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June 23, 2000  
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US NUCLEAR REGULATORY

PUBLIC MEETING

APRIL 29, 1999

SALT LAKE CITY, UTAH

RE: SPENT FUEL STORAGE INSTALLATION -- SKULL VALLEY RESERVATION

Statement:

Women Concerned/UtahnsUnited is a long standing citizens organization concerned about nuclear testing, Utah's downwind issues, the storage of 43% of the nations chemical weapons in Utah and with the problems of chemical and biological testing at Dugway Proving Grounds. We are also opposed to the "temporary" nuclear waste storage site on the Goshute Reservation. We believe this is a "bad neighbor" idea.

The use of the word "temporary" storage is arguable. The transportation of spent nuclear fuel to this site may be subject to accidents that might be planned (sabotage) or unplanned. The possibility of Public Fuel Storage (PFS) opening the door to other power companies to store nuclear waste at the Goshute site is of major concern as we look to Utah's future.

The 820-acre nuclear storage facility is opposed, not only, by the Governor of the State of Utah and his advisors, but also by the people of Utah, by most grass-root citizen's organizations and by one-third of the members of the Goshute Tribe.

No one wants nuclear waste in their backyard, nor in their neighbor's backyard. Let's not dump nuclear waste in anyone's backyard. This waste needs to be stored near the plant that produced the waste until a permanent site is established. We need to look to the future for acceptable solutions in the production of this kind of waste product and the problems it creates. The Goshute and the PSF nuclear waste storage plan is a perfect example of a scandalous benefit to a meager few and a great risk to many.

Rosemary A. Holt, Past President, WomenConcerned/UtahnsUnited, April 29, 1999

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ADD Scott Flanders  
(LSCF)

NUCLEAR REGULATORY COMMISSION BOARD (NRC)  
PUBLIC MEETING  
JUNE 23, 2000  
SALT LAKE CITY, UTAH

RE: SPENT NUCLEAR FUEL STORAGE -- SKULL VALLEY RESERVATION

Women Concerned/UtahnsUnited is a long standing citizen's organization that has been involved in nuclear testing, Utah's downwind issues, the storage of 43% of the nations chemical weapons in Utah and with the problems of chemical and biological testing at Dugway Proving Grounds. We are opposed to the "temporary" nuclear waste storage site on the Goshute Reservation.

At this point, I would like to put a focus on the use of the word "temporary." "Temporary" is constantly used by the Private Fuel Storage consortium when they are promoting storing highly radioactive waste on the Goshute Reservation. This slick brochure is but a token example of the heavy handed use of advertising and the misleading use of the word "temporary" by PFS (show example). I believe this brochure is so patronizing and misleading that it is deceptive and dishonest.

The promise of "temporary" storage in Utah raises these questions:

1. When the highly radioactive spent fuel rods are placed in casks, will they not be permanent casks? Who, in 40 years from now will be reminding us -- they said this waste was temporary!
2. If the proposed permanent storage site in Nevada never comes on-line is it not possible the Goshute Reservation will become a permanent site? With the certain possibility of expanding onto the remaining 18,000 acres of the Goshute Reservation. Perhaps PFS should add to their sales brochures the old motto: "build it and they will come."
3. If Nevada comes on line as the nation's permanent storage site, would it not be feasible that other long standing nuclear waste, that has not received attention, will become the priority waste over Utah's already permanently casked waste -- does it not make sense nuclear waste storage in Utah will become permanent?

I believe, for PFS, the Tooele County Commission and those on the Goshute Reservation, who support this travesty of land use, to use the term "temporary" is inaccurate and misleading to the people of Utah and the nation.

We are requesting that you do not license the PFS to store radioactive waste in Utah. They should not be licensed in Utah because they have not been forthright in the disclosure that the site on the Goshute Reservation in Utah may become a permanent storage site. We are asking that you require PFS to stop, what we consider, their false, misleading advertising. We in Utah do not want to be patronized, misled, misinformed, and deceived by PFS, some members of the Goshute Tribe nor the Tooele County Commission. We are requesting that the NRC licensing board support the Governor of Utah, the Utah state regulators and the citizens of Utah and the nation in this endeavor.

ROSEMARY A. HOLT, PAST PRESIDENT, WOMENCONCERNED/UTAHNSUNITED

WomenConcerned/UtahnsUnited is opposed to the storage of spent nuclear fuel rods on the Goshute Reservation. We believe, now more than ever, the information that has been given to the citizens of Utah on this issue, is woefully inadequate.

We believe the NRC is responsible to require the Private Fuel Storage and any other agencies involved with this consortium to provide factual, forthright, quality information to all stakeholders who will be impacted by the nuclear storage proposal. We do not believe the cost/risk/benefit documentation has been shared with the Goshutes nor the citizens of Utah. Nor has information been shared with those states or cities whose path will be crossed during the transportation of high level radioactive waste. Stakeholders must have truthful information before they are able to give their "informed consent" to allow the transportation or the storage of nuclear waste in their communities.

I would like to show you the questionable quality of the information that has been disseminated about by PFS. I ask the NRC panel if you would call this worthwhile information?

SHOW BROCHURE

This brochure reminds me of something the tobacco industry might publish.

We are requesting that the NRC delay and extend, for at least 180 days, the next steps in the process of licensing PFS to store nuclear waste in Utah. During that time we would ask that the Draft Environmental Impact Statement (DEIS) be made available in summary form to the public. It is very difficult for the average person to feel competent enough to comprehend the volume of a complete DEIS. During this time we would ask that PFS be required to print a brochure that is an information document with objective risk/benefit issues identified.

After the time extension we would request that public question/answer sessions be made available. The public has not been allowed to ask any questions on this issue and even the state has been overpowered by strict rules as to what the NRC would allow them to discuss on this issue. For example, is the NRC going to waive their own earthquake regulations and make an exception on the Goshute Reservation, if so, why? Will the NRC require a resident inspector at the Goshute site? What sort of law enforcement will be provided on the Goshute site and by whom? What happens when PFS a few years in the future sells out to another utility consortium and the Goshutes and Utahns ends up with a huge bankruptcy such as we are now witnessing with "Safety Kleen?"

These are but a few of our concerns and we would appreciate it if you would prove to our citizens and to the nation that the NRC is not just another entrenched bureaucratic entity. Perhaps you could refute the rumor that the decision has already been made by the NRC and that these public comment periods are strictly tokenism.

We here in Utah have long been burdened by the nuclear testing "downwind" issues and now we may be forced to endure what we could call the "upwind" issues of nuclear waste storage. "Downwind" or "upwind" we are asking the NRC to choose the "no action" alternative and to deny a license to PFS. DO NOT LEAVE UTAH HANGING IN THE WIND AGAIN.

WOMENCONCERNED/UTAHNUNITED  
ROSEMARY A. HOLT, PAST PRESIDENT  
1589 DEVONSHIRE DRIVE, SALT LAKE CITY, UTAH 84108  
AUGUST 21 2000

200 SEP -5 PM 4:00  
Rules and Directives  
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USNRC

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