



United States  
Department  
of Energy

Comment Form

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1. Among the many reasons that favor the location of the Assembly/Conversion Plant at Savannah, there is the issue of transportation of plutonium. Conversion of pit material would result in the transportation of 40 SCS for further disposition. The transportation process is not only a major nuclear safety issue compared to pit transportation, but the issue of transportation safety, the conversion of the pit material should be done at SCS.

2. Construction and operation of a pit assembly/conversion facility at Rocky Flats increases the plutonium legacy cleanup that the Department of Energy will have to attend with in the future. The decommissioning and decontamination of these facilities will be expensive and time consuming. Location of the facility at SCS will not significantly add to legacy issues that will need to be addressed at SCS. Actual commitments of resources argue for the location of the pit assembly/conversion at SCS.

3. There seems to be a conflict in DOE management of plutonium. DOE is allowing RFES to dispose of residues at 10 weight % plutonium at the Waste Isolation Pilot Plant (WIPP) is going to great lengths to control. But the plutonium residues go in high-level waste glass to meet the Spent Nuclear Fuel Standard. Why is some 10 weight % plutonium material allowed to be sent to WIPP but other 10 weight % plutonium material will require expensive processing and requalification?

SCD93

SCD93-1

Alternatives

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS based on transportation concerns. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. As indicated in Section 2.18, no traffic fatalities from nonradiological accidents or LCFs from radiological exposures or vehicle emissions are expected. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses (including analyses of transportation risks), technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

SCD93-2

Waste Management

Regardless of the site chosen, D&D would have to occur for the pit conversion facility at some time in the future and the process would be similar wherever the facility was located.

SCD93-3

Waste Management

The plutonium that is the subject of this SPD EIS is surplus weapons-usable plutonium that could be relatively easily used to build a nuclear weapon and must therefore be converted into a form that meets the Spent Fuel Standard. This weapons-usable plutonium is typically greater than 50 percent weight plutonium. The Spent Fuel Standard, as identified by NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors. The plutonium in the impure residues and scrub alloy (all of which contain less than 50 percent plutonium by weight) that are the subject of the *Final Environmental Impact Statement on Management of Certain Plutonium Residues and Scrub Alloy Stored at the Rocky Flats Environmental Technology Site* (DOE/EIS-0277F, August 1998) are not in the same form and present a lower proliferation risk.

DOE has determined that the waste management controls required for WIPP will provide adequate resistance to theft and diversion by unauthorized parties for the limited quantities of plutonium in RFETS residues (or any plutonium disposed with waste to WIPP). The waste management controls for the residues were evaluated to be consistent with international standards for physical protection of nuclear material within nations. In addition, the disposal of the residues avoids any processing that would increase material attractiveness.

DOE evaluated WIPP disposal during the screening of options for disposition of surplus weapons-usable plutonium. This is not a reasonable alternative because WIPP does not have sufficient capacity for the entire 50 t (55 ton) of material, and the option would not meet the Spent Fuel Standard for disposition of weapons-usable plutonium. The NAS report on plutonium disposition, *Management and Disposition of Excess Weapons Plutonium* (March 1994), concluded that direct geologic disposal of plutonium from weapons would not meet the Spent Fuel Standard.

**NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE  
JAMES GALLMAN, SR.  
PAGE 1 OF 2**

My name is James Gallman, Sr.. I am President of the State of South Carolina Conference of Branches of the National Association for the Advancement of Colored People, more affectionately known as the State NAACP.

On behalf of the NAACP, allow me to express my support for the Pit Disassembly and Conversion mission at the Savannah River Site. The NAACP believes the existing infrastructure, experience, expertise, and previous plutonium accomplishments should be a major consideration in the Department of Energy locating the mission at SRS.

Also, it is my understanding that the DOE acknowledges that at least \$60 million can be saved if the mission is co-located with the Mixed Oxide Fuel Fabrication Plant and Immobilization at SRS. In fact, I understand that this is a conservative figure, which could be as high as \$75 million.

A year ago I served as the President of the Aiken Branch NAACP. The Branch passed a resolution regarding its support of SRS as the lead facility in plutonium management and disposition. Let me share that resolution with you. **READ RESOLUTION.**

As you can see by those present here today, the NAACP and the surrounding community fully supports the Savannah River Site and all the Plutonium Disposition Missions. This community support is unparalleled within the DOE complex.

Selecting SRS to receive the Pit Disassembly and Conversion is the right decision for SRS and our nation.

Thank you for allowing me this opportunity to speak to you for us and the many dedicated people of this community.

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SCD47

**SCD47-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE  
JAMES GALLMAN, SR.  
PAGE 2 OF 2



AIKEN BRANCH  
National Association For The Advancement Of Colored People  
P.O. Box 1516  
Aiken, South Carolina 29802

RESOLUTION

WHEREAS the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

WHEREAS plutonium disposition represents one of the most certain future missions of the Department of Energy for the next 20 to 30 years; and

WHEREAS the Department of Energy has decided to pursue a dual path for plutonium disposition and has named the Savannah River Site as a candidate site for both options; and

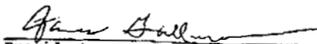
WHEREAS the Savannah River Site has produced approximately 40 percent of all United States weapons grade plutonium over the last 45 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public, or the environment; and

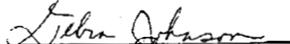
WHEREAS the Department of Energy in its Record of Decision recognizes the Savannah River Site as "a plutonium competent site with the modern, state-of-the-art storage and processing facilities ... with the only remaining large-scale chemical separation and processing capability in the DOE complex"; and

WHEREAS the regional community in the Central Savannah River Area (CSRA) of South Carolina and Georgia strongly supports continued plutonium missions for the Department of Energy's Savannah River Site;

NOW BE IT RESOLVED that the Aiken Branch of the National Association for the Advancement of Colored People (NAACP) strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

APPROVED this 27th day of March 1997 at Aiken, South Carolina by the Executive Board of the Aiken Branch NAACP.

  
President

  
Secretary

SCD47

RESOLUTION NO. 97-06  
ENDORING MAJOR PLUTONIUM MISSIONS  
FOR THE SAVANNAH RIVER SITE

WHEREAS, the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

WHEREAS, plutonium disposition represents one of the most certain future missions of the U. S. Department of Energy for the next 20 to 30 years; and

WHEREAS, the Department of Energy has decided to pursue a dual path for plutonium disposition and has named the Savannah River Site as a candidate site for both options; and

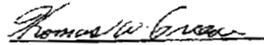
WHEREAS, the Savannah River Site has produced approximately 40 percent of all U. S. weapons grade plutonium over the last 45 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public, or the environment; and

WHEREAS, the Department of Energy, in its Record of Decision, recognizes the Savannah River Site as "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities...with the only remaining large-scale chemical separation and processing capability in the DOE complex"; and

WHEREAS, the City of North Augusta strongly supports continued plutonium missions for the Department of Energy's Savannah River Site.

NOW THEREFORE, BE IT RESOLVED by the Mayor and City Council in meeting duly assembled and by the authority thereof that the City of North Augusta strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

DONE, RATIFIED AND ADOPTED BY THE MAYOR AND CITY COUNCIL OF THE CITY OF NORTH AUGUSTA, SOUTH CAROLINA, ON THIS 3rd DAY OF March, 1997.

  
Thomas W. Greene, Mayor

ATTEST:  
  
Leona J. Lewis, City Clerk

SCD98-1

Alternatives

DOE acknowledges the commentors' support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

REMARKS OF MAYOR LARK JONES AT THE PUBLIC HEARING  
Concerning SRS New Missions/ Pit disassembly and conversion

On behalf of the City of North Augusta, I would like to make a few brief comments concerning the upcoming decision by the Dept. of Energy in locating the plutonium pit disassembly and conversion missions.

The City of North Augusta publicly supports and endorses the Savannah River Site as the logical choice for this endeavor. I would like to place in the record and make a part of my comments, Resolution 98-16 which was adopted by the Mayor and City Council on August 3, 1998.

(Resolution read into the record)

SRS is the logical choice for many reasons:

1. The site, its size, facilities and location is excellent. While, I am a lay person not involved with the site, I'm sure that its continued safe operation for over 40 years means there is a great deal of infrastructure already in place that may not need to be duplicated for these new missions. Environmentally and security wise, I believe the site to be in good order. I can only speculate that the use of the current site at SRS would result in a cost savings of millions of taxpayer dollars.
2. The workforce is highly skilled and ready to do the job. Aiken County probably has one of the highest numbers of engineers per capita of any county in the United States...many of whom are skilled in the nuclear industry. Even if new training is required, we have the base from which to start, as well as the educational facilities with which to assist in any such needed training.
3. Past Record. The past record of the Savannah River site as to both performance and safety are excellent. As Mayor of a city of over 16,000 persons, I'm called upon daily to make judgments that affect the lives of our citizens. Examining the record of persons and entities that our city deals with is one of the major criteria we use in decision making. I urge DOE to follow that same philosophy. If you do, I'm sure you'll like what you find.

SCD15

**SCD15-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. DOE is appreciative of the public support it has received from the local communities at all of the candidate sites for the surplus plutonium disposition program.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

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4. **Community Support.** To be sure, SRS has been an integral part of our community for 45 years now. Yes, it does have a very important economic impact as well, but nowhere, I dare say will you find anymore community acceptance and support for any nuclear type industry than here in Aiken County.

As someone who is charged with being the guardian of the dollars of taxpayers, I am concerned with budgets and costs. This weekend, I will have two kids in private colleges, so costs will be even more important to me on a personal level. I understand the need for costs savings and cost effectiveness in the areas before us. It would then follow that the most cost effective method to accomplish those goals would be to consolidate all plutonium operations at the Savannah River Site including Mox fuels as well as Pit disassembly and conversion.

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In summary, SRS has the facilities, the workforce, the track record and the necessary community support to do the job for this country! Finally, I do want to stress that we want to do the job for not North Augusta, not the CSRA, not South Carolina or Georgia but for our entire country.

This decision should be one based on merit, considering the factors of cost, workforce and facilities. It does not need to be a decision based upon politics, favors for one group or one sector or punishing of another.

Thank you.

RESOLUTION NO. 98-16  
SUPPORTING THE PIT DISASSEMBLY AND CONVERSION MISSION  
BEING LOCATED AT SAVANNAH RIVER SITE

WHEREAS, the Savannah River Site has demonstrated a continued strong leadership role in this nation's national security since the inception of the site; and

WHEREAS, the professional management team and employees of the Savannah River Site have the proven experience for continuing in this leadership role; and

WHEREAS, the Department of Energy has recognized the importance of and demonstrated their faith in the Savannah River Site by its decisions to locate the MOX and immobilization missions there; and

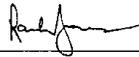
WHEREAS, the location of the third element of the plutonium disposition mission, pit disassembly and conversion, is now being reviewed by the Department of Energy; and

WHEREAS, the Savannah River Site is the only site being considered with the on site experience of processing plutonium and with the necessary infrastructure required for this critical mission.

NOW, THEREFORE BE IT RESOLVED by the Mayor and City Council in meeting duly assembled and by the authority thereof, and on behalf of the citizens of the City of North Augusta, that the Department of Energy is urged to select the Savannah River Site for its pit disassembly and conversion mission.

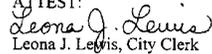
BE IT FURTHER RESOLVED that the citizens of North Augusta are encouraged to attend the Department of Energy's public meetings scheduled for Thursday, August 13, 1998 at 1:00 P.M. or 6:00 P.M. in the North Augusta Community Center and to voice their support for locating the pit disassembly and conversion mission at the Savannah River Site.

DONE, RATIFIED AND ADOPTED BY THE MAYOR AND CITY COUNCIL OF THE CITY OF NORTH AUGUSTA, SOUTH CAROLINA, ON THIS 3<sup>rd</sup> DAY OF August, 1998.



Lark W. Jones, Mayor

ATTEST:

  
Leona J. Lewis, City Clerk

SCD15

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Nuclear Information & Resource Service  
Nuclear Control Institute  
Public Citizen's Critical Mass Energy Project  
Safe Energy Communication Council  
Physicians for Social Responsibility  
Global Resource Action Center for the Environment

**FOR IMMEDIATE RELEASE**

August 12, 1998  
Contact: Michael Mariotte, Mary Olson (202)328-0002

**ENVIRONMENTAL, ARMS CONTROL, PEACE AND JUSTICE AND ENERGY  
GROUPS SAY "NIX MOX!"**

NIRS to Comment at DOE Hearing in North Augusta, August 13, 1998

Non-Governmental Organizations representing taxpayers, the environmental community, energy consumers and those working to prevent nuclear proliferation stand in support of citizens in the Southeast who oppose the new proposals to make mixed oxide (MOX) plutonium fuel at the U.S. Department of Energy's (DOE) Savannah River Site (SRS). These organizations support the dismantlement of nuclear warheads and efforts to insure the plutonium from these weapons of mass destruction are secure and unavailable for use in future warheads.

This experimental conversion of nuclear warhead pits (plutonium-239) for use as fuel in nuclear power reactors does not make sense. When compared to the one alternative that DOE has identified—the immobilization of the plutonium-MOX would:

- cost more taxpayer money
- involve more steps where plutonium will be vulnerable to diversion or theft
- involve more steps where waste will be generated
- require a greater level of purity of the plutonium, and therefore more processing
- result in more waste from processing, more worker exposures and would cost more
- require a redesign of power reactors that were not designed for plutonium fuel
- lower the already thin margin of safety in aging power reactors
- significantly increase potential radiological consequences of a major reactor accident
- establish plutonium as a commodity
- remove any credible basis for the US to criticize hybrid military/energy programs in other countries, leading to situations like India and Pakistan
- take longer to accomplish the original goal of making the plutonium from nuclear weapons dismantlement unavailable for use in another nuclear weapon.

"MOX does NOT get rid of plutonium," said Mary Olson of the Nuclear Information & Resource Service, "Reactors do not burn anything, they split atoms. As plutonium atoms

SCD27

**SCD27-1**

**MOX Approach**

DOE acknowledges the commentors' opposition to the MOX approach. DOE has identified as its preferred alternative the hybrid approach. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again. The fabrication of MOX fuel and its use in commercial reactors has been accomplished in Western Europe. This experience would be used for disposition of the U.S. surplus plutonium.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

Safeguards would be in place to ensure that neither approach would be vulnerable to diversion or theft.

The hybrid approach would result in slightly more waste being generated and greater worker exposure than the immobilization-only approach, but potential impacts to the public during normal operations are not expected to be major at any of the DOE candidate sites. Furthermore, DOE continues to prefer the hybrid approach for the reasons of practicality and leadership discussed above.

