

From: Kevin Kamps <kevin@beyondnuclear.org>
Sent: Friday, October 23, 2020 4:28 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Beyond Nuclear's 20th set of public comments, re: Docket ID NRC-2016-0231, and report number NUREG-2239, NRC's ISP/WCS CISF DEIS, re: Stringent Criteria for a Highly Radioactive Waste Geologic Repository; 1,000+ organizations opposed ...

Dear NRC Staff,

We submit these comments on behalf of our members and supporters, not only in New Mexico and Texas, near the targeted ISP/WCS CISF site, but across both of these states, and the rest of the country, along road, rail, and waterway routes that would be used for high risk, highly radioactive waste shipments to ISP/WCS's CISF, as well as to Yucca Mountain, Nevada, on Western Shoshone land -- wrongly and illegally assumed by ISP/WCS, as well as by NRC, to someday (or some decade, or some century) become a permanent disposal repository. This unnecessarily repeated, multiple legged, cross-continental transport of highly radioactive waste, is another significant aspect of the EJ (Environmental Justice) burden associated with this ISP/WCS CISF scheme.

The following subject matter has gotten little to no attention in NRC's ISP/WCS CISF DEIS, a far cry from NEPA's legally binding "hard look" requirement:

Stringent Criteria for a Highly Radioactive Waste Geologic Repository; 1,000+ organizations opposed to the Yucca dump targeted at Western Shoshone land in NV

Please take into consideration the list of "Stringent Criteria for a Highly Radioactive Waste Geologic Repository," which I prepared several months ago, below. In order to legitimately open a safe, sound, publicly accepted permanent geologic repository, one that is protective of health, safety, and the environment, DOE (actually, NOT DOE -- its replacement -- see just below) will need to identify a location that meets all of these stringent criteria, and, as mentioned at the end, perhaps others yet to be identified.

Actually, not DOE -- but a replacement agency or institution. For, just as consent-based siting was listed as a top final recommendation by the Blue Ribbon Commission on America's Nuclear Future Final Report in Jan., 2012, so too was replacement of DOE in this role, as DOE has garnered so much public distrust over these and related matters, that the damage to trust is permanent and irreparable, and DOE must be replaced. (Of course, much the same could be said of NRC, as well.)

I provide this listing, as promised in earlier comments I've submitted in this proceeding, in order to show that the proposed Yucca Mountain, Nevada dump-site violates many, to most, to all of these criteria. But not only should Yucca Mountain be removed from any further consideration for a permanent dump-site, it will be removed. Why? Because the Western Bands of the Shoshone Nation of Indians, the State of Nevada, and more than a thousand environmental, environmental justice, social justice, and public interest organizations, representing many millions of American members, demand it, just as they have for 33 years and counting, ever since passage of the infamous "Screw Nevada" Act of 1987, the Nuclear Waste Policy

Amendments Act of 1987, which singled out Yucca Mountain as the only site in the country for further consideration as a permanent repository. Beneath the following "Stringent Criteria" listing, I have also included a partial listing of the 1,000-group+ environmental, justice, and public interest coalition, representing every state, that is adamantly opposed to the Yucca dump.

Thus, for all of these reasons, ISP/WCS's and NRC's assumption that Yucca Mountain will someday become a permanent repository, is bogus, illegal, erroneous, wrong, unacceptable, and improper. Neither ISP/WCS nor NRC can justify calling this proposed CISF "temporary" or "interim." If it is licensed, constructed, and operated, it will certainly become very long-term surface storage, likely indefinite, and perhaps even *de facto* permanent -- a surface storage/disposal parking lot dump.

Citations (linked immediately below; reproduced in full, further below):

[Stringent Criteria for a Highly Radioactive Waste Geologic Repository](http://www.beyondnuclear.org/repositories/2020/5/26/stringent-criteria-for-a-highly-radioactive-waste-geologic-r.html)

<<http://www.beyondnuclear.org/repositories/2020/5/26/stringent-criteria-for-a-highly-radioactive-waste-geologic-r.html>>;

[1,000+ organizations opposed to the Yucca Mountain dump targeted at Western Shoshone Land in Nevada](http://archives.nirs.us/radwaste/yucca/yuccaopponentslist.htm)

<<http://archives.nirs.us/radwaste/yucca/yuccaopponentslist.htm>>

[a partial listing -- the resistance has expanded since 2002].

Of course, transporting high-risk, high-level radioactive waste once, instead of multiple times, makes good sense. Thus, CISFs make no sense. Irradiated nuclear fuel should be transported only once, from the nuclear power plant sites where it is currently located, to a permanent repository. But that permanent repository must meet all of the stringent criteria listed above. Yucca Mountain cannot do so. Therefore, Holtec and NRC should stop illegally and improperly assuming it will do so. If Holtec and NRC refuse to stop, then Yucca dump opponents -- the Western Shoshone, the State of Nevada, and more than a thousand environmental and public interest groups, representing many millions of people -- will see to it that Holtec and NRC are stopped, just as the adamant resistance to the Yucca dump has stood strong for 33 years, and counting.

So, for the irradiated nuclear fuel that already exists, geologic isolation, at a site meeting all the stringent criteria above, is the preferred alternative to Holtec's CISF in NM.

For the irradiated nuclear fuel that does not already exist, the preferred alternative to Holtec's CISF in NM, is to not generate it in the first place. Dangerously age-degraded reactors should be shut ASAP for safety's sake alone. Proposed new reactors should be cancelled, and no new reactors built in the future. The electricity supply for replacing these shutdown old, and cancelled proposed new, reactors should be provided by energy efficiency and conservation savings in the

first place, and any newly or otherwise needed electricity should be provided, instead of by nuclear power, by ever more clean, safe, secure, reliable, and affordable renewable energy, such as by solar and wind power.

