

WCS_CISFEISCEm Resource

From: Erica Stanojevic <ericast@gmail.com>
Sent: Thursday, March 16, 2017 4:26 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Interim Storage Facility in Andrews, Tx - Parking lot dump

Please don't risk the Oqallala Aquifer. We all need water.

Mobile Chernobyl shipping risks

Eunice, New Mexico (four miles from WCS, across the TX/NM border) has the dubious distinction that every single train car load of high-level radioactive waste will pass through on its way into (and, if it ever leaves, out of) WCS. But transport impacts, to import more than half the irradiated nuclear fuel in the U.S. into West Texas, will be felt nation-wide. In that sense, **when it comes to radioactive waste transportation, we all live in Eunice, NM.**

But a parking lot dump at WCS would only increase safety risks. It would not decrease them. It would multiply transport risks, as it would only be temporary (supposedly). All that highly radioactive waste would have to move again, to a permanent burial site (yet to be identified "that's a big IF!). And that could be back in the same direction from which it came in the first place!

WCS's assumption that the dump at Yucca Mountain, Nevada will open someday, to take the high-level radioactive waste away, is inappropriate. The vast majority of Nevadans has expressed its very adamant non-consent for 30 years now, and still vehemently oppose it. This is reflected by bipartisan resistance by elected officials, at both the state government level, as well as the congressional delegation level.

WCS's assumption that another permanent burial dump will be opened, by someone, somewhere, someday, somehow, is also inappropriate. After all, the search for a national geologic repository has gone on since the 1950s, but has failed. And DOE's current estimate for the opening of the U.S.'s first repository is 2048, 31 years from now. Except they have no idea where that will be. There is every likelihood that 2048 date will slip into the future as well.

The failed Private Fuel Storage, LLC parking lot dump targeted at the Skull Valley Goshutes Indian Reservation in Utah, likewise assumed the Yucca dump would open. They were, of course, incorrect.

So PFS's "Plan B" was to "return to sender." If 40,000 metric tons of irradiated nuclear fuel "the same amount targeted to go to WCS, isn't that curious?!" "what would that "return to sender" policy have looked like?

Maine Yankee was a PFS consortium member. More than 50 rail sized containers of irradiated nuclear fuel would have traveled 5,000 miles round trip, accomplishing absolutely nothing, other than exposing millions of people in numerous states to high-risk shipments.

Another version of this is the fact that permanent burial sites could be located right back in the same direction from which the waste came in the first place. In fact, at one time, DOE was targeting two sites in Maine, seven sites in Vermont, and two sites in New Hampshire, for permanent burial dumps. (See Beyond Nuclear's backgrounder, re: the NH targets, at: http://static1.1.sqspcdn.com/static/f/356082/24115710/1487366549330/New_Hampshire_dump_final+draft.pdf?token=ZDgyvKfq8uxG4HPqWmvVvXBuwmY%3D).

This game of high-risk, high-level radioactive waste musical chairs, or hot potato, on the roads, rails, and waterways, is unacceptable. It amounts to Radioactive Russian roulette. Multiplying transport risks for no good reason is wrong, and makes no sense.

The Nuclear Assurance Corporation's Quality Assurance (NAC QA) failures mentioned above are very significant to shipping risks. Shipping casks would be less capable of withstanding severe accidents (such as high-speed crashes, including into immovable objects, like bridge abutments; high-temperature, long-duration fires; deep, long-lasting underwater submersions; drops from tall heights, onto unyielding surfaces, such as bridge foundations; or some combination of all those), as well as intentional attacks (such as with shaped charges, or anti-tank weapon systems "see below) or other powerful explosions (such as explosive cargoes on passing trains, including, nowadays, crude oil "Bomb Trains," as from the Bakken oil fields in North Dakota).

Adding to these shipping risks, is the potential for barge shipments on surface waters. WCS is supposed to be "mostly rail" -- which can also mean many barges (26 reactors in the U.S. lack direct rail access, meaning barges on surface waters -- the Great Lakes, rivers, seacoasts -- could be used to haul the 100+ ton, rail-sized casks to the nearest rail head). Backgrounders (including more details on the high risks) on these various barge routes (including maps) were originally written for the Yucca dump scheme; however, WCS could just as well involve such barges.