Although the MOX approach would require a greater level of purity than the immobilization approach, impacts including exposures, were considered in the analyses. As described in Sections 2.18.3 and 4.28.2.8, additional spent fuel would be produced by using MOX fuel instead of LEU fuel in domestic, commercial reactors. Spent fuel at the proposed reactor sites is not expected to change dramatically due to the substitution of MOX assemblies for some of the LEU assemblies. Likewise, the additional spent fuel would be a very small fraction of the total that would be managed at the potential geologic repository.

Commercial reactors in the United States are capable of safely using MOX fuel. The commercial reactors selected for the MOX approach include only those reactors whose operational life is expected to last beyond the life of the surplus plutonium disposition program. In addition, NRC would evaluate license applications and monitor operations of domestic, commercial reactors selected to use MOX fuel to ensure adequate margins of safety. Section 4.28.2.5 was added to include an analysis of the increased risks associated with accidents involving MOX fuel at the proposed reactors.

Section 4.28 was revised to provide reactor-specific analyses and discuss the potential environmental impacts of using a partial MOX core from routine operations and reactor accidents.

DOE's *RFP for MOX Fuel Fabrication and Reactor Irradiation Services* (May 1998) is constructed to ensure that plutonium is not a marketed commodity.

The disposition of surplus plutonium is not a military action. The goal of the surplus plutonium disposition program is to reduce the threat of nuclear weapons proliferation worldwide by conducting disposition of surplus plutonium in the United States in an environmentally safe and timely manner.

Under either the immobilization-only approach or the hybrid approach, all 50 t (55 tons) of surplus plutonium would be processed out of the proposed plutonium disposition facilities over a 10- to 15-year period.

Operation of the proposed surplus plutonium disposition facilities is expected to take approximately the same amount of time for either approach. The difference in timing for the hybrid approach is associated with the amount of time that MOX fuel would be irradiated in domestic, commercial reactors. However, none of the proposed reactors are expected to operate longer under the hybrid approach than they would if they continued to use LEU fuel.

#### SCD27-2

#### MOX Approach

It is true that in the MOX approach only a fraction of the plutonium would actually be consumed in the reactor; but the remainder would be an integral part of massive spent fuel assemblies. The spent fuel assemblies would be so large and radioactive that any attempted theft of the material would require a dedicated team willing to suffer large doses of radiation, along with substantial equipment for accessing and removing the spent fuel from the storage facility and carrying it away.

Use of MOX fuel in domestic, commercial reactors is not proposed in order to subsidize the commercial nuclear power industry. The purpose of this proposed action is to safely and securely disposition surplus plutonium by meeting the Spent Fuel Standard. The Spent Fuel Standard, as identified by NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors. The MOX facility would produce nuclear fuel that would displace LEU fuel that utilities would have otherwise purchased. If the effective value of the MOX fuel exceeds the cost of the LEU fuel that it displaced, then the contract provides that money would be paid back to the U.S. Government by DCS based on a formula included in the DCS contract.

are split in MOX fuel, new plutonium is being formed. The uranium present absorbs neutrons and creates new plutonium." She continued, "I think DOE's hidden agenda is to give nuclear utilities a direct taxpayer subsidy to keep their aging, uncompetitive nuclear reactors operating in the face of electric market deregulation. MOX is nothing more than nuclear welfare." Olson will be commenting for Nuclear Information and Resource Service at the DOE's public comment meeting in North Augusta on August 13, 1998.

Paul Leventhal, president of the Nuclear Control Institute, commented that "DOE's own studies show that direct disposal of warhead plutonium as waste would be cheaper, faster and safer than turning it into MOX fuel. Therefore we should not reverse 20 years of U.S. policy against the proliferation risks of plutonium fuel. A U.S. MOX program only encourages other nations, like Japan and Germany, to continue their dangerous efforts to commercialize plutonium.

"Burning 200 tons of plutonium in reactors adds about \$1.7 billion to the costs of safeguarding it by other methods", said economist William Weida of the Global Resource Action Center for the Environment. "There is currently no way to economically use plutonium as reactor fuel and to proceed with the MOX program would be an abuse of taxpayer funds."

"Commercial reactors do not need to burn MOX fuel, they need to be shut down or phased out," said Linda Pentz, Communications Director of the Safe Energy Communication Council. "Nuclear power has proven to be economically and environmentally hazardous. Burning MOX fuel is misleadingly promoted as a method of "disposing" of surplus plutonium from nuclear weapons. In fact it does nothing of the kind, but instead creates greater volumes of radioactive waste with no solution yet found for safe and perpetual storage."

"Joining the commercial and weapons arms of nuclear industry will hasten the demise of commercial nuclear power in the United States," said James Riccio of the Public Citizen Critical Mass Energy Project. "The MOX program reveals the true nature of commercial nuclear power. It was linked to the nuclear weapons project from the cradle and this will be its grave."

**CONTACTS**

Nuclear Information & Resource Service Mary Olson (202) 328-0002	Safe Energy Communication Council Linda Pentz (202) 483-8491
Nuclear Control Institute Edwin Lyman (202) 822-8444	Physicians for Social Responsibility Lisa Ledwidge (202) 898-0150 ex 222
Global Resource Action Center for the Environment Alice Slater (212) 726-9161	Public Citizen's Critical Mass Energy Project James Riccio (202) 546-4996

SCD27

**SCD27-3**

**MOX Approach**

By fabricating MOX fuel from surplus plutonium, the United States is not encouraging either domestic or foreign commercial use of plutonium. Consistent with the U.S. policy of discouraging the civilian use of plutonium, a MOX facility would be built and operated subject to the following strict conditions: construction would take place at a secure DOE site, it would be owned by the U.S. Government, operations would be limited exclusively to the disposition of surplus plutonium, and the MOX facility would be shut down at the completion of the surplus plutonium disposition program. For reactor irradiation, the NRC license would authorize only the participating reactors to use MOX fuel fabricated from surplus plutonium, and the irradiation would be a once-through cycle with no reprocessing.

Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

**SCD27-4**

**MOX Approach**

The goal of the surplus plutonium disposition program is not simply safeguarding the plutonium indefinitely, but also dispositioning the plutonium in an environmentally safe, cost-effective, and timely manner. Converting the surplus plutonium into MOX fuel and using it in domestic, commercial reactors is an effective way to accomplish this.

Because cost issues are beyond the scope of this SPD EIS, this comment has been forwarded to the cost analysis team for consideration. As explained in response SCD27-1, the cost report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

**SCD27-5**

**MOX Approach**

This comment is addressed in responses SCD27-1 and SCD27-2.



R & H MAXXON, INC.

August 13, 1998

Mr. Howard R. Canter, Acting Director  
Office of Fissile Materials Disposition  
US Department of Energy  
100 Independence Avenue  
Washington, DC 20585

Dear Mr. Canter:

I am the co-owner of a local business with 52 retail outlets in South Carolina and Georgia. I am writing to express my support for the assignment of all three portions of the Surplus Plutonium Disposition mission to the Savannah River Site.

Former Secretary Pena stated and your Draft Environmental Impact Statement correctly concludes that Savannah River is the preferred alternative for the MOX fuel fabrication and immobilization portions of this important non-proliferation mission because of its staff expertise, plutonium infrastructure and exemplary safety performance. These same considerations hold true for the Pit Disassembly and Conversion Facility, and your decision should be to similarly assign this portion of the Surplus Plutonium Mission to Savannah River.

As a taxpayer, I expect this work to be performed in the safest, most reliable and cost-efficient manner. Savannah River has a record of performance and its safety record sets the standard for the rest of DOE. Savannah River also offers the assurance that the total program can be accomplished for the fewest taxpayer dollars. All of the plutonium infrastructure and staff expertise currently exist at Savannah River, and several hundreds of millions of dollars can be saved if they are not unnecessarily duplicated elsewhere.

The two state Central Savannah River Area has a long and supportive relationship with DOE. We welcome and support the Surplus Plutonium Disposition program because of its importance to international non-proliferation goals. Our support is also based on the knowledge that Savannah River can conduct this program to the highest levels of safety. The active support of the local communities will help assure that this important program can be conducted in the most expeditious manner.

Thank you for the opportunity to comment on this important matter.

Sincerely,

Tim Dangerfield  
Vice-President

### SCD45-1

### Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

1

**RADCHEMCO**  
**H. PERRY HOLCOMB**  
 PAGE 1 OF 4



Environmental Radiochemistry,  
 Radiochemical Characterization of  
 Waste Sites and Solid Waste,  
 Actinide Processing Chemistry

H. Perry Holcomb, Ph. D.  
 1891 Green Forest Drive  
 North Augusta, SC 29841-2157  
 Telephone 803-279-4839  
 Fax 803-613-1854  
 Email pholcomb@home.ifi.net

August 13, 1998

Ms. Laura Holgate  
 Director, Office of Fissile Materials Disposition  
 U. S. Department of Energy  
 P. O. Box 23786  
 Washington, DC 20026-3786

Re: Comment on the Surplus Plutonium Disposition (SPD) Draft Environmental Impact Statement (EIS)

Dear Ms. Holgate:

I attended the afternoon session of the public meeting that the DOE held in North Augusta, SC today regarding the SPD Draft EIS. Near the end of the afternoon session I made a presentation regarding the intrinsic worth of the plutonium being dispositioned by the DOE via this EIS. This letter to you serves to put these comments into a formal submission to the DOE.

I retired from the SRS two years ago after 36 years of service to du Pont and to Westinghouse, the prime contractors there. Twenty of those years were in analytical and separations chemistry support and development at SRTC; eleven and one-half were in F Area in technical support of separations activities, including programs involving the recovery of plutonium from CTSMO scrap and scrub alloy from Rocky Flats; and the final four and one-half years were spent in support of environmental restoration activities primarily involving the radiochemical characterization of SRS waste sites and wastes therefrom.

Since retiring from WSRC, I have continued to serve as a radiochemical consultant for environmental restoration matters to SAIC, to Rust Environmental, and to Duke Engineering and Services, all SRS subcontractors.

My comments regarding the draft SPD EIS are twofold:

- I wholeheartedly support the SRS as the site to locate the pit disassembly and conversion mission. SRS has the infrastructure, the personnel, and the overwhelming support of the local public to make such a mission a success there. Needless to say, it would be most cost effective to locate the pit disassembly and conversion mission at SRS rather than at Pantex. And then DOE must ask itself the question, "Why contaminate another site in the complex with the plutonium waste that will result?" That is already a *fait accompli* at SRS. | 1
- The DOE is charged with managing a national treasure in the 50 metric tons of surplus plutonium addressed by the draft EIS. I asked a question in today's | 2

MD022

**MD022-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**MD022-2**

**DOE Policy**

DOE acknowledges the commentor's concern regarding the market value of surplus plutonium and agrees that there is an intrinsic worth to plutonium from its energy content. However, it is not valid to compare the fuel prices for plutonium versus fossil fuels because the costs to use the two fuels are very different. The real measure of the worth of plutonium as a fuel is its ability to generate electricity in the open market. These values are estimated in three reports, *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), and the *Technical Summary Report for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0003, October 1996), all of which are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

All of the surplus plutonium would not be made into MOX fuel because some of it is not suitable for fabrication due to the complexity, timing, and cost that would be involved in purifying the material. Also, pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest

Ms. Laura Holgate  
Director, Office of Fissile Materials Disposition, USDOE

Page 2

public meeting that no one present could answer, "Just how much is that 50 metric tons of plutonium worth?" I am somewhat appalled that DOE is even considering immobilizing part (17 metric tons) or all of this very valuable energy source. I would urge the DOE to not immobilize a single gram of the surplus plutonium that could eventually be used for MOX, even if pretreatment of the scrap might be necessary. My reasons follow.

The intrinsic value, energywise, of the 50 metric tons of plutonium should be made known to the public by DOE and should be included in the final EIS as public record. Nowhere have I seen this mentioned or brought forth in any analysis. So, please allow me to develop for you my very simple approach to placing a value on the surplus 50 metric tons of plutonium covered by the draft EIS.

The following data come from the web site of the Amarillo National Resource Center for Plutonium (the Center), <http://www.pu.org>:

- The energy in one metric ton (1000 kg, or 1000 g/kg X 1000 kg = 1E+06 grams of plutonium) is equivalent to that in:
  - 4 million metric tons of coal (or 1 gram Pu = 4 metric tons of coal), or
  - 15 million barrels of oil (or 1 gram Pu = 15 barrels of oil)
- The energy in one metric ton of plutonium can supply a year's worth of electricity to a population center of 790,000.

Now, developing from the foregoing facts as given by the Center:

- The energy in 50 metric tons of plutonium is therefore equivalent to:
  - 200 million metric tons of coal (50 X 4 million), or
  - 750 million barrels of oil (50 X 15 million).

Developing further:

- So, the intrinsic energy value of 50 metric tons of plutonium can be either:
  - **\$29.7 billion** (as derived from: 200 million metric tons of coal is 220 million short tons. The price of bituminous coal is \$135 per short ton, as quoted to me today by the Dixie Ice and Coal Company in Augusta, GA; or (220E+06 short tons X \$135/short ton = \$2.97E+10), or
  - **\$9.0 billion** (as derived from: 750 million barrels of oil X \$12/barrel = \$9.0E+09).

And:

- The energy equivalent of 50 metric tons of plutonium can supply the electric needs for **50 years** to a city with the combined population (approximately 790,000) located in the South Carolina counties of Aiken, Charleston, and Greenville, according to the 1990 census.

2

MD022

possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

Ms. Laura Holgate  
Director, Office of Fissile Materials Disposition, USDOE

Page 3

The DOE is charged with managing an extremely valuable energy resource in the surplus plutonium. The draft EIS states that 17 metric tons of plutonium is destined for immediate immobilization because of its waste form and/or quantity and nature of contaminants. I submit to you that SRS currently has most of the facilities and the personnel to possibly recover several metric tons of plutonium from these "scrap" forms and convert it into a useful energy source, MOX.

2

**Each metric ton, so saved from permanent disposal and converted to MOX, is worth, at a minimum, the equivalent of 15 million barrels of oil. At a very conservative price of \$12/barrel for oil, each metric ton of plutonium so saved is worth \$180 million! Its worth, in terms of four million metric tons of bituminous coal, is \$594 million!!**

I have not done any analysis regarding the environmental effects that would be caused by the burning of the 200 million metric tons of coal or the 750 million barrels of oil represented by the energy in the 50 metric tons of surplus plutonium. That is really outside my expertise. However, I would request that the DOE perform this evaluation and include the results in the final SPD EIS. Such additional information may overwhelmingly support converting as much of the surplus plutonium as possible into MOX.

