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3264 Nutmeg Street
Salt Lake City, UT 84121
September 18, 2000

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Mr. Daniel Meyer
Chief, Rules Review & Directives Branch
Div. of Freedom of Information & Publications Services
Office of Administration, Mailstop T-6D-59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Meyer:

As a citizen of Salt Lake City, I am concerned that the plan to store 40,000 tons of high level nuclear waste in Skull Valley Utah is based on engineering theory rather than on actual testing. Inasmuch as storage of this magnitude has never been attempted, there is, of course, no actual data available which would be relevant to the Skull Valley proposal. So, it is apparent that this is actually an engineering experiment based only upon textbook theory that is currently available.

When so little is known about the actual performance and behavior of the waste material and the storage casks over a long period of time, it certainly seems unwise to conduct such an experiment so close to a major population center.

One is reminded of the nuclear testing of the 1950's in Nevada, when the public was assured by the Government that there was no danger to them, also based upon engineering theory. The engineering textbooks had to be rewritten after those disastrous experiments and it seems like the people of the West are once again being asked to rely upon engineering theory which has proved to be unreliable, if not deadly.

Obviously, experiments and testing needs to be performed in order to verify the engineering theories on the behavior of nuclear materials transportation and storage. However, Skull Valley is simply too close and up wind of Salt Lake City to provide an adequate margin of safety in the event that the experiment goes wrong.

I respectfully request your consideration of the above concern in your decision making process.

Sincerely,


Rodger M. Brimhall

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ERMS 03
Add Scott Flanders
(SCF)

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