

From: "Joe Arnold" <joearnold@home.com>
To: <opa@nrc.gov>
Date: Wed, Sep 13, 2000 9:37 AM
Subject: Proposed Temporary Storage Facility

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Rules and Directives
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USNRC65 FR 39206
June 23, 2000
(69)

David Meyer, Chief

Rules Review and Directives Branch

Division of Freedom of Information and Publications

Office of Administration

Mailstop T-6D-59

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Dear Mr. Meyer:

I am writing to express my opposition to the construction and operation of an independent spent fuel storage installation on the Skull Valley Goshute Indian Reservation here in Utah. The citizens of Utah are just beginning to learn of this issue and understand its possible implications in our area. I am urging that the period for public input be extended for six additional months and that hearings also be held in communities on the proposed routes.

This proposal is ill-conceived for many reasons. As a whole, these issues add up to a strong argument for the No Action Option, especially since the GAO studies have found there is adequate storage at the plants themselves. This proposal is really about increased profits and improved public relations for the nuclear plants. What follows is a partial list of reasons why I find this proposal so objectionable.

-The DEIS (Draft Environmental Impact Statement) has many gaps in it:

- it does not address PFS financial responsibility/liability to ensure minimum impact to environment and human health.
- PFS hasn't been required to show sufficient funds for facility's construction, operation, and closure.
- it fails to identify transportation routes.
- it fails to consider infrastructure costs to communities along routes.

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- it fails to consider wildfire threat and firefighting resources.
- it fails to consider seismic activity.
- The notion that this is a temporary site is very dubious, as it is likely that the Yucca Mountain site will not be approved. Even if approved, Yucca Mountain's capacity cannot contain all the waste.
- The transport of these wastes from all across the nation poses risk to citizens along the routes, especially if there are accidents severe enough to release radiation. Given the scope of this project, there will be accidents. Since Private Fuel Storage is a limited liability corporation, who will be responsible for any cleanup? The DEIS makes no provision for accident cleanups. Assessment of accident risk is based on statistics from the 1960's of traffic density, driving speeds, etc. Even without accidents, the elderly, children, and fetuses en route could receive radiation doses strong enough to affect them.
- There are fault lines in Skull Valley, and even on the reservation. Also, no test wells have been drilled to determine if there is adequate water for firefighting usage.
- Property values along the route will be substantially lowered based on negative perceptions.
- The site is located in close proximity to an important bombing range, and the Air Force will have to substantially reduce their activities in the area, which will make Hill Air Force Base susceptible to closure.
- The Utah state government is provided no power to govern this. The Utah Division of Transportation and the Department of Defense were not consulted.
- The majority of Goshutes on the reservation are opposed to this, but are being silenced by threats. This whole proposal reeks of environmental racism.

Given all these reasons, I am advocating that a No Action Option be taken as the best possible scenario for the time being. Since this is a very complex and multifaceted issue, I am requesting that the public input period be extended an additional six months, and that communities along the routes be alerted and given their own opportunities for public hearings with the NRC, and with any other entities involved in the decision-making process. Thank you for your attention-please do not allow this project to be approved!

Sincerely,

JoeArnold