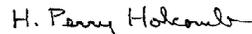
3

I urge you to implement measures to save, and use for MOX, every possible gram of surplus plutonium. As a start, a technical task force should be established to evaluate such scrap recovery operations, which could take place at the SRS in F-Canyon and FB-Line and the other special processing operations associated with these SRS separations facilities. By reclaiming every metric ton of plutonium possible from the 17 metric tons of "scrap" plutonium, the DOE could not only save the American Taxpayers more than \$100 million but also could be very, very proud of such an extremely important recycling effort.

4

Thank you for the courtesy, attention, and interest shown by you and the other DOE staff to the attendees at the North Augusta meeting this afternoon.

Sincerely,



H. Perry Holcomb, Ph. D.

MD022

**MD022-3**

**General SPD EIS and NEPA Process**

An analysis of the potential energy value of surplus plutonium was done as part of the *Storage and Disposition PEIS* (see Section 4.9). According to that analysis, MOX fuel use would likely have minor impacts on the environment and the nuclear fuel cycle industries.

The goal of the surplus plutonium disposition program is to reduce the threat of nuclear weapons proliferation worldwide by conducting disposition of surplus plutonium in the United States in an environmentally safe and timely manner. Converting the surplus plutonium into MOX fuel and using it in domestic, commercial reactors is an effective way to accomplish this. Consistent with the U.S. policy of discouraging the civilian use of plutonium, a MOX facility would be built and operated subject to the following strict conditions: construction would take place at a secure DOE site, it would be owned by the U.S. Government, operations would be limited exclusively to the disposition of surplus plutonium, and the MOX facility would be shut down at the completion of the surplus plutonium disposition program. For reactor irradiation, the NRC license would authorize only the participating reactors to use MOX fuel fabricated from surplus plutonium, and the irradiation would be a once-through cycle with no reprocessing.

Obtaining energy from the surplus plutonium is a secondary consideration. It is not expected that the energy value of the surplus plutonium will be a consideration in the decision on the location of disposition facilities or the amount of plutonium (0 to 33 t [0 to 36 tons]) to be dispositioned as MOX fuel.

**MD022-4**

**Alternatives**

DOE has identified as its preferred alternative a hybrid approach of using both immobilization and MOX fuel fabrication to disposition up to 50 t (55 tons) of surplus plutonium. Under this alternative, approximately 33 t (36 tons) of clean plutonium metal and oxides would be used to fabricate MOX fuel, which would be irradiated in domestic, commercial reactors. The remaining 17 t (19 tons) of surplus, low-purity, nonpit plutonium is not suitable for fabrication into MOX fuel because of the complexity, timing, and cost that would be involved in purifying those plutonium materials. Finally, use of the

F-Canyon or FB-Line for conducting plutonium recovery operations in support of the plutonium disposition program as suggested by the commentor would extend their life beyond the timeframe that DOE currently intends to operate these facilities.



United States  
Department  
of Energy

Comment Form

NAME: (Optional) Bill Randall  
ADDRESS: 17 white oak Dr. N. Augusta, SC 29860  
TELEPHONE: ( ) \_\_\_\_\_  
E-MAIL: \_\_\_\_\_

Isn't the environmental impact to  
the local community minimized @ SRS  
due to 310 square mile plant size  
versus the 25 sq. mile plant at Pantex?

1

SCD70

SCD70-1

Facility Accidents

Appendixes K.4 and K.5 describe the potential accident impacts to a hypothetical maximum receptor at each respective site boundary. Although most accidents (and normal operations) were calculated to yield somewhat higher doses to this receptor at Pantex (due to the site boundary being closer to the release location, meteorology, etc.), the differences from a health risk standpoint were found to be quite minor in most cases. This assertion is illustrated when comparing cancer risk values given in Tables K-12, K-3, K-14, and K-25. DOE facilities are sited and designed in such a manner that significant protection is provided for the health and safety of the public.

As discussed in DOE Orders 420.1 and 6430.1a, there are a number of factors that are considered in the decisionmaking process for siting a facility within the DOE complex. These factors include topography, seismology, geology, hydrology, and radiological dose limiting criteria. No matter where a given facility is built, it must satisfactorily comply with all applicable guidance for the protection of worker and public health and safety.



United States  
Department  
of Energy

Comment Form

NAME: (Optional) R. E. Rapy

ADDRESS: 1639 HUCKLEBERRY DR, Aiken SC

TELEPHONE: (803) 644-3678

E-MAIL: THE FUTURE ENERGY REQUIREMENTS OF THIS COUNTRY MAKE THE CONVERSION OF EXCESS PLUTONIUM TO ENERGY PRODUCTION THE MOST SENSIBLE MEANS OF DISPOSAL.

AS MUCH AS ECONOMICALLY FEASIBLE OF THE EXCESS PU SHOULD BE CONVERTED TO MOX FUEL. IMMOBILIZATION SHOULD BE A LAST RESORT.

SRS IS VERY SUITED TO PERFORM THIS MISSION.

1

2

SCD68

SCD68-1

MOX Approach

DOE acknowledges the commentor's support for the MOX approach. DOE has identified as its preferred alternative a hybrid approach. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again. Under this approach, approximately 33 t (36 tons) of clean plutonium metal and oxides would be used to fabricate MOX fuel, which would be irradiated in domestic, commercial reactors. The remaining 17 t (19 tons) of surplus, low-purity, nonpit plutonium is not suitable for fabrication into MOX fuel because of the complexity, timing, and cost that would be involved in purifying those plutonium materials.

SCD68-2

Alternatives

DOE acknowledges the commentor's support for siting the MOX facility at SRS. As indicated in Section 1.6, SRS is preferred for the MOX facility because this activity complements existing missions and takes advantage of existing infrastructure and staff expertise. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

Author: HOWARD CANTER at md-OL  
 Date: 3/16/1998 5:52 PM  
 Priority: Normal  
 TO: DAVID NULTON, BERT STEVENSON  
 Subject: Opposed to SC receiving Plutonium - Request Hearings  
 Dear Director Canter and Under Secretary Holgate,

As a former employee of the South Carolina Department of Health & Environmental Control's Nuclear Emergency Planning Section, I can tell you from experiencing the problem from the INSIDE, we as citizens of the beautiful state of South Carolina do not need nor want to be the repository of any more Plutonium or other nuclear substance. I would like to request that hearings be held in Columbia, SC.

1

The citizens of South Carolina deserve equal opportunity to understand and discuss and vote on this question, which has up-to-now been largely monopolized by the few with special interest (read: \$\$\$).

2

We do not need to be the dumping ground of the nation - no permanent site has been settled upon, so we'll probably wind up keeping it. We do not need to live under the multiple threats to our health and safety. We do not need to hold GENERATIONS of South Carolinians' lives - our descendants! - hostage.

1

Thank you for your help in this serious issue.

Sincerely,  
 Robert G. Ridgeway

1408 Cedar Terrace St.  
 Columbia, SC 29209

FD331

FD331-1

Alternatives

DOE acknowledges the commentator's opposition for siting the proposed surplus plutonium disposition facilities at SRS, and request to have public hearings in Columbia, South Carolina. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Each of these facilities would process some fraction of the surplus plutonium so that it could be permanently disposed of in a potential geologic repository. Only the immobilized plutonium, in canisters of vitrified waste from DWPF, would be stored at SRS for any length of time, pending availability of the potential geologic repository. DOE is presently considering a replacement process for the in-tank precipitation (ITP) process at SRS. The ITP process was intended to separate soluble high-activity radionuclides (i.e., cesium, strontium, uranium, and plutonium) from liquid HLW before vitrifying the high-activity fraction of the waste in DWPF. The ITP process as presently configured cannot achieve production goals and safety requirements for processing HLW. Three alternative processes are being evaluated by DOE: ion exchange, small tank precipitation, and direct grout. DOE's preferred immobilization technology (can-in-canister) and immobilization site (SRS) are dependent upon DWPF providing vitrified HLW with sufficient radioactivity. DOE is confident that the technical solution will be available at SRS by using radioactive cesium from the ion exchange or small tank precipitation process. A supplemental EIS (DOE/EIS-0082-S2) on the operation of DWPF and associated ITP alternatives is being prepared.

This SPD EIS, for the purposes of analysis, assumes that Yucca Mountain, Nevada, would be the final disposal site for all immobilized plutonium and MOX spent fuel. As directed by the U.S. Congress through the NWPA, as amended, Yucca Mountain is the only candidate site currently being characterized as a potential geologic repository for HLW and spent fuel. DOE has prepared a separate EIS, *Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0250D, July 1999), which analyzes the environmental impacts from construction, operation and monitoring, related transportation, and eventual closure of a potential geologic repository.

To provide for public comment on the SPD Draft EIS, DOE conducted public hearings near the potentially affected DOE sites, and thus with the most directly affected populations. Approximately 1,700 copies of the SPD EIS were mailed, and an NOA letter was mailed to an additional 5,500 members of the public. The proposed actions do not involve disposal of surplus plutonium in South Carolina. Hearings for SRS were held in North Augusta, South Carolina. DOE provided appropriate opportunities and means for public comment on the program, and gave equal consideration to all comments, regardless of how they were submitted: public hearings, mail, a toll-free telephone, and fax line. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**FD331-2**

**General SPD EIS and NEPA Process**

During the comment period for this SPD EIS, July 17 through September 16, 1998, DOE hosted five public hearings that provided opportunities for oral and written comments from the public. These hearings, which were open to all individuals and organizations, included afternoon and evening hearings in the North Augusta Community Center in North Augusta, South Carolina.



United States  
Department  
of Energy

Comment Form

NAME (Optional) George C. (Chris) Rodrigues  
ADDRESS: 1703 Highland Park Avenue, Aiken SC 29801  
TELEPHONE (803) 668-5774  
E-MAIL: chr@rod00@aol.com

While the work force at Pantex is very capable at their current mission, I know from my personal experience that they have no capability or infrastructure to handle or process plutonium on-site (finished, fabricated or metal component/pile). This includes both operations as well as facility design and construction. Pantex would have to start from square one to build such a knowledge, skill, and experience base as well as build facilities (basically on a "green" or "let's facilities. Someone has to have a highly original knowledge, experience, and specific skill base to perform plutonium processing work such as this - we have been doing this for forty five years. We have facilities with all required infrastructure and capability - It would be very cost effective to convert these facilities to disassemble excess pits and process all plutonium in them for disposition. It makes no sense from any viewpoint to locate this unique knowledge against SRS. I make these comments with twenty years of hands on plutonium experience in R&D, manufacturing, and facility design, construction and startup at

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SCD61-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

SAVANNAH RIVER REGIONAL DIVERSIFICATION INITIATIVE  
THOMAS J. STONE ET AL.  
PAGE 1 OF 1



SAVANNAH RIVER REGIONAL DIVERSIFICATION INITIATIVE  
Aiken, South Carolina 29802, (803) 593-9954 ext. 1409 FAX (803) 593-4296

RESOLUTION

Whereas the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

WHEREAS plutonium disposition represents one of the most certain future missions of The U.S. Department of Energy for the next 20 to 30 years; and

WHEREAS The Department of Energy has already chosen the Savannah River Site as the site for MOX Fuel Fabrication and Immobilization because of the Site's capabilities as DOE's only operating plutonium processing site; and

WHEREAS consolidating all three of the new plutonium disposition facilities, including the Pit Disassembly and Conversion Facility, at the Savannah River Site would save at least \$1.6 billion, compared to establishing and maintaining the required capabilities at other sites; and

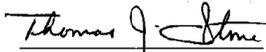
WHEREAS the Savannah River Site has produced approximately 40 percent of all U.S. weapons grade plutonium over the last 45 years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public or the environment, and

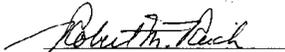
WHEREAS the Department of Energy in its Record of Decision recognizes the Savannah River Site as "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities...with the only remaining large-scale chemical separation and processing capability in the DOE complex"; and

WHEREAS the regional community in the Central Savannah River Area (CSRA) of South Carolina and Georgia strongly supports continued plutonium missions for the Department of Energy's Savannah River Site;

NOW BE IT RESOLVED that the Savannah River Regional Diversification Initiative (SRRDI) strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in Mixed Oxide Fuel Fabrication, Immobilization, and Pit Disassembly and Conversion.

APPROVED this 15<sup>th</sup> day of August 1998 at Aiken, South Carolina, by the Savannah River Regional Diversification Initiative Board of Directors.

  
Thomas J. Stone  
Chairman

  
Robert M. Reich  
Secretary

SCD25

SCD25-1

Alternatives

DOE acknowledges the commentors' support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**SAVANNAH RIVER SITE RETIREE ASSOCIATION**  
**TOM GREENE**  
**PAGE 1 OF 1**

August 13, 1998

**PUBLIC HEARING – PIT DISASSEMBLY & CONVERSION**

Mr. Chairman:

I am Tom Greene, Chairman of the Savannah River Site Retiree Association. The Association is less than a year old and has already achieved a membership of over 500 retirees. We are growing at a very steady rate and we expect we will eventually represent the 2000 WSRC & BSRI retirees.

At our Board meeting on August 4, 1998 the Board voted unanimously to support the critical third element of the Department of Energy Plutonium Disposition Mission – The Pit Disassembly and Conversion. The reasons for this strong support are:

1. First of all, it makes sense that all three missions be placed at one location such as Savannah River Site because SRS has the infrastructure and the expertise to effectively handle the mission.
2. Secondly, use of SRS for all three parts of the plutonium disposition mission would result in a cost savings of approximately \$1.6 Billion based on avoided costs of new structure and equipment that would be required at other DOE sites.
3. Third, the DOE has already expressed confidence in the SRS team by assigning two of the three missions to SRS – the MOX and immobilization missions.
4. Fourth, SRS is better equipped and better experienced than Pantex to effectively handle all three missions.
5. Last and most importantly, I speak not only as chairman of the retiree organization but also as former Mayor of the City of North Augusta - the citizens of our area continue to strongly support the Savannah River Site and its missions. We have worked hard in the past and are working hard now, to insure that in the future the SRS continues to be a strong economic engine in our area and continues to play a leadership role in the security of our Nation.

