

Private ISF

From: Lisa Stone <lestone@aya.yale.edu>
Sent: Tuesday, January 24, 2017 1:00 PM
To: PrivateISF
Subject: "Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities"

1. 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 <<https://www.nirs.org/stop-fukushima-freeways/>> , 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 <<http://static1.1.sqspcdn.com/static/f/356082/27010338/1462424717363/Transportation+Maps-1.jpg?token=TM%2FbJ6JhFDsgOA%2BtLMiwPmZVELk%3D>> , 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.

2. Currently, DOE's name is mud when it comes to radioactive waste management. This includes GOCO endeavors such as the high-level radioactive waste liquid vitrification plant at Hanford Nuclear Reservation, which is many years behind schedule and billions of dollars over budget; as well as the utter failure at the Mixed Oxide Fuel Fabrication Facility at Savannah River Site, South Carolina, one of the worst boondoggles in DOE -- and in fact U.S. federal government -- history. As the BRC recommended as its second highest priority in its Final Report in January 2012, DOE must be replaced with a competent, trustworthy radioactive waste management federal agency.

3. All costs, liabilities, and risks should be borne by the PI companies involved, not by the public. If the PI companies are not willing to bear the burden of all liabilities involved in the centralized interim storage scheme, this is a clear sign that the proposal is too risky to undertake. To undertake it nonetheless, at taxpayer liability (such as called for by WCS in TX), would create a moral hazard with a highly radioactive twist!

Thank you for your consideration! Good luck with your deliberations.

Lisa E. Stone