Please address and rectify your woefully inadequate "hard look" under NEPA, re: this health-, safety-, and environmentally-significant, as well as legally-binding, subject matter above.

And please acknowledge your receipt of these comments, and confirm their inclusion as official public comments in the record of this docket.

Thank you.

Sincerely,

Kay Drey, President, Board of Directors, Beyond Nuclear

and

Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear

Citations reproduced in full, here below:

Stringent Criteria for a Highly Radioactive Waste Geologic Repository

Prepared by Kevin Kamps (Beyond Nuclear radioactive waste specialist; Don't Waste Michigan board of directors member; Citizens for Alternatives to Chemical Contamination advisory board member)

May 26, 2020

The Earth's surface is such a volatile, fragile, and high-risk location, that our search for a deep geologic repository for permanent isolation of highly radioactive wastes is a critical imperative. (Just as critical is the need to stop the generation of highly radioactive wastes in the first place, since -- even 78 years after Enrico Fermi generated the first highly radioactive wastes during the Manhattan Project, and 63 years after the commencement of operations at the first U.S. "civilian" or commercial reactor, generating irradiated nuclear fuel -- we currently still have no safe, secure, sound, acceptable solution for their permanent disposition.) The basic but stringent criteria, however, which such a candidate geologic repository site would have to meet would include:

(1) Legality (for example, a proposed site can't violate U.S. treaties with Native American Nations, like the Western Shoshone Treaty of Ruby Valley of 1863; such treaties are the highest law of the land, equal in stature to the U.S. Constitution itself).

(2) Consent-based siting (the Western Shoshone, and the State of Nevada, do not consent to the Yucca dump; legalized bribery of vulnerable communities also does not constitute "consent"; as Keith Lewis, environmental director of the Serpent River First Nation in Ontario, put it in the book *This Is My Homeland: Stories of the effects of nuclear industries by people of the Serpent River First Nation and the north shore of Lake Huron* (1998, published by Serpent River First Nation, edited by Serpent River First Nation Members Lorraine Rekmans and Keith Lewis, as well as by Anabel Dwyer), "There is nothing moral about bribing a starving man with money."

(3) Scientific suitability (that is, isolation of hazardous radioactivity from the living environment for at least a million years -- Yucca can't meet this criteria either, by a long shot! If the Yucca dump were opened, serious leakage to the environment could begin within centuries, but would become large-scale after 11,000 years, this according to DOE's own computer modeling! The leakage would just worsen over longer time periods. It would continue to present a hazard for a million years or more).

(4) Environmental justice (Newe Sogobia and Nevada can't be targeted again, after decades of nuclear weapons testing fallout, "low" level radioactive waste dumping, etc.).

(5) Regional equity (no East dumps on West, especially when 90% of the highly radioactive wastes are in the eastern half of the U.S., and 75% is east of the Mississippi River).

(6) Mitigation of transport risks (closely related to regional equity, immediately above).

(7) Inter-generational equity (related to scientific suitability, above -- no double standards, as at the proposed Yucca dump, where the first 10,000 years' "allowable" or "permissible" dose standard is 15 milli-Rem per year, which then is "allowed" or "permitted" to go up to 100 mR/yr after 10,000 years out to a million years -- meaning future generations would face 6.66 times more "allowable"/"permissible" exposure to hazardous radioactivity than current generations!).

(8) Non-proliferation (the risk of the weapons-grade plutonium in the irradiated nuclear fuel being exploited for weapons manufacture is a major reason that perpetual surface storage is not acceptable, and permanent irreversible "disposal" is needed).

(9) Pre-"disposal" reprocessing is unacceptable (given the weapons proliferation risk, the environmental ruination and health damage that would result from large-scale hazardous radioactivity releases, not to mention the astronomical expense, which the public would be forced to pay for).

(10) This list of required strict siting criteria could well expand, as additional concerns come to light.

1,000+ organizations opposed to the Yucca Mountain dump targeted at Western Shoshone Land in Nevada

[a partial listing -- the resistance has expanded since 2002]

OVER 50 NATIONAL & 700 STATE/LOCAL ENVIRONMENTAL & PUBLIC INTEREST ORGANIZATIONS OPPOSED TO THE YUCCA MOUNTAIN NUCLEAR WASTE DUMP

National Organizations (51 Total)

Alliance for Nuclear Accountability, Seattle, Washington
American Lands Alliance, Washington, DC
Americans for Democratic Action, Washington, DC
American Rivers, Washington, DC
American Public Health Association, Washington, DC
Center for Safe Energy, Earth Island Institute, Berkeley, California
Clean Water Action, Washington, DC
Defenders of Wildlife, Washington, DC
Earthjustice, Oakland, CA
Environmental Action Foundation, Takoma Park, Maryland
Environmental Defense, New York, NY
Environmental Working Group, Washington, DC
Fellowship of Reconciliation, Nyack, NY
Free the Planet!, Washington, DC
Friends of the Earth, Washington, DC
Government Accountability Project, Seattle, WA
Grandmothers for Peace International, Elk Grove, CA
Great Lakes United (over 160 local groups in Great Lakes states and provinces), Buffalo, NY
Greenpeace, Washington, DC
Honor the Earth, St. Paul, Minnesota
Indigenous Environmental Network, Bemidji, MN
Institute for Energy and Environmental Research, Takoma Park, Maryland
International Association of Fire Fighters, Washington, DC