Thank You,

Tom Greene,  
 Chairman,  
 Savannah River Site Retiree Association(SRSRA)

SCD22

**SCD22-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

THANK YOU, MR. MODERATOR

MY NAME IS Tim Moore AND I AM THE MAYOR OF [REDACTED] SNELLING,  
[REDACTED]

IN THIS CAPACITY AND FROM A PROFESSIONAL VIEW, I AM  
EXTREMELY INTERESTED IN WHAT HAPPENS WITH THE SAVANNAH  
RIVER SITE AND THE THOUSANDS OF FINE EMPLOYEES THAT WORK  
THERE.

I AM NOT A NUCLEAR ENGINEER AND NOT AN EXPERT ON  
PLUTONIUM, BUT I DO UNDERSTAND FINANCES. AND WHAT I HAVE  
LEARNED OVER THE PAST FEW MONTHS IS THAT THE COST OF  
LOCATING THIS MISSION ANYWHERE OTHER THAN THE SAVANNAH  
RIVER SITE WOULD BE A DISSERVICE TO THE TAXPAYERS OF THIS  
GREAT COUNTRY. YOUR OWN REPORTS AND STUDIES SHOW THE  
CONSOLIDATION OF THE PLUTONIUM MISSION AT ONE SITE SAVES  
MILLIONS AND MILLIONS OF DOLLARS.

AND TO TRAIN ANOTHER WORKFORCE FROM ANOTHER LOCATION TO  
DO WHAT THE SAVANNAH RIVER FOLKS ALREADY KNOW HOW TO DO

1

SCD41

SCD41-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

IS NOT VERY RESPONSIBLE.

I URGE YOU TO TAKE THE MESSAGE BACK TO THE DEPARTMENT OF  
ENERGY IN WASHINGTON, THAT OUR COMMUNITIES SUPPORT THE  
PLUTONIUM DISPOSITION MISSION BEING LOCATED AT THE  
SAVANNAH RIVER SITE.

AND AS YOUR OWN RESEARCH SHOWS YOU, IT IS THE FINANCIALLY  
RIGHT THING TO DO!!

THANK YOU.

1

SCD41



State of South Carolina

Office of the Governor

DAVID M. BEASLEY  
GOVERNOR

Post Office Box 11369  
COLUMBIA 29211

May 5, 1998

The Honorable Federico Peña  
Secretary of Energy  
United States Department of Energy  
1000 Independence Avenue  
Washington, D.C. 20585

Dear Secretary Peña,

The State of South Carolina has long been a primary supporter of the Department of Energy's National Defense and Environmental Clean-Up Missions. It is my understanding that the Department is taking an "integrated" approach to addressing clean-up issues, and this will again require significant involvement from the State of South Carolina due to the extensive expertise, capabilities, and infrastructure available at the Savannah River Site (SRS).

While the dialogue on clean-up continues, I understand that the Department of Energy plans to announce the selection of preferred sites for the three components of the Plutonium Disposition Program and the nation's new source of tritium in the near future. In the midst of this decision making process, I feel it is very important that the Savannah River Site be strongly considered for all three components of the Plutonium Disposition Program (Plutonium Disassembly and Conversion, Mixed Oxide Fuel and Immobilization), and for the Accelerator to be selected as the nation's source of tritium.

I believe it is unwise to overlook the inherent savings that arise from integration of the plutonium missions at the Savannah River Site. No other Department of Energy facility has the experience and infrastructure needed to complete the disposition program in a timely and cost effective manner. It is my understanding that consolidation of this mission will significantly reduce the up-front capital investment in new facilities, and will reduce the overall cost of the program by over \$1 billion dollars. Therefore, I strongly support consolidating all three of the plutonium disposition facilities at the Savannah River Site.

Further, I feel that the selection and commitment to build the linear accelerator represents the Department's best option for supplying the nation's tritium demands. It is a clean technology that is the right choice for the environment. Also, the Accelerator Production of Tritium (APT) does

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2

SCD74

SCD74-1

Alternatives

DOE acknowledges the Governor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

SCD74-2

DOE Policy

Accelerator production of tritium is beyond the scope of this SPD EIS. It was analyzed in the *Final Programmatic Environmental Impact Statement for Tritium Supply and Recycling* (DOE/EIS-0161, October 1995). The Secretary of Energy announced in December 1998 that he selected TVA's Watts Bar and Sequoyah reactors as the preferred facilities for producing a future supply of tritium. Consistent with DOE's dual-track strategy for tritium production, the linear accelerator option was designated as a backup technology. DOE would complete key research and development milestones for the accelerator but would not complete construction.

**SOUTH CAROLINA, OFFICE OF THE GOVERNOR**  
**HONORABLE DAVID M. BEASLEY**  
**PAGE 2 OF 2**

Secretary Peña  
May 5, 1998

Page 2

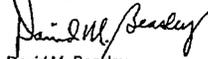
not have the policy concerns that have been raised regarding the Commercial Light Water Reactor. With the APT, the clear historic separation of civilian and defense missions will be preserved. Further, it holds the promise of exciting new technology and with the new modular design, the cost is more than competitive with the cost of the proposed completion of a Tennessee Valley Authority reactor.

2

The Savannah River Site is clearly the logical choice for these missions. I ask you to fully consider the consolidation of all the plutonium disposition activities at SRS and the selection of the APT as the nation's new tritium source. The awarding of these missions to SRS will clear the way for the State of South Carolina to continue its long-standing role as an active and supportive partner of the Department's national goals.

3

Sincerely,



David M. Beasley

- cc: Senator Strom Thurmond
- Senator Fritz Hollings
- Representative Floyd Spence
- Representative Lindsey Graham
- Representative Mark Sanford
- Representative Bob Inglis
- Representative Jim Clyburn
- Representative John Spratt

SCD74

**SCD74-3**

**Alternatives**

This comment has been forwarded to the Office of Commercial Light Water Reactor Production.



State of South Carolina

Office of the Governor

DAVID M. BEASLEY  
GOVERNOR

POST OFFICE BOX 11369  
COLUMBIA, S.C. 29211

June 18, 1997

To the Department of Energy and concerned citizens of the SRS Community:

Thank you for affording me the opportunity to comment on the proposed scope of the Surplus Plutonium Disposition Environmental Impact Study.

As most of you may already know, I had the opportunity to meet with the South Carolina Congressional Delegation in Washington several weeks ago. At that meeting, your elected representatives pledged to work towards securing new missions for the Savannah River Site (SRS), while ensuring a viable long term disposal plan. I have pledged to support this effort and stand ready to follow their leadership in protecting this federal reservation.

I regret that my schedule does not allow me to be with you in person, but if Congress and the Department of Energy decide to pursue this dual pathway for disposition, then I would request that SRS be fairly considered. With an online vitrification process, plutonium processing facilities, and over 40 years of experience and expertise in the field, plutonium disposition appears to be a mission that the Savannah River Site is uniquely qualified to perform.

Thank you for your time and attention.

Sincerely,

David M. Beasley

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SCD75

### SCD75-1

### Alternatives

DOE acknowledges the Governor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**SOUTH CAROLINA, OFFICE OF THE GOVERNOR**  
**HONORABLE DAVID M. BEASLEY**  
**PAGE 1 OF 1**



**State of South Carolina**

**Office of the Governor**

DAVID M. BEASLEY  
GOVERNOR

August 13, 1998

Ms. Laura Holgate  
United States Department of Energy  
Office of Fissile Materials Disposition  
MD-4 Forestall Building  
1000 Independence Avenue, SW  
Washington, DC 20588

Dear Ms. Holgate,

I regret that my schedule does not allow me to be with you in person, but I appreciate the opportunity to comment on the Surplus Plutonium Disposition Draft Environmental Impact Statement.

I strongly endorse the Savannah River Site (SRS) for the entire surplus plutonium disposition mission. As you are well aware, the State of South Carolina has long been a patriotic partner of the department's national defense and environmental clean-up missions. This historical service to the nation has been exemplified by the site's commitment to excellence. It is this trademark quality that is so explicitly displayed in the Savannah River Site's selection as the preferred site for both the immobilization facility and the mixed-oxide fuel fabrication facility.

Given this acknowledgment by the department, the overall integrity of the mission should not be sacrificed by splintering the disposition of surplus plutonium. Consolidation of this mission at SRS will reduce the up-front capital investment in new facilities and life cycle costs by over one billion dollars. Further, there is no other site within the Department of Energy complex that can claim the expertise, infrastructure and citizenry support of over 40 years that are the hallmarks of the Savannah River Site Complex and community.

The Savannah River Site is the logical, financial and technical choice for the department's entire surplus plutonium disposition mission. It is the right choice for the Department of Energy and the nation. I am confident your analysis will compel the same conclusion.

Sincerely,

David M. Beasley

SCD14

**SCD14-1**

**Alternatives**

DOE acknowledges the Governor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**Remarks by State Treasurer Richard Eckstrom  
August 13, 1998 Environmental Impact Public Statement Hearing  
North Augusta Community Center**

My name is Richard Eckstrom, and I'm the treasurer of the State of South Carolina. --- I'm here today to voice my support for the Savannah River Site. --- I also want to talk about taxpayer issues --- regarding DOE's Plutonium Disposition Program.

SRS is the largest industrial employer in the State of South Carolina. --- It employs more than 14,000 people. --- Seventy percent of its workforce lives in South Carolina. --- The total economic impact of SRS to this area --- is approximately 2 billion dollars annually.

We're proud of the contribution that SRS has made to our national security through the years. --- Since the site began operating in the 1950s, it has been a major participant in our defense industry. --- From its inception, SRS has developed and maintained the highest levels of safety and consideration for its workforce, the public and our natural resources in this area.

SCD50

**SCD50-1**

**Alternatives**

DOE acknowledges the commentator's support for siting the pit conversion facility at SRS. DOE considers all the candidate sites suitable for disposition activities from a public acceptance, safety, and conduct of operations viewpoint. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

We're proud that SRS is the only "truly operational site" remaining in the DOE Complex. ---- Hanford and Rocky Flats are strictly in clean-up modes, as they have been for several years. ---- The Pantex plant in Texas has never been anything but an assembly-and-dismantlement site.

We agree with DOE's assessment ---- just last year---- when it said that SRS is (quote) ---- "a plutonium competent site with the most state-of-the-art storage and processing facilities, and .... a site with the only remaining large-scale chemical separation and processing capability in the DOE complex." (end quote)

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Pantex, which is now competing with SRS for the Pit Disassembly and Conversion mission, ---- has never processed plutonium ---- it has only stored it. I would remind you that Pantex has neither the experience ---- nor the necessary infrastructure ---- to do this work.

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SCD50

Consider the following financial facts that emphatically support the selection of SRS for this mission:

First, unless SRS is chosen for the Pit Disassembly and Conversion work, the infrastructure that exists at SRS would have to be constructed at an alternate site ---- at a cost of hundreds of millions of dollars to the taxpayers of this country, ---- The failure to use the extensive human resources and experience at SRS ---- would only run up those costs. ---- Did we not **promise** the taxpayers a “peace dividend?”

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It makes no sense to **not use** what already exists at SRS.

Secondly, because the alternate site has never **processed** plutonium, ---- a plutonium clean-up legacy doesn’t exist at that site. ---- If plutonium processing is introduced at the alternate site, ---- another legacy will be created which will require **significant** taxpayer dollars to remediate. ---- Because SRS has a history of plutonium processing, ---- we would expect incremental remediation costs to be minimal.

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SCD50

From the taxpayers' perspective, ---- the collocation of the nation's Plutonium Disposition missions at SRS will save the taxpayers hundreds of millions ---- and possibly as much as a billion dollars. ---- Again, did we not promise the taxpayers a "peace dividend?"

But there are more than financial considerations. ---- A qualified workforce currently exists here at SRS. ---- This qualified workforce is a community of people. ---- These people have families.

Through the years, this community and the state have invested in infrastructure ---- to support these families. ---- This community and the state have invested in law enforcement and fire services ---- to protect these families. --- This community and the state have invested in hospitals, clinics, and emergency medical services ---- to provide for their health needs. ---- This community and the state have invested in elementary schools, middle schools, high schools, technical colleges, and university campuses ---- to educate the children of these families.

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And why did this community and the state choose to make these permanent investments for the workforce of SRS? ---- Because back in the 50s, this community, and the state, and SRS joined together as strategic partners. ---- And through the years, we have always viewed the well-being of the site's workforce, ----- and the well-being of the thousands-upon-thousands of their family members, ----- as our primary responsibility.

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This community and the state have always enthusiastically supported SRS and its vital national security missions. ---- And we have given SRS our consistent, unwavering support for the past five decades. ---- No one else can come close to matching that. ---- Thank you for your serious consideration --- and for the opportunity to speak here today. ---- We stand ready, willing, and able ---- to continue to support the vital missions of SRS.

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SCD50

**SOUTH CAROLINA DEPARTMENT OF COMMERCE**  
**ROBERT V. ROYALL**  
**PAGE 1 OF 1**



SOUTH CAROLINA  
DEPARTMENT OF COMMERCE

David M. Beasley  
Governor

August 10, 1998

Robert V. Royall  
Secretary

Ms. Laura Holgate  
United States Department of Energy  
Office of Fissile Materials Disposition  
MD-4 Forestall Building  
1000 Independence Avenue, SW  
Washington, DC 20580

Dear Ms. Holgate:

Thank you for this opportunity to comment on the Proposed Environmental Impact Statement for the Disposition of Surplus Weapons Grade Plutonium. I concur with Governor Beasley's endorsement of the Savannah River Site as the best site for the entire Surplus Plutonium Mission.

The workforce of the State and of the Savannah River Site Region has a demonstrated history of supporting the missions of the United States Department of Energy. As a result, over its more than forty year history, the SRS has become an important factor in both State and Regional economies.

Your Department should be proud of the workforce which you have assembled at SRS. These workers and their skills have been an enrichment for the region. With the assistance of your Department's Worker and Community Transition Program we have been successful in attracting private sector firms to the Region to re-employ many of the skills displaced by downsizing. The Plutonium Mission, coupled with these private sector initiatives, will help maintain this workforce and the body of science which it represents, an objective which I believe will be in the best interest of both the Nation and South Carolina.

Sincerely,

  
Robert V. Royall

mh

**SCD08-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

This is Bret Bersie. I'm the Director of the South Carolina Progressive Network. It's a coalition of nearly 50 organizations across the state with a membership base of 63,000 people. We voted on Saturday, September 12, to request that the Department of Energy have additional public hearings in South Carolina on the plutonium disposition plan. The only hearing that's been held is one that held in North Augusta and the attendees at that hearing were 98 percent paid employees of the Savannah River Site who were given a paid, paid leave to attend the meeting and, and promote the option. There are many citizens in South Carolina that feel that they haven't been heard. Many citizens don't even know the questions going on and so we would, would request the additional hearings in at least Columbia, which is the capital of the state, and be given a month's notice before the hearing. My address is P.O. Box 8325, Columbia, South Carolina 29202. My phone number is (803) 808-3384.

