

Private ISF

From: Gordon Edwards <ccnr@web.ca>
Sent: Saturday, January 28, 2017 12:00 AM
To: PrivateISF
Subject: "Response to the RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities" re "proposal" by "Spent Fuel Reprocessing Group" for Barnwell spent fuel storage/reprocessing in S. Carolina

Mr. Andrew Griffith
DOE Office of Nuclear Energy

The first paragraph of the US Department of Energy's web-posted document entitled

NUCLEAR FUELS STORAGE & TRANSPORTATION PLANNING PROJECT

<https://www.energy.gov/ne/fuel-cycle-technologies/nuclear-fuels-storage-transportation-planning-project>

reads as follows:

"The future of nuclear energy in the United States depends on our ability to manage and disposition used nuclear fuel and high-level radioactive waste. Used fuel management and disposition are essential components in any nuclear fuel cycle, including recycle fuel cycles. "

This paragraph is revealing. The opening sentence indicates that the first concern of the US Department of Energy is with the "future of nuclear energy in the United States" rather than with the future of US citizens, the future of the United States of America as a country, or the future of the planet. The second sentence indicates that the US DOE is ever-mindful of the long-standing desire of the nuclear power industry to extract plutonium (and other fissile or fertile materials) from irradiated nuclear fuel before abandoning the residual non-fissile materials in an engineered dump.

The Canadian Coalition for Nuclear Responsibility believes that the long-term management of these highly radio toxic materials that remain dangerous for literally hundreds of millions of years — in human terms, forever — must be taken out of the hands of agencies such as the US DOE that are conflicted in their mission. An appropriate nuclear waste management agency must be independent of the nuclear industry and of any government agency whose mandate includes the promotion of nuclear technology, whether civilian or military. If nuclear waste management remains under the control of those who are promoting nuclear technology the built-in conflict of interest will inevitably compromise the mission to protect the environment as well as this and future generations from the potentially devastating effects of widespread dissemination of these materials, capable of causing billions of human cancers.

Scientists do not know how to destroy or to eliminate these materials in a practical manner. We do. Not know how to neutralize them or to render them harmless. Moreover, the human race has never successfully demonstrated the ability of safely disposing of any kind of indestructible toxic materials over the immeasurably long time periods during which they remain dangerous. As a result, abandonment of these wastes (euphemistically described as "permanent disposal") is scientifically and ethically unsound. Rolling Stewardship is the only scientifically defensible and ethically responsible management scheme that can be justified, implying an intergenerational commitment to package these wastes securely against any natural or man-made disaster, to monitor them continuously and to ensure that they are retrievable at all times, to retrieve and repackage them when necessary, with the sole purpose of protecting the health and safety of persons and the environment.

As such it must not be under the control of any agency with conflicting motives, whether those be to promote the expansion of the nuclear industry or to derive profit from the management of these materials. Those conflicting motives will inevitably compromise the security of the management system.

The Ontario Royal Commission on Electric Power Planning in its 1978 publication "A Race Against Time: Report on Nuclear Power in Ontario", opposed the centralized interim storage of irradiated nuclear fuel because any such scheme would presuppose reprocessing (plutonium extraction). Economic considerations alone would lead to that conclusion, as otherwise the centralized interim storage of nuclear waste would cost billions of dollars while generating no revenues.

CCNR is utterly opposed to the centralized interim storage of nuclear waste, especially in rivers at profit-making hands.