
1. PUBLIC COMMENT PROCESS

This chapter of the Comment Response Document describes the public comment process for the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor* and the procedures used to respond to those comments. Section 1.1 describes the means through which comments were acquired, summarized, and numbered. Section 1.2 discusses the public hearing format that was used to solicit comments from the public. Section 1.3 describes the organization of this document, including how the comments were categorized, addressed, and documented. Section 1.4 also provides guidance on the use of this document. Section 1.5 discusses the major comments received on the environmental impact statement. Section 1.6 includes a discussion of the major changes to the environmental impact statement that resulted from the public comment process. This chapter includes indexes of all comments received during the 60-day public comment period and the December 14, 1998, public meeting.

1.1 INTRODUCTION

In August 1998, the U.S. Department of Energy (DOE) published the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor* (CLWR Draft EIS). This document explained the need for a domestic tritium production source to maintain the United States' nuclear deterrent and described and analyzed the environmental impacts associated with tritium production at one or more nuclear power plants owned and operated by the Tennessee Valley Authority (TVA). The 60-day public comment period on the CLWR Draft EIS began on August 28, 1998, and ended on October 27, 1998.

During the comment period, public hearings were held in North Augusta, South Carolina; Rainsville, Alabama; and Evensville, Tennessee. After the public comment period ended, a public meeting was held on December 14, 1998, in Evensville, Tennessee, to allow the public to comment on TVA proposals submitted to DOE in early December. **Figure 1-1** shows the locations and dates of the public hearings and meeting. In addition, the public was encouraged to submit comments via the U.S. mail service, e-mail to a special DOE web site on the Internet, a toll-free 800-number phone line, and a toll-free fax line. Section 1.5 includes a summary of the major comments received through the public comment process. Section 1.6 includes a summary of the changes that were made to the CLWR Draft EIS as a result of the public comment process.

December 14, 1998, Public Meeting

Prior to fulfilling the requirement to reach a technology decision by the end of 1998, Secretary of Energy Bill Richardson asked TVA to submit final proposals for the Watts Bar and Sequoyah reactors, as well as for the completion of TVA's Bellefonte reactor. These proposals were provided to DOE the first week in December 1998, after the close of the public comment period for the CLWR Draft EIS on October 27, 1998 (see Volume 1, Section 1.1.4 of the CLWR EIS). Upon receiving the proposals, the Secretary of Energy directed that this information be presented for public review and comment prior to his reaching the technology decision. To enable this, it was necessary to schedule and conduct the December 14, 1998, public meeting with a minimum of notice. At this meeting, DOE presented information on the new TVA proposals, answered questions, and accepted comments on the proposals and the tritium program in general. The public was encouraged to submit written, faxed, telephoned, and e-mailed comments on the new TVA proposals. All comments received as a result of the December 14, 1998, public meeting are presented separately in Chapter 2 of this volume (200 series and 800 series commentors); DOE's responses to the December 14, 1998, comments have been integrated with the public comment period responses in Chapter 3 of this volume.