DOE's Feb. 2002 Yucca Mountain Final Environmental Impact Statement gives a preview of barge shipments that could well be required to ship high-level radioactive waste to WCS, TX. The following barge shipment routes were proposed under the Yucca Mountain plan:

(See NIRS factsheets on barge shipments of deadly high-level radioactive waste on waterways, by state, posted online September 28, 2004):

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- MD - Chesapeake Bay
<<https://web.archive.org/web/20160331033728/http://www.nirs.org/factsheets/mbargefactsheet92804.pdf>>
-
- VA - James River
<<https://web.archive.org/web/20160331033736/http://www.nirs.org/factsheets/vabargefactsheet92804.pdf>>
-
- DE - Delaware Bay
<<https://web.archive.org/web/20160331032838/http://www.nirs.org/factsheets/debargefactsheet92804.pdf>>
-
- NJ, NY, CT - Waters Surrounding New York City
<<https://web.archive.org/web/20160331034044/http://www.nirs.org/factsheets/nybargefactsheet92804.pdf>>
-
- MA - Cape Cod Bay, Massachusetts Bay, and Boston Harbor
<<https://web.archive.org/web/20160331020332/http://www.nirs.org/factsheets/mabargefactsheet92804.pdf>>
-
- IL, MI, WI - Lake Michigan
<<https://web.archive.org/web/20160327081932/http://www.nirs.org/factsheets/mibargefactsheet92804.pdf>>
-
- LA, MS - Mississippi River
<<https://web.archive.org/web/20160331080128/http://www.nirs.org/factsheets/lamsbargefactsheet92804.pdf>>
-
- TN, AL - Tennessee River
<<https://web.archive.org/web/20160331063817/http://www.nirs.org/factsheets/tnalbargefactsheet92804.pdf>>
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- NE, KS, MO - Missouri River
<<https://web.archive.org/web/20160331020303/http://www.nirs.org/factsheets/nemoksbargefactsheet92804.pdf>>

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- CA - California Coast

<<https://web.archive.org/web/20160331030740/http://www.nirs.org/factsheets/cabargefactsheet92804.pdf>>

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- FL - Florida's Atlantic Coastline

<<https://web.archive.org/web/20160331035101/http://www.nirs.org/factsheets/flbargefactsheet92804.pdf>>

(However, with something as simple as a rushed NRC rubber-stamp amendment, WCS could apply for, and quickly get, permission to *truck* in smaller-sized, "Legal Weight Truck" (LWT) casks to WCS. This mix of trains/barges and trucks, would mean even more American communities would be exposed to Mobile Chernobyl risks.)

Dirty Bomb on Wheels [security risks would abound](#). This was made clear by the test of an anti-tank missile against an (empty) irradiated nuclear fuel shipping cask at the U.S. Army's Aberdeen Proving Ground in Maryland. The June 1998 test targeted a German CASTOR cask. While certified for storage-only in the U.S. (the cask model is deployed at Surry, VA), it is widely used for transport in Europe. CASTORs have thick die cast iron walls, as opposed to thin walled steel casks in the U.S. That is, CASTORs are significantly more robust, more capable to withstand such an attack. However, even the CASTOR, the Cadillac of shipping casks as some have called it, was severely breached by the anti-tank missile. A hole as big around as a grapefruit or softball was blown clean through the side wall. Had irradiated nuclear fuel been inside, the hole would have created the pathway for release of disastrous amounts of hazardous radioactivity – all the more so, if an incendiary attack were combined with the explosive attack. In short, shipping containers were not designed to withstand such attacks. See:

<<https://web.archive.org/web/20150908070611/http://www.nirs.org/factsheets/nirsfctshdrycaskvulnerable.pdf>>.

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 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.

Blessings,
Erica Stanojevic

Federal Register Notice: 81FR79531
Comment Number: 6254

Mail Envelope Properties

(CAGmK+R+MmAWKHPVFuD=bjoY14+pAkDq2DP1yKdBswGBBHBCpXA)

Subject: [External_Sender] Interim Storage Facility in Andrews, Tx - Parking lot dump
Sent Date: 3/16/2017 4:25:46 PM
Received Date: 3/16/2017 4:25:52 PM
From: Erica Stanojevic

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Files	Size	Date & Time
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