



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS OGDEN AIR LOGISTICS CENTER (AFMC)
HILL AIR FORCE BASE, UTAH**

12 June 1998

MEMORANDUM FOR Dr. Edward Y. Shum
Environmental Project Manager
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
MS06G22
Washington, D.C. 20555

FROM: OO- ALC/EM
7274 Wardleigh Road
Hill Air Force Base, UT 84056-5137

SUBJECT: Comments for consideration in the Environmental Impact Statement (EIS) for Private Fuel Storage's High Level Nuclear Waste Storage at Skull Valley Goshute Indian Reservation, Utah

1. The primary concern of Hill Air Force Base is airspace and training range impacts to the Utah Test and Training Range. We would expect to see this issue addressed in the EIS for Private Fuel Storage's High Level Nuclear Waste Storage at the Skull Valley Goshute Indian Reservation, Utah.
2. Currently low level flights run through Skull Valley to access the Utah Test and Training Range which is located 10 miles to the west of Skull Valley. Both 388th and 419th Fighter Wing's F-16 aircraft fly low (500 feet to 2000 feet above ground level) and medium level flights (5000 feet to 25,000 feet above ground level) in the Sevier B Military Operating Area (which includes the Skull Valley Goshute Indian Reservation). Any over flight restrictions would hamper the training mission of the 388th and 419th Fighter Wings. Our concern is that the proposed nuclear storage site is located within a Military Operating Area Airspace.
3. The Utah Test and Training Range has the unique capability of handling Air Launched Cruise Missiles that impact 10 to 12 miles west of Skull Valley. This impact area is the only one in the world certified by the Department of Energy as a target area for test impacts for certain classes of weapons. This range was designed in 1979 for the use of handling large footprint weapons, which are any weapons traveling further than 15 miles to target. This includes Sea Launched Cruise Missiles launched from the California coast, which are sent via low level air routes to impact in the Utah Test and Training Range. Our concern is that the proposed nuclear storage site is too close to the large footprint weapons impact area.
4. There is a live fire target located on the Utah Test and Training Range 10 to 12 miles west of the Skull Valley Goshute Reservation proposed nuclear waste storage site. High Speed Anti-Radiation Missiles, Maverick Missiles, and other explosive weapons impact at this site. This

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target is a valuable training asset for US Air Force aircrews. Our concern is that the proposed nuclear storage site is too close to the weapons impact area.

5. We feel that an in-depth evaluation of the risks presented by the current military operations mentioned above must be addressed in the Environmental Impact Statement. Although the probability is extremely low, these risks include an aircraft accident or a stray or misguided weapon system.

6. Thank you for this opportunity to submit comments for consideration in the EIS for Private Fuel Storage's High Level Nuclear Waste Storage at Skull Valley Goshute Indian Reservation, Utah.

A handwritten signature in black ink, reading "E. Allan Dalpias" with a horizontal line extending to the right.

E. ALLAN DALPIAS
Director of Environmental Management