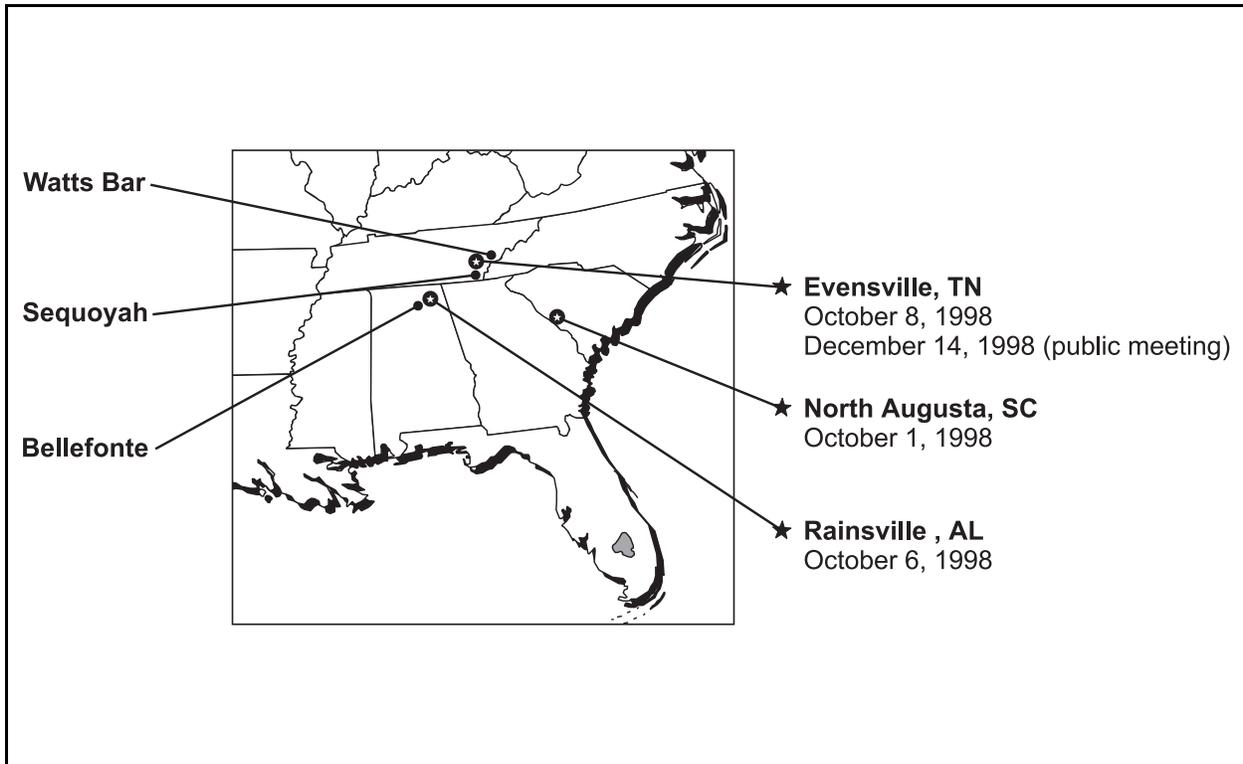


Figure 1-1 Public Hearing and Meeting Locations and Dates, 1998

The number of persons estimated in attendance at each hearing or meeting, together with the number of comments submitted and recorded, are presented in **Table 1-1**. These attendance estimates are based on the number of registration forms completed and returned at each hearing or meeting, as well as a rough "head count" of the audience, and may not include all those present.

Table 1-1 Public Hearing/Meeting Locations, Attendance, and Commentors

<i>Location</i>	<i>Date</i>	<i>No. in Attendance</i>	<i>Commentors</i>
North Augusta, SC	October 1, 1998	34	4
Rainsville, AL	October 6, 1998	200	27
Evensville, TN	October 8, 1998	59	14
Evensville, TN (public meeting)	December 14, 1998	71	36

All public hearing and meeting comments were combined with comments received by other means (mail, e-mail, 800-number, fax) during the comment period. Written comments were date-stamped and assigned a sequential document number. Chapter 2 of this volume contains copies of the comment documents received by DOE. **Table 1-2** provides an overview of the number of comments received and categorized by method of submission.

Table 1–2 Method of Comment Submission

<i>Method</i>	<i>Number of Submittals and Commentors</i>
Faxes	18
U.S. mail	51
1-800 number	34
E-mail	17
Hearings/meetings (written statements)	82
Total submittals	203

1.2 PUBLIC HEARING FORMAT

The public hearings used a format that allowed two-way interaction between DOE representatives and the public and encouraged public comments on the document. A neutral facilitator was present at each hearing to direct and clarify discussions and comments. A court reporter also was present at each hearing to record the proceedings and provide a transcript of the public comments and the dialogue between the public and the DOE and TVA representatives on hand. These transcripts are available in DOE Public Reading Rooms near each site and in Washington, DC.

The format used for each hearing included a presentation, question and answer session, and a public comment period. The hearing opened with a welcome from the facilitator, followed by a presentation on the proposed action by a DOE representative. The facilitator next opened the question and answer session to give the audience a chance to ask questions about the material presented. This was followed by the public comment session, during which attendees were given an opportunity to read a prepared statement of no more than five minutes. Modifications to the format were made at each of the public hearings to fulfill the special requests of attendees. Following the public hearings, statement summaries were prepared from the transcripts of each hearing and the comment documents submitted by the attendees (see Chapter 2 of this volume).

