

63 FR 39206
 June 23, 2000
 (113)

From: Richard Mingo <discriminatingtraveler@juno.com>
To: <nrcprep@nrc.gov>
Date: Thu, Jul 27, 2000 1:16 PM
Subject: Draft Report Comments: NUREG-1714

Below is the result of your feedback form. It was submitted by Richard Mingo (discriminatingtraveler@juno.com) on Thursday, July 27, 2000 at 13:16:51

StreetNumber: 917 S.

StreetName: Park Row

City: Salt Lake City

State: UT

ZIP: 84105

Country: US

Comments: I oppose the proposal to permit the storage of spent nuclear fuel rods on Skull Valley Goshute site.

I think the site is too close to the metropolitan Sale Lake area and presents a health risk to the communities along the Wasatch Front that has not been adequately analyzed. I think the number of trips that would occur each day transporting high level nuclear wastes poses an unacceptable risk to the communities along the Wasatch Front.

The structural integrity of the canisters used to transport spent nuclear fuel rods is questionable in the event of an accident. It is foreseeable that in the event of an accident one or more of the canisters could easily break releasing high level nuclear wastes into the environment. More analysis should be done on the risks of a canister breaking in an accident.

I believe the proposal takes advantage of the Goshute Tribe and the dire economic conditions on the reservation. The EIS needs to analyze the impacts on the Tribe including those areas and items of cultural and spiritual significance. Other alternatives for economic development should be considered.

How would the storage facility and communities along the Wasatch Front be protected from an increased threat of terrorism resulting from the proposed project if it were implemented?

The Draft EIS failed to address indirect and cumulative impacts of the proposed action as required by 40 CFR 1500. Tooele County is on the verge of becoming the nation's biggest environmental sacrifice zone, only 40 miles west of the Wasatch Front. What are the indirect and cumulative impacts of the proposed project along with all past, present and reasonably foreseeable projects on local economies, individual property values and of course the health risks on local residents and those in the surrounding region? Tooele County is the fastest growing county in one of the fastest growing states in the nation. What are the cumulative impacts of past, present and future projects on growth and prosperity within the local community and outlying regions as they earn a reputation for becoming the nation's dumping ground for "toxic wastes?"

40 CFR 1502.14 requires that a reasonable range of alternatives be considered. This part requires that the agency [applicant] to:

(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

Template - ADM-013

ERDS-03
 add Scott Flannery
 (SCF)

(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.

(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

(d) Include the alternative of no action.

NRC's own guidance specifies that the applicant submit a slate of alternatives, and the NRC compares the proposed site to the alternatives. The DEIS does not present and analyze a reasonable range of alternatives as required by law. The only other alternative site evaluated was in Wyoming and this analysis did not "devote a substantial treatment" to this alternative. Certainly there are other reasonable sites that should have been evaluated including storing spent fuels in the locations/regions in which they were generated.

The No Action Alternative was not analyzed in any detail. What are the consequences of not implementing the project and not meeting the Purpose and Need for the project?

The Purpose and Need for the Project included the need to provide economic development for the Goshute Tribe. If this is in fact an underlying need for the project, then an array of alternatives to meet this need should have addressed in the DEIS.

The DEIS does not comply with the federal regulations for implementing NEPA, NRC's own implementing regulations and is therefore inadequate. I request that the DEIS be redrafted to address the omissions, that a draft be reissued, and that the public be given an opportunity to review and comment on the revised draft prior to any decisions being made on the proposal.

Thank you for the opportunity to comment.

Sincerely,

Richard Mingo
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SLC UT 84105

Submit2: Submit comments

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