

In regard to relicensing of NFS, this plant does not have 8 inch thick pressure vessels that are constantly being bombarded with a high density neutron flux nor does it generate megawatts of electricity. This plant is a manufacturing facility primarily for batch processing of radioactive fuel. In that regard, it does not have system components that have an operating life of forty years and does not fit the criteria or need to be issued a license for that duration of time.

However as a nuclear fuel processing/reprocessing facility it does fall into the category of 10 CFR 50 Appendix B requiring a Nuclear Quality Assurance Program equivalent to NQA-1 and cannot legally be issued a license without meeting that requirement. . During my previous discussions with the NRC they stated that,; “NFS is not required to comply with any Quality Program because it was not included in their Licensing requirements”!

I personally cannot rationalize anyone attempting to operate a Nuclear Plant w/o having a NQA Program in place because part of the QA function is to verify the infrastructure systems of the Plant are correctly operational in order to mitigate/prevent accidents that affect the health and safety of the public. Of course the Congressional Charter of the NRC requires it to protect the health and safety of the public and the NQA Program is specifically designed to implement that NRC requirement.

Indeed the failure to include the engineering systems cohesion of a formal Nuclear Quality Program is in fact the exact reason why this nuclear fuel processing plant has been infamously named by the national nuclear watchdogs as “The Sieve of the Nuclear Industry”.because of all the spills, effluent releases, and accidents that have occurred over the duration of its existence.

Although I wasn't convinced that this nuclear plant had been allowed to operate in an uncontrolled status for decades, intuitively I knew that if it was true that there really was not any Quality Program it followed that there was no Statistical Process Control being used for the batch processing manufacturing operations. This of course means that there must be large quantities of rejects being generated. The Navy is and was on a cost plus contract w/o incentives for process improvements and had to pay for everything that was produced whether it was usable or not so it was hard to find records of the “Submarine Scrap Fuel”. Sure enough, indirectly, I found the scrap sub fuel in a 1991 letter to NRC from NFS requesting an additional 140 barrels for mixed radioactive waste.

Before that there was another 140 barrels and 200 barrels and 120 barrels etc. I'll leave the final count up to the GAO. But the math goes like this:

A fuel pellet weighs about 2 grams and produces the energy of 3 barrels of oil

So on that scale: $453 \text{ gms per pound} / 2 \text{ gms per pellet} = 226 \text{ pellets per pound}$

And at \$80 per barrel of oil times 3 = 240 times 226 = \$54,240 per pound of fuel

Now if a waste storage barrel can hold 3 cubic feet of material it can easily hold 200 pounds of Submarine Scrap Fuel at a total cost of over a MILLION DOLLARS per barrel

In case you didn't follow all the numbers, they have generated hundreds and hundreds and hundreds of barrels of Submarine Scrap Fuel at cost overruns exceeding a half a BILLION DOLLARS.

Since the streets of Erwin aren't exactly paved with Gold, I suspect that the Lion's Share of those monies are returned to the NRC as lobbyist expenses and consulting costs for all of the failure events that have occurred. Senator John Glenn recently initiated an Inspector General investigation of the NRC Region I and found Multiple Illegal Gratuities had been given to the Yankee Power Plant NRC Personnel. I see no difference in Region II except that the bought and paid for levels of NRC management must go higher for NFS due to the irrational specification interpretations professed by NRC Personnel in order to justify their actions.

The NRC, by failing to include in its licensing requirements a formal Quality Program for this plant, has performed a horrendously gross disservice to this Nuclear Plant, to the Navy, to the Environment and to the Public. The NRC officials by knowingly allowing this situation of non-quality to continue for decades without correction are in this writer's opinion, Grossly Negligence in the Performance of their Duties of Office! Because of the previously demonstrated levels of bias and lip service paid to their Congressional Charter requirements, they are UNQUALIFIED to make the rational judgements necessary to License this plant.