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Subject: Box-Elder Spent Fuel Storage Initiative, or
Pigeon Spur Fuel Storage Facility (PSFSF)
Nuclear Regulatory Commission docket No. 72-23

In response to the Draft Environmental Impact Statement (EIS) NUREG-1714 for NRC Docket No. 71-22 Private Fuel Storage (PFS), L.L.C, for intermediate spent nuclear fuel (SNF) storage on the Skull Valley Band of Goshute Indian Reservation in Tooele County, Utah, the EIS is deficient. In APPENDIX F - Site Selection valuation forms in the EIS - it fails to compare the Box Elder Fuel Storage Alternative, NRC Docket No 72-23, also named the Pigeon Spur Fuel Storage Alternative - NRC Docket No. 72-23. The Pigeon Spur site has significant advantages over the PFS site including but not limited to the following:

1. The Pigeon Spur site contains an operating RR siding of the main line of the Southern Pacific RR Continental line. The site also has the berm for a prior spur which entered into the property, where track can be reinstalled for a reasonable cost. In comparison, PFS is 32 miles from the nearest RR line, which is an E-W, UP RR main line. (Note that the Southern Pacific RR was recently purchased by Union Pacific RR.) The point is that the Pigeon Spur RR siding will not involve either time delays or possible difficulties in being established.

2. The Union Pacific RR line from Wyoming to the Pigeon site traverses less than 1/10 of Utah's population by county. The RR route to Pigeon does not travel down the Wasatch Front. This compares to the UP RR line from Wyoming to the PFS site which traverses in excess of 2/3 of Utah's population by county. The Wyoming to PFS RR transport route requires traversing down the Wasatch Front from Ogden to Salt Lake City, then going west through metropolitan West Valley out towards Tooele. The RR route to PFS is through Utah's main area of population.

3. The Pigeon Spur site is in an area of unrestricted public air space. In fact, Pigeon Spur is only a few miles from a public aviation navigating VorTac. Pigeon Spur is about 30 miles northwest of a corner of the boundary of the Wendover Bombing and Gunnery Training Range. The Pigeon Spur site is separated from the Training Range by the twenty mile long Newfoundland mountain range. Going east from the site for 25 miles, the Southern Pacific RR track passes by the north end of the Newfoundland mountain range, then proceeds east another

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25 miles to Lakeside, along here the RR track goes somewhat parallel within three miles of the north boundary of the Wendover Training Range. The Wendover Training Range and Dugway Proving Grounds and Test Center areas are used by Hill Air Force Base to hone pilot's skills. Corridors between the adjacent mountain ranges are used by Hill aircraft to enter the ranges for flight training. The PFS site is less than 10 miles from the Dugway Proving Grounds and is apparently in a flight corridor. Pigeon is out almost 30 miles and is not in a military flight corridor.

4. Seismic activity in western Utah is basically associated with the Wasatch Fault. The Pigeon site is 100 miles west of the Wasatch Fault. The Pigeon site is 26 miles west of the nearest recorded seismic activity of 11,000 events recorded in the Utah and Nevada area. Pigeon Spur is in a region classified as seismic zone 2. In comparison the PFS site is on a known seismic fault and in a region classified as seismic zone 3.

5. The Box-Elder County Commission has said that Western Box-Elder County, Utah, is possibly the most desolately populated region of the nation and would be ideal for locating a SNF storage site. In five thousand square miles there are only about 150 families and their numbers are declining since their principal occupation is cattle range ranching, the economics of which is forcing the residents to leave to find employment elsewhere. See the Map Case and 1997 newspaper articles previously furnished to NRC. Records show that no one lives in the one hundred (100) square miles centered around the Pigeon site. In the 1,000 square miles centered around the site the last population census showed about a dozen residents. The closest significant population is about a dozen families living at Grouse Creek, 30 miles north. Next closest is Park Valley about 50 miles to the northeast, having about two dozen families.

6. By contrast, Skull Valley, though sparsely populated now, is near Tooele, one of the fastest growing cities in the nation. In 40 years significant Tooele area population growth will expand the short distance west into Skull Valley. There are already workers at a nearby laboratory and native American residents live only a few miles from the PFS site. There is a significant amount of ground water available in Skull Valley. It is conceivable that water can be piped into Skull Valley from the Wasatch mountains east. With these sources there is water available to support a growing population in Skull Valley. In comparison water is in great shortage in western Box-Elder County. The Pigeon project of storage of SNF is ideal for western Box-Elder County which would need very little water to support the facility.

7. Construction work at Pigeon Spur is not likely to encounter historical items or artifacts.

8. The project at Pigeon Spur will not exploit any minority.

9. The residents of western Box-Elder county are hardworking cattle ranchers. They want an employment opportunity. See the newspaper articles with the furnished map case. We have met with them in town meetings and have shown the project and discussed work possibilities. They declined a five million dollar per year perk to their community like the U.S. Government has offered Caliente, Nevada, for a train to truck SNF transfer site. They countered saying that they agreed that help of \$1M per year benefit would be very acceptable. What they really want are jobs. These western ranchers are well educated and have good practical skills. They are already experienced or can be easily trained to operate the heavy machinery required for building the Pigeon storage facility and then to operate and maintain the site. The residents have relatives and friends who have lived there who would move back if employment were there. In a petition one hundred twenty two (122) people signed for acceptance of the PSFSF project while

only two (2) signed in opposition.