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I have an additional comment and that is that I recall when the Allied General Nuclear Services Plant was built at this, outside the Savannah River Plant to reprocess plutonium to make mixed oxide fuels twenty years ago. Jimmy Carter, when he was President, issued an executive order saying that mixed oxide fuels could not be used. Did that executive order wear out or has it been supplanted by something that I'm not aware of? See if you can answer that question for me. Thank you very much.

2

PD067

**PD067-1**

**General SPD EIS and NEPA Process**

DOE acknowledges the commentor's concerns regarding the public hearing. DOE employees and contractors at SRS were neither granted leave nor ordered to present their views at the North Augusta hearing; they attended in an official capacity or took personal leave to attend. DOE believes that the hearing was objective and open; all attendees were given an opportunity to provide comments orally or in writing. It was simply not feasible to hold public hearings in every location, including the locations suggested by the commentor.

To provide for public comment on the SPD Draft EIS, DOE conducted public hearings near the potentially affected DOE sites, and thus with the most directly affected populations. This decision did not preclude relevant comment by State and local government, tribes, individuals, and organizations. Approximately 1,700 copies of the SPD Draft EIS were mailed, and an NOA letter was mailed to an additional 5,500 members of the public. Several means were available for providing comments: public hearings, mail, a toll-free telephone and fax line, and the MD Web site. Equal consideration was given to all comments, regardless of how they were submitted.

**PD067-2**

**Nonproliferation**

The Allied General Nuclear Services Plant was constructed to recover plutonium and uranium from spent nuclear fuel. President Carter issued an Executive Order terminating the plant's reprocessing capability before construction was completed. Under the MOX approach, the use of U.S. surplus plutonium in existing domestic, commercial reactors does not involve reprocessing (reprocessing is a chemical separation of uranium, transuranic elements [including plutonium], and fission products from spent reactor fuel and the reuse of the plutonium and uranium to produce new fresh fuel). Consistent with the U.S. policy of discouraging the civilian use of plutonium, a MOX facility would be built and operated subject to the following strict conditions: construction would take place at a secure DOE site, it would be owned by the U.S. Government, operations would be limited exclusively to the disposition of surplus plutonium, and the MOX facility would be shut down at the completion of the surplus plutonium disposition program. For reactor irradiation, the NRC license would authorize only the participating reactors to use MOX fuel fabricated from surplus plutonium, and the irradiation would be a once-through cycle with no reprocessing.

**Comments by T. Scott Beck**  
**Member of the House of Representatives**  
**State of South Carolina**

**DOE Draft EIS for Surplus Plutonium Disposition**

**August 13, 1998**

SCD13

Thank you for providing me this chance to address an issue ... that's so important ... not only to our community ... but to our nation as well.

Let me also take this opportunity ... to formally welcome you ... to the 83<sup>rd</sup> legislative district of South Carolina.

We're a district comprised of many current ... and former site workers ... who have a keen understanding of the unique technical challenges ... involved in plutonium processing.

As one of those former employees myself ... who's worked at the site's primary plutonium processing facility ... I know this **isn't** work ... that can be done ... by **just** anyone ... or **just** anywhere.

Plutonium processing is highly specialized ... with unique contamination protection ... safety ... material accountability ... and waste management requirements ...

... much of it an infrastructure ... that already exists at Savannah River ...

... much of it requiring skills ... that already exist there as well.

It's a capability ... that you'd have to totally re-created somewhere else.

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SCD13

**SCD13-1**

**Alternatives**

DOE acknowledges the Representative's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

*Beck -- Page 2*

On top of that ... SRS is already listed as the preferred site for two thirds of the plutonium disposition mission.

Doesn't it make sense ... to locate all three plutonium plants together ... to take advantage of the cost benefits ... that are sure to be realized with shared facilities and staff?

Furthermore ... because plutonium processing carries with it ... extensive ... **and** expensive ... clean-up obligations ... why even consider placing it at a site - unlike Savannah River - where those obligations don't already exist?

In recent years ... I've been a student of the vagaries imperfections of the NEPA process.

I know ... that all too often ... final conclusions can be ... just about anything you want them to be.

In this case ... I hope you'll at least be consistent ...

And consider what I ... and many others here have said ... in light of your own findings ... in a similar EIS in 1996 ... for Stockpile Stewardship & Management.

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SCD13

*Beck -- Page 3*

In it ... you state:

“Plutonium would not be introduced into a site that does not currently have a plutonium infrastructure because of the high cost of new plutonium facilities and the complexity of introducing plutonium into sites without current plutonium capabilities.”

Many of my constituents ... and their co-workers at SRS ... have safely and responsibly ... met the plutonium processing needs of this nation ... for most of the last half of this century.

They’ve demonstrated their worthiness to take that mission ... into the next century as well.

Give them that chance.

Thank you.

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SCD13

**SOUTH CAROLINA HOUSE OF REPRESENTATIVES**  
**HONORABLE RUDY MASON**  
**PAGE 1 OF 2**

I am Rudy Mason, South Carolina State Representative. <sup>House District</sup> I am here representing the Aiken County, South Carolina Delegation. This group of legislators has members from both parties and we may disagree on various issues; however, we are in unanimous agreement in our support of the Pit Disassembly and Conversion mission at the Savannah River Site.

As legislators we are aware that citizens expect their government to make wise fiscal decisions. Citizens demand that we evaluate the alternatives and then choose the one option that serves their best interest while spending the least amount of taxpayers dollars. This EIS hearing is about finding the best location for this critical plutonium disposition mission.

The Savannah River Site has a proven history of handling plutonium. In fact, DOE has previously acknowledged SRS's expertise; therefore, we must consider the financial aspect of this decision. DOE also has acknowledged that the intergration of the plutonium missions at Savannah River Site will save taxpayers millions. Therefore, the decision that should come out these hearings is that the entire Plutonium Disposition, including Pit Disassembly and Conversion, should take place at SRS.

Once again, I would like to reintroduce into the record the resolution passed by our delegation in support of Plutonium Disposition Missions at SRS.

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SCD97

**SCD97-1****Alternatives**

DOE acknowledges the Representative's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**SOUTH CAROLINA HOUSE OF REPRESENTATIVES  
HONORABLE RUDY MASON  
PAGE 2 OF 2**

**A RESOLUTION**

Whereas, the handling and disposition of excess weapons plutonium is of grave concern to the national security of the United States; and

Whereas, plutonium disposition represents one of the most certain future missions of the Department of Energy for the next twenty to thirty years; and

Whereas, the Department of Energy has decided to pursue a dual path for plutonium disposition and has named the Savannah River Site as a candidate site for both options; and

Whereas, the Department of Energy's Surplus Fissile Materials Disposition Program will result in the production of qualified disposal forms and the eventual removal of these materials from the State of South Carolina; and

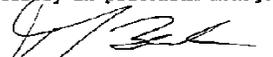
Whereas, the Savannah River Site has produced approximately forty percent of all United States weapons grade plutonium over the last forty-five years and has safely handled plutonium in glovebox processing equipment with no adverse impact on workers, the public, or the environment; and

Whereas, the Department of Energy in its Record of Decision recognizes the Savannah River Site as "a plutonium competent site with the most modern, state-of-the-art storage and processing facilities...with the only remaining large-scale chemical separation and processing capability in the DOE complex"; and

Whereas, the regional community in the Central Savannah River Area (CSRA) of South Carolina and Georgia strongly supports continued plutonium missions for the Department of Energy's Savannah River Site. Now, therefore,

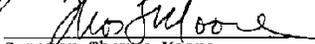
Be it resolved that the Aiken County, South Carolina Legislative Delegation strongly endorses major plutonium missions for the Savannah River Site and urges the Department of Energy to designate the Savannah River Site as its lead facility in plutonium management and disposition.

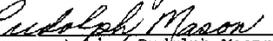
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Representative Thomas Beck

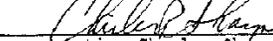
  
Representative Roland Smith

  
Representative William Clyburn

  
Senator Thomas Moore

  
Representative Rudolph Mason

  
Senator W. Greg Ryberg

  
Representative Charles Sharpe

SCD97

Laura HOGATE

DOE EIS HEARING

<sup>AFTERNOON</sup>  
GOOD ~~MORNING~~ AND WELCOME TO SOUTH CAROLINA. I AM BRAD HUTTO, STATE SENATOR, REPRESENTING TWO OF THE HOST COUNTIES FOR THE SAVANNAH RIVER SITE - BARNWELL AND ALLENDALE COUNTIES. I ALSO REPRESENT ORANGEBURG AND HAMPTON COUNTIES. MANY OF MY CONSTITUENTS FROM ALL FOUR COUNTIES WORK AT THE SITE. <sup>MANY DRIVE AN HOUR EACH DAY EACH WAY.</sup>

SRS Family Georgia and N. Carolina

BAMBERG

WE ARE PROUD OF OUR LONGSTANDING RELATIONSHIP WITH THE DEPARTMENT OF ENERGY. WE ARE PLEASED TO HAVE BEEN DESIGNATED AS THE PREFERRED SITE FOR

MOX FUEL FABRICATION AND <sup>FOR</sup>  
~~WASTE MANAGEMENT AND~~ IMMOBILIZATION

AND WE ACTIVELY SEEK THE DESIGNATION AS THE PREFERRED SITE FOR

SCD42-1

Alternatives

DOE acknowledges the Senator's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

PIT DISASSEMBLY AND CONVERSION.

THE WORKERS AND COMMUNITIES OF THE  
*CENTRAL* SAVANNAH RIVER AREA ARE READY AND ABLE TO  
ACCEPT THE CHALLENGES AND RESPONSIBILITIES  
THAT WOULD ACCOMPANY ~~THE CONVERSION OF THE~~  
CONSOLIDATION OF  
A FULL PLUTONIUM DISPOSITION MISSION. *AT SRS.*

AS YOU SEEK TO MAKE A DECISION ABOUT THE  
LOCATION OF THE PIT DISASSEMBLY AND  
CONVERSION ~~MISSION~~, *FACILITY* WE KNOW THAT YOU WILL  
RECOGNIZE THAT THE SAVANNAH RIVER SITE

HAS ~~THE~~ *MUCH* OF THE NEEDED SUPPORT  
INFRASTRUCTURE FOR SUCH A MISSION IN PLACE

WE HAVE AN EXPERIENCED AND DEDICATED  
WORKFORCE. WHO HAVE THE EDUCATION, TRAINING  
AND ABILITY TO ~~CARRY OUT THE~~ *MAN A* PIT DISASSEMBLY  
AND CONVERSION *FACILITY.*

1

SCD42

WE BELIEVE THAT THE LOCATION OF THE PIT  
DISASSEMBLY AND CONVERSION PROJECT HERE  
WILL GENERATE VAST SAVINGS TO THE COUNTRY.

*SRS HAS*  
~~WE HAVE~~ THE TRADITION AND TRAINING  
~~NECESSARY~~ TO SAFELY AND EFFICIENTLY HANDLE  
~~OUR TRACK RECORD OF SAFETY IS 22 YEARS~~  
THIS NEW MISSION. ~~PROTECT THE~~ PUBLIC, ENVIRONMENT  
AND WORKERS.

1

<sup>SOUTH CAROLINA</sup>  
OUR ^ CONGRESSIONAL DELEGATION HAS  
PROVIDED US WITH STEADFAST AND UNWAVERING  
SUPPORT IN WASHINGTON OVER THE MANY YEARS  
OF OPERATIONS ~~HERE~~ AT THE SAVANNAH RIVER  
SITE. THEIR CONTINUED UNYIELDING COMMITMENT  
TO THE PEOPLE AND COMMUNITIES OF THIS AREA  
SHOULD FURTHER DEMONSTRATE TO YOU THE  
WARM RECEPTION AND HOSPITALITY THAT YOU CAN  
EXPECT FOR <sup>THE SITING OF</sup> NEW MISSIONS HERE AND THE FULL  
COOPERATION THAT YOU WILL RECEIVE IN MAKING

SCD42

THE DECISION TO CONSOLIDATE ALL PLUTONIUM  
DISPOSITION MISSIONS AT SRS.

FURTHERMORE, THE CITIZENS AND  
COMMUNITIES THAT I REPRESENT ARE AS  
COMMITTED AS WE ALWAYS HAVE BEEN TO DOING  
OUR SHARE TO PROVIDE FOR OUR NATIONAL  
SECURITY. WE ARE PROUD OF THE ROLE THAT  
SAVANNAH RIVER SITE HAS PLAYED OVER THE  
*LAST HALF CENTURY* ~~YEARS~~ IN THE DEFENSE OF OUR NATION AND

WE ARE READY TO CONTINUE THIS TRADITION OF  
SERVICE TO OUR COUNTRY. *AS WE APPROACH*  
*THE NEW MILLENNIUM.*

1

SCD42

SOUTH CAROLINA SENATE  
HONORABLE W. GREG RYBERG  
PAGE 1 OF 2

W. GREG RYBERG  
SENATOR, AREA AND DISTRICT COMMITTEE  
GENERAL DISTRICT 24

HOME ADDRESS:  
P. O. BOX 1077  
HANES, SC 29802  
(803) 644-6225  
FAX: (803) 618-4020



COMMITTEES:  
CONNECTIONS AND PARTNERSHIP  
LABOR, COMMERCE AND INDUSTRY  
GENERAL  
TRANSPORTATION  
STATE HOUSE COMMITTEE

SENATE ADDRESS:  
P. O. BOX 127  
GREENBAY SENATE OFFICE BLDG.  
COLUMBIA, SC 29801  
803/732-5714  
FAX: (803) 238-9220

June 19, 1997

Mr. Howard Canter  
U.S. Department of Energy  
Office of Fissile Materials Disposition  
MD-4 Forrestal Building  
1000 Independence Avenue, SW  
Washington, D.C. 20588

Dear Mr. Canter:

I appreciate the opportunity to express my support of the Savannah River Site (SRS) as the best and singular choice for the Department of Energy's Plutonium Disposition Mission. According to my understanding, currently, there are two options being considered for the handling and disposition of excess plutonium - mixed-oxide (MOX) fuel production and vitrification. Furthermore, I have been informed that SRS is the only location under consideration which has the capability to contribute in both methods of disposition.

