

WCS_CISFEISCEm Resource

From: Joel Masser <joelmasser@gmail.com>
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The government has a responsibility to protect people, property, and the environment. This includes protecting citizens from the actions of the government itself.

The probability of one accident in one location is small. But over time and distance, numerous shipments, and a large amount of waste, the probability is much greater. In fact, the Department of Energy expects accidents. With current technology, equipment, and infrastructure, accidents are inevitable.

The stakes are huge. Accidents at nuclear waste storage sites and transit accidents pose unacceptable risks to life, health, property, and the environment. For transporting waste over existing rail lines and highways, many millions of people live, work, and go to school within the 100-mile wide impact zone around transport routes. (The Department of Energy considers the impact zone to be 50 miles on either side of the transportation route.) Just in California, likely transport routes go through Los Angeles, Orange County, Sacramento, Fresno, Bakersfield, Riverside, and San Bernardino. This affects something over 80% of the state's population. Besides threatening the residents of the Central Valley, an incident there threatens the whole state's water supply, food supply, transportation network, and power grid. On top of all that, it is anticipated that waste will be transported by barge on the Pacific Ocean, which threatens the coastline and marine life including fisheries.

The dangers of transporting hazardous and explosive materials by train or truck are well-known. We have all read and heard about rail and highway accidents that turn into disasters because of the nature of the cargo. Our roads and rail lines are in notoriously poor condition.

Furthermore, current waste containers have not been proven able to withstand a collision without leaking. They have also not been proven to withstand radiation for an extended period of time without cracking and leaking. In addition, the containers are not fully shielded and continuously emit radiation while in transit on our roads and rail lines.

Regarding interim storage there are several major problems. Using interim storage would approximately double transport cost because the waste has to be moved first to the temporary site and then to the permanent site. It is anticipated that interim sites would have lower safety standards and precautions. Therefore the risks would more than double: Double loading, unloading, and transporting plus extra probability of accident and likelihood of higher contamination at an interim site. The whole idea of interim storage seems to me to be imprudent at best, but more candidly, irresponsible and reckless.

Regarding potential sites in West Texas and New Mexico, many local residents are opposed to a nuclear waste site in or near their communities.

Congress has not authorized interim storage or any storage sites in Texas. In approving a license application for interim storage in Texas or New Mexico, the NRC would be acting outside the law.

To address these serious issues, the following steps must be taken:

1. Before any licenses for interim, consolidated, or permanent repository storage are granted the problems of safe storage and safe transportation must be resolved. A program of research and development is a prerequisite. Much more information and proven technology are needed for safe storage and transport of waste. Meanwhile, safety at current temporary sites must be increased.
2. Granting storage licenses and transporting waste must not be undertaken until infrastructure and equipment including containers are proved safe by actual physical testing, including stress testing.
3. Before any licenses are granted, Congress must change current law to authorize the creation of radioactive waste sites that satisfy stringent safety standards.
4. When the technical problems of transporting and storing waste have been solved, siting must be in accordance with Executive Order 12898 ensuring environmental justice.

Thank you for considering my input.

Joel Masser

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