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

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Interim Storage Partners LLC's Consolidated Interim Spent Fuel Storage Facility

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General Comment

A parking lot dump at WCS would 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.