PrivateISF

From: Ellen Atkinson <jeanne184490@gmail.com>
Sent: Thursday, January 12, 2017 1:05 PM
To: PrivateISF
Subject: "Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities"

Dear Friends,

I am writing to discourage developing private intiatives for nuclear dumps.

"Private Initiatives," such as Waste Control Specialists, LLC's scheme to open a de facto permanent parking lot dump for commercial irradiated nuclear fuel (high-level radioactive waste) storage in west Texas, are ***illegal*** under the terms of the Nuclear Waste Policy Act, as Amended.

As Tom "Smitty" Smith of Public Citizen's Texas office has said, *"Texans do not consent to the risky plan to store high-level radioactive waste at private sites on an open pad above ground in Texas. Another company near Hobbs, New Mexico -- less than 50 miles away -- is expected to file an application to open a storage site that would accept the rest of the nation's high-level nuclear waste. These twin 'storage sites' likely would create a de facto high-level national waste sacrifice zone.* ***This proposal invites disaster because the private owners will be cutting costs at every turn to maximize profits****. If there was radioactive contamination our land, air, water, and human health could be harmed for millenia."*

Private permanent parking lot dumps are high-risk, not only radiologically but also to U.S. taxpayers' pocketbooks. As Kevin Kamps of Beyond Nuclear has said: "***By requiring a permanent deep geological repository to be operating before centralized interim storage [whether private or federal government owned/operated], Congress wanted to prevent the very real danger of a de facto permanent parking lot dump -- a high-level radioactive waste storage site that would be designed for the short-term but be there forever. WCS, for example, is a cynical shell game and taxpayers are sure to lose. Congress was right that liability for the costs for storing commercial irradiated nuclear fuel belong with the generators and should not be shifted onto the backs of the American public.***"

Regarding the transportation costs and risks of centralized interim storage (whether private or federal government owned/operated):

As Diane D'Arrigo, radioactive waste project director at Nuclear Information and Resource Service, has said, "***Moving irradiated nuclear fuel over roads, rails, and waterways to a supposedly temporary site puts us all at risk and creates only the illusion of a solution.***"

And as Karen Hadden, executive director of the Texas-based SEED (Sustainable Energy & Economic Development) Coalition, has said, "***Due to risks of radioactive contamination from leaks or accidents or potential terrorist actions, nuclear waste should only be moved once, and only when a deep underground permanent repository is in place that could safely isolate the dangerous waste for the million years [see immediately below] that it will remain hazardous.***"

In fact, a coalition of environmental groups, including NRDC, NIRS, Nevada Nuclear Waste Task Force, Citizen Action Coalition of Indiana, and Public Citizen, won a major court victory on July 9, 2004, which ordered EPA back to the drawing board on its proposed Yucca Mountain high-level radioactive waste dump regulatory cut-off at 10,000 years post waste burial. In 2008, EPA's revised regulations acknowledged a ***one million year hazard*** associated with irradiated nuclear fuel and high-level radioactive waste. (Truth be told, there are radioactive poisons in high-level radioactive waste that will remain hazardous far longer than even a million years. Iodine-129, as but one example, has a 15.4 million year half-life. This mean it will remain hazardous for 154 to 317 million years!)

Don't do it. Thanks for your time and attention.

Sincerely,

Ellen Atkinson

Reno, NV