League of Conservation Voters, Washington, DC
League of United Latin American Citizens, Washington, DC
League of Women Voters of the United States, Washington, DC
National Environmental Coalition of Native Americans, Prague, OK
National Environmental Trust , Washington, DC
National Wildlife Federation, Washington, DC
Natural Resources Defense Council, Washington, DC
Nuclear Information and Resource Service, Washington, DC
Pax Christi USA, Erie, PA
Peace Action, Washington, DC
Physicians for Social Responsibility, Washington, DC
Presbyterian Church (USA), National Ministries Division, Washington, DC
Psychologists for Social Responsibility, Washington, DC
Public Citizen, Washington, DC
The Safe Energy Communication Council, Washington, DC
Scenic America, Washington, DC
Sierra Club, Washington, DC
Taxpayers for Common Sense, Washington, DC
Union of American Hebrew Congregations/ Religious Action Center of Reform Judaism,
Washington, DC
United Church of Christ, Office for Church in Society, Washington, DC
United Electrical, Radio & Machine Workers of America (UE), Alexandria, Virginia
The United Methodist Church, General Board of Church and Society, Washington, DC
U.S. Public Interest Research Group, Washington, DC
The Wilderness Society, Washington, DC
Women's International League for Peace and Freedom, Philadelphia, PA
The Women Legislators' Lobby (WiLL), Washington, DC
Women's Action for New Directions (WAND), Washington, DC
20/20 Vision, Washington, DC

**State and Local Organizations
(Over 700 Total, Representing All 50 States and the District of Columbia)**

Alabama Environmental Council, Birmingham, Alabama

Alaska Center for the Environment, Anchorage, Alaska

Air, Water, Earth Organization, Lake Havasu City, Arizona

Alliance of Atomic Veterans, Topock, Arizona

Arizona Citizen Action, Phoenix, AZ

Arizona Safe Energy Coalition, Tucson, Arizona

Black Mesa Indigenous Support, Flagstaff, AZ

DON'T WASTE ARIZONA, INC., Phoenix, Arizona

Environmental Justice Action Group, Tucson, AZ

Flagstaff Activist Network, Flagstaff, Arizona

Flagstaff Opposed to Nuclear Transportation (FONT), Flagstaff, Arizona

GE Stockholders Alliance, Tucson, Arizona
Sky Island Watch, Tucson, Arizona
Southwest Toxic Watch, Tucson, Arizona
Student Environmental Action Coalition, SW, Tucson, Arizona
The Nuclear Resister, "a chronicle of hope", Tucson, Arizona

Women's International League for Peace and Freedom, Tucson, Arkansas
Arkansas WAND, Little Rock, AR
Student Activists that Value the Earth (SAVE), Conroy, Arkansas
The Arkansas Public Policy Panel, Little Rock, Arkansas

Abalone Alliance, San Francisco, California
Alliance for Survival, Costa Mesa, California
Americans for a Safe Future, Santa Monica, California
The Atomic Mirror, Port Hueneme, CA
Awende/S Women's Native Drum, Auburn, CA
Bay Area Nuclear Waste Coalition, San Francisco, California
Berkeley Women in Black, Berkeley, CA
Butte Environmental Council, Chico, CA
Calaveras County Green Party, Calaveras County, CA
California Alliance in Defense of Residential Environments, Sherman Oaks, CA
California Communities Against Toxics, Rosamond, California
Californians for Radioactive Safeguards, Atherton, California
Call to Action, Santa Cruz, CA
Citizens Along the Roads and Tracks (CART), Sacramento, CA
Climate Action NOW!, Berkeley, CA
Committee to Bridge the Gap, Los Angeles, California
Conference of Social Justice Coordinators, Los Angeles, CA
Desert Citizens Against Pollution, Lancaster, California
Earth Action Network, Los Angeles, California
Earth Regeneration Society, Berkeley, CA
East Bay Peace Action, Albany, CA
EcoBridge, San Francisco, CA
El Dorado County Green Party, Placerville, CA
Grandmothers for Peace International, Elk Grove, California
Grandmothers for Peace, Sacramento Chapter, Sacramento, CA
Grandmothers for Peace/San Luis Obispo County Chapter, San Miguel, CA
Gray Panthers of LA West, Los Angeles, California
Greenaction for Health and Environmental Justice, San Francisco, CA
Green Party, San Bernardino, CA
Gray Panthers of Sacramento, Sacramento, CA
Healing Global Wounds, Freedom, California
HOME - Healing Ourselves and Mother Earth, Tecopa, CA
Independent Power Providers, North Fork, California
Inland Independent People's Campaign, Claremont, CA
Life on Planet Earth, Atascadero, California

Los Gatos Unitarian Fellowship, Los Gatos, CA
Nuclear Age Peace Foundation, Santa Barbara, CA
The Nuclear Democracy Network, Bolinas, CA
Nuclear Guardianship Project, Berkeley, CA
Nuclear Weapons Free Zone Commission, Arcata, CA
Occidental Arts and Ecology Center, Occidental, CA
People Against Radioactive Dumping, Needles, CA
Physicians for Social Responsibility, Los Angeles, CA
Physicians for Social Responsibility - Santa Monica, Santa Monica, CA
Bonnie Raitt, ARIA Foundation, Los Angeles, CA
Redbud, Rough and Ready, CA
Redwood Alliance & REEI, Arcata, California
Sacramento Green Party, Sacramento, CA
SF-Bay Area Physicians for Social Responsibility, San Francisco, CA
San Luis Obispo GREEN Party, San Luis Obispo, CA
San Luis Obispo Mothers for Peace, San Luis Obispo, CA
Save Ward Valley, Needles, California
Social Justice Center of Marin, Fairfax, CA
Southern California Abolition 2000, Santa Monica, CA
Students for Social Responsibility, California Polytechnic Institute, San Luis Obispo, CA
The Green Party of Santa Barbara County, Santa Barbara, California
Tri-Valley CAREs (Citizens Against a Radioactive Environment), Livermore, CA
Women's Energy Matters, Berkeley, CA
Women For - Orange County Chapter, Laguna Beach, California

