



# Arizona Safe Energy Coalition

5349 West Bar X Street, Tucson, AZ, 85713  
Phone: (520) 908-9269 Fax: (520) 908-9273

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June 23, 2006  
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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, DC 20555-0001

Dear Mr. Meyer:

We are strongly opposed to the Nuclear Utilities' "Private Fuel Storage" plan that would create a High-Level Radioactive Waste Dump on a Goshute Indian Reservation in Utah, and which would also expose thousands of people in dozens of states along transportation routes.

Even though termed an "Interim Storage Site", the chances are overwhelming that the site could evolve into a permanent dump for high-level radioactive waste. If, in fact, it truly IS an interim site, then the transport of this deadly refuse to the ultimate site would further expose the public all over again. It makes NO sense to move the waste to a temporary site, just to move it again. Provision is already made for dry cask storage ON SITE (where generated), reducing the risks to thousands of persons en route, and also at the chosen new temporary dump site.

We believe it is irresponsible public policy to bribe a destitute Native American tribe to receive the lethal waste that other knowledgeable communities refuse to touch. Native American communities have already borne more than their fair share of the toxic legacy of the nuclear age in areas where uranium mining was conducted without proper protection of workers. It violates common decency as well as President Clinton's Executive Order 12898 requiring measures to protect against environmental injustice among minority groups. For the NRC to claim that the PFS has no environmental justice impacts is outrageous rhetorical blather.

There are many issues that the DEIS DOES NOT cover, each of which is greatly important, and must be addressed before serious consideration is given to this flawed proposal. The synergistic effect of this dump with impacts of surrounding toxic facilities must be considered. The DEIS does not reveal the potential adverse health impact and enormous cost for cleanup for a severe rail cask accident, or even the doses of radiation to the public during actual transit through local communities (without an accident).

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The NRC must hold public hearings in communities along the transportation corridors where shipments of high level radioactive waste would occur (whether PFS member utilities, or others which would be shipping waste). The general public has no awareness of the hazards of this plan. The government is presently receiving strong public criticism of secret exposures of radiation to workers in the 40's and 50's during the nuclear weapons buildup. Now the government is considering a similar scheme to knowingly expose thousands of people to radiation, UNNECESSARILY, to appease utilities that have the muscle to lobby Congress for this favor. The public MUST be informed.

Our group heard only a few days ago about the opportunity to comment on this proposal. We are distressed that the public has such little access to this information. We strongly urge that the comment period be extended so others have a chance to understand the enormous risks and the negligible benefits. We suggest that an extension of 9 months would be fair.

In summary, we strongly oppose the shipment of ANY high level radioactive waste from any reactor site until a proven, safe permanent disposal site be approved. Temporary dry cask storage on site would be far better than shipping this deadly material (in unproven shipping casks) to a temporary site ANYWHERE.

The nuclear industry should read the writing on the wall, and stop generating radioactive waste as soon as possible. There is no future to nuclear-generated electricity. Continuing to use these reactors creates unacceptable burdens for our grandchildren and their grandchildren to have to deal with....without ANY benefits.

Sincerely,



Betty Schroeder, Chair

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