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**Utah Farm Bureau Federation**

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**C. BOOTH WALLENTINE**

EXECUTIVE VICE PRESIDENT  
AND CHIEF ADMINISTRATIVE OFFICER

(801) 233-3000

May 21, 1998

Dr. Edward Shum  
Environmental Project Manager  
Spent Fuel Licensing Section, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**RE: Written Comments for Scoping Meeting Record for an EIS on the Proposed High Level Nuclear Waste Storage Facility at the Skull Valley Indian Reservation**

The Utah Farm Bureau Federation is an organization of more than 22,000 families in Utah, representing the large majority of farmers and ranchers in the state. Based on policies adopted by the House of Delegates of the American Farm Bureau Federation, we submit the following suggestions for consideration in the scoping process.

1. We recommend that producers and transporters of any nuclear waste whether high or low level, should be responsible for its safe transport and storage within the limits governed by county, state and federal regulations. Therefore, we support regulations on such facilities as adopted by the state of Utah.
2. The 1982 Nuclear Waste Repository Act establishes science-based procedures for the handling of nuclear waste. We urge strict adherence to preponderant scientific findings in any determination of safety and health issues surrounding this proposed site.
3. Water supplies, both surface and ground water, are potential targets for any adverse impacts that an EIS may identify for this facility. Agriculture in Utah is highly dependent upon ground water. Careful study should be given to any underground water resources that may be isolated to the proposed site, or which may migrate through underground aquifers or channels through the proposed area.
4. If the EIS finds **any** adverse impact on the economic well-being of agriculture in any area of the state or adjacent states as a result of this proposed facility, the owners of the facility should be legally required to provide full compensation for any losses incurred by agriculture.
5. We are opposed to the use of recycled nuclear BRC (below regulatory concern) waste products in any materials used in processing, producing or packaging of any product not reused by the nuclear industry itself. We are unclear as to whether the proposed site could lend itself to any

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such use of nuclear materials either with present or potential future technology.

6. We oppose the processing, reprocessing, and the production of mixed-oxide (MOX) nuclear fuel in areas where there is possibility or risk of pollution and contamination of agricultural lands, air and ground water.

By this letter, we request that we receive copies of any preliminary findings as well as the final EIS on this proposed facility. These documents and information will allow us to develop further policy regarding the agriculture issues surrounding this proposed facility.

Thank you for the opportunity to comment for the scoping meeting record.

Sincerely,

A handwritten signature in black ink that reads "C. Booth Wallentine". The signature is written in a cursive style with a large, stylized initial "C".

C. Booth Wallentine  
Executive Vice President  
and Chief Administrative Officer