1.3 ORGANIZATION OF THIS COMMENT RESPONSE DOCUMENT

This Comment Response Document is organized into the following sections:

- Chapter 1 includes a description of the public comment process; the public hearing format; the organization of this document; the use of this document, including tables; the major comments received; and the changes made to the CLWR Draft EIS.
- Chapter 2 contains scanned copies of the comment documents received during the public comment period and the December 14, 1998, public meeting, as well as summaries of the comments received at the public hearings and the public meeting. Comments received as a result of the December 14, 1998, public meeting are presented separately (the 200 and 800 series).
- Chapter 3 includes the comment summaries and DOE's responses by category.
- Chapter 4 lists the references for this volume.

Tables are provided at the end of this chapter to assist commentors and other readers in locating individual comments concerning the CLWR EIS. The comments are categorized by issue (e.g., land or water resources) and organized under assigned category codes. **Table 1-3** lists the issue categories and corresponding category codes. Similar comments within the same issue category are presented under an assigned summary code.

Table 1-3 Issue Categories

<i>Category Code</i>	<i>Issue Category</i>
01	Policy issues
02	Purpose and need for tritium
03	Tritium requirements
04	Other production options
05	NEPA process
06	Reasonable alternatives selection
07	General support/opposition
08	DOE past practices
09	TVA past practices
10	Land, aesthetics, noise, soils, general environment
11	Air, water resources
12	Ecological resources
13	Socioeconomics, environmental justice
14	Occupational and public health and safety (normal conditions)
15	Occupational and public health and safety (accident conditions)
16	Waste management
17	Spent nuclear fuel management
18	Transportation
19	Design and fabrication of tritium-producing burnable absorber rods (TPBARs)
20	Decontamination and decommissioning
21	Reactor licensing issues
22	Safeguards and security
23	Cost issues
24	Miscellaneous

All comments appear in Chapter 2. Scanned images of the comments submitted via the U.S. mail service, e-mail, toll-free phone line, toll-free fax line, or personal submission at the public hearings are presented first. The scanned images are followed by summaries of oral comments submitted at the public hearings and

meeting, listed according to dates (see **Table 1-4**). The commentator numbers correspond to the dates the comments were received, as indicated in Table 1-4.

Table 1-4 Assignment of Commentor Numbers

<i>Comments Received (Dates)</i>	<i>Commentor Numbers</i>
August 28, 1998, to November 13, 1998	001-147
October 1, 1998 (public hearing in North Augusta, South Carolina)	500-507
October 6, 1998 (public hearing in Rainsville, Alabama)	600-629
October 8, 1998 (public hearing in Evensville, Tennessee)	700-720
December 10, 1998, to December 17, 1998	200-255
December 14, 1998 (public meeting in Evensville, Tennessee)	800-835

Table 1-5 lists all commentators who made statements or submitted comments at the public hearings or during the public comment period and at the December 14, 1998, public meeting, including members of the public, representatives of organizations or agencies, and public officials. Commentors are listed alphabetically by their last name, along with the page on which their comments appear in Chapter 2, the numbers assigned to individual comments in each document or statement summary, the comment summary-response codes, and the page in Chapter 3 on which their comments are summarized and responded to by DOE and TVA. **Table 1-6** lists the Federal, state, and local officials and agencies, companies, organizations, and special interest groups that submitted comments. The commentators in Table 1-6 are listed alphabetically by organization, along with the names of the individuals who submitted the comments, the document number assigned, and the page on which the document appears in Chapter 2.

Table 1-7 is organized by comment summary-response code. Using the appropriate comment summary-response code, commentators can locate all of the comments that are reflected in each summary. The table also lists the page in Chapter 3 where each comment summary and corresponding response appears.

1.4 HOW TO USE THIS COMMENT RESPONSE DOCUMENT

This section will assist the reader in finding individual comments and the corresponding responses from DOE and TVA. The commentator begins by locating his or her name or organization in Table 1-5 or Table 1-6, respectively. Table 1-5 is an index of all commentators. Table 1-6 is an index of organizations and public officials. Both of these tables list the page number in Chapter 2 on which their comments appear. To locate other comments that address the same comment summary-response code, the commentator should use Table 1-7. This table lists the comment summary-response codes, the page in Chapter 3 on which the comment is addressed, and the other comment numbers addressed by each comment summary-response code.