American Friends Service Committee, Colorado Office, Denver, Colorado
Citizens for Peace in Space, Colorado Springs, CO
Colorado Clean Water Action, Denver, CO
Colorado Coalition for the Prevention of Nuclear War, Denver, CO
Connections 2000, Boulder, CO
Environmental Information Network, Inc., Denver, CO
Global Response, Boulder, CO
Peace and Justice Task Force, United Church of Christ, Denver, CO
Physicians for Social Responsibility, Denver, CO
Rocky Mountain Peace and Justice Center, Boulder, Colorado
The Colorado Environmental Seminars, Denver, Colorado
Women's International League for Peace and Freedom, Colorado, Boulder, Colorado

Citizens Awareness Network , CT Chapter, Haddam, Connecticut
Citizens Regulatory Commission, Waterford, Connecticut
Connecticut Coalition Against Millstone, Mystic, CT
Connecticut Green Party, Hartford, Connecticut
Connecticut Opposed to Waste, Broad Brook, Connecticut
Donnelly/Colt, Hampton, CT
Don't Waste Connecticut, New Haven, CT
E3 (Earth, Equality, Education), Middletown, Connecticut

Earth Challenge, Inc., New Haven, Connecticut
Peoples Action for Clean Energy (PACE), Canton, CT
Stonington Chapter of the Connecticut Green Party, Stonington, CT
Toxics Action Center, West Hartford, Connecticut

Green Delaware, Port Penn, Delaware
Green Party of Delaware, Newark, DE
Student Environmental Action Coalition, U. of Delaware
Students for the Environment, University of Delaware, Newark, DE

Environmental and Peace Education Center, Fort Myers, Florida
Florida Coalition for Peace and Justice, Gainesville, Florida
Lower Florida Keys Women's International League for Peace and Freedom, Summerland Key, Florida
Physicians for Social Responsibility, Ft. Pierce, FL
U. of Florida Environmental Action Group, Gainesville, FL

Alternatives In Action!, Atlanta, Georgia
Action for a Clean Environment, Alto, Georgia
Campaign for a Prosperous Georgia, Savannah, GA
Food Not Bombs, Atlanta GA
Georgians Against Nuclear Energy, Atlanta, Georgia
Grandmothers for Peace/Southeast Chapter, Alpharetta, GA
Physicians for Social Responsibility – Atlanta, Atlanta, GA
Sierra Club, Atlanta, GA
Women's Action for New Directions/Atlanta, Atlanta, GA

Irradiation Free Food Hawaii, Big Island of Hawaii, Hawaii
Life of the Land, Honolulu, HI

Downwinders, Lava Hot Springs, Idaho
Environmental Defense Institute, Troy, Idaho
Snake River Alliance, Idaho Falls, ID

Body Wisdom Incorporated, Lake Bluff, Illinois
Chicago Media Watch, Chicago, Illinois
Chicago Greens, Chicago, IL
Coalition for Nuclear Justice, Brookport, IL
Committee for New Priorities, Chicago, IL
Environmental Concerns Organization (E.C.O.), DePaul University, Chicago, IL
Illinois Student Environmental Network, Urbana, IL
Lake County Conservation Alliance, Grayslake, IL
Lake County Green Party, Mundelein, IL
Northwestern University Students for Ecological and Environmental Development (SEED), Evanston, IL
Nuclear Energy Information Service, Evanston, Illinois

Nuclear-Free Great Lakes Campaign, Evanston, IL
Prairie Alliance, Dahinda, IL
Regional Association of Concerned Environmentalists, Brookport, IL
Rogers Park Greens, Chicago, IL
USASC Justice and Peace Office, Red Bud, IL

Citizens Action Coalition of Indiana, Indianapolis, Indiana
Community Times, West Lafayette, IN
Heartwood, Bloomington, IN
Hoosier Environmental Council, Indianapolis, IN
Michiana Earth Day, South Bend, IN
St. Joseph Valley Greens, South Bend, IN
Tippecanoe Environmental Council, West Lafayette, IN
Valley Watch, Inc., Evansville, Indiana

Integrative Educational Systems, Ames, Iowa
EarthCare, Des Moines, IA
Iowa Citizen Action Network, Des Moines, IA
Iowa City/Johnson County Green Party, Iowa City, Iowa
Iowa Farmers Union, Clear Lake, IA
Iowans for Nuclear Safety, Cherokee, Iowa
Iowa Renewable Energy Association, Muscatine, IA
Iowa Sustainable Energy for Economic Development (SEED) Coalition, Iowa City, IA
Student Environmental Action Coalition, U. of Northern Iowa

Enviro-Health Concerns, Wichita, Kansas
Kansas Natural Resource Council, Topeka, KS
Physicians for Social Responsibility/Kansas, Wichita, KS
The Southwind Group, Lawrence, Kansas
Wolf Creek Citizens Watchdog Group, Lawrence, Kansas

Appalachia Science in the Public Interest, Mt. Vernon, Kentucky
Chemical Weapons Working Group, Berea, KY
Citizens Environmental Defense League, Bowling Green, KY
Coalition for Health Concern, Benton, KY
Common Ground, Berea, KY
Kentucky Environmental Foundation, Berea, KY
Non-Stockpile Chemical Weapons Citizen Coalition, Berea, KY
Yggdrasil Institute, Georgetown, KY

Safe Schools, Lafayette, Louisiana
Alliance for Affordable Energy, New Orleans, LA

Cheaper, Safer Power, Portland, Maine
Earth Day Commitment, Edgecomb, Maine

Friends of the Coast Opposing Nuclear Pollution, Wiscasset, ME
Woolwich Greens, Woolwich, ME

Alternative Press Center, Baltimore, Maryland
DC Solar, College Park, Maryland
Maryland Safe Energy Coalition, Baltimore, MD
Nuclear Free Takoma Park Committee, Takoma Park, MD
SERV, Kensington, MD

