

RESPONSE TO REPLACEMENT RESEARCH REACTOR EIS

From: _____
Address: _____

Date: _____

**To: Replacement Research Reactor Draft EIS
Environment Assessment Branch
Environment Australia
GPO Box 787, Canberra City, ACT, 2601.**

I oppose the proposal to build a new nuclear reactor at Lucas Heights because:

- the Environmental Impact Assessment process is deeply biased: the Australian Nuclear Science and Technology Organisation (ANSTO) is itself responsible for preparing the Environmental Impact Statement (EIS). Why has the government ignored the recommendation of the 1993 Research Reactor Review that a public inquiry should be held if a new reactor is envisaged?
- the willingness of federal government to objectively evaluate the EIS is open to serious doubt given that the government has already made an in-principle decision to build a new reactor at Lucas Heights, and given that a senior government source was quoted on ABC Radio National (March 29) saying: "The government decided to starve the opponents of oxygen, so that they could dictate the manner of the debate that would follow the announcement. Because they couldn't win it on rational grounds ... they decided, right, we'll play the game and in the lead up to the announcement catch them totally unawares, catch them completely off-guard and starve them of oxygen until then."
- according to the Australian Academy of Science and the International Atomic Energy Agency, there have been five fatal research reactor accidents around the world. There is no guarantee that the sixth fatal accident will occur at Lucas Heights.
- emergency planning is grossly inadequate, as demonstrated during the bushfires of late 1997.
- the intention is to send spent uranium fuel from the new reactor overseas, but no contracts have been signed with overseas reprocessors. The intention is that wastes arising from reprocessing are to be put in a shed in the Billa Kalina region of South Australia. But the government is only at the site-selection phase of the plan to force a radioactive waste dump on South Australians; it is by no means a *fait accompli*. The dump planned for Billa Kalina is opposed by Aboriginal groups with native title claims on the area, by many non-Aboriginal residents in and around the Billa Kalina region, by the South Australian ALP and some or all of the minor parties in South Australia.
- a new reactor would most likely be the thin edge of the nuclear wedge. ANSTO's Executive Director, Helen Garnett, told a Senate Estimates Committee that Lucas Heights is a "reasonable" place to put a radioactive waste reprocessing plant.
- there are unresolved questions regarding the health effects of radiation. There is growing evidence linking radiation to genetic defects, as discussed in a *New Scientist* article titled "Radiation Roulette" (October 11, 1997). Apart from the possibility of inducing cancer in future generations, radiobiologists are concerned on the strength of recent research that radiation-induced genetic instability may cause a "scattergun effect" - small increases in a wide range of disorders including defective foetal development, and brain disorders such as Alzheimer's, Parkinson's and motor neuron diseases. These risks may be "acceptable" to the federal government and to ANSTO management but they are not acceptable to the residents of the Sutherland Shire.
- according to Professor Geoffrey Wilson, less than one third of ANSTO's activities depend on the operation of a research reactor. Another independent evaluation confirmed this finding. The HIFAR reactor should be shut down without replacement. There should be further investment in non-reactor technologies at Lucas Heights. This strategy has several advantages: far less generation of radioactive waste; advantages in relation to health and safety; few if any staff redundancies; and far less community opposition to ANSTO.
- a new reactor is not needed for medical isotope production. There are numerous alternatives including cyclotrons, spallation sources, importation, and alternative medical technologies such as MRI, CT, US etc. Dr. Khafagi, a nuclear medicine specialist who doubles as a member of the ANSTO Board, is on record in a 1992 journal article saying "*thorough evaluation of the only meaningful end-point - patient outcome - is scanty.*"
- the scientific rationale for the reactor is equally dubious. The federal government did not even consult the Chief Scientist or the Australian Science, Technology and Engineering Council (ASTEC) about the reactor proposal. The CSIRO said in 1993 that more productive research could be funded for the cost of a reactor.