For example, if Susan Gordon (commentor 137) wants to find her comments, she should go to Table 1-5 to find her name and the corresponding page in Chapter 2 on which her document appears. On page 2-101, Ms. Gordon would find her scanned document has been "side-barred" (published with vertical lines in the outer margin to identify individual comments) and her first comment has been coded for comment summary-response 08.02. Table 1-5 also provides Ms. Gordon with the number of comments identified, the comment summary-response code assigned to each comment, and the page number in Chapter 3 on which the corresponding comment summary and response are found. After obtaining the comment summary-response code from either the scanned document on page 2-101 or Table 1-5, Ms. Gordon would then turn to Chapter 3 to read DOE's response to her comment. Ms. Gordon could use Table 1-7 to locate other comments expressing

similar concerns. For this example, comment summary-response code 08.02 on page 3-34 also addresses the following comments: 36-1, 41-4, 58-2, 103-3, 132-2, 136-3, 137-1, 211-3, 217-3, 252-3, 507-2, 707-7, 720-2, 800-9, and 803-3. These comments are listed numerically by commentor (first number followed by the dash) in Chapter 2.

1.5 MAJOR COMMENTS ON THE CLWR DRAFT EIS

During the public comment period, approximately 800 comments were received. An additional 230 comments were received in conjunction with the December 14, 1998, public meeting. Most of the comments focused on a limited number of major issues. These issues and DOE's responses as well as other related comments, are found in Chapter 3 of this volume and are summarized below.

By far, a majority of comments supported the completion and operation of the Bellefonte Nuclear Plant for tritium production because it would promote economic development in a depressed area and provide other, similar benefits. Other commentors generally opposed the completion of the Bellefonte plant as a nuclear power plant, particularly for tritium production. In response to these comments, DOE acknowledged there is both public support and opposition for the Bellefonte alternative. The CLWR EIS addresses all of the benefits cited by the commentors who favored the Bellefonte alternative, as well as the concerns expressed by opponents. DOE's responses to these and other related comments are found in Chapter 3, under Category 7: General Support/Opposition.

The cost-effectiveness of the CLWR and the Accelerator Production of Tritium (APT) alternatives was another frequent theme among many commentors. Most asked for cost-related information and/or expressed the opinion that cost should be the major determining factor in a tritium production decision. In addition, some commentors questioned the accuracy of the cost information that DOE provided at the public hearings and the December 14, 1998, public meeting, and many believed there was little possibility that TVA could complete the Bellefonte plant for the cost estimates cited. Other commentors stated they felt the large expenditures required for CLWR tritium production would be better spent on other, more urgent social needs such as education and environmental restoration. Some commentors were concerned about possible costs to TVA ratepayers resulting from tritium production.

In response to the cost-related comments, DOE stated that the CLWR EIS was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality's regulations on implementing NEPA (40 CFR 1500 through 1508), and DOE's NEPA regulations (10 CFR 1021). None of these regulations require the inclusion of a cost analysis in an EIS. As discussed in Volume 1, Section 3.2.1, the basic objective of the CLWR EIS is to provide the public and DOE decisionmakers with a description of the reasonable alternatives for CLWR tritium production and information about their potential impacts on public health and safety and the environment. While cost could be an important factor in the ultimate Record of Decision, the purpose of this and other EISs is to address the environmental consequences of the proposed action. However, DOE distributed cost information comparing the CLWR and APT alternatives (DOE 1998c) at the public hearings in October 1998, and this information is available upon request. In response to comments concerning the accuracy of TVA's cost estimates for completing the Bellefonte plant, DOE considers TVA's cost estimates to be both accurate and conservative, given that the plant is nearly complete and TVA's cost estimates were evaluated by an external reviewer. In response to comments that CLWR funds would be better spent on other, more urgent social needs, DOE noted that Congress determines how funds are allocated, and DOE does not determine Federal spending priorities. Furthermore, such spending priorities are beyond the scope of this EIS. In response to the concerns of TVA ratepayers about potential costs resulting from tritium production, DOE responded that no additional costs to ratepayers are expected. DOE's responses to the cost-related public comments are found in Chapter 3, under Category 23: Cost Issues.

