

# Committee to Bridge the Gap

446 T STREET • SACRAMENTO, CA 95814  
(916) 444-3669 • magavern@rcip.com

65 FR 39206  
June 23, 2000

RECEIVED

2000 SEP 26 AM 10:12

Rules and Directives  
Branch  
USNRC

213

72-22

September 20, 2000

Mr. David Meyer  
Chief, Rules and Directives Branch  
Division of Freedom of Information and Publications Services  
Office of Administration  
Mail Stop T-6D-59  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Re: Committee to Bridge the Gap comments on NUREG-1714, "Draft Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facility in Tooele County, Utah"**

Dear Mr. Meyer:

Licensing the proposed independent spent fuel storage installation (ISFSI) on the reservation of the Skull Valley Band of Goshute Indians would constitute a grave environmental injustice. Native Americans have already borne more than their fair share of the deaths and diseases caused by the United States government's failed experiment with nuclear power. Uranium mining has taken a grievous toll on many Indians who were never told of the dangers of their occupation.

Now eight private utilities seek governmental approval for dumping their highly irradiated nuclear fuel on the Goshute reservation. Like the earlier ill-fated attempt by nuclear utilities to dump radioactive waste on the Mescalero tribe of New Mexico, this effort uses the illusion of economic development to entice a tribe into trading away its future. The claim in the draft environmental impact statement that "there are no disproportionately high and adverse impacts on low income or minority populations" does not stand up to even the barest scrutiny. To once again target an Indian tribe with our nation's deadliest poison makes a mockery of justice.

The reservation could well become the permanent, not "interim," resting place for the lethal wastes, and the EIS should account for that possibility. Although the utilities claim that this would just be an interim dump, nuclear waste is very difficult to pick up once it has been put down. The ostensible interim nature of the proposed dump relies on the Department of Energy opening a repository at Yucca Mountain, Nevada. But the Yucca site has several major technical flaws, including groundwater contamination, seismic vulnerability and volcanism, and is opposed by the State of Nevada and the vast majority

ADM03

LOS ANGELES OFFICE  
1637 BUTLER AVENUE, SUITE 203  
LOS ANGELES, CA 90025  
(310) 478-0829

SANTA CRUZ OFFICE  
2-1185 EAST CLIFF DRIVE  
SANTA CRUZ, CA 95062  
(831) 462-6136

ERIDS-03  
Add Scott  
Flanders  
CSCE

Template ADM-013

of its people. Therefore, any irradiated fuel moved to the Goshute reservation might stay there indefinitely, without any of the safeguards necessary for a long-term facility.

The proposed waste dump would also impose serious risks on people outside of the reservation, especially those along the routes of transport from nuclear reactors to the dump. The DEIS does not adequately address the dangers of moving 4,000 giant casks, containing 40,000 tons of high-level nuclear waste, long distances by rail.

According to Radioactive Waste Management Associates, a severe PFS rail shipment accident releasing just a small fraction of the radioactive contents of a cask carrying 5-year-old cooled nuclear fuel (which is legal to ship under NRC regulations) would result in over 115 latent cancer fatalities to exposed individuals; the economic costs of emergency response, evacuation, interdiction and clean-up could be between \$14 billion and \$24 billion. A severe rail accident in a more dense urban area could cost over \$300 billion. All economic impacts over \$7 billion become the liability of the American taxpayer, under the Price-Anderson Act. The NRC must calculate and publish the full economic and health impacts from a severe accident in both urban and rural settings for all the projected transport routes. Full health impacts would include not only latent cancer fatalities, but non-fatal cancers, birth defects, genetic damage, lowered immunity, and other diseases. Twenty-five transport accidents with fully loaded casks bound for Skull Valley can be expected - many of them minor, but perhaps some severe.

Despite these risks, the NRC has not held a single public hearing outside of Utah on this DEIS. NRC should hold public hearings in all the transport corridor states through which waste could be shipped from commercial reactors to the proposed ISFSI.

All of the risks posed by this massive shipping and dumping of nuclear waste are unnecessary. There is no environmental or public health reason for moving irradiated fuel away from the reactors that generated it to a centralized site. Nuclear utilities are trying to solve their public relations problems at the expense of public health.

Respectfully Submitted,



Bill Magavern  
Sacramento Director  
Committee to Bridge the Gap