



GLOBAL RESOURCE ACTION CENTER FOR THE ENVIRONMENT

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

September 20, 2000

Dear Mr. Meyer:

On behalf of GRACE (The Global Resource Action Center for the Environment), I am writing to express our opinion regarding the "Private Fuel Storage" (PFS) proposal. The 200 rail casks per year carrying nuclear material shipped through dozens of states, would be dumped on the reservation land of the small, impoverished Skull Valley Band of Goshute Indians west of Salt Lake City) starting in 2003.

We request that the Nuclear Regulatory Commission (NRC) extend the Draft Environmental Impact Statement (DEIS) public comment deadline at least 60 days, to allow for an adequate response period. In addition, we believe that holding only three hearings in Utah does not fairly represent public opinion from the dozens of States that would be affected as transport corridors for shipments of huge amounts of high-level nuclear waste. Therefore, we request that the NRC hold public hearings in all the transport corridor States that would be affected by PFS member company shipments.

One severe rail cask accident could cause over one hundred cancer deaths and cost tens or hundreds of billions of dollars to clean up. NRC's DEIS does not describe the potential environmental and economic impacts of rail accidents bound for PFS. The government's "RADTRAN 5" model enabled Dr. Marvin Resnikoff of Radioactive Waste Management Associates to discover that an accident releasing only a fraction of the radioactive contents of a cask, would result in 115 cancer fatalities to exposed individuals. He also calculated that the economic costs of emergency response, evacuation, interdiction and clean up (which is often not possible at all) would be between \$14 billion and \$24 billion. The same model reveals that a severe rail accident in a more dense urban area could lead to over \$300 billion in economic costs. All economic impacts over \$7 billion become the liability of the American taxpayer, under the Price-Anderson Act. We ask that the NRC calculate and publish the full potential economic and health impacts (including non-fatal cancers, birth defects, genetic damage, lowered immunity, and other diseases) from accidents in both rural and urban areas for all projected transport routes.

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(SCF)

NRC's DEIS does not adequately identify the routine (even without any accidents) doses of radiation to the public from the transport casks. The DEIS should be amended to include this important information.

The DEIS also fails to address the possibility that this "interim storage site" could become a permanent open-air dump for high-level nuclear waste. Forty years is a questionable length of time for the PFS and NRC to call the proposed site "interim." The NRC made a promise to the people of Nevada that it would not license Yucca Mountain until due process and scientific soundness were completely achieved and confirmed by a rigorous licensing regimen. However, the DEIS names Yucca Mountain as the permanent dump as if the decision has already been made. This is an outright betrayal to Nevada citizens of the NRC's promise regarding the mountain. Even if NRC licenses Yucca Mountain, its 63,000 metric ton capacity for commercial high-level waste cannot contain the 86,000 tons that are projected to exist in the U.S. by 2030. Excess waste might as well remain in Utah, out in the open because there is no safe storage area available.

Our organization and many others believe that PFS is environmental racism. The attempt to dump atomic wastes on Native American lands is racist against a poor minority community. In fact, dump opponent and tribal member Sammy Black Bear is aware that tribal council chairman Leon Bear signed the lease agreement with PFS without the agreement of a majority of the tribal membership. Chairman Bear is now using PFS money to bribe additional tribal members to sign onto the lease agreement. Sammy Black Bear is the lead plaintiff for a lawsuit against the Bureau of Indian Affairs regarding the lease agreement between the tribal council and PFS despite the lack of proper majority approval within the tribe.

Genocidal treatment of the Goshutes by white settlers has been ongoing for centuries. Native American tribes are consistently targeted for high-level nuclear waste dumps. Despite lease payments to the tribal council, it is shocking for the NRC to claim that dumping an enormous stockpile of high-level wastes on this reservation does not impact on environmental justice. Keith Lewis, Serpent River First Nation environmentalist has said, in referring to the toxic destruction of his Ontario reservation due to 50 years of uranium mining, "There is nothing moral about tempting a starving man with money." Utah residents have also already suffered for decades as a result of nuclear weapons tests in Nevada.

Finally, the DEIS does not report the cumulative impacts of adding a high-level nuclear waste dump to Skull Valley, which is already home to numerous toxic facilities. The Goshutes who occupy a fraction of their original vast territory are already surrounded by a U.S. Army nerve gas and chemical weapons incinerator, the Envirocare "low level" radioactive waste dump, U.S. military biological weapons proving ground and bombing range, and a magnesium factory whose hydrochloric acid emissions make it one of the single worst air polluters in the country. We request that the cumulative impacts of adding more toxins to this area be more closely examined.

Thank you for your consideration of these recommendations. We look forward to an extended comment period, a wider range of public hearings, and the re-working of the DEIS.

Sincerely,



Alice Slater
President