Citizen Awareness Network, Shelburne Falls, Massachusetts
Citizens at Risk, Cape Cod, MA
C-10 Research and Education Foundation, Newburyport, MA
Don't Waste Massachusetts, Duxbury, Massachusetts
Massachusetts Citizens For Safe Energy, Boston, Massachusetts
MetroWest WAND, Hopkinton and Woodville, MA
Post Cassini Flyby News, Wendell Depot, MA
WAND and Mass Action for Women, Natick, MA
Women's Action for New Directions, Amesbury, MA
Women's Action for New Directions, Mt. Holyoke College, South Hadley, MA
Women's Action for New Directions of Western Massachusetts, Amherst, Massachusetts

Bertha Cappan Reynolds Society/Social Workers for Justice Western Michigan University,
Kalamazoo, Michigan
BOND—Border Opposes Nuclear Dump, Temperance, MI
Chernobyl Children's Project, Kalamazoo, Michigan
Citizens for Alternatives to Chemical Contamination, Lake, MI
Citizens for a Healthy Planet, Emmett, Michigan
Citizens for Environmental Protection, Niles, Michigan
Citizens' Resistance at Fermi Two, Monroe, MI
Coalition for a Nuclear Free Great Lakes, Monroe, MI
Don't Waste Michigan, Grand Rapids, Michigan
EnvOrg Student Environmental Organization, Kalamazoo, Michigan
Kalamazoo Area Coalition for Peace and Justice, Kalamazoo, Michigan
Leonard Peltier Support Group, Pavilion Township, Michigan
Lone Tree Council, Bay City, MI
Michigan Environmental Council (representing over 50 groups), Lansing, MI
Non-Violent Student Organization, Kalamazoo College, Kalamazoo, Michigan
Northwoods Wilderness Recovery, Marquette, MI
Palisades Watch, Kalamazoo, Michigan
People's Food Co-Op, Kalamazoo, Michigan
Positives for Peace and Environmental Justice, Niles, MI
Professional Inventor's Alliance, Grand Blanc, Michigan
Radiological Evaluation & Action Project, Great Lakes, Ewen, MI
Students for a Sustainable Earth, Western Michigan University, Kalamazoo, Michigan
West Michigan Environmental Action Council, Grand Rapids, Michigan
Women's Action for New Directions, Ann Arbor, MI

Women's Action for New Directions-Metro Detroit, Southfield, MI
World Tree Center for Peace, Justice and Mother Earth, Kalamazoo, Michigan

Bottineau Citizens In Action, Minneapolis, Minnesota
Clean Water Action Alliance of Minnesota, Minneapolis, Minnesota
Communities United for Responsible Energy, Lake City/Frontenac, Minnesota
Duluth-Superior FOR, Duluth, MN
Home Owners on the Mississippi for the Eco-System (HOMES), Minneapolis, MN
Institute for Local Self-Reliance, Minneapolis, MN
Mankato Area Environmentalists, Mankato, MN
MN-WEB (Minnesota Women's Earth Brigade), Minneapolis, MN
Minnesotans for an Energy-Efficient Economy, Saint Paul, Minnesota
Mississippi Corridor Neighborhood Coalition, Minneapolis, MN
North American Water Office, Lake Elmo, Minnesota
Prairie Island Coalition, Lake Elmo, Minnesota
Sunrise Alternatives, Cannon Falls, MN

Mississippi 2020 Network, Inc., Jackson, Mississippi

Citizens Against Radioactive Transport, Webster Groves, MO
Kansas City Greens, Kansas City, Missouri
Mid-Missouri Peaceworks, Columbia, MO
Mississippi River Basin Alliance, St. Louis, MO
Missouri Coalition for the Environment, St. Louis, Missouri
Sierra Club, Jeff. City, MO

Missoula Women for Peace, Missoula, Montana
Native Forest Network -- West, Missoula, Montana
Women's Action for New Directions, Missoula, MT

Nebraskans for Peace, Lincoln, Nebraska
Sierra Club, Lincoln, NE
South Salt Creek Community Organization, Lincoln, NE
Western Nebraska Resources Council, Chadron, NE

Alliance of Atomic Veterans, Atomic Workers Division, Las Vegas, NV
Alliance for Worker's Rights, Reno, Nevada
Campaign for Nevada's Future, Las Vegas, NV
Citizen Alert, Las Vegas, Nevada
Citizens Against Nuclear Waste in Nevada (CANWIN), Carson City, NV
Clark County Greens, Las Vegas, NV
Friends of Nevada Wilderness, Las Vegas, NV
Great Basin Mine Watch, Reno, NV
Nevada Desert Experience, Las Vegas, Nevada
Nevada Empowered Women's Project, Reno, Nevada
Nevada Green Party, Reno, NV

Nevada Nuclear Waste Task Force, Las Vegas, Nevada
Nevada Wilderness Project, Reno, NV
National Environmental Trust, Las Vegas, NV
Nuclear Risk Management For Native Communities, Duckwater, NV
Progressive Leadership Alliance of Nevada, Las Vegas, Nevada
Public Resource Associates, Reno, Nevada
Rural Alliance For Military Accountability, Reno, Nevada
Sierra Club, Toiyabe Chapter, Las Vegas, NV
Truckee River Yacht Club, Reno, Nevada
Western Shoshone Defense Project, Crescent Valley, NV
Yucca Mountain Riggers, Las Vegas, NV

Good Money, Inc., Dover, New Hampshire
New Hampshire Peace Action, Concord, New Hampshire
Seacoast Anti-Pollution League, Portsmouth, NH

Coalition Against Toxics, Marlton, New Jersey
Coalition for Peace & Justice, Cape May, New Jersey
Grass Roots Environmental Organization of New Jersey, Flanders, New Jersey
Green Party of New Jersey, Trenton, New Jersey
Jersey Shore Nuclear Watch, Brick, NJ
NJ/NY Environmental Watch, Elizabeth, NJ
Oyster Creek Nuclear Watch, Island Heights, New Jersey
Stockton Peace Action, Richard Stockton College, Pomona, NJ
UNPLUG Salem, Linwood, NJ

