

Re: GNEP PEIS comments:

Gentlemen,

Tomorrow, June 4, 2007 is the deadline for responding to your call for comments on your preliminary environmental impact statement for Global Nuclear Energy Partnership,. By now, you have received responses from learned individuals and groups, such as Princeton's Dr. Frank Von Hippel's "Illogic of Reprocessing", Harvard's Dr. Mathew Bunn's excellent report, and Robert Alvarez's report on the waste that will be produced by reprocessing. Take their studies and reports seriously. Abandon GNEP immediately

I hereby request that you include all of the comments that you receive, including this one, with answers thereto, in the GNEP PEIS. I further request that you add me to your list to receive the PEIS and all further documents relating to GNEP.

GNEP is an ill advised, ill conceived, plan. It costs too much and makes the problems of nuclear waste disposal more complicated and dangerous. It exasperates the problem of proliferation. We, the people of the United States, do not want reprocessing, or breeder reactors, and we certainly don't want to take other nation's nuclear waste, all of which are included in GNEP.

Who was responsible for originating GNEP, - NERAC?

According to DOE's 2005 Nuclear Energy Budget, NERAC, Nuclear Energy Research Advisory Committee, wrote "The Roadmap to Recovery of the Nuclear Industry." Please include minutes of the NERAC meetings and how they devised this roadmap, including GNEP from it's inception, in the PEIS.

Who are the members of NERAC, and their affiliations? How much money has each member's organization, company, National Lab, or University, received to date, or is expected to receive from GNEP? PEIS is suppose to be a full disclosure document. So, in your cost benefit analysis, please give full disclosure of the presently estimated total costs, plus who pays the costs ,and who reaps the huge monetary benefits, naming companies, corporations, universities, government labs, and all other entities, both foreign and domestic, that have or will be a recipients of grants and contracts.

DOE's 2005 and 2006 nuclear budgets preceded the term, GNEP, however, in those documents it was referred to as Generation 4 Reactors, Advanced Fuel Cycle Initiative, and Global Nuclear Energy Initiative.

In the DOE 2006 budget, Advanced Fuel Cycle Initiative listed Reprocessing, which you conveniently renamed recycling, MOX fuel fabrication, and Process Storage, a sanitized name for waste disposal. .

As GNEP evolved, it encompassed Advanced Fuel Cycle Initiative, Global Energy Initiative, and Generation 4 Reactors, breeders without the blanket. MOX fuel fabrication

and Process storage were conveniently dropped. Instead of 4 sites for reprocessing being considered, as was specified in the 2006 DOE budget, a total of 11 are now included. Although Russia was not named in the countries included in Global Energy Initiative, it has become a part of GNEP, as one of the countries that will accept, along with Japan, England, France, and the USA, foreign nuclear spent fuel for reprocessing. All except the USA are using the old reprocessing method, PUREX. GNEP proposes an untested technology, which is reported to be very little more proliferation resistant than PUREX.

England and France dispose of their reprocessing waste by pumping it into the ocean. Japan has not been successful with their reprocessing plant. America has spent billions of dollars buying plutonium from dismantled bombs from Russia. Why are we now proposing that they do more reprocessing, which makes more plutonium readily available for nuclear weapons?

The PEIS for GNEP should include the political consequences as well as the monetary costs. Instead of prohibiting proliferation, GNEP encourages it. Excluded countries (Second class countries) are clamoring already to do their own enrichment and reprocessing. Iran and North Korea are two examples. GNEP, along with its companion, Complex 2030 (Bombplex) and Reliable Replacement Warheads, (a new generation of nuclear weapons) are reigniting the cold war. Our reputation as a country that can be trusted to keep its word has been shot to pieces by these ill conceived plans. The non proliferation treaty has been trashed as just another scrap of paper.

Look at the history of reprocessing. especially at the Savannah River Site, SRS. Since 1990, DOE has paid Westinghouse over \$1 billion per year to clean up that site, and to vitrify the waste contained in 51 of the more than 200 huge tanks of left over reprocessing waste. Since that time, more than 2000 logs of vitrified waste have been produced, but none of the 51 tanks have been completely emptied. The National Academy of Sciences even did a report, headed by Dr. Frank Parker, that recommended that instead of grouting, DOE should leave the partially emptied tanks until a technology could be developed to more completely remove the very radioactive sludge in the bottom of each of them.

DOE disregarded NAS's recommendations. This gives little hope that you will pay any attention to those of us who now give you information that is contrary to your pre-approved decisions; however, we believe that it our responsibility to try.

By removing process storage from GNEP you are leaving the impression that there is no waste from reprocessing. Instead, a much larger volume of waste will remain, and it will be harder to handle than the alternative of leaving the spent nuclear fuel rods intact, and stored on site.