Consolidation of all of the contemplated plutonium operations at one site appears to be not only the most cost-effective approach but also to be in the best interest of our Country. DOE's adopted strategy to consolidate operations as the complex was downsized is a good one. SRS currently has the infrastructure, layout, and specialized skills necessary to effectuate consolidation of and a smooth, cost-effective transition to DOE's new mission. It is also the only location that would not require extensive capital outlay to implement DOE's plans. Additionally, SRS's existing operation features numerous facilities which would enhance and complement these new missions.

SRS is the only site with the level of current expertise, experience and proven ability to safely handle these new missions. It is the only large-scale operating plutonium processing facility in the country. Its facilities have been extensively renovated and modernized and stand ready for duty. The proven people assets needed for plutonium missions already exist at SRS and need not be moved or developed elsewhere. Having lived within the community for 20 years, I would unequivocally say that the SRS employees are second to none. Through the ups and downs of the SRS employment cycle, the core competency of the Site has been integral to its success and to the vast community support. Bricks and mortar, canisters and glass logs, are only a portion of the SRS success equation. Our people and our community involvement are, I believe, the key to DOE's success. It is a fact that employees perform to their highest potential when they enjoy the support of their community.

SCD103

SCD103-1

Alternatives

DOE acknowledges the Senator's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**SOUTH CAROLINA SENATE**  
**HONORABLE W. GREG RYBERG**  
**PAGE 2 OF 2**

June 19, 1997

Mr. Howard Canter  
Page 2

Aiken County and its surrounding communities wholeheartedly support SRS in its bid for new compatible missions and we believe we offer the lowest cost alternative to DOE while protecting the environment. The community's commitment to SRS has been actively demonstrated since it was first built in the early 1950's. I believe the level, breadth, and depth of support for this facility continues to be unprecedented. I regard this support as unparalleled by any other DOE facility within the complex.

In spite of the tremendous cut backs at SRS over the past four years, our community has stood steadfast behind the site and actively assisted SRS in its pursuit of new missions. This site, and its countless contractors and economic off shoots, is not only the largest employer in our area, it is also an integral part of our community through the involvement of its operator, Westinghouse, in charitable and civic organizations and endeavors. Their commitment to getting involved and to giving back to our community has resulted in increased support for the site.

With concern for fiscal responsibility and accountability at all levels of government being the national outcry, along with competent people and community support being integral to the success of the Plutonium Mission, I steadfastly feel that SRS is the most logical choice for DOE's mission for Plutonium Disposition.

Sincerely,



W. Greg Ryberg  
District 24

SCD103

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**SOUTH CAROLINA SENATE**  
**HONORABLE W. GREG RYBERG**  
**PAGE 1 OF 2**

**W. GREG RYBERG**  
 SENATOR, Aiken and Lexington Counties  
 SENATORIAL DISTRICT 54



COMMITTEES:  
 CORRECTIONS AND PENITENTIARY  
 LABOR, COMMERCE AND INDUSTRY  
 GENERAL  
 TRANSPORTATION  
 STATE HOUSE COMMITTEE

SENATE ADDRESS:  
 P. O. BOX 142  
 GREENBAY SENATE OFFICE BLDG.  
 COLUMBIA, SC 29202  
 (803) 212-6148  
 FAX: (803) 212-6290

August 13, 1998

Mr. Howard Canter  
 U.S. Department of Energy  
 Office of Fissile Materials Disposition  
 MD-4 Forrestal Building  
 1000 Independence Avenue, SW  
 Washington, D.C. 20588

Dear Mr. Canter:

I appreciate the opportunity to express my support of the Savannah River Site (SRS) as the best and singular choice for the Department of Energy's Surplus Plutonium Disposition Mission. As former Secretary Pena stated and your Draft Environmental Impact Statement correctly concludes, Savannah River is the preferred alternative for the MOX fuel fabrication and immobilization portions of this important non-proliferation mission because of its staff expertise, plutonium infrastructure and exemplary safety performance. These same considerations hold true for the Pit Disassembly and Conversion Facility, and your decision should be to similarly assign this portion of the Surplus Plutonium Mission to Savannah River.

Consolidation of all of the contemplated plutonium operations at one site appears to be not only the most cost-effective approach but also to be in the best interest of our Country. DOE's adopted strategy to consolidate operations as the complex was downsized is a good one. SRS currently has the infrastructure, layout, and specialized skills necessary to effectuate consolidation of and a smooth, cost-effective transition to DOE's new mission. It is also the only location that would not require extensive capital outlay to implement DOE's plans. Additionally, SRS's existing operation features numerous facilities which would enhance and complement these new missions.

SRS is the only site with the level of current expertise, experience and proven ability to safely handle these new missions. It is the only large-scale operating plutonium processing facility in the country. Its facilities have been extensively renovated and modernized and stand ready for duty. The proven people assets needed for plutonium missions already exist at SRS and need not be moved or developed elsewhere. Having lived within the community for 21 years, I would unequivocally say that the SRS employees are second to none. Through the ups and downs of the SRS employment cycle, the core competency of the Site has been integral to its success and to the vast community support. Bricks and mortar, canisters and glass logs, are only a portion of the SRS success equation. Our people and our community involvement are, I believe, the key to DOE's success. It is a fact that employees perform to their highest potential when they enjoy the support of their community.

SCD43

**SCD43-1**

**Alternatives**

DOE acknowledges the Senator's support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**SOUTH CAROLINA SENATE**  
**HONORABLE W. GREG RYBERG**  
**PAGE 2 OF 2**

August 13, 1998

Mr. Howard Canter  
Page 2

Aiken County and its surrounding communities wholeheartedly support SRS in its bid for new compatible missions and we believe we offer the lowest cost alternative to DOE while protecting the environment. The community's commitment to SRS has been actively demonstrated since it was first built in the early 1950's. I believe the level, breadth, and depth of support for this facility continues to be unprecedented. I regard this support as unparalleled by any other DOE facility within the complex.

In spite of the tremendous cut backs at SRS over the past few years, our community has stood steadfast behind the site and actively assisted SRS in its pursuit of new missions. This site, and its countless contractors and economic off shoots, is not only the largest employer in our area, it is also an integral part of our community through the involvement of its operator, Westinghouse, in charitable and civic organizations and endeavors. Their commitment to getting involved and to giving back to our community has resulted in increased support for the site.

With concern for fiscal responsibility and accountability at all levels of government being the national outcry, along with competent people and community support being integral to the success of the Plutonium Mission, I steadfastly feel that SRS is the most logical choice for the Pit Disassembly and Conversion Facility.

Sincerely,



W. Greg Ryberg  
District 24

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SCD43

SCD80-1

Alternatives

DOE acknowledges the commentors' support for tritium production and surplus plutonium disposition at SRS. Tritium production is beyond the scope of this SPD EIS, but is analyzed in the *Final Programmatic Environmental Impact Statement for Tritium Supply and Recycling* (DOE/EIS-0161, October 1995). As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input.

**ERDA**  
EDUCATION, RESEARCH AND DEVELOPMENT  
ASSOCIATION OF GEORGIA UNIVERSITIES  
900 Atlantic Drive  
Atlanta, Georgia 30332-0425  
(404)-894-3800 FAX (404)-894-0325

**SCUREF**  
SOUTH CAROLINA UNIVERSITIES  
RESEARCH AND EDUCATION FOUNDATION  
Strom Thurmond Institute  
Clemson, South Carolina 29634-5701  
(854)-656-1964 FAX (854)-656-0896

June 24, 1987

The Honorable Newt Gingrich  
2428 Rayburn House Office Building  
United States House of Representatives  
Washington, DC 20515

Dear Mr. Speaker:

Since 1992, regional universities in South Carolina and Georgia have partnered with Westinghouse Savannah River Company and the Department of Energy at the Savannah River Site to expand the technical expertise and resources of the site to accomplish missions to solve problems, train employees and educate the public. We want these efforts to continue and to expand in the future. Your active support is needed now as new missions for SRS are being considered.

The two new mission areas are:

- Tritium Production for National Defense
- Surplus Nuclear Materials Disposition for National and International Security

SRS has existing experience and expertise as well as the required infrastructure to execute both of these missions in a safe and environmentally acceptable manner. These projects complement the successful environmental cleanup and remediation program at the site to which we are already contributing.

The Savannah River Site has been previously selected to be the site for future production of Tritium for our national defense program if required. Our institutions can assist by contributing to the basic science and technology research that would be needed to design and operate such a facility. Our institutions will also provide educational opportunities to create a cadre of operational and design engineers, scientists, environmental specialists and safety experts.

The material disposition mission would process and ultimately dispose of excess plutonium and highly enriched uranium, significantly reducing the risk of proliferation. Our universities fully support and are ready to partner with SRS to achieve this mission. Your support is essential. The leading research universities of South Carolina and Georgia are solidly behind the new missions, without which this region of Georgia and South Carolina will continue losing

ERDA Member Institutions: Clark Atlanta University; Emory University; Georgia Institute of Technology;  
Georgia State University; Medical College of Georgia; University of Georgia  
SCUREF Member Institutions: Clemson University; Medical University of South Carolina;  
South Carolina State University; University of South Carolina

SCD80

SOUTH CAROLINA UNIVERSITIES RESEARCH AND EDUCATION FOUNDATION  
CONSTANTINE CURRIS ET AL.  
PAGE 2 OF 2

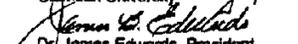
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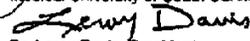
jobs and expertise at SRS. It is critical that we stabilize funding and employment at the SRS through Congressional support for the new missions.

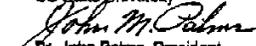
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Sincerely,  
SCUREF

  
Dr. Constantine Curris, President  
Clemson University

  
Dr. James Edwards, President  
Medical University of South Carolina

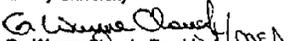
  
Dr. Leroy Davis, President  
SC State University

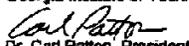
  
Dr. John Palms, President  
University of South Carolina

ERDA

  
Dr. Thomas Cole, President  
Clark Atlanta University

  
Dr. William Chace, President  
Emory University

  
Dr. Wayne Clough, President  
Georgia Institute of Technology

  
Dr. Carl Patton, President  
Georgia State University

  
Dr. Francis Fedesco, President  
Medical College of Georgia

  
Dr. William F. Prokasy, Acting President  
University of Georgia

Distribution List:

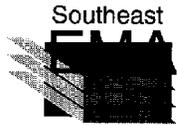
The Honorable Newt Gingrich  
The Honorable Paul Coverdell  
The Honorable Max Cleland  
The Honorable Jack Kligston  
The Honorable Sanford Bishop  
The Honorable Michael "Mac" Collins  
The Honorable Cynthia McKinney  
The Honorable John Lewis  
The Honorable Bob Barr  
The Honorable Saxby Chambliss  
The Honorable Nathan Deal  
The Honorable Charles Norwood  
The Honorable John Linder

The Honorable Strom Thurmond  
The Honorable Ernest Hollings  
The Honorable Mark Sanford  
The Honorable Floyd Spence  
The Honorable Lindsey Graham  
The Honorable Bob Inglis  
The Honorable John Spratt  
The Honorable James Clyburn  
  
The Honorable David Beasley  
The Honorable Zell Miller  
Mr. Federico Pena

ERDA Member Institutions: Clark Atlanta University; Emory University; Georgia Institute of Technology;  
Georgia State University; Medical College of Georgia; University of Georgia  
SCUREF Member Institutions: Clemson University; Medical University of South Carolina;  
South Carolina State University; University of South Carolina

SCD80

**SOUTHEAST ENVIRONMENTAL MANAGEMENT ASSOCIATION**  
**CARL A. MAZZOLA**  
**PAGE 1 OF 2**



**SOUTHEAST ENVIRONMENTAL  
MANAGEMENT ASSOCIATION**

P.O. Box 5446 • Aiken, South Carolina • 29804  
Phone and Fax (803) 648-9545

September 9, 1998  
SEMA-98-009

US Department of Energy  
Office of Fissile Materials Disposition  
P. O. Box 23786  
Washington, DC 20026-3786

Gentlemen:

The Southeast Environmental Management Association (SEMA) is a non-profit organization of environmental management professionals. We were formed in 1994 for the purpose of providing a forum for the exchange of technical and programmatic information pertaining to environmental restoration, waste management and minimization, and environmental compliance issues, as they pertain to public and private sector enterprises in the southeast United States.

SEMA offers public comment in response to the Surplus Plutonium Disposition (SPD) Draft Environmental Impact Statement (DEIS):

Having reviewed the alternatives presented in the SPD DEIS for the Pit Disassembly and Conversion Facility, the Mixed Oxide (MOX) Fuel Facility, and the Plutonium Immobilization Facility (PIF), it is apparent that the preferred site for each of these facilities should be the Savannah River Site (SRS) in Aiken, South Carolina. This preference is based on many compelling arguments presented in the EIS itself, such as:

- SRS experience for almost 50 years in the safe handling, safe processing, and secure management of a full spectrum of plutonium products,
- A highly developed and well-maintained infrastructure especially suited for each of these facilities,
- Synergistic advantages to the co-location of the Pit Disassembly and Conversion Facility with the PIF and MOX facilities next to the Actinide Packaging and Storage Facility,
- The large size of the SRS reservation (300 square miles) provides an additional buffer unavailable at other candidate sites (these facilities will be more than 6 miles from the nearest offsite individual),
- A highly trained and effective workforce with many years of experience with plutonium materials and processes inclusive of the only DOE Plutonium Training Facility, and
- A competitive cost advantage estimated as high as \$120 million which would demonstrate the DOE commitment to be responsible stewards of taxpayer dollars.

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MD167

**MD167-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS and appreciates the community support. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

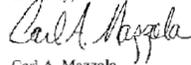
**SOUTHEAST ENVIRONMENTAL MANAGEMENT ASSOCIATION**  
**CARL A. MAZZOLA**  
**PAGE 2 OF 2**

US Department of Energy - Office of Fissile Materials Disposition  
September 9, 1998  
Page 2

Notwithstanding the aforementioned advantages, the greatest argument that can be made is the unwavering commitment of the CSRA people, governments, industries, and organizations, like SEMA, in support of existing and new DOE missions. This commitment should not be taken lightly, for it is based on years of working closely with DOE-SR in shouldering the heavy responsibility of safe, environmentally benign, and strategically important missions of providing nuclear materials for our nation's defense and in remediating the legacy of the nuclear weapons complex.

Based on the decades of experience that the CSRA has had with SRS, we have full confidence that these new missions will be carried out safely and in an environmentally sound manner.