Albuquerque Center for Peace and Justice, Albuquerque, New Mexico
Citizen Action of New Mexico, Albuquerque, NM
Citizens for Alternatives to Radioactive Dumping, Albuquerque, NM
Concerned Citizens for Nuclear Safety, Santa Fe, NM
Humans Against Nuclear Waste Dumps, Mescalero, Ruidoso, NM
Kwanitewk Native Resource Network, Meriden, NM
Los Alamos Study Group, Santa Fe, NM
Nuclear Watch of New Mexico, Santa Fe, NM
Peace Action New Mexico, Santa Fe, New Mexico
Progressive Student Alliance of the University of New Mexico, Albuquerque, New Mexico
Southwest Research and Information Center, Albuquerque, New Mexico
Tribal Environmental Watch Alliance, Espanola, NM
Water Information Network, Albuquerque, NM

Alliance to Close Indian Point, Ossining, New York
Beacon Sloop Club
Bronx Greens, Bronx, NY
CAN DO (Citizens Against Nuclear Energy – Dobbs Ferry)
Chappaqua Against Nuclear Generated Power (CHANGE)
Chenango North Energy Awareness Group, South Plymouth, New York

Citizens Awareness Network/Central New York, Syracuse, New York
Citizens' Environmental Coalition, Albany, NY
Citizens for Safe Energy
Clearwater Hudson River Sloop, Poughkeepsie, NY
Coalition on West Valley Nuclear Wastes, Concord, NY
Communities United For Responsible Energy
Council on Intelligent Energy & Conservation Policy
Croton Close Indian Point Group
Economists Allied for Arms Reduction, Pearl River, NY
Environmental Advocates, Albany, New York
EnviroVideo, Tilden, NY
F.A.C.T.S. (For A Clean Tonawanda Site), Inc., Kenmore, NY
Fingerlake Citizens for the Environment, Waterloo, NY
Fish Unlimited, Shelter Island, New York
Fishkill Ridge Community Heritage
Genesee Valley-Rochester Greens, Rochester, NY
Global Resource Action Center for the Environment (GRACE), New York, New York
Green Party of Erie County, Buffalo, NY
Green Party of the Lower Hudson Valley, NY
Green Party of Onondaga County, Syracuse, NY
Group for the South Fork, Bridgehampton, NY
Hogarth Center for Social Action, Manhattanville College
Irvington Neighbors Against Indian Point
Lawyers' Committee for Nuclear Policy, New York, NY
Long Island SHAD, Huntington, NY
Metro New York Peace Action Council, New York, New York
New York City Campaign to Close Indian Point
New York City SAFE (Seeking Alternatives for the Environment)
New York City WAND, New York, NY
New York City Citizen's Awareness Network, Brooklyn, NY
New York City Physicians for Social Responsibility
New York Public Interest Research Group (NYPIRG)
New York State Greens/Green Party, Flushing, NY
NGO Committee on Disarmament, New York, NY
No Escape, Peekskill, NY
Nuclear Free Hudson
Nuclear Free New York, Huntington, New York
Pace Energy Project
Peconic Green Party, Eastern Long Island, NY
Peoples Video Network, New York, New York
Philipstown League for the Environment and Safe Energy (PLEASE)
Physicians for Life, Watermill, NY
Project Edna (engaged democracy for the nuclear age), Brooklyn, NY
Riverkeeper, Inc.
Rockland Citizens Awareness Network
Rockland County Civic Association

Rockland County Conservation Association
Scenic Hudson
Sprayno Coalition
Sierra Club, Atlantic Chapter
Sierra Club, Lower Hudson Group
Sound Shore Safe Energy Advocates (SSSEA)
STAR (Standing for Truth About Radiation), East Hampton, New York
Student Environmental Action Coalition (SEAC), Syracuse, NY
Sustainable Energy Alliance of Long Island, Bridgehampton, NY
Syracuse Food Not Bombs, Syracuse, New York
Syracuse Nuclear Action Group, Syracuse, New York
Temple Beth El Social Action Committee, Tonawanda, NY
UFTbr /S 108 Chapter, Brooklyn, NY
United Bronx Environmental Coalition
Utica Citizens in Action, Utica, NY
War & Peace Foundation, New York, New York
Waterkeeper Alliance
Westchester Green Party, Northwest
WESPAC (Westchester People's Action Coalition), White Plains, NY
Westchester Residents Advocating for Improved Neighborhoods (WRAIN)
Westchester SAFE (Seeking Alternatives for the Environment)
Western New York Peace Center, Working Group on Disarmament, Buffalo, NY
Working Group on Disarmament of the Western New York Peace Center, Buffalo, New York
Women's Action for New Directions, Brooklyn, NY
Women's Environment & Development Organization, New York, New York
Women's International League for Peace and Freedom, NY Metro, New York, New York
Yorktown Close Indian Point Group

Active Students for a Healthy Environment, Asheville, North Carolina
Anson County Citizens Against Chemical Toxins in Underground Storage (CACTUS),
Clemmons, NC
Blue Ridge Environmental Defense League, Glendale Springs, North Carolina
Chapel Hill Greens Party, Chapel Hill, NC
Communities for Sustainable Forestry, Union Mills, NC
Conservation Council of North Carolina, Raleigh, NC
Durham/Chapel Hill Women's International League for Peace and Freedom, Durham, NC
Haywood Peace Fellowship, Waynesville, NC
Long Branch Environmental Education Center, Leicester, North Carolina
NC Citizens Research Group, Inc., Durham, NC
North Carolina Waste Awareness and Reduction Network (NC WARN), Raleigh-Durham, NC
Orange County Greens, NC
Protect All Children's Environment, Marion, NC
Triangle Chapter Physicians for Social Responsibility, Raleigh, NC
Western North Carolina Alliance, Asheville, NC

