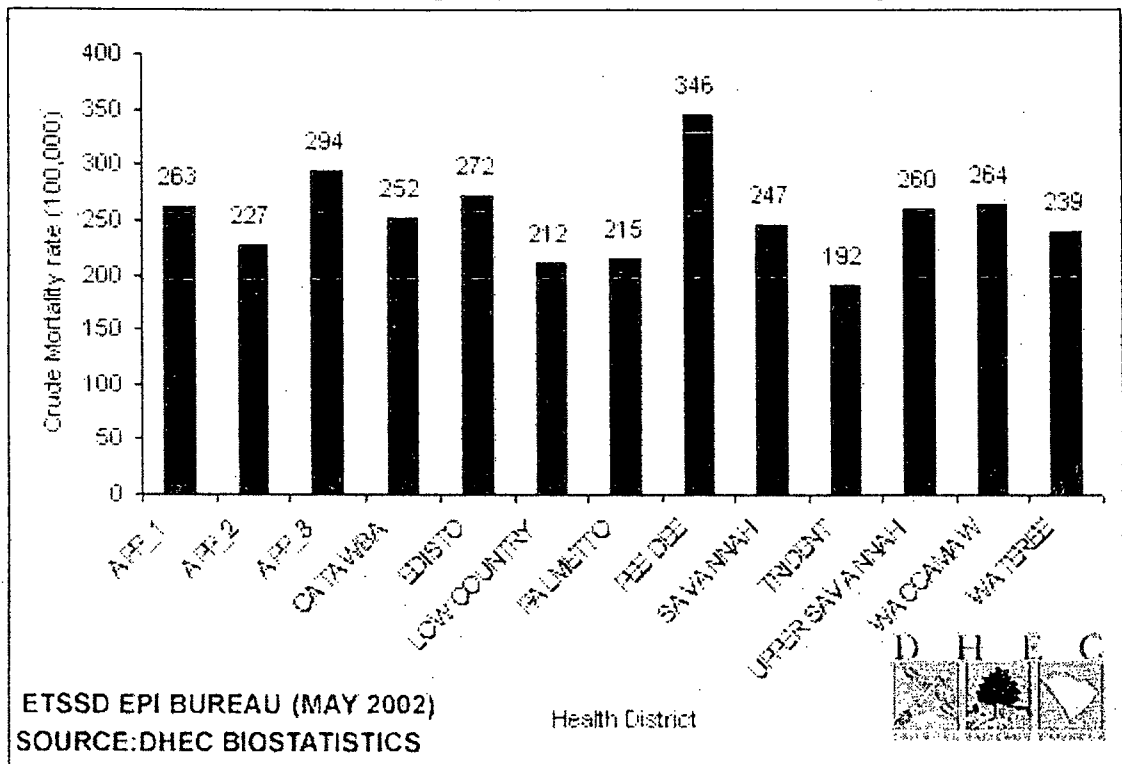


[http://www.scdhec.net/HS/epi/county\\_reports.htm](http://www.scdhec.net/HS/epi/county_reports.htm)

### YEAR 2000 TEN LEADING CAUSES OF DEATH IN BARNWELL COUNTY



# YEAR 2000 HEART DISEASE MORTALITY RATE IN SOUTH CAROLINA HEALTH DISTRICTS



[http://www.scdhec.net/HS/epi/county\\_reports.htm](http://www.scdhec.net/HS/epi/county_reports.htm)

