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**Docket:** NRC-2016-0231

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

**Comment On:** NRC-2016-0231-0220

Interim Storage Partners LLC's Consolidated Interim Storage Facility

**Document:** NRC-2016-0231-DRAFT-0250

Comment on FR Doc # 2018-22810

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## General Comment

Docket ID NRC-2016-0231.

Mobile Chernobyl Shipping Risks are right in my backyard.

Risks of Routine or Incident-Free Shipments Nonetheless Being Like Mobile X-ray Machines That Can't Be Turned Off, and Risks of Externally Contaminated Shipments;

Since a private centralized interim storage facility could easily become a de facto permanent parking lot dump, or could one day well be targeted not just for storage but also for permanent disposal (such a preference has been expressed in related legislation on Capitol Hill, that the pilot-, and full-scale, centralized interim storage site also be considered for permanent disposal), the following criteria must be met: scientific (geologic, hydrologic, etc.) site suitability; free, fully informed, consent-based siting; environmental justice, not just for current, but also for all future generations.

In addition, since consolidated interim storage would require unprecedented numbers of shipments (by road, rail, and/or waterway) of highly radioactive irradiated nuclear fuel, through many to most states, such "Mobile Chernobyl" risks must be minimized. (See, for example, projected nationwide shipping routes to Yucca Mountain, Nevada, which has been targeted for governmental (DOE) centralized interim storage in the past, and is still targeted for permanent disposal; see also projected cross-country shipping routes to the PI Waste Control Specialists, LLC facility in Andrews County, West Texas, targeted for centralized interim storage.) Long-distance shipments should only happen once, to suitable, consent-based, environmentally just

permanent disposal, not to a supposedly interim storage site, from which the wastes will have to move again, multiplying transport risks. Consent should be required for transport corridor communities for such shipments, and transport container safety and security should be guaranteed, requiring significant upgrades to current shipping container integrity standards.