North Dakota Clean Water Action, Fargo, North Dakota

Citizens Protecting Ohio (C-Pro), Bexley, Ohio
Cleveland Peace Action, Cleveland, OH
Coalition for a Safe Environment, Toledo, OH
Congress of the Greens/Green Party USA, Cleveland, OH
Earth Day Coalition, Cleveland, Cleveland, Ohio
Environmental Health Watch, Cleveland, OH
Fernald Residents for Environment, Safety & Health, Fernald, OH
Green Environmental Coalition, Yellow Springs, OH
Green Party of Cuyahoga County, Cleveland, OH
Green Party of Ohio, Cleveland, OH
HELP the Environment, Walbridge, OH
Northeast Ohio Greens, Columbia Station, OH
Ohio Citizen Action, Cleveland, OH
Ohio Greens Anti-Nuclear Organizing Committee, Cleveland, OH
Toledo Coalition for Safe Energy, Toledo, OH
Walk Across America for Mother Earth, Columbus, Ohio
Wilmington College Peace Resource Center, Wilmington, Ohio
Women Speak out for Peace & Justice, Women's Int'l League for Peace & Freedom, Cleveland Branch

Citizens Action for Safe Energy, Claremore, OK
Coalition for Environmental Awareness, Newkirk, OK
Earth Concerns of OK (ECO), Tulsa, Oklahoma
EcoLaw Institute, Tahlequah, OK
National Environmental Coalition of Native Americans, Prague, Oklahoma
Oklahoma Toxics Campaign, Guthrie, OK
Oklahomans United, Oklahoma City, OK
Our Earth, University of Oklahoma, Norman, OK
Student Action Network, University of Oklahoma, Norman, OK

Center for Energy Research, Salem, Oregon
Columbia Riverkeeper, Hood River, OR
Don't Waste Oregon, Boring, Oregon
HANFORD WATCH, Portland, Oregon
Indigenous Support Coalition of Oregon, Eugene, Oregon
Northwest Environmental Advocates, Portland, Oregon
Northwest Veterans for Peace, Milwaukie, Oregon
Nuclear Free America, Salem, OR
Oregon Conservancy Foundation, Portland, OR
Oregon Peaceworks, Salem, Oregon
Pacific Party of Oregon (Greens), Portland, Oregon
Southern Oregon Forest Coalition, Medford, OR
United Methodist Church, Salem, OR

Activists' Center for Training In Organizing and Networking (ACTION), Philadelphia, PA
Allegheny Green Party, Strattonville, Pennsylvania

Central Pennsylvania Citizens for Survival, State College, Pennsylvania
Citizen Power, Pittsburgh, PA
Clean Air Council, Philadelphia, PA
Communities for Sustainable Forestry, Kane, PA
Concerned Citizens for SNEC Safety, Six Mile Run, PA
Eco-Action, Penn State University
Environmental Coalition on Nuclear Power, State College, Pennsylvania
Green Party of Pennsylvania, Lancaster, Pennsylvania
Greens of Philadelphia, Philadelphia, Pennsylvania
McKean County Citizens Against Nuclear Waste, Bradford, PA
No Nukes, Harrisburg, Pennsylvania
Northeast Pa. Audubon Society, Honesdale, Pennsylvania
Pennsylvania Citizen Action Network, Reading, PA
Pennsylvania Consumers Action Network, Philadelphia, Pennsylvania
Pennsylvania Environmental Network, Blossburg, PA
Philadelphia Solar Energy Association (PSEA), Philadelphia, Pennsylvania
PROACT, Kane, PA
R.E.S.C.U.E., Nicholson, Pennsylvania
Stop the Organizations Raping Mankind, Seneca, PA
Three Mile Island Alert, Harrisburg, Pennsylvania
Voices of Central Pennsylvania, State College, Pennsylvania
Women in Black, Lancaster Group, Lancaster, Pennsylvania
Women's International League for Peace and Freedom-Main Line Branch, Haverford, PA

Appalachian Mountain Club, Providence, Rhode Island
Citizen's League for Environmental Action and Recovery (CLEAR), Manville, Rhode Island
Clean Water Action, Providence, RI
Coalition for Consumer Justice, Jamestown, RI

Carolina Peace Resource Center, Columbia, South Carolina

Bison Land Resource Center, Brookings, South Dakota
Lakota Kammerer Foundation, Rapid City, SD
South Dakota Resources Coalition

Coalition for a Healthy Environment, Knoxville, Tennessee
Oak Ridge Environmental Peace Alliance, Oak Ridge, Tennessee
Green Party of Tennessee, Knoxville, TN
Physicians for Social Responsibility, Knoxville, Tennessee
Tennessee Citizen Action, Nashville, TN
Tennessee Valley Energy Reform Coalition, Knoxville, TN
War Resisters League/Nashville, Nashville, TN

Austin Greens, Austin, Texas
Bastrop County Environmental Network, Bastrop, Texas
Border Environmental Network, Alpine, Texas

Chambers Appraisal Service, Odessa, Texas
Downwinders at Risk, Duncanville, TX
El Paso Chapter, National Lawyer's Guild, El Paso, Texas
El Paso Solar Energy Association, El Paso, Texas
Grandmothers and Mothers Alliance for the Future, Austin, Texas
Mothers Organized to Stop Environmental Sins (MOSES), Dallas, Texas
Peace Farm, Amarillo, TX
SEED Coalition, Austin, Texas
Senior Citizens Alliance of Tarrant County, Political Action Committee, Ft. Worth, TX
Sierra Blanca Legal Defense Fund, Sierra Blanca, Texas
Southwest Workers Union, San Antonio, TX
STAND (Serious Texans Against Nuclear Dumping), Amarillo, Texas
Texas Alliance for Human Needs, Austin, TX