Sincerely,



Carl A. Mazzola  
SEMA President, 1998

cc: The Honorable Lindsey Graham, US House of Representatives  
The Honorable Greg Ryberg, South Carolina State Senate  
Mr. Greg Rudy, Manager, US Department of Energy-Savannah River Site  
Mr. Ambrose Schwallie, President, Westinghouse Savannah River Company  
Mr. Mike Butler, Citizens for Nuclear Technology Awareness  
Citizens Advisory Board, Savannah River Site

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MD167

**SRS CITIZENS ADVISORY BOARD**  
**PAGE 1 OF 1**

Savannah River Site

**CITIZENS ADVISORY BOARD**

Recommendation #1  
 July 28, 1998

**Recommendation on the  
 Draft Surplus Plutonium Disposition  
 Environmental Impact Statement**

Background

The Draft Surplus Plutonium Disposition (SPD) Environmental Impact Statement (EIS) identifies reasonable alternatives and potential environmental impacts for the proposed siting, construction, and operation of three facilities for plutonium disposition. After the Storage and Disposition of Weapons-Usable Fissile Materials programmatic EIS was completed, former Secretary of Energy Hazel O'Leary announced in January 1997 that DOE would pursue a dual track for plutonium disposition—immobilization and mixed oxide. The draft SPD EIS tiers from the Storage and Disposition programmatic EIS.

The alternatives in the draft SPD EIS include three disposition facilities designed to collectively disposition up to 50 metric tons of surplus plutonium. A facility to disassemble and convert pits into plutonium oxide is proposed with SRS and Pantex designated as equally preferred sites. DOE also has announced that SRS is the preferred site for both the immobilization and MOX fuel fabrication facilities. The immobilization facility includes a collocated capability to convert non-pit plutonium materials into a form suitable for immobilization. The MOX facility will fabricate plutonium oxide into MOX fuel. The fuel would be used in existing commercial reactors in the United States.

Recommendation

The SRS CAB has reviewed the Draft SPD EIS in which DOE states SRS is the preferred location for immobilization and MOX and one of two locations for pit disassembly operations. Based on this information just released, the SRS CAB initially concurs with the DOE statement that SRS is a reasonable site for some or all of the proposed missions for the following reasons:

1. We support site integration activities when the selected sites are best able to perform those activities that are part of their core function.
2. Incremental risks presented in the draft summary appear to be minimal and acceptable.

Concerning pit disassembly activities, the SRS CAB asks DOE to consider that, should Pantex be chosen to conduct the pit conversion mission, this decision would create a new plutonium processing site within a system endeavoring to consolidate operations for cost effectiveness, but most importantly, would increase the amount of environmental cleanup that ultimately will be required. We also acknowledge that the missions would add economic benefit to the local community.

SRS CAB Recommendation #61  
 Adopted July 28, 1998

FD206

**FD206-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses (including risk analyses), technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

**FD206-2**

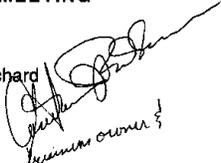
**Alternatives**

The existing infrastructure at Pantex is described in Section 3.4.11, and the impact of the proposed surplus plutonium disposition facilities on the infrastructure at Pantex is discussed in Section 4.26.3.6. This SPD EIS analyzes impacts to the environment due to construction and normal operation of the pit conversion facility. This facility would be located in a new building at either Pantex or SRS. The new building should have the same level of contamination regardless of the site and require the same amount of D&D work.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the site-specific cost estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

COMMENTS FOR THE DOE PLUTONIUM DISPOSITION PUBLIC MEETING

Prepared by Dr. Constance J. Pritchard  
President, The Pritchard Group  
North Augusta, SC 29861  
803-279-4175 (v)



My interest in speaking today is as a member of the North Augusta community. I am a small business owner who works with area businesses in a variety of training and consultative ways. I also serve on a number of Boards of Directors including Chambers of Commerce and Workforce Development. These roles, professionally and personally, have given me a chance to be knowledgeable about the Savannah River Site and its mission.

I speak for myself today, and I think that my comments also reflect those of a number of others in the community. As are many others here today, we are well acquainted with the quality, dedication, and professionalism of workers at the Savannah River Site. These individuals live near us, work in the community beside us, attend church with us, and share in the raising families here in the CSRA. We are proud of the safety record that SRS has, and support its ability to remain a productive facility.

We view the Savannah River Site as a provider with a long record of safety and efficiency in the production and disposal of nuclear materials and products. The workers at SRS have repeatedly demonstrated their competency and commitment to the safe production and disposal of nuclear products. Not only <sup>are</sup> the necessary levels of expertise available at SRS for plutonium disposition, the existing infrastructure will be a tax savings for us. As an employer and a tax payer, that consideration is a primarily one for me.

Not only does SRS have the expertise of its employees, its leadership - world class partnerships -- businesses that are best in class -- have formed ~~the~~ unite global technology. They bring the management, nuclear experience and knowledge, and technology to effect safe plutonium disposition. This partnership is working well, is cost effective, and serves to illustrate SRS's ability to adapt ~~and seek~~ to learn and improve.

I offer my support that the Savannah River Site be chosen for the DOE plutonium disposition mission.

email: fulvalue@aol.com

SCD21

SCD21-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

TRI-COUNTY ECONOMIC DEVELOPMENT ALLIANCE  
J. CALVIN MELTON  
PAGE 1 OF 1

RESOLUTION

WHEREAS, THE TRI COUNTY ECONOMIC DEVELOPMENT ALLIANCE IS A LEGALLY RECOGNIZED REPRESENTATIVE OF THE MEMBER COUNTIES OF ALLENDALE, BAMBERG, AND BARNWELL IN SOUTH CAROLINA; AND

WHEREAS, THE DUTY OF THE ALLIANCE IS TO ASSIST IN THE CREATION OF ECONOMIC DEVELOPMENT OPPORTUNITIES WITHIN THE MEMBER COUNTIES; AND

WHEREAS, THE ALLIANCE WAS CREATED TO WORK ON BEHALF OF THE MEMBER COUNTIES IN A UNIFIED AND MUTUALLY BENEFICIAL MANNER; AND

WHEREAS, ANY JOB CREATION AND CAPITAL INVESTMENT IN A HOST COUNTY ALSO BENEFITS THE OTHER MEMBER COUNTIES; AND

WHEREAS, SIXTY SIX PER CENT OF THE SAVANNAH RIVER SITE IS LOCATED WITHIN THE BORDERS OF TWO OF THE MEMBER COUNTIES AND MORE THAN 1400 EMPLOYEES OF THE SITE ARE RESIDENTS OF THE MEMBER COUNTIES; AND

WHEREAS, THE MEMBER COUNTIES BELIEVE ANY ASSISTANCE DERIVED FROM THE SAVANNAH RIVER SITE DURING THE DOWNSIZING OF THE FACILITY TO ANY MEMBER COUNTY OF THE ALLIANCE WOULD BE BENEFICIAL TO THE REGION; AND

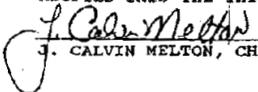
WHEREAS, NO SPECIFIC CONGRESSIONAL MANDATE LIMITS THE DEPARTMENT OF ENERGY'S ASSISTANCE TO THE EFFECTED AREA; AND

WHEREAS, THE COMMUNITY REUSE ORGANIZATION (SRRDI) CAN RECOMMEND TO THE DEPARTMENT OF ENERGY MODIFICATIONS WITHIN THE CHARTER OF THE SRRDI ORGANIZATION; AND

WHEREAS, THE THREE REGIONAL ECONOMIC DEVELOPMENT ORGANIZATIONS, THE AIKEN-EDGEFIELD PARTNERSHIP, THE METRO-AUGUSTA CHAMBER OF COMMERCE, AND THE TRI-COUNTY ALLIANCE, REPRESENT ADDITIONAL ADVERSELY EFFECTED COUNTIES WITH LARGE POPULATIONS OF SAVANNAH RIVER SITE EMPLOYEES BEYOND THOSE RECOGNIZED BY THE DEPARTMENT OF ENERGY UNDER THE CURRENT (CRO) STRUCTURE.

NOW, THEREFORE BE IT RESOLVED THAT THE BOARD OF DIRECTORS OF THE TRI-COUNTY ALLIANCE DOES HEREBY SUPPORT AND RECOMMEND THE ADDITION OF BAMBERG AND EDGEFIELD COUNTIES IN SOUTH CAROLINA, AND BURKE COUNTY IN GEORGIA TO THE SRRDI SERVICE REGION.

ADOPTED THIS THE THIRTIETH DAY OF JANUARY, 1997.

  
J. CALVIN MELTON, CHAIRMAN

SCD100

SCD100-1

Other

DOE acknowledges the resolution that Bamberg and Edgefield Counties in South Carolina and Burke County in Georgia be included in the SRRDI service region.

MR. MODERATOR, I ALSO WANT TO EXPRESS TO YOU AND THE DEPARTMENT OF ENERGY, OUR DESIRE TO HAVE THE PLUTONIUM DISPOSITION MISSION LOCATED AT THE SAVANNAH RIVER SITE.

I AM CALVIN MELTON, AND I AM CHAIRMAN OF THE TRI-COUNTY ECONOMIC DEVELOPMENT ALLIANCE, REPRESENTING ALLENDALE,

BAMBERG, AND BARNWELL COUNTIES. *and Vice Chairman of SRDZ Board - Representing three Counties in SC & 2 Counties in Georgia.*

AS YOU KNOW, OUR COMMUNITIES HAVE ALWAYS BEEN A GREAT SUPPORTER OF THE DEPARTMENT'S MISSIONS AND WE HAVE ATTENDED THESE PUBLIC HEARINGS NUMEROUS TIMES ON OTHER ISSUES TO VOICE OUR SUPPORT.

THIS ONE SEEMS TO BE A LITTLE DIFFERENT, IN THE FACT THAT THIS SHOULD BE A FAIRLY SIMPLE DECISION.

THE PREVIOUS SECRETARY HAS ALREADY ANNOUNCED THE DEPARTMENT'S DESIRE TO HAVE THE SAVANNAH RIVER SITE PERFORM THE VITRIFICATION PROCESS, AND HAS SELECTED THE SITE TO BE THE HOME OF THE MOX FUEL PROGRAM.

SCD32

### SCD32-1

### Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

**TRI-COUNTY ECONOMIC DEVELOPMENT ALLIANCE  
CALVIN MELTON  
PAGE 2 OF 2**

THEREFORE, IT ONLY MAKES SENSE THAT THE PIT CONVERSION  
PROCESS BE LOCATED AT THE SAVANNAH RIVER SITE AS WELL.

THE TRI-COUNTY ALLIANCE AND ITS MEMBERS, STRONGLY  
ENCOURAGES YOU TO MAKE A DETERMINATION BASED ON THE  
CAPABILITIES OF THE COMPETING SITES AND NOT ON POLITICS.

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**CONFIRM THE SAVANNAH RIVER SITE AS THE SITE OF CHOICE  
FOR ALL THE PLUTONIUM MISSIONS, AND LET'S GET ON WITH  
THE NATION'S BUSINESS.**

THANK YOU.

SCD32

**DOE Draft EIS for Surplus Plutonium Disposition  
Thursday, August 13, 1998**

Good afternoon, I'm Keith Benson, President and Chief  
Professional Officer of the United Way of the CSRA.

Thank you for providing this opportunity to comment on  
an issue that's so important to our region and to our friends and  
neighbors at the Savannah River Site.

Many speakers today have addressed the technical and  
political aspects of the decisions you are considering in order  
to ultimately make the world a safer place for all of us to live.

It sounds like they've raised some very good points. But  
I'm not a technical expert or a political scientist. I am,  
however, an expert on the quality of life and the quality of  
people, the people you have working at SRS.

I work with them on our Board of Directors, on the  
governing bodies of our various member agencies and many  
community projects. I've witnessed their talents in many other

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SCD37

**SCD37-1**

**Alternatives**

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

aspects of our community. Our successes are due, in large measure, to them. And what I am certain of is that on top of their technical skills, on top of their unique capabilities, they are first and foremost quality people who take the safety and well-being of their neighbors to heart.

For 40 years, the men and women at the Savannah River Site have safely and responsibly supported, not only our nation's defense, but also the best interests and needs of their neighbors. Employees have donated millions of dollars and volunteer hours to improve quality of life. From what I've heard today, it's in the government's best interest to place the nation's plutonium disposition mission in the capable hands of our friends and neighbors at SRS. They've never disappointed me. I'm certain they won't disappoint you.

Thank you.

SCD37

3526 Boundbrook Lane  
Columbia, SC 29206

September 16, 1998

U.S. Department of Energy  
Office of Fissile Materials Disposition  
PO Box 23786  
Washington, DC 20026-3786

I wish to comment on the *Surplus Plutonium Disposition Draft Environmental Impact Statement*.

1. The Savannah River Site is not, in my opinion, a suitable site for plutonium disposal due to the unstable geologic conditions of the area.
2. Vitrification seems like a promising technology for immobilizing plutonium.
3. Any plan to reuse plutonium for energy generation (such as the MOX fuel) would seem ill-advised. Due to the highly toxic nature of plutonium, any reuse would be present needless risk to workers and the environment. If an enemy forced such exposure on our land and people, we would consider it a hostile act. I strongly oppose any plan by our own government which could increase the chance of accidental exposure to plutonium.

Respectfully submitted,  
Meira (Maxine) Warshauer

FD322

### FD322-1

### Geology and Soils

DOE acknowledges the commentor's opposition to siting the proposed surplus plutonium disposition facilities at SRS due to unstable geologic conditions. Section 3.5.6.1 discusses the geologic conditions of the area, noting that no substantial geologic hazards or unstable soils exist at the site. Section 4.26.4.1 states that geology and soils would not appreciably affect, nor be affected by, the proposed facilities. Surplus plutonium would not be disposed of at SRS. This SPD EIS assumes, for the purposes of analysis, that Yucca Mountain, Nevada, would be the final disposal site for all immobilized plutonium and MOX spent fuel. As directed by the U.S. Congress through the NWSA, as amended, Yucca Mountain is the only candidate site currently being characterized as a potential geologic repository for HLW and spent fuel. DOE has prepared a separate EIS, *Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0250D, July 1999), which analyzes the environmental impacts from construction, operation and monitoring, related transportation, and eventual closure of a potential geologic repository.

