

**Public Citizen Critical Mass Energy Project
Nuclear Information & Resource Service
Nuclear Energy Information Service
Citizen Action Coalition of Indiana
Citizen Awareness Network**

Edward Y. Shum, Environmental Project Manager
Irradiated Fuel Licensing Section
Irradiated Fuel Project Office
Of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission, Rockville, Maryland
Washington DC 20555

June 19, 1998

Mr Shum:

The undersigned organizations, on behalf of our members throughout the United States request an extension in the opportunity to comment on the proposed Private Fuel Storage high-level nuclear waste storage at the Skull Valley Goshute site.

There is considerable evidence that this proposal is not in fact well enough defined for the NEPA process to be conducted in a meaningful, or defensible manner. We concur with those who are urging the Commission to table any Environmental Impact Statement process until there is a completed proposal and until any jurisdictional issues have been resolved.

In the event that this process proceeds, we respectfully ask an additional 60 days for scoping comments to enable citizens, businesses and State agencies in transportation corridor states between the reactor sites and the Skull Valley Goshute Nation, who will be affected by this major federal action, to participate in defining the scope and potential impacts of this licensing decision.

Our concerns span the overall policy concern of the justification for such a facility and the impact on our national nuclear waste policy, to the very detailed concerns that each and every community on the transportation routes to such a facility have.

The fact that our comments are not available in the time originally allowed is indicative of the size of the impact of this proposal. Organizations and agencies who are geographically close to the site were well aware of the announcement of a scoping period. The undersigned organizations are also directly affected, and our members are directly affected, but the initial comment period of 49 days was not sufficient for us to even become aware of the comment period until the last day. This precludes any participation by our members. It certainly excludes any possibility that other entities such as State agencies who have yet to hear about this notice will respond within a time that will be considered.

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Given the national impact of this decision, we urge you to delay this process until the proposal is complete and to make a comment period that will be inclusive of all affected parties, which the initial period was not.

Sincerely,

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