DOE's real nuclear waste plan is to simply reword it. As for the waste left over from reprocessing, you reclassified it. Instead of high level waste, first you changed its name to "residual waste incidental to reprocessing." That in turn was simplified to transuranic waste and low level waste. Now, it has been disclosed in NIRS', "Out of Control, On Purpose"

that low level nuclear waste is being dumped in municipal landfills. Tennessee has four such landfills, the largest being near Nashville, The Middle Point Landfill on Jefferson Rd. in Murfreesboro, Tn. All this was done with no hearings.

You cannot solved the problem of nuclear waste. When Rep. Leo J. Ryan did a congressional study and published his report. " The Cost of Nuclear Power", he stated that up until that time, in the 1970's, there had been over 5,000 studies on what to do with nuclear waste, with still no answers. The federal agencies either the NRC, or it's predecessor, AEC, could not even tell his committee how much money had been spent on all those studies. GNEP is yet another such study, with still no answer.

Now, your non-solution is just to dump nuclear waste with our municipal trash, like any other garbage. This demonstrates that you have given up even trying to handle it responsibly. Earlier you attempted to declassify radioactive metals as radioactive, to allow them to be recycled into consumer goods such as belt buckles and even radioactive frying pans. The public made such an outcry, that this plan was quietly shelved. The one statement that I remember, from the over 5,000 that were submitted was, "You fools, what are you trying to do, kill us all?" The same could certainly be said of GNEP.

In addition to our municipal landfills becoming nuclear dumps, tritium, radioactive hydrogen from nuclear facilities, has become so wide spread that there are hundreds of pages of references to it on Google. In the 1980's you and the NRC ceased monitoring for Strontium 90 in milk. In the body, SR. 90 acts like calcium, lodges in bones, and causes leukemia. Krypton 90, is emitted routinely from nuclear plants, and quickly decays to become SR. 90. Public water systems monitor for other toxins in drinking water, but not radionuclides. So, your solution to pollution, whether it be carbon laden soot from coal fired plants to radioactive waste, is dilution. Just disperse it widely. After all, the excess cancers, leukemia, and birth defects won't be traceable to their cause. These are externalities, costs born by the victims.

Now we realize that the whole planet is the victim. You are using Global Warming as an excuse to promote your favorite type of energy, Nuclear Power. Without it, what excuse would you have for billions of dollars in DOE's annual budget? Without nuclear energy and nuclear weapons, there would be no DOE at all, a Ronald Regan unkept promise.

Disposing of nuclear waste in municipal landfills may awaken the public that neither DOE nor NRC, or any other agency of the government protects our health. Another National Academy of Sciences study that is completely ignored is BIER VII, that confirms that there is no threshold dose below which radiation does no damage.

GNEP would necessitate much more transportation of nuclear material. In addition to the monetary cost, please include the carbon burden from this increased transportation, plus the costs of building new highways, such as I-3 that is intended to link Oak Ridge, Savannah River Site (SRS) and the port of Savannah where foreign highly radioactive spent nuclear fuel bound for reprocessing would be downloaded. Include all other hidden costs that are

incidental to reprocessing, including externalities.

Utilities know that reprocessing only increases the cost of nuclear fuel. They are unwilling to pay for it, so the entire cost of GNEP will be born by taxpayers. There is no commercial market for reprocessed fuel. Hence, the need to link a new generation of the failed breeder reactor. If at first you don't succeed, fail, fail again.

There is a link between GNEP and Reliable Replacement Warheads, including Bombplex (Complex 2030.) SRS wants it all, both GNEP and Bombplex. What they really want are jobs. Just jobs. That's all any of your supporters at the misguided 11 sites who have volunteered to accept GNEP really want. GNEP and the nuclear revival are the new equivalents of WPA.

Your PEIS should give a lists of ways to spend the same amount of money as projected over the life of GNEP, hundreds of billions of dollars, and the number of jobs that could be produced with alternative sustainable energy. Since there would be money left over, the dollars saved could be transferred to other federal programs that will benefit society, such as better education and health care.

The PEIS should also detail the source of funding for all the hundreds of billions that GNEP would costs.

Our elected representatives must also weigh the alternatives. The American Public believes that global warming is real. We believe that the money that is going to be pored into the pockets of the special interests that are promoting GNEP would better be spent on alternatives that will truly reduce carbon. Nuclear Power and GNEP are too little, too late, and they costs too much. Examples of alternatives that can make a difference now are carbon sequestration for existing and new coal fired plants, plus renewable sustainable sources of energy that produce no carbon, ie, wind, solar, ocean current turbines, energy efficiency, and conservation. For the transportation sector hydrogen fuel can be made from aluminum and water. Renewables can provide the energy sources. Legislation should mandate that only hybrid vehicles are to be sold in the US after 2010. Transportation of nuclear spent fuel can be eliminated by leaving it on site. These are all alternatives that should be included in your PEIS.

Respectfully submitted,

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