

June 2, 1998

United States Nuclear Regulatory Commission
Office of Nuclear Material and Safeguards
Washington D.C.

Subject:

Scoping Meeting to identify Significant Environmental Issues pertaining to a proposed independent Irradiated Fuel Storage Facility on the Reservation of the Skull Valley Band of Goshute Indians.

The Coalition 21 organization is a group of Idaho-based public-citizens with an interest in the subject issue. We appreciate the opportunity to comment, and herewith request that this statement, or any any other the Coalition directs to you about this issue, be included in in the hearing record for the NRC's and the public's consideration.

The Coalition is an all-volunteer group from a great variety of backgrounds. It's primary mission is to help ensure that the technologies needed to sustain an appropriate quality of life in America, including a clean environment and sufficient quantities of environmentally-benign affordable energy, are available to the citizens of the U.S. in the 21st century.

Our motto is "Supporting tomorrows technologies with facts, not fears!."

The Coalition is unequivocally and wholly in support of nuclear power and the electrical utilities which employ this technology to supply nearly one quarter of this nation's electrical energy. We therefore support any efforts to ensure that nuclear utilities are not hampered in storage of their irradiated fuel. Note that we do not refer to this valuable material as "spent" fuel. That misnamed term is not used in other nuclear-powered countries, who rationally recycle/reprocess their irradiated fuel. "Spent" is an erroneous designation perpetuated by purely political, not technical reasons, and we hope that is a short-term situation.

The Coalition notes that compared with the demonstrated environmental insults caused by hydroelectric power dams and burning carbonaceous fuels, nuclear power is clearly the most environmentally benign of the large-scale reliable, safe, practical sources of electrical energy that are available to modern society.

We truly support research and development and implementation of improving combustion efficiencies and likewise emphasis on employing "alternatives energy" technologies as energy sources where ever feasible. However it is clear to us these technologies will be insufficient to meet the energy requirements of the United States in the next century. Only nuclear energy can help deliver this world and this country from the appalling disasters that have already commenced attributable to global warming, as well as helping to meet the clean air standards for which the citizens of our cities have a right to have.

Of great concern to us is that neither the utilities, the government, or academia appear to be at all concerned that the 100+ nuclear plants that now provide 23% of the nation's electricity are at the midpoint of their service life, and there's no plans in hand to replace them, not even

with polluting fossil plants or environment-ravaging power dams!

This country is truly in danger from an impending energy shortage! Those who oppose nuclear power for alleged "environmental concerns" have not objectively studied the facts, and being uninformed, may be the unwitting disciples of the anti-nuclear propagandists.

It is a mystery to those of us in the Coalition (some of us have been volunteer environmental activists on natural resource issues for many years) how any real environmentalists can oppose nuclear power on environmental grounds. To us, it doesn't make sense!

To continue: The Coalition supports NRC Commissioner Nils Diaz perceptive views on nuclear energy, per his article published in the May issue of Nuclear News (pages 36-40). He pointed out that the same five dominant issues have been involved with the technology that pertains to nuclear power plants for many many years, namely: economics, closing the fuel cycle, how good/safe the technology is, public information - public/government support, and lastly, regulation of the electric power generation industry. Our interested is focused especially on the following three topics:

(a) On a section of the article devoted to "Closing the fuel cycle"(p.38), he commences with a cogent "Closing the fuel cycle is an issue of classic uncertainty, global in scope and political in nature." He subsequently quotes a letter from the NRC Chair expressing the NRC view that "an integrated high-level waste management system is needed for protection of public health and the environment. The elements of this system include centralized interim off-site storage, together with a transportation mechanism to tie the elements together."

Since the rest of the administration is not moving forward in a timely manner to provide interim irradiated fuel storage, Coalition 21 feels it is important for the NRC to help in accomplishing this public safety and environmental goal by doing a thorough and expeditious job on this Environmental Impact Statement (EIS).

The Coalition notes that a group of eminent and respected (for objectivity as well as achievement) scientists, namely "Scientists for Secure Waste Storage" has volunteered to help evaluate technical disputes for technically sound and expeditious resolution pertaining to such issues. The Coalition strongly recommends that this group be a major player in achieving such resolutions.

(b) On public information (p.39), Mr. Diaz states that the NRC should "...stand up for the truth, and object, firmly and categorically whenever misinformation on nuclear issues is placed in circulation. This is not a matter of being pro-nuclear, or anti-nuclear, it is a matter of being pro-public and pro-truth."

Coalition 21 feels the NRC should firmly adhere to this approach in addressing (in the EIS) the vast amount of misinformation that has already surfaced about this project. Remember, the Coalition motto "...Facts, NOT fear!"

We deplore, (more correctly, despise) those who deliberately misinform the public for their own purposes, whether such be the news media, politicians, so-called "nuclear watch dogs" (who are often making a career of being paid protesters), and "environmentalists" who focus primarily on nuclear-related issues and pay little attention to preservation/conservation of natural resources.

(c) On risk-informed regulation (p.40), Diaz states "Only a nuclear regulatory infrastructure permeated by risk information can improve effectiveness and efficiency...."

Coalition 21 believes that this principle should be applied to the extent practical in this EIS, both to compare this new risk to existing risks (from materials such as nerve gas storage etc.) and to show whether the new and existing risks have any impact on each other. We would remind NRC that they have an EIS review underway for a new dry DOE-proposed above-ground irradiated fuel storage facility (ISFSI) at the INEEL, a facility in which the Coalition also has an interest. To the extent that the two projects are technically and environmentally similar (desert environment, low population, etc.), NRC need not "reinvent the wheel."

Lastly, Coalition 21 would not want to this EIS delayed by having the NRC do a total environmental analysis of global warming. However, in appropriate places in the EIS document, the NRC should not hesitate to point out how important nuclear power must be in achieving the Kyoto accord, as well as achieving the overall objectives of the Comprehensive National Energy Strategy that is under review.

Summing up, whether it be the interim nuclear irradiated fuel storage facility championed by Senator Larry Craig, the courageous and timely overture to the Midwest nuclear facilities by the Skull Valley Band of the Goschute, or other such worthwhile ventures, the citizen's of this country, and its nuclear utilities must not be thwarted by those seeking to delay such needed ventures. Ignore those who stridently screech about risk where there are no risks of any consequence, and prophesy calamities where scientific and empirical experience prove there is no significant hazard. Dismiss those who talk of environmental concerns when the real concern is that the most environmentally-benign power source is not being encouraged, but thwarted by the ignorant, the deceitful, and the misinformation brokers, and the bias of journalists who insist on referring to engineered nuclear storage repositories with the pejorative word "dump."

We believe that the NRC will make the right assessments, stand up and be forthright in ignoring political influences, and make the timely and right choices for this country's citizens. Based on information received at today's hearing, the Coalition will provide more input on this issue.

For the Coalition 21,

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