

February 25, 2008

DOCKETED  
USNRC

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Ms or Mr. Secretary,

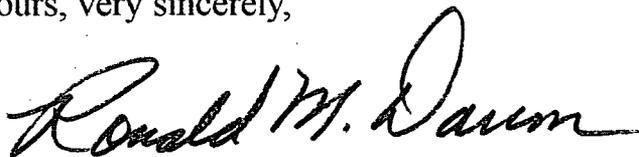
When I read the enclosed material, I felt outrage and despair.

Making it possible for Italy or any other country to send its nuclear waste to Utah or any other state in the Union, is preposterous. It's as preposterous as putting EnergySolutions' name on the Delta Center in Salt Lake City.

We might as well let Italy also send along its human waste and sewage leaving that country pristine. Let's volunteer Northern Utah to become a black hole. Those well organized and well funded terrorist groups that threaten us can stay home in the Middle East...we'll take care of our own death and destruction, thank you very much.

Please, I beg you, put a stop to this nonsense. Now - while you still have the authority to do so.

Yours, very sincerely,



A Citizen of the United States and Northern Utah

# Put proposal to dump nuclear waste in Utah

The proposal by EnergySolutions Inc. to accept nuclear waste from Italy has become, pardon the pun, a "hot" topic for Utah. The potential for this stroke of brilliance to have health and economic repercussions for many Utah citizens requires that every angle be thoroughly dissected in the public arena before permission is granted.

Beginning with Marie Curie, the scientific community and then government regulatory agencies have consistently underestimated the public health consequences of radioactivity exposure at every stage of evolution of the nuclear industry.

Thousands of Utahns became the victims of underestimating the toxicity of above-ground nuclear testing in



Brian Moench

Nevada. The environmental contamination of underground nuclear testing was also underestimated and it was allowed to continue until the early 1990s.

The toxicity that uranium miners were exposed to was underestimated and many died from malignancies. The mill tailings from the processing of uranium ore were initially thought to be benign, and for several years these

tailings were used as building material, incorporated into the cement poured in foundations. Eventually, the folly of this practice became clear and those buildings had to be closely monitored for high levels of radioactivity. Some had to be abandoned.

X-rays were once thought to be innocuous, which resulted in the public receiving countless X-rays without consideration of the possible consequences of repeated exposures. Remember, taking X-rays of the feet used to be part of buying a new pair of shoes.

Likewise, when nuclear power plants were first built, little thought was given to the problem of disposing of the radioactive waste because the

extent of the toxicity was not fully understood. Obviously we are paying now for that lack of understanding.

Because of this extensive history of tragic miscalculation, the public has every reason to be suspicious about whether practices at EnergySolutions' repository at Clive, the largest commercial nuclear waste dump in the country, and the federal regulations it must meet, adequately protect our health. The burden of proof should be on the nuclear industry to unequivocally demonstrate that the waste stored at EnergySolutions' disposal facility is harmless.

According to media reports in Europe, the disposal industry in Italy is so riddled with

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## Utah under microscope

corruption that it is routine for that country's waste to be much "hotter" than advertised. A highly regarded British medical journal, *The Lancet Oncology*, has detailed higher rates of many types of cancer among Italians living near illegal rubbish dumps owned and managed by the Italian Mafia. These dumps are stuffed with radioactive and toxic waste and have been leaking deadly gases for many years.

At a hearing last week, we learned the astonishing fact that EnergySolutions has no way of verifying the concentration of radioactivity within containers of waste from any source once they have arrived at its facility.

It requires only a modest

dose of skepticism to conclude that dumping Italian waste at EnergySolutions' disposal facility is a spectacularly high-risk venture that offers the public virtually no benefit and an incalculable risk.

When this same risk/benefit analysis was applied in the early 1980s to the MX mobile missile system, and to the Pentagon's "Divine Strake" test last year, the proposals were buried by courageous opposition from the public, religious organizations, and state and local governments.

Let's hope that same courage is brought to bear on the proposal to dump Italian nuclear waste in Utah.

> **BRIAN MOENCH** is president of *Utah Physicians for a Healthy Environment*.

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# OUR VIEW

Feb. 7, 2008

By The Tribune Editorial Board

## Speak now ...

### Or forever hold Italy's nuclear waste

**O**pposition is mounting against EnergySolutions Inc.'s proposal to import low-level radioactive waste from Italy's dismantled nuclear power industry.

The Utah Radiation Control Board and a key U.S. House committee chairman saddled up against the plan last week, joining a posse of nuclear-watchdog groups, the Healthy Environment Alliance of Utah and congressional leaders from Texas, Kentucky and Tennessee.

While the state control board, according to its lawyer, lacks the legal authority to derail the shipments to EnergySolutions' dump in Tooele County, it will ask the federal Nuclear Regulatory Commission to carefully assess our nation's long-term disposal needs before allowing large volumes of foreign waste to enter the country. The EnergySolutions facility at Clive will soon be the sole repository for waste from 36 states. And if company officials have their way, and the NRC sets a dangerous precedent by granting the high-volume import license, the facility may eventually serve much of Europe, where public outrage has prevented the development of even low-level disposal sites.

While the board is powerless to stop the plan, the Northwest Interstate Compact on Low-Level Radioactive Waste Management, which controls the flow of waste to the EnergySolutions disposal facility, apparently is not.

In a letter last week, U.S. Rep. Bart Gordon, D-Tenn., the House Science and Technology Committee chairman, reminded the compact that its 1998 decision to open the Tooele facility to waste generated outside the eight-state compact was made to serve "an important national purpose." And that while accepting waste from Europe serves EnergySolutions' purpose — to make money — it serves no purpose for the nation.

If the license were granted, Gordon wrote, "It would say to the world that the United States is open for business and will take the world's low-level radioactive waste until our facilities are filled, regardless of the needs of our country."

The congressman is correct. And that's not the message the United States and Utah should send.

Now it's time for our governor, our congressional delegation and our state House and Senate leaders to pressure the compact and the NRC to put a stop to EnergySolutions' plan.

You can do your part, too. The NRC is accepting public comment before ruling on the licensing request. If you're worried that Utah could become the world's radioactive waste dump if the plan is approved, and you should be, send your objections to Secretary, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555-0001, Attn: Rulemaking and Adjudication Staff.