Many commentors questioned the need for nuclear weapons and/or the present need for tritium. Other commentors expressed a belief that the amount of tritium needed to support current and future nuclear weapons stockpiles is less than the amount stated in the CLWR EIS. In response, DOE cited its responsibilities for maintaining the nation's nuclear weapons stockpile under the Atomic Energy Act of 1954 and the requirements of the 1996 Nuclear Weapons Stockpile Plan and accompanying Presidential Decision Directive, which established the size and composition of the nation's nuclear weapons stockpile and the need for a new tritium production source by approximately 2005. DOE stated that sufficient quantities of tritium can be obtained no longer from weapons being retired from the existing stockpile, as cited in the most recent Presidential Decision Directive. DOE's responses to comments concerning the need for tritium are found in Chapter 3, under Category 2: Purpose and Need for Tritium.

Several commentors expressed concern that tritium production in a commercial reactor would violate U.S. policy regarding the separation of commercial and military uses of nuclear energy, would hinder nonproliferation efforts, and would encourage other nations to use their own commercial facilities for nuclear weapons purposes. In response to these concerns, DOE cited the conclusions of a high-level study entitled *Interagency Review of the Nonproliferation Implications of Alternative Tritium Production Technologies Under Consideration by the Department of Energy, A Report to the Congress* (DOE 1998b). This interagency review concluded that any nonproliferation issues associated with the production of tritium in a CLWR were manageable and that DOE should continue to pursue the CLWR option, as stated in Volume 1, Chapter 1, Section 1.3.5. DOE also stated that there is no U.S. policy, law, or treaty that prohibits the production of tritium that ultimately will be used in weapons in a commercial reactor. In addition, DOE stated that the United States is a declared weapons state, and the purpose of nonproliferation efforts is to keep nonweapons states from acquiring nuclear weapons while the declared weapons states work toward total disarmament. DOE noted that other nations already operate dual-purpose reactors that serve both civilian and military needs. DOE's responses to comments on nonproliferation, the separation of civilian and military nuclear facilities, and other policy issues are found in Chapter 3, under Category 1: Policy Issues.

Many commentors were concerned about public and occupational health and safety issues. Some specifically questioned TVA's past history and practices related to plant safety. In response to these concerns, DOE stated that the environmental impacts and potential radiological doses to both workers and the public resulting from tritium production would be well below the limits considered acceptable by Federal and state regulatory authorities. Public and occupational health and safety issues are discussed in Volume 1, Chapter 5, of the CLWR EIS. DOE also stated that prior to irradiation of any TPBARs, a U.S. Nuclear Regulatory Commission (NRC) safety evaluation would be required to amend the operating license of the reactors for tritium production. This review specifically would look at all potential health and safety issues. DOE's responses to public and occupational health and safety comments are found in Chapter 3, under Category 14: Occupational and Public Health and Safety - Normal Conditions.

Several commentors stated that DOE has a history of polluting and contaminating every site they have operated and wanted to know why the proposed action would be any different. In response, DOE acknowledged having a number of older facilities in need of environmental cleanup, and an aggressive cleanup program is underway to upgrade these facilities and ensure their continued compliance with Federal and state regulations. All of the CLWR tritium production alternatives involve the use of state-of-the-art TVA reactors. These reactors have excellent environmental compliance records and exemplary environmental, health, and safety programs to ensure their continued compliance with Federal and state regulations. In addition, DOE expressed confidence that tritium production in a CLWR would be safe and is technically straightforward. To commentors who expressed concern that CLWR tritium production expenditures would drain DOE's budget for its facility cleanup activities, DOE responded that the funding for both of these programs would come from separate Congressional appropriations. Funding for CLWR tritium production would not be obtained from funding already allocated for facility cleanup activities. DOE's responses to comments about past DOE

practices and conflicts between DOE's cleanup activities and tritium production are found in Chapter 3, under Category 8: Past DOE Practices.

