SOUTHERN
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DIVERSIFICATION
INITIATIVE

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reindustrializing south central ohio

June 20, 2002

David Allen
US Dept of Energy
SE-30-N, PO Box 2001
Oak Ridge, TN 37831

Dear Mr. Allen:

I am writing on behalf of the Board of Directors of the Southern Ohio Diversification Initiative (SODI) in response to the Draft Programmatic Environmental Assessment (DOE/EA-1393). As the designated DOE Community Reuse Organization, SODI is working with many organizations to bring new projects to the Portsmouth Site (PORTS). The action proposed in the Environmental Assessment will have many adverse impacts on our collective efforts to implement a productive reuse strategy.

The following are provided as initial questions and comments requiring your response:

- Please identify any other potentially reusable uranium material/uranium feed currently located at PORTS.
- What buildings would be used at PORTS for this project?
- What building(s) are included in the 450,000 square feet of available building space cited in the Draft Environmental Assessment (DOE/EA 1393)?
- What other facilities would be required to support the DOE preferred option to consolidate all of the material at PORTS?
- Why is the material considered "valuable" and "reusable"?
- If more potentially reusable material is shipped to PORTS, please identify the impacts/restrictions on other building and facilities at the site (in the context of production reuse).
- Please identify the method of shipment, mode of transportation, and route(s).
- What guarantees will the local community receive regarding the ultimate disposition date?
- Please provide the proposed schedule of re-classification to ensure the material is reusable, marketable, and not deemed a waste.
- What happens to the material if it is subsequently determined to be a waste?
- Please identify the markets for this material.
- When did the DOE preferred option first receive consideration?

- How would the importation of the material affect current clean up projects? Future D&D activities?
- How many permanent jobs are associated with this project? Newly created full-time permanent positions with the DOE preferred option?
- Please identify the community benefits associated with the importation of this material to PORTS.
- Will the full proceeds, including applicable taxes, of the sale of this material be returned to the community?
- Will the DOE utilize the designated CRO for disposal/sale of this material?
- Define temporary storage.
- Assuming there is a market for this material, is there a prohibition or moratorium that would prevent or affect its sale?
- Does USEC have any need for any of this material?
- Has the DOE considered transferring ownership of any of the material to USEC?
- Will additional security be needed at PORTS if any of the material is imported?
- Has DOE consulted with and sought the input of the Ohio Congressional Delegation regarding the importation of nuclear material to PORTS? If so, what was the outcome?
- Of the 158 sites currently storing the material, is there any more "reusable" or "potentially marketable" material being generated? If yes, will it automatically be transferred to the storage site chosen during this action?
- Has any of this material ever been classified as a waste?
- Please identify all of the sites currently storing this material and provide a brief description of the material at those sites.
- Please explain the relationship (on page 3-2/Environmental Justice Section) between race, income and the decisions to store this material at any location.
- Please provide brief details on the nature of retrofitting/upgrade required at PORTS for the DOE preferred alternative.
- Who will be used to complete retrofitting required at PORTS?
- Who regulates the safe storage of the material at PORTS?

On behalf of the southern Ohio region, and before any decision on this matter is made, we respectfully request a meeting with the Secretary of Energy or his designee with authority to make decisions regarding this issue.

We believe this proposed action is contrary to our efforts, the stated DOE mission to reindustrialize, and the tireless efforts of our elected representatives in Columbus and Washington for productive, job intensive reuse of the PORTS facility in Piketon. Therefore, the SODI Board of Directors opposes the subject material being stored at the Piketon site. The residents of Southern Ohio desire projects that have recognizable value and benefit for the community. We want input into our future, the goals for the site, and new missions.

Thank you for the opportunity to provide these questions and comments. Your responses are greatly anticipated and may lead to more questions. We look forward to

an open dialogue and honest discussion with DOE on this and other matters. If you have any questions or need clarifications do not hesitate to contact me at the above.

Sincerely,

Gregory L. Simonton
Executive Director
Southern Ohio Diversification Initiative

Cc: file
SODI Board of Directors