

From: Crispin B. Hollinshead <chollins@igpp.ucsd.edu>
 To: <nrcprep@nrc.gov>
 Date: Mon, Sep 11, 2000 12:31 PM
 Subject: Draft Report Comments: NUREG-1714

65 FR 39206
 June 23, 2000
 (121)

Below is the result of your feedback form. It was submitted by
 Crispin B. Hollinshead (chollins@igpp.ucsd.edu) on Monday, September 11, 2000 at 12:30:32

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

I am disappointed that the government is still trying to avoid the nuclear waste problem by short sighted, morally bankrupt actions such as the Public Fuel Storage plan for Utah. Not only are we creating unknown environmental hazards for the entire country, but we are continuing our despicable record of destroying Native Americans. This plan is driven by a need to bail out the nuclear industry, with no regard for the larger population of the US. Nuclear power is a financial and environmental disaster, yet no one in government wants to admit that, so we keep trying to hide our dirty little problem.

If you are honest, and not just a company dupe, you should do the following as a bare minimum.

1. NRC should hold public hearings in all the transport corridor States that would be impacted by PFS member company shipments. NRC plans none.
2. NRC should hold public hearings in all the transport corridor States that would be impacted by NON-member utilities which would nonetheless ship high-level waste to PFS. NRC plans none.
3. NRC should extend the Draft Environmental Impact Statement (DEIS) public comment deadline at least 180 days.
4. A single severe rail cask accident could cause 115 latent cancer fatalities and cost tens or hundreds of billions of dollars to clean up. NRC's DEIS is severely deficient in not publishing such impacts.
5. NRC's DEIS fails to calculate the ADDED risks from PFS's proposal to ship contaminated casks back across the entire country to the reactors of origin without first dealing with the leaks.
6. NRC's DEIS does not adequately identify the 'routine' (even if there

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are no accidents) doses to the public from these transport casks (mobile x-ray machines that cannot be turned off) rolling down the railroad tracks through American communities.

7. NRC's DEIS fails to deal with the possibility that this 'interim storage site' could become a de facto permanent open air dump for high-level nuclear waste.

8. There is no need for NRC to license an away-from reactor dry cask storage facility, when it already licenses at-reactor facilities using the exact same technology. To ship the wastes to Utah simply adds the risks of transportation, while doing nothing to improve protection of public health, safety, and the environment.

9. NRC's statement in the DEIS that PFS has no environmental justice impacts is absurd. The repeated attempts to dump forever deadly high-level atomic wastes on Native American lands is environmental racism, pure and simple.

10. The DEIS does not address the cumulative impacts of adding a high-level nuclear waste dump to Skull Valley, which is already surrounded by numerous toxic facilities.

I have no expectation that you will take this advice, but I want to go on record as opposed to this insane proposal being forced on the people of Utah.

Sincerely,

Crispin B. Hollinshead

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