

# PUBLIC SUBMISSION

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**Docket:** NRC-2016-0231

Waste Control Specialists LLC's Consolidated Interim Spent Fuel Storage Facility Project

**Comment On:** NRC-2016-0231-0005

Environmental Reviews: Waste Control Specialists, LLC; Consolidated Interim Spent Fuel Storage Facility Project

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RULES / REGULATIONS

## General Comment

Risk of De Facto Permanent Parking Lot Dumps:

What if so-called interim storage (for "only" 20-40 years, which is already a long time, in most people's books!) becomes much longer term, or even de facto permanent?

What if future replacements for today's U.S. Representatives from these adjacent congressional districts in NM and TX, decide enough is enough, and the high-level radioactive wastes need to move? Those one or two future U.S. Representatives from here, would then face the daunting challenge of overcoming the inertia, or even active opposition, of the other 433-434 Members of the U.S. House of Representatives, who might be just fine with the high-level radioactive wastes staying at WCS forevermore (it's not in their congressional district, after all!) - which is how long they remain hazardous by the way.

In 2008, under court order, the U.S. Environmental Protection Agency acknowledged that commercial irradiated nuclear fuel remains hazardous

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for a million years into the future. This is actually an underestimate. Take Iodine-129, as but one example. Its half-life is 15.7 million years.

It will remain hazardous for at least ten half-lives, or 157 million years. I-129 is in high-level radioactive waste, too.

A 2013 U.S. Senate bill - forerunner to current versions of the legislation in Congress - added to the risks of "interim" storage sites becoming de facto permanent parking lot dumps, by stating a preference for co-location of pilot interim storage alongside large-scale, non-priority interim storage, and even the permanent repository (that is, burial dump).

Also, the waiver of any connection or "linkage" between development of centralized interim storage and progress toward opening a repository only increases the risk that stored wastes will simply be allowed to remain in centralized, so-called "interim," surface facilities indefinitely into the future. In other words, they could become de facto permanent parking lot dumps.

U.S. Senator Jeff Bingaman (D-NM), Chairman of the Energy and Natural Resources Committee, warned against this de-linkage in 2012.

In fact, the requirement for a permanent disposal repository being opened and operating was, and still is, essential and foundational in the Nuclear Waste Policy Act, as Amended, the benchmark law on commercial irradiated nuclear fuel management.

This was, and still is, a safeguard against interim storage sites becoming de facto permanent surface "disposal," or parking lot dumps.

Note that linkage requires an operating repository, not just a licensed one, nor just a proposed one by someone, for someday, somewhere, some way. Remarkably, current DOE projections for the opening of a permanent burial dump are by 2048, 31 years from now, although they don't know who, where, or how!

2048 is 106 years after Enrico Fermi generated the first cupful of high-level radioactive waste of the Atomic Age, in his Chicago Pile-1 at the University of Chicago squash court under the football stadium, on Dec. 2, 1942 as part of the Manhattan Project race for the atomic bomb; 2048 is 99 years after the first civilian, or commercial, irradiated nuclear fuel was generated, at the Shippingport atomic reactor near Pittsburgh, PA. Such remarkable delays in high-level radioactive waste management and disposal are another red flag, warning about WCS's facility becoming a long-term, or even de facto permanent parking lot dump.

Thank you.