Some commentors suggested that the CLWR EIS was deficient and inadequate as a NEPA document. In response, DOE stated that it believes that the EIS is adequate and fully complies with NEPA. The EIS evaluates all reasonably foreseeable environmental impacts for all reasonable alternatives, in accordance with the Council on Environmental Quality's regulations (40 CFR 1500-1508) and DOE's NEPA regulations (10 CFR 1021) and procedures. DOE's responses to NEPA-related comments are found in Chapter 3, under Category 5: NEPA Process.

Other commentors stated that the relationship between the CLWR, APT (DOE 1999a,) and Tritium Extraction Facility (DOE 1999b) EISs was not clearly explained in the CLWR Draft EIS. In response, DOE added a Preface to the CLWR Final EIS to better describe the relationship between the CLWR EIS, the APT EIS (DOE 1999a), and the Tritium Extraction Facility EIS (DOE 1999b). This Preface also addresses Energy Secretary Richardson's December 22, 1998, announcement that the CLWR would be the primary tritium supply technology (DOE 1998d). DOE's responses to comments concerning the relationship between the CLWR, APT, and Tritium Extraction Facility EISs is found in Chapter 3, under Category 5: NEPA Process (comment summary-response code 05.01).

Several commentors were concerned about the additional spent nuclear fuel that would be generated by tritium production. DOE responded that additional spent nuclear fuel would be generated if more than 2,000 TPBARs were irradiated in a single reactor, as stated in Volume 1, Section 3.2.1, of the CLWR Final EIS. DOE also stated that the CLWR EIS evaluates the environmental impacts of additional spent fuel generation resulting from a maximum number of 3,400 TPBARs. DOE stated that it would manage the tritium production process to minimize, to the extent practicable, the generation of additional spent nuclear fuel. In the event a suitable repository is not available, as required by law, the additional spent nuclear fuel generated as a result of tritium production would be stored on site in a dry cask independent spent fuel storage installation. DOE's responses to spent nuclear fuel comments are found in Chapter 3, under Category 17: Spent Fuel Management.

Several commentors suggested that the production of tritium in a CLWR would make TVA reactors an attractive target for terrorists and that DOE should address the consequences of such an attack in the EIS. In response, DOE stated that, prior to loading TPBARs in TVA's Watts Bar reactor as part of the Lead Test Assembly Program, a thorough security review was conducted. This review found existing security provisions to be adequate to protect against such a threat. Prior to utilizing Watts Bar or other TVA reactors for tritium production, additional DOE and NRC reviews would be required to ensure adequate safeguard and security. DOE's responses to these and other security-related comments are found in Chapter 3, under Category 22: Safeguards and Security.

1.6 CHANGES FROM THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

In response to comments on the CLWR Draft EIS and as a result of information that was unavailable at the time of the issuance of the Draft, Volume 1 of the CLWR Final EIS contains revisions and new information. These revisions and new information are indicated by a double underline for minor word changes or by a sidebar in the margin for sentence or larger changes. A brief discussion of the most important changes is provided in the following paragraphs.

TPBAR Failures

In analyzing the potential releases of tritium to the environment from the proposed action, the CLWR Draft EIS assumed that two of the TPBARs under irradiation would fail and the entire inventory of tritium would be available to be released to the environment under normal operating conditions. The same two-TPBAR

failure assumption was made in the analysis of transportation accidents. The assumption was based on the failure statistics of standard burnable absorber rods, i.e., two failures out of 29,700 rods through July 1980. Since the issuance of the CLWR Draft EIS, additional information obtained from Westinghouse revealed that both failures were attributed to early manufacturing defects that have been corrected. The failures were attributed to slumping of the absorber material—a condition that cannot occur in the TPBARs. Since the two early failures, more than 500,000 Westinghouse burnable absorber rods have been used without a single observed failure. Consequently, the CLWR Final EIS still analyzes the impacts to the health and safety of the public from the potential failure of two TPBARs, but characterizes the event of such a failure as an abnormal event during an irradiation cycle, rather than a continuous, normal-operation occurrence. This change in assumptions results in changes in the potential tritium releases and estimated doses to the public under normal reactor operation and some accident conditions (i.e., the nonreactor design-basis accident) for all reactor alternatives.