### FD322-2

### Immobilization

DOE acknowledges commentor's support for the vitrification alternative of the immobilization approach to surplus plutonium disposition. Vitrification alternatives were evaluated in detail in the *Storage and Disposition PEIS*, which states that DOE would make a determination on the specific technology on the basis of this SPD EIS. This SPD EIS identifies the ceramic can-in-canister approach as the preferred immobilization technology. Section 4.29 provides a detailed comparison of immobilization technology impacts.

### FD322-3

### MOX Approach

DOE acknowledges the commentor's opposition to reusing plutonium for energy generation. The use of MOX fuel in domestic commercial reactors is not proposed in order to produce electricity. Rather, the purpose of this proposed action is to safely and securely disposition surplus plutonium by meeting the Spent Fuel Standard. The Spent Fuel Standard, as identified by

NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors.

Consistent with the U.S. policy of discouraging the civilian use of plutonium, a MOX facility would be built and operated subject to the following strict conditions: construction would take place at a secure DOE site, it would be owned by the U.S. Government, operations would be limited exclusively to the disposition of surplus plutonium, and the MOX facility would be shut down at the completion of the surplus plutonium disposition program. For reactor irradiation, the NRC license would authorize only the participating reactors to use MOX fuel fabricated from surplus plutonium, and the irradiation would be a once-through cycle with no reprocessing. Analyses provided in Section 2.18.3 and Chapter 4 of Volume I for the alternatives that include MOX fuel fabrication and irradiation show that potential environmental impacts would likely be minor.

Donald L. Speed, Senior Engineer  
Westinghouse Savannah River Company  
Building 730-1B, Room 2162  
Aiken, SC 29808  
W: (803) 952-9353  
FAX: (803) 952-9350

facsimile transmittal

To: Office of Facility Materials Disposition Fax: (800) 820-5156  
From: Donald L. Speed Date: 09/16/98  
Re: Comments on SPD EIS Summary Pages: 1  
 Urgent  For Review  Please Comment  Please Reply  Please Recycle

I attended the 8/13 evening meeting in North Augusta, SC. I was a little disappointed in that the meeting became a forum for public statement by an endless stream of politicians, though I assume you are accustomed to that by this time.

I primarily attended to hear technical comments, and there were few. One of the comments, however, piqued my interest because it centered on the question of purity in the MOX fuel. Before coming to SRS in 1990, I spent several years at LLNL as a systems engineer in the Atomic Vapor Laser Isotope Separation (AVLIS) program, primarily on the Pu side. Though the pilot plant for this program planned for NEEL was never built (it was a "peace dividend" after the Wall came down), the process itself was technically sound. In fact, I believe the uranium side of AVLIS is the source of USEC. My question is, has the AVLIS process been reviewed for possible use in the MOX program? After eight years at a site storing tens of millions of gallons of high level waste, I'd be encouraged to see at least one other alternative considered that doesn't involve complex, expensive-to-treat-and-dispose-of waste streams.

My other comment concerns a statement on page S-9 of the EIS Summary, which says "The construction of new facilities for the disposition of surplus US plutonium would not take place unless there is significant progress on plans for plutonium disposition in Russia." This is an admirable sentiment, and I fully concur, but what are the indicators to be used in this evaluation—parallel plant design and deployment? A signed treaty with the major states of the former USSR? Or is this simply a decision that will be made by the President or Congress when DOE is prepared to request the capital funds for design and construction?

I applaud the work you have done in exploring technologies for HEU/Pu disposition, as well as sorting through the siting alternatives. I also appreciate the opportunity to attend the public meeting, and to comment on this EIS. Thank you!

FD319

FD319-1

Other

Nearly all AVLIS research to date has focused on uranium isotope separation and enrichment rather than purification. The AVLIS technology might not be suitable for purification of plutonium. Considerable research and proof-of-concept demonstrations would be required prior to such an application. The cost and time required for deployment of the AVLIS technology for this application would also be significant. Due to the potentially long development time, high costs, and attendant technical uncertainties, application of the AVLIS technology for plutonium purification was not deemed a reasonable disposition option in this SPD EIS. Discussion of treatment options that were considered and the maturity of the various technologies can be found in the ROD for the *Storage and Disposition PEIS*.

FD319-2

Nonproliferation

The United States and Russia recently made progress in the management and disposition of plutonium. In late July 1998, Vice President Gore and Russian Prime Minister Sergei Kiriyenko signed a 5-year agreement to provide the scientific and technical basis for decisions concerning how surplus plutonium will be managed. This agreement enables the two countries to explore mutually acceptable strategies for safeguarding and dispositioning surplus plutonium. Accordingly, the U.S. Congress appropriated funding for a series of small-scale tests and demonstrations of plutonium disposition technologies jointly conducted by the United States and Russia. For fiscal year 1999 (starting October 1998), Congress further appropriated funding to assist Russia in design and construction of a plutonium conversion facility and a MOX fuel fabrication facility. This funding would not be expended until the presidents of both countries signed a new agreement. The United States does not currently plan to implement a unilateral program; however, it will retain the option to begin certain surplus plutonium disposition activities in order to encourage the Russians and set an international example.

FD319-3

General SPD EIS and NEPA Process

DOE acknowledges and appreciates the commentor's support for the surplus plutonium disposition program and the related public outreach activities.

WESTINGHOUSE SAVANNAH RIVER COMPANY  
 RICHARD TANSKY  
 PAGE 1 OF 2

MISS HOLGATE: MR. NULTON HERE TODAY  
 MY NAME IS RICHARD TANSKY I AM ~~STATIONED~~  
 REEVALUATING THE TRAINING PROGRAM AT SRS AS THE ~~HOST~~  
~~FOR WESTINGHOUSE SAV. RIVER CO. AS THE~~ SITE TRAINING MGR  
 FOR WESTINGHOUSE  
 I UNDERSTAND THAT AT THE HEARINGS CONDUCTED  
 A PARTX THIS WEEK, THE ISSUE OF THE TRAINING  
 AND QUALIFICATION OF THE WORKFORCE WAS APPROPRIATELY  
 RAISED. WITHOUT FEELING THE NEED TO POINT OUT  
 THE IMPORTANCE OF THE QUALIFICATIONS AND COMPETENCE  
 OF THE WORKFORCE IN THE DECISION MAKING PROCESS.  
 I'D TO POINT TO A FEW OF THE REASONS WHY THE  
~~WORKFORCE AT SRS IS BEST~~ TRAINING + QUALIFICATION  
 PROGRAM AT SRS SUPPORTS A DECISION TO  
 LOCATE THE P<sub>1</sub> PIT DISASSEMBLY + CONVERSION MISSION  
 AT SRS.

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SCD09

## SCD09-1

## Alternatives

DOE acknowledges the commentor's views on SRS workforce qualifications and support for siting the pit conversion facility at SRS. As indicated in the revised Section 1.6, SRS is preferred for the pit conversion facility because the site has extensive experience with plutonium processing, and the pit conversion facility complements existing missions and takes advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

~~IT IS THE BEST~~ ~~QUALIFIED~~ <sup>most qualified</sup>  
SRS has the best trained workforce in the Complex. <sup>SITE HAS STAFF ALREADY</sup>  
<sup>QUALIFIED + EXPERIENCED IN PV CONVERSION</sup>  
SRS has the only training programs accredited by the DOE Accrediting Board and has 17 training programs accredited. <sup>PROCESS</sup>

Training programs in Operations, RadCon, and Maintenance carry college credit.

~~Training for nuclear facility operators enables them to analyze, predict and troubleshoot.~~

Annual investment in Training at SRS is > \$40 million - 97% is directly related to job qualification and safety. <sup>AN ADDITIONAL \$2 MILLION IN ADDITION REIMB.</sup>  
<sup>SITE HAS OVER \$20 MILLION INVESTED IN TRAINING FACILITIES</sup>

Training Program effectiveness is continually evaluated through:  
Formal Self-Assessment Program  
Facility Evaluation Board audits of facilities  
Training Oversight Committee - <sup>CHAIR</sup> BY EVF

Other sites have adopted SRS training records <sup>MANAGEMENT</sup> system, procedures manual, and many training courses.

SRS Integrated Safety Management System ensures a workforce competent to carry out assignments safely.

SRS Training is exported to other DOE sites, commercial enterprises (MCG), and internationally (Russia)

DNFSB obtains Radworker Training from SRS and has lauded our aggressive training in creating and maintaining a culture of Disciplined Operations.

DOE Spent Fuels Team trained by SRS in RWT, Respiratory, and Asbestos prior to their trips to China, Russia, N. Korea, and India

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SCD09

## **Intro**

Fran Williams Vice President Environment, Safety, Health and Quality Assurance Division

- Provide oversight for Westinghouse to ensure our operations protect the safety and health of our employees and the public and that our operations are in compliance with state, federal, and DOE requirements in industrial safety, radiation and contamination control, environmental and health surveillance.

SCD34

## Safety

- HISTORICALLY 1992-1996 Injury and Illness ranking of DOE Production Contractors prove WSRC is the best
  - » Lost Workday Case Rates for WSRC 0.3, Pantex 2.8 and DOE average was 1.0
  - » Total Recordable Case Rates for WSRC 0.7, Pantex 5.1 and DOE average 8.1
  - » Cases per 200,000 hours
- RECENTLY 1/97-9/97 Injury and Illness ranking of DOE Production Contractors prove WSRC is the best
  - » Lost Workday Case Rates WSRC 0.5, Pantex 2.4 and DOE Average 1.1
  - » Total Recordable Case Rates WSRC 1.1, Pantex 4.1 and DOE Average 7.4
- SRS has an outstanding Lost Work-Time Injury Record
  - Construction Workers earned the Westinghouse President's Award for working more than 2.5 MILLION hours without a lost-time injury
  - Operations recently reached the 3.8 MILLION hours mark without a lost-time injury
- Worker's Comp costs are 6 times LOWER than industry
- 1/97-9/97 Cost Index Ranking of DOE Production Contracts once again prove WSRC is the safest site in the complex
  - » WSRC 3.08, Pantex 28.85, and DOE average 14.4
  - » Coefficients should not be advertised as dollar figures - only as appropriate weighting factors
  - » Coefficients derived from study of direct and indirect dollar costs of injuries
  - » Index is approximately equal to cents lost per hour worked
- National Safety Council stated SRS level of employee participation is "incredible and an indication of a strong safety culture"
  - SRS responses ranked in the 89th percentile of the National Safety Council data base
    - » Only 11 of 100 companies scored higher

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SCD34

## SCD34-1

## Other

DOE acknowledges the commentor's views on the positive attributes of SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPD EIS ROD.

## RadCon

- Historically SRS has been viewed as having the best RadCon Program in the DOE Complex
  - SRS supported Pantex in early 90s by lending technical assistance in directing cleanup and RadCon monitoring for TRITIUM releases
- Our employee surveillance programs are in place ON SITE and they exceed DOE requirements
  - Our State-of- the-Art Radiation Instrument Calibration Facility is a model for the DOE Complex
  - We also have a NEW Whole Body Count facility
  - External Dosimetry is DOELAP accredited
  - Bioassay program and Whole Body Count evaluation is in lock step for DOELAP accreditation
  - Nationally recognized expertise in both internal and external dosimetry
- SRS has the ONLY accredited RadCon Training Program in the DOE Complex
- SRS continuously strives to improve the programs to protect worker safety and health
  - Average Worker Dose (mrem/person) decreased 50% in last 10 years
    - » Better work planning, ALARA program (and scope reductions)
  - Intakes decreased by 67% over last 6 years
    - » Enhanced work planning and expansive RadCon job coverage
  - Personal Contaminations decreased 99% over last 10 years
    - » Engineering controls and rollbacks
- Medical Department consists of 9 physicians, 18 nurses and 5 facilities spread ACROSS the site to service our employees
  - Medical covers surveillance for radiological contamination, toxic and chemical exposure, injuries and illnesses, routine wellness programs and substance abuse testing.

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SCD34

## Environmental

- Largest DOE weapons site and second in the complex (WIPP 1st) to earn ISO 14001 certification.
- Met ALL environmental regulatory requirements in 1997
- Exceeded Goal of 98% Compliance with NPDES regulations by 1.9%
- SRS NEPA Team earned the National Association of Environmental Professionals Presidential Award of Excellence for NEPA/CERCLA Guidance
- Several SRS employees are working on ANSI standards development and regulation writing committees AT THE REQUEST of our regulators
  - WSRC expertise is valued based on our proven track record
- Another example of our regulator's confidence in WSRC is the fact that DHEC has granted WSRC permission to permit ourselves for drinking water, erosion control plans and for small volume waste waters

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SCD34



United States  
Department  
of Energy

Comment Form

NAME: (Optional) DAVID WILLIAMS  
ADDRESS: 127 ROLLING ROCK RD., AIKEN SC 29803  
TELEPHONE: (803) 699-0121  
E-MAIL:

CONGRATULATIONS TO DOE ON PERFORMING A THOROUGH INVESTIGATION INTO THE AREA'S OF CANDIDACY REGARDING SELECTION OF THE BEST SITE FOR DISPOSING OF COLD WAR PLUTONIUM STOCK PILES.

SRS SHOULD BE THE SITE CHOSEN BASED ON MERIT, TRACK RECORD OF SAFETY + THE RIGHT MIX OF TECHNICAL SUPPORT FROM ITS WORK FORCE. DIVERSIFYING + EMPHASIS THE CHOICE FOR SRS IS THE CONCERN OF COST SAVINGS TO THE CITIZENRY OF THIS COUNTRY AND THE PUBLIC SUPPORT THAT THE MUSEUM ENJOYS IN THIS COMMUNITY.

David J. Hill

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SCD71

SCD71-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.



United States  
Department  
of Energy

*Comment Form*

NAME: (Optional) George Zachmann  
ADDRESS: \_\_\_\_\_  
TELEPHONE: (803) 952-4851  
E-MAIL: \_\_\_\_\_

I feel that WSPC has proven itself as a safe and disciplined facility at which several stabilization missions have been successfully completed. It not only makes sense to perform Pu disposition mission at WSPC. The highly skilled technical workforce understands Conduct of Operations standards while meeting integrated schedules. I feel the Pu Disassembly and Conversion and MOX fuel fabrication should be performed at WSPC.

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SCD60-1

Alternatives

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at SRS. As indicated in the revised Section 1.6, SRS is preferred for the proposed facilities because the site has extensive experience with plutonium processing, and these facilities complement existing missions and take advantage of existing infrastructure. Decisions on the surplus plutonium disposition program at SRS will be based on environmental analyses, technical and cost reports, national policy and nonproliferation considerations, and public input. DOE will announce its decisions regarding facility siting and approach to surplus plutonium disposition in the SPDEIS ROD.

SCD60