Citizens Against Radioactive Waste in Utah, Salt Lake City, Utah
Escalante Wilderness Project, Escalante, UT
Families Against Incinerator Risk, Salt Lake City, UT
HEAL Utah, Salt Lake City, UT
Living Rivers, Moab, UT
Shundahai Network, Salt Lake City, UT
Utah Peace Test, Salt Lake City, UT

Citizens Awareness Network, Johnson, VT
Native Forest Network, Eastern North America, Burlington, Vermont
New England Coalition on Nuclear Pollution, Brattleboro, Vermont
Peace and Justice Center, Burlington, VT
Rural Vermont, Montpelier, VT
Solar Action for Vermont, Townsend, Vermont
Vermont Citizens Awareness Network, Dummerston, VT

Earth Lodge/Gray Panthers, Manassas Park, Virginia
Nurses.Net, Woodbridge, VA
Taking Responsibility for the Earth and the Environment, Blacksburg, Virginia
Virginia Consumer Action, Virginia

Environmental Center, Western Washington University, Bellingham, Washington
Friends of the Earth, Seattle, WA
HEAL (Hanford Education Action League), Spokane, Washington
Heart of America Northwest, Seattle, WA
Mangrove Action Project, Port Angeles, WA
The Radioactivist Campaign, Belfair, WA
Waste Action Project, Seattle, Washington

Dorothy Day Catholic Worker, Washington, DC
Eco Sense, American U., Washington, DC
Native Youth Alliance, Washington, DC

Power Shift, Washington, DC
Proposition One Committee, Washington, DC
Voices Opposed to Environmental Racism, Washington, DC

Ohio Valley Environmental Coalition, Huntington, West Virginia
West Virginia Citizen Action Group, Charleston, WV

Grandmothers for Peace/Northland Chapter, Superior, WI
Indigenous Law Students Association, Madison, WI
Lakes and Prairies Life Community, Ferryville, WI
Mining Impact Coalition of Wisconsin, Madison, Wisconsin
Nukewatch, Luck, Wisconsin
RENEW Wisconsin, Madison, Wisconsin
Student Environmental Action Coalition, U. of Wisconsin, Milwaukee
University of Wisconsin Greens, Madison, WI
Watershed Information & News Service, Shawano, WI
West Allis Community Media Center, West Allis, WI
Wisconsin Green Party, Sun Prairie, Wisconsin

Powder River Basin Resource Council, Douglas, Wyoming
Wyoming Outdoor Council, Lander, Wyoming
Wyoming Peace Initiatives, Cheyenne, WY

Supporting documentation:

Great Lakes United, 20 th Annual General Meeting, Yucca Mountain Resolution, June 9, 2002, Chicago, IL.

Michigan Environmental Council, Policy on High Level Radioactive Waste, ADOPTED: May 22, 2002, Lansing, MI.

May 13, 2002 press release, "Citizens Groups Charge Nuclear Industry Has Overbearing Influence on Congress's Yucca Mountain Nuclear Waste Dump Decision," Lansing, Michigan.

May 7, 2002 "Statement by Jill Lancelot, Legislative Director at Taxpayers for Common Sense for the May 7 th Yucca Mountain Press Conference," Washington D.C.

May 7, 2002 press conference opposing Yucca Mountain prior to the US House of Representatives vote to override the Gov. of Nevada's veto, Washington, DC.

May 6, 2002 press release, "INDIAN POINT SAFE ENERGY COALITION URGES CONGRESSIONAL REPRESENTATIVES TO OPPOSE YUCCA MOUNTAIN RADIOACTIVE WASTE DUMP," New York.

May 2, 2002 League of Women Voters of the US email urgent lobby request, "LEAGUE OPPOSES YUCCA MOUNTAIN AS AN UNSAFE REPOSITORY FOR NUCLEAR WASTE."

April 16, 2002 Participants in National Environmental Rally/Lobby Day at US Capitol against Nuclear Waste Transport to Yucca Mountain, Washington, D.C.

March 26, 2002 letter to the U.S. Senate from major national environmental, consumer and safe energy organizations urging Senators to uphold Nevada's veto of DOE's "premature and technically unfounded recommendation in favor of the Yucca Mountain site."

January 29, 2002 letter to the U.S. Congress about the DOE Inspector General report on alleged conflict of interest involving the Yucca Mountain Project's law firm, Winston and Strawn.

March 12, 2001 letter to President George W. Bush re: impending Environmental Protection Agency promulgation of radiation release regulations for Yucca Mountain.

December 14, 2000 letter to Energy Secretary Richardson regarding alleged bias by DOE Yucca Mountain Project contractor TRW, Inc. in the preparation of the "Yucca Mountain Site Recommendation Considerations Report".

May 1, 2000 letter to U.S. Senators urging them to sustain President Clinton's veto of S. 1287.

2000, 66 th UE Convention, Resolution: "Keep Highly Radioactive Nuclear Waste Off Our Highways And Railroads," http://www.ranknfile-ue.org/policy_rw.html

Policy Statement Adopted by the Governing Council of the American Public Health Association on November 10, 1999, as reported in American Journal of Public Health, March 2000, Vol. 90, No. 3, page 461: "Declare Proposed National Permanent Nuclear Waste Repository Site Unsafe...".

December 12, 1998 "Petition to the Secretary of Energy for Disqualification of Yucca Mountain from Consideration as a Nuclear Waste Repository".

List of 129 environmental, religious, and citizen organizations against S. 104 (2/13/97).

Letters to US Senators and Representatives on HR 1020, January 8, 1997.

April 16, 1996 Letter to Hon. Robert Dole, Majority Leader, United States Senate.

Letter to Speaker of the House Newt Gingrich and US Representatives on HR 1020, November 8, 1995.

Copies of these and additional supporting documents are available upon request.

Revised May 19, 2002, by Kevin Kamps, Nuclear Information & Resource Service

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

Federal Register Notice: 85FR27447
Comment Number: 7456

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