The Secretary's Technology Announcement

The CLWR Draft EIS was issued in August 1998. At the time, the decision on the primary and backup technologies to be used for tritium production had not been made. On December 22, 1998, Energy Secretary Bill Richardson announced that the CLWR would be DOE's primary option for tritium production and the proposed linear accelerator at the Savannah River Site would be the backup option (DOE 1998d). In addition, the Secretary designated TVA's Watts Bar and Sequoyah Nuclear Plants as the preferred CLWR facilities. The CLWR Final EIS was revised to reflect the Secretary's announcement decision and include the Preferred Alternative. Changes were made primarily in the introductory sections of the CLWR Final EIS for accuracy. The evaluation of the impacts was not affected.

Clarification of TVA Proposals

In response to public comments about the status of the TVA proposals to provide irradiation services or the sale of a CLWR, Volume 1, Section 1.1.4, of the CLWR EIS was revised. The discussion of the procurement process clarifies that DOE is considering only the purchase of irradiation services, not the purchase of a reactor. Additionally, the section clarifies that TVA submitted several proposals to DOE during the ongoing negotiations. An earlier TVA proposal for the use of Watts Bar expired. However, in December 1998, TVA submitted another offer to DOE to provide irradiation services at Watts Bar and Sequoyah, as well as additional proposals for Bellefonte. TVA's offer to provide irradiation services at one or more of the three proposed sites is still viable.

Nonproliferation Policy Issues

In response to public comments requesting DOE to provide examples of the commingling of civilian nuclear programs with military nuclear programs, Volume 1, Section 1.3.5, of the CLWR EIS was revised. The discussion of nonproliferation now includes an explanation and some background information on the issue, as well as examples of the commingling of civilian and military uses of nuclear power.

Water Quality Analysis

In response to public comments expressing concern about impacts to public water withdrawals downstream of the Bellefonte Nuclear Plant, sections of Chapters 4 and 5 in Volume 1 were revised. The discussions of surface water use for Bellefonte (Volume 1, Section 4.2.3.4) identifies nearby intakes downstream. The discussions of potential impacts to surface water near the three reactor sites (Volume 1, Sections 5.2.1.4, 5.2.2.4, and 5.2.3.4) include the tritium concentration at various locations downstream. In addition, Volume 1, Section 5.2.3.4 was revised to include potential chemical concentrations downstream of Bellefonte.

Accident Analysis

During the preparation of the CLWR Final EIS, data related to the design and fabrication of the TPBARs indicated that the release of tritium from an accidental breach of a TPBAR more likely would be time-dependent than instantaneous and finite, as was assumed in the Draft EIS (PNNL 1999). Consequently, the analyses for the TPBAR handling accident and the transportation cask handling accident at the reactor site (Volume 1, Appendix D) and the transportation cask accident en route (Volume 1, Appendix E) were revised to reflect the more recent data.

Environmental Justice

Figures in Volume 1, Appendix G were revised to improve their quality. New figures were added to show the location of minority and low-income populations within a 16.1-kilometer (10-mile) radius. In addition, a representative average individual dose at 40.2 kilometers (25 miles) to each of the 16 principal directions has been overlaid onto the 80.5-kilometer (50-mile) radius to show the potential dose to minority and low-income populations.

Tritium Requirements and Supply

In response to public comments expressing concern about the disparity between the amount of tritium needed and the amount that could be supplied by one CLWR, Volume 1, Section 3.2.1 was revised. The discussion explains that the exact amount of tritium needed is classified information, however, for the purposes of analysis, it is not expected to exceed 3 kilograms per year (6.6 pounds per year). It further clarifies that one reactor with 3,400 TPBARs would be expected to satisfy a steady-state tritium requirement in most years.

Comparison of the APT and CLWR Alternatives

In response to public comments requesting additional information about the No Action Alternative, Volume 1, Section 3.2.6 was expanded to include a table comparing the impacts of producing tritium under the accelerator and CLWR options. A document comparing the costs of the technology options is available upon request from DOE (DOE 1998c).

Source of Uranium-235 for Tritium Production

In response to public comments concerning the source of blended-down uranium-235 that could be used as nuclear fuel for tritium production, Volume 1, chapter 5, Section 5.2.7 was revised for clarification. A discussion of the environmental impacts resulting from blending-down activities of highly enriched uranium was also added.