10. The Pigeon Spur project can be done more economically, in terms of railroad access (there is no need to ask the government to build a 32 mile RR spur), in terms of site construction, and in terms of operation.

11. Proprietary SNF storage technologies have been developed for the railroad gear and canister transfers for the SNF storage. On October 19, 1998, a license application was submitted for the Pigeon Spur facility. The license application in NRC Docket No. 72-23 will be perfected.

12. PSFSF will offer an electric utility location on site "dry pool" storage alternative.

13. The PSFSF will have its storage field operations computer programmed, remotely controlled and have Internet type accessible storage records of daily convection air temperature, monthly cask radiation mapping, and semi-annual canister internal inert gas pressure. The site operation of the PSFSF will invoke public confidence and acceptance.

14. SNF contains 92% U238. At some point in time it will be cost effective to process the SNF and use it for fuel rather than to continue its storage. PSFSF will be prepared to participate in future reprocessing of SNF.

15. When reprocessing of SNF is eventually started, the Pigeon Spur central western location will offer shorter transportation routes with less mileage in heavily populated areas.

Pigeon Spur wants to do storage of spent nuclear fuel and petitions to do so. In the EIS the advantages of the Pigeon Spur site must be considered. A form FUEL STORAGE SITE PROPOSAL INITIAL SCREENING for the Pigeon Spur Fuel Storage Facility is included with this letter. For support of this request letter we submit the information contained in our documents of our licence application dated October 19, 1998. It will amplify the above and show additional advantages. In other words the text of this request includes our text of six volumes of the Docket No. 72-23 license application of October 19, 1998, which includes:

- LICENSE APPLICATION
- ENVIRONMENTAL REPORT
- SAFETY ANALYSIS REPORT
- EMERGENCY PLAN
- SAFEGUARDS (controlled document)
- REFERENCE INFORMATION BOOK

We herewith petition for consideration of the PSFSF at Pigeon Spur per 40 CFR 1502.14(b). Dated this seventh (7th) day of September, 2000.

Sincerely yours,



William D. (Bill) Peterson, M.S., P.E.
Pigeon Spur Fuel Storage Facility, P&A Engineers

Enclosures are listed above.

Screening Form GS829

Books sent separately

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FUEL STORAGE SITE PROPOSAL INITIAL SCREENING
PIGEON SPUR FUEL STORAGE FACILITY (PSFSF)
BOX ELDER COUNTY, UTAH

TRANSPORTATION

Within 25 miles of mainline railroad? Yes
Railroad on site? Yes
Site Access to one or more highways? Yes

SEISMIC

At least two miles from capable fault? Yes
At least five miles from capable fault, no faults on site? Yes
Ground accelerations 0.5g or less and within existing vendor design criteria? Yes

FLOODING

Above 100 year return frequency flood per USGS? Yes
Above 300 year return frequency flood per USGS? Yes

HOST

Has sovereign immunity? Unknown
Does not require Federal Land transfer? Yes
Is a tribe or community of less than 4000 population? Yes
Is a tribe or community of less than 500 population? Yes
Is providing a site for lease or at a reasonable cost within jurisdiction? Yes
Is providing a site with at least two 150-acre locations within a 5000-acre area? Yes
Is providing a site with a population density below 25/square mile within 2 miles of the site? Yes
Is providing a site free of known historical sites, major recreational areas and endangered species? Yes

PUBLIC ACCEPTANCE

Is in an area free of history of pro-active *antinuclear referenda? Yes
Has a vote of host population on record in support of the facility? Yes
Has a resolution of the governing body on record in favor of the facility? Unknown

ANY UNIQUE FINDINGS

No significant impact upon current US Airforce (Hill Airforce Base) aircraft operations in area. Site is about 30 miles NW distant from the Wendover Bombing and Gunnery Training Range boundary. Population within a five mile radius is zero. The 1,000 square miles centered by the site (18 mi R) has a population of around 12 people. Site location is in seismic zone 2, is 26 miles from nearest recorded activity of 11,000 events in this Utah and Nevada area where most seismic is attributed to the Wasatch fault. Site is immediately adjacent to the main line of the Southern Pacific Continental railroad. The RR route using Pigeon Spur avoids Utah's main population along the Wasatch Front. The Pigeon Spur project has been shown for the past five years at the county fair. In the two towns closest to the site, in town meetings western Box-Elder County residents have expressed that the majority of the population wants and needs the project and work opportunity. Pigeon Spur has better storage technologies which are proprietary to Pigeon Spur. Pigeon Spur has advantages over PFS - NRC Docket No. 72-22 which must be considered in the advancement of the PFS EIS. Pigeon Spur has a submitted license application. NRC Docket No. 72-23 will be perfected.

REASONS FOR REJECTION

Under negotiation