

## Private ISF

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**From:** markstansbery@gmail.com on behalf of Mark Stansbery <walk@igc.org>  
**Sent:** Wednesday, January 25, 2017 4:26 AM  
**To:** PrivateISF  
**Subject:** Response to the RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities by Private initiatives

Hello Andrew Griffith (DOE):

Thank you for receiving these comments, and I hope that more fully discussed plans will come to the public light. Public policy is never done well in haste nor in secret.

The "Private Initiatives" plan to place high level radio-logical materials near waterways, over aquifers, or next to the Great Lakes appears not thought out very well. Since Yucca Mountain became unacceptable as a receptacle for radio-logical materials through extensive environmental impact studies, the nuclear industry has pushed for storage facilities that reduce their liability.

Step One: the nuclear industry must stop producing radio-logical material that is beyond current technological capacity and public interest.

Step Two: once the volume and concentration of radio-logical waste is determined, then a waste storage policy might make sense. Since the nuclear industry produced radio-logical material without public consent, public policy must promote corrective behavior.

Step Three: only after the public and government know what is the volume and concentration of waste to be processed/stored will ratepayers (Nuclear Waste Fund) and taxpayers (U.S. Treasury) know what percentage needs paid for construction and operation costs of the centralized/decentralized storage facility/facilities (traditional utilities rate of return policies).

When, not if, the storage facility/facilities goes/go wrong, the public would be left with unlimited liabilities.

The proposed private facilities will profit from billions of public dollars (Public funding subsidizes the nuclear industry now even with the industry's malfeasance/ignorance on so many fronts). The long range potential danger is that so-called "interim" surface storage facilities will turn into permanent sacrifice zones.

Even now the existing storage sites put the public at risk of catastrophic radio-logical material releases, and due to eventual loss of institutional control or concern for public safety these proposed "Private Initiatives" only further endangers the public interest.

Now is the time to stop producing radio-logical materials.

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Peace, Mark D. Stansbery

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