Mitigation Measures

The CLWR Draft EIS discusses the need for mitigation measures, if such need were warranted, right after the presentation of the impacts for each environmental resource. A new Volume 1, Section 5.5 was added to the CLWR Final EIS to summarize these discussions.

Sensitivity Analysis

An additional variation from the baseline analysis has been included in Volume 1, Section 5.2.9 of the CLWR EIS, i.e., the possibility of producing tritium at some date later than 2005.

Miscellaneous Revisions and Editorial Changes

Several sections in the CLWR Final EIS were revised to reflect the availability of more recent data, or to include corrections to erroneous information, improvements in the presentation, and other editorial changes. None of these revisions affect the environmental impact assessment of the EIS. The sections with these types of revisions are:

- 3.2.3 Reasonable Alternatives
- 4.2.1.1 Affected Environment, Land Resources, Watts Bar
- 4.2.1.3 Affected Environment, Air Quality, Watts Bar
- 4.2.1.8 Affected Environment, Socioeconomics, Watts Bar
- 4.2.2.1 Affected Environment, Land Resources, Sequoyah
- 4.2.2.3 Affected Environment, Air Quality, Sequoyah
- 4.2.2.4 Affected Environment, Water Resources, Sequoyah
- 4.2.2.6 Affected Environment, Ecological Resources, Sequoyah
- 4.2.2.8 Affected Environment, Socioeconomics, Sequoyah
- 4.2.3.3 Affected Environment, Air Quality, Bellefonte
- 4.2.3.4 Affected Environment, Water Resources, Bellefonte
- 4.2.3.6 Affected Environment, Ecological Resources, Bellefonte
- 5.2.1.8 Environmental Consequences, Socioeconomics, Watts Bar
- 5.2.3.6 Environmental Consequences, Ecological Resources, Bellefonte
- 5.2.3.8 Environmental Consequences, Socioeconomics, Bellefonte
- 5.2.3.9 Environmental Consequences, Public and Occupational Health and Safety, Chemical Hazards, Bellefonte
Environmental Consequences, Public and Occupational Health and Safety, Energizing Transmission Lines, Bellefonte
- 5.2.7 Fabrication of TPBARs
- 5.3 Cumulative Impacts
- 6.2.2 Environmental Protection Permits
- 6.3.1 Environmental Protection, Endangered Species Act
Environmental Protection, National Historic Preservation Act
- 6.3.3 Worker Safety and Health
- 6.4 DOE Regulations and Orders
- 6.5.2.1 NRC Performance, Civil Penalties-Watts Bar 1
- 6.5.3.1 NRC Performance, NRC Notices of Violation and Enforcement Action, Sequoyah
- Chapter 7 References
- A.3.2 Physical Description of the TPBAR
- Appendix B Methods for Assessing Environmental Impacts
- C.3.4 Radiological Releases to the Environment and Associated Impacts
- D.1.1.10 Beyond Design-Basis Accident
- G.5 Environmental Justice Analysis, Results for the Sites

Table 1-5 Index of Commentors

<i>Name of Commentor</i>	<i>Document or Statement Summary on Chapter 2 Page Number</i>	<i>Comment Number</i>	<i>Comment Summary-Response Code</i>	<i>Comment Summary and Response on Chapter 3 Page Number</i>
Abraham, Steve Distah, AL	2-22	38-1	07.03	3-31
Aderholt, Robert, U.S. Congressman Washington, DC	2-37	54-1	07.03	3-31
Aderholt, Robert, U.S. Congressman Washington, DC	2-194	609-1	07.03	3-31
Allen, Ronald Homosassa, FL	2-80	114-1	23.15	3-89
Ambrose, Jackie Huntsville, AL	2-20	35-1	07.03	3-31
Anderson, Charles	2-193	601-1	14.21	3-58
Anderson, Philip, Mayor Dutton, AL	2-38	55-1	07.03	3-31
Anderson, Philip, Mayor Dutton, AL	2-196	613-1	07.03	3-31
Anonymous Scottsboro	2-11	17-1 17-2	07.03 14.04	3-31 3-52
Anonymous (1)	2-17	28-1	07.02	3-30
Anonymous (2) Knoxville, TN	2-34	48-1 48-2 48-3	02.01 01.04 14.04	3-8 3-2 3-52
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