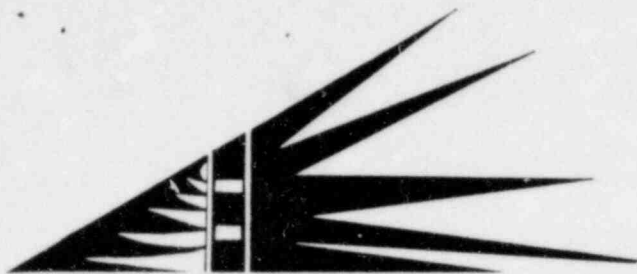


H. Denton



SOUTHWEST RESEARCH AND INFORMATION CENTER

September 13, 1982

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Director, Clinch River Breeder
Reactor Program Office

Dear Director:

Southwest Research & Information Center is submitting these comments on the NRC's Draft Supplement to the Final Environmental Statement on the CRBRP, Docket No. 50-537, NUREG-0139, Draft Supplement. We are an educational and scientific organization working primarily on energy and environmental issues. A number of our supporters live near the Clinch River site, and people across the nation are concerned about the impacts of the Breeder Program.

First, we want to strongly object to the procedures used in obtaining comments on this draft. Section 1506.10(c) of CEQ's NEPA regulations requires "not less than 45 days for comments on draft statements." NRC is giving only the minimum 45 days from the publication of the Federal Register notice, which in our case is only 31 days from the time of the actual receipt of the document. (This short availability to us is despite our request of June 9, 1982 that there be a supplement and that we receive the Supplement when it was prepared.) Additionally, we received the Errata Sheet for the supplement only 9 days prior to the comment deadline for the supplement. Thus, we have clearly been effectively denied the minimum requirement of a 45 day comment period. Thus, we would request an additional 15 day comment period from the time that we are notified that such a comment period is available. Because of the inadequate time given to us to comment on the document, these comments are admittedly less detailed than we would have otherwise prepared.

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Both the FES and the Supplement are grossly inadequate in discussing transportation issues. The Safe Secure Transport (SST) is not described in any adequate way for either NRC or the public to realistically evaluate its safety. The discussion of Type B packages on pages 7-3 to 7-5 and in Appendix D fails to mention that packaging for the wastes from the CRBR do not exist. Thus, the public putting faith in the assertion that the packages "are designed to withstand severe accident environments" is akin to saying that the DC-9 was designed to fly safely. Design and actual performance are not the same, especially regarding nuclear waste transportation where over the next 15 years the nation faces totally unprecedented numbers of shipments of commercial spent fuel and TRU wastes and of military high level and TRU wastes. A point that will also be emphasized later is that there is inadequate discussion of the origin of the initial fuel for CRBR, including its transportation to the site.

A point of substantial concern to us and the public generally is the environmental and health consequences of releases of plutonium and other radioactive materials. Since several of the changes in the Errata Sheet deal with this issue, we are especially concerned about the ridiculously short comment period on this data. Suffice to say that there are clear inadequacies in the numbers given. Specifically, there is no indication that the Staff has considered the studies of Dr. E.A. Martell ("Basic Considerations in the Assessment of the Cancer Risks and Standards for Internal Alpha Emitters," Jan. 10, 1975, Statement at hearings by EPA on plutonium standards and, with S.E. Poet. "Plutonium-239 and Americium-241 Contamination in the Denver Area," Health Physics, Oct. 1972, pp. 537-548) and K.Z. Morgan ("Suggested Reduction

of Permissible Exposure to Plutonium and Other Transuranium Elements," American Industrial Hygiene Association Journal, August 1975, pp. 567-575) on acceptable levels of plutonium for workers or the public. There is no adequate discussion of the impacts of Plutonium-238, Plutonium-241 and Americium-241 on the biota, despite the fact that significant scientific research shows that compounds of americium may be taken up by plants from the soil more readily than plutonium (see, for example, John T. Edsall, "Toxicity of plutonium and some other actinides," Bulletin of the Atomic Scientists, Sept. 1976, pp. 27-37). Thus, while we have not had adequate time to arrive at alternative calculations, we feel strongly that the doses mentioned in the Supplement for releases of effluents from CRBRP facilities are not conservative and that they could be understated by significant amounts. Further, it is unclear how the doses in Tables A5.2 and A5.3 were in fact arrived at. There is no indication of why the site boundary was changed from "0.4 miles SSW" on page 5-22 of the FES to "0.44 miles NW" on page 5-12 of the Supplement. Even more amazingly, page 5-23 of the FES indicated that discharge "would be fully diluted by a factor of 670 over the unmixed plant discharge;" while the Supplement (page 5-18) says the discharge "would be fully diluted by a factor of 67 over the unmixed plant discharge." Are either of these numbers correct? If so, how do we know it to be true? Why the great change, which from our view has to have environmental impacts? Additionally, Appendix D apparently does not even draw on existing data of dose releases from the West Valley facility; data which are certainly relevant and applicable to Clinch River. Uniform dispersion will not occur, so why is that assumed? All of these omissions of other scientific data and analysis that is known to NRC staff can only lead to the conclusion that they were intentionally ignored--a totally unacceptable and inadequate discussion for a FES or a Supplement.

We find no adequate discussion of the cumulative and potentially synergistic effects of other activities in the nearby area. For example, we understand that a synfuels plant is to operate in the area. What are the impacts of the synfuels facility and the CRBR? Such analysis is necessary to adequately inform decision-makers on either project. Additionally, the impacts of dredging on the rivers in the area is mentioned on page 4-28 only in relation to fish spawning; however potential releases of radioactive materials that are not initially taken up by the biota are certainly possible and must be analyzed not only for the initial dredging (page 4-28) but also for that dredging necessary during the lifetime of the facility. There is no indication in the Supplement that an adequate, comprehensive study of these issues has been done.

Regarding safeguards issues, we find no adequate discussion of possible theft of plutonium and especially no discussion of potential sabotage by terrorists. For both environmental and legal reasons such a discussion is necessary, and it should have been done in this Supplement if there is any possibility that such sabotage could take place.

Thank you for your consideration of these comments. We hope to hear from you soon regarding an extension of time for us and any other members of the public who were given inadequate time to comment on the Supplement.

Sincerely,

Don Hancock
Information Coordinator