

STATE OF SOUTH CAROLINA
Governor's Nuclear Advisory Council

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September 6, 2012

Ms. Sachiko McAlhany
SPD Supplemental EIS NEPA Document Manager
U.S. Department of Energy
P.O. Box 2324
Germantown, MD 20874-2324

Comments on the Draft SPD Supplemental EIS

Dear Ms. McAlhany:

The South Carolina Governor's Nuclear Advisory Council (GNAC) appreciates this opportunity to comment on DOE's *Draft* Surplus Plutonium Disposition (SPD) Supplemental Environmental Impact Statement (SEIS). The SEIS describes previous decisions that still stand and focuses on alternatives for the disposition of an additional 14.4 tons of surplus plutonium for which no disposition decision has previously been made, identifies options for pit disassembly and conversion of the plutonium metal to oxide, and describes the preferred alternative identified in the January 12, 2012 second amended Notice of Intent.

The preferred alternative for the surplus plutonium is the MOX fuel alternative. This option maximizes the plutonium converted to MOX fuel, generates the least amount of transuranic waste and generates very little waste (approximately two additional canisters) that must be processed through the Defense Waste Processing Facility and stored at SRS until such time as a geologic repository is available. The transuranic wastes would be shipped to the Waste Isolation Pilot Plant in New Mexico for ultimate disposal.

The GNAC supports the selection of the MOX fuel alternative as the preferred alternative. First, we believe it is the alternative that gets the plutonium processed most quickly, and maximizes the conversion of weapons plutonium into commercial power reactor fuel. Second, it generates the least amount of waste of the alternatives considered. Finally, as stated in our scoping comments, our overarching consideration is that activities necessary for plutonium disposition should not delay or forestall the liquid radioactive waste disposition program at SRS. The MOX fuel alternative meets these criteria. Other alternatives analyzed do not.

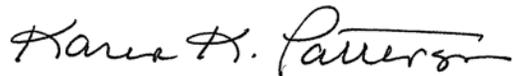
DOE has identified four options for the pit disassembly and conversion process in this SEIS but has not identified the preferred option. The four options are a hydride/ dehydride process in a stand-alone facility in F Area; a similar process at a facility constructed in existing facilities in K Area; and performing pit disassembly at an existing facility at Los Alamos National Laboratory (LANL), and in gloveboxes installed in K Area with the conversion from metal to oxide done in H Canyon and HBLLine. We prefer the option of disassembly at LANL and K Area with the conversion to oxide done in H Canyon and HB Line for the following reasons:

- The construction of the PDC facility either in F or K Areas is estimated to take 13 years. Our experience with DOE's construction estimates is that they are overly optimistic; we believe it unlikely the project would be completed in 13 years. More importantly, the country does not have the funds for another large construction project.
- The PDC process requires a hydride/dehydride process which is not as well understood as the processes used in the H Canyon and HBLine option.
- Pit disassembly at LANL and in K Area requires no new facility construction, only modifications to existing facilities, making the time line shorter, and the costs more reasonable.
- Dissolving plutonium in H Canyon and converting metals to oxides in HB Line are proven processes with well understood chemical interactions.

GNAC is aware that a completed EIS and its Record of Decision do not guarantee the initiation of a project. The National Defense Authorization Act of 2002¹ (NDAA) required DOE to have a plutonium disposition plan prior to consolidating plutonium from several DOE sites at SRS. Since that time DOE has created and abandoned and re-created several plans for plutonium disposition. South Carolina has been patient as DOE has struggled to establish its SPD plans. We hope DOE will issue a Record of Decision by early 2013, that there are no more NEPA analyses to be done, and that DOE is strongly committed to this plan and will immediately develop a schedule, secure funding, and begin dispositioning plutonium.

We thank you for this opportunity to comment on the SPD DSEIS, and continue to look forward to the day when planning gives way to execution.

Sincerely,



Karen Patterson, Chair
South Carolina Governor's Nuclear Advisory Council

Cc: Gov. Nikki Haley
Members of the Council
Mr. Tom D'Agostino, Administrator, DOE National Nuclear Security Administration
Mr. David Huezinga, Senior Advisor, DOE Environmental Management
Mr. Doug Dearolph, Manager, National Nuclear Security Administration, SRS
Dr. Dave Moody, Manager, DOE-SR

¹ Section 3155 of Public Law 107-107, entitled "Disposition of Surplus Defense Plutonium at Savannah River Site, Aiken, South Carolina", of the National Defense Authorization Act for Fiscal Year 2002.