## **WCS\_CISFEISCEm Resource**

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**To:** WCS\_CISFEIS Resource

Subject:[External\_Sender] Docket ID NRC-2016-0231-0220Attachments:MRT letter to the editor Nov 30 2018.pdf; ATT00001.txt

To whom it may concern,

The following letter to the editor was sent to the Midland, Texas newspaper last Friday. The letter is regarding the topic of nuclear waste disposal in West Texas and contains important factual data that has not been previously disclosed.

Sincerely,

Sean McDaniel

Federal Register Notice: 83FR44922 Comment Number: 27454

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To the editor of the Midland Reporter Telegram,

When I saw Wednesday's front page story discussing the upcoming rebuttal from WCS of the arguments against storing high level nuclear waste in West Texas, it piqued my interest. Nuclear energy has been used worldwide for many decades. In fact, growing up in Denver, Colorado, my father worked for Cyprus Minerals and was responsible for the uranium mine outside Canon City. I grew up a fan of nuclear energy. The question I asked myself when the WCS rebuttal was queued up on Wednesday was simple: is there a guidebook - call it a "best practices manual" - on how to locate, build, and operate a nuclear storage facility that isn't adjacent to a nuclear power plant? The answer to that question is a resounding YES. In September, 2007 the International Atomic Energy Agency ("IAEA"), which was set up in 1957 by the United Nations, published a report titled "Selection of Away-from-Reactor Facilities for Spent Fuel Storage - A Guidebook." The guidebook discusses regulatory, environmental, and technical recommendations, and also provides recommendations regarding facility locations. Section 3.2.2 - titled Location and infrastructure, states – and I quote – "The AFR implementing organization would also be advised to avoid land with exploitable mineral and energy resources, land adjacent to airports, toxic chemical facilities, facilities manufacturing or using explosives, and refineries" (emphasis added). The IAEA is the world's central intergovernmental forum for scientific and technical co-operation in the nuclear field. It has provided a guidebook, call them best-practices, for establishment of an AFR facility for storage of spent fuel. And the IAEA guidebook clearly states that it's not a good idea to locate a facility near exploitable minerals and energy sources. So why are we even having a discussion about placing a storage facility anywhere in or near the Greater Permian Basin?

Thank you,

Sean McDaniel

PS – if any readers would like to see the guidebook for themselves, the link is: <a href="https://www-pub.iaea.org/books/IAEABooks/7510/Selection-of-Away-from-Reactor-Facilities-for-Spent-Fuel-Storage">https://www-pub.iaea.org/books/IAEABooks/7510/Selection-of-Away-from-Reactor-Facilities-for-Spent-Fuel-Storage</a>. Section 3.2.2 starts on page 23.

