

- LEAVE NUCLEAR WASTE ON SITE | 1
- AVOID THE RISKS OF HAULING TOXIC WASTE | 2
- FORGET MOX, ITS MORE TOXIC THAN PLUTONIUM | 2
- COMMUNITIES NEAR CHOSEN REACTOR SITES HAVE | 3
- ARIGHT TO EXPRESS THEIR WISHES.

STOP THIS NUCLEAR
MADNESS
NOW

- **MOX is dangerous.** The use of MOX in the U.S. sends the wrong signal to Russia and the rest of the world: that Americans regard plutonium as a valuable energy source rather than a dangerous waste. It encourages other nations to embrace a plutonium fuel economy, leading to increased worldwide trade of plutonium and greater risks to international security, public health and the environment. Plutonium, among the most dangerous of substances, is so lethal that just a speck can cause cancer in humans. A recently-released study by the Nuclear Control Institute finds that a severe accident at a reactor fueled with MOX could cause twice as many fatal cancers as an identical accident at a uranium-fueled reactor. | 2
- **MOX is slower and more expensive.** Immobilization is estimated to cost less than MOX and complete the job years sooner. Utilities will only use MOX fuel when it is heavily subsidized by the US government; taxpayers would be paying utilities to use MOX. | 4
- **MOX is not needed.** Immobilization is now successfully underway at the Savannah River Plant in South Carolina and at the West Valley Demonstration Project in New York. Immobilization can handle a wider variety of surplus plutonium forms (residues, oxides, metals, etc.) as compared to MOX. Furthermore, the use of MOX fuel made from weapons-grade plutonium has not been proven to work in U.S. commercial reactors. | 4
- **MOX is not wanted.** In March 1998 more than 200 non-governmental organizations worldwide called upon Presidents Clinton and Yeltsin to halt the MOX development program and protested the use of plutonium as an energy source. Hundreds of international organizations have signed on to a similar statement this year. Both the Oregon State Legislature and the Texas Farm Bureau have passed resolutions opposing the use of MOX. Newspapers including the Denver Post, located near the Rocky Flats Plant which stores 14 of the 50 tons of surplus plutonium, and newspapers throughout the Southeast U.S. where the first stage of MOX use is set to begin, have editorialized against MOX. | 3

FR011

FR011-1

Alternatives

DOE acknowledges the commentor's preference for the No Action Alternative and concern about the shipment of nuclear material and waste. Continued onsite storage would only defer a decision regarding the disposition of surplus plutonium, and therefore would only defer the impacts of plutonium disposition activities. Eventually, these materials would have to be disposed of. In addition, continued storage of surplus plutonium at the sites where it is currently located could delay site cleanup and closure.

Section 2.18 and Table L-6 summarizes the transportation impacts associated with all the alternatives. These estimates show that additional fatalities are unlikely. As stated in Appendix L.3.2, DOE has accumulated more than 151 million km (94 million mi) of over-the-road experience transporting DOE-owned cargo, including plutonium, with no accidents that resulted in a fatality or release of radioactive material. The transportation of routine shipments of wastes are discussed in Appendix L.6.4.

FR011-2

MOX Approach

DOE acknowledges the commentor's opposition to the MOX approach. Use of MOX fuel in domestic, commercial reactors is not proposed in order to advocate a plutonium economy. 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.

Chapter 4 of Volume I provide the results of detailed impact analyses of the proposed surplus plutonium disposition facilities and reactors. Risks and consequences are addressed. The impacts on workers and the general population associated with normal operations and postulated accidents are included in these analyses, as well as the potential impacts on the environment. The impacts associated with each alternative are summarized in Section 2.18.

FR011-3**General SPD EIS and NEPA Process**

DOE acknowledges the commentor's view that communities near the proposed reactor sites that would use the MOX fuel have the right to express their wishes. During the 45-day public comment period on the *Supplement to the SPD Draft EIS*, DOE held a public hearing in Washington, D.C., on June 15, 1999, and invited comments. For those interested parties who could not attend the hearing on the *Supplement*, DOE provided various other means for the public to express their concerns and provide comments: mail, a toll-free telephone and fax line, and the MD Web site. Also, at the invitation of South Carolina State Senator Phil Leventis, DOE attended and participated in a public hearing held on June 24, 1999, in Columbia, South Carolina. Moreover, interested parties would likely have the opportunity to submit additional comments during the NRC reactor license amendment process should the MOX approach be pursued per the SPD EIS ROD.

Decisions on the surplus plutonium disposition program 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.

FR011-4**Alternatives**

DOE has identified as its preferred alternative the hybrid approach which includes both immobilization and MOX fuel. As shown in the cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), it is expected that the hybrid approach would be more expensive than the immobilization-only approach. However, pursuing the hybrid approach 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.

Although no U.S. commercial reactors are licensed to use plutonium-based fuel, several are designed to use MOX fuel, and others can easily and safely accommodate a partial MOX core. These commercial reactors are capable of safely using MOX fuel. Section 4.28 was revised to discuss the environmental impacts of operating the reactors that would use MOX fuel.

