

From: Marcel Buob <marcel@rlc.net>
To: <nrcprep@nrc.gov>
Date: Thu, Sep 21, 2000 8:23 PM
Subject: Draft Report Comments: NUREG-1714

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June 23, 2000

(185)

Below is the result of your feedback form. It was submitted by
Marcel Buob (marcel@rlc.net) on Thursday, September 21, 2000 at 20:22:39

72-22

StreetNumber: 3104

StreetName: Bedlington Place

City: Holland

State: PA

ZIP: 18966

Country: USA

Comments: Based on the Nuclear Regulatory Commission's (NRC) Draft Environmental Impact Statement (DEIS) for the Construction and Operation of an Independent Spent Nuclear Fuel Storage Installation on the Skull Valley Band of Goshute Indians Reservation and the Related Transportation Facility Tooele County, Utah (NUREG 1714), this proposed program has serious flaws and omissions in respect to public awareness and participation, human health impacts, and socio-economic impacts on the corridor communities.

This program would start the unprecedented transportation of hundreds to thousands of high-level radioactive waste shipments (depending on the number of utilities participating in the program) on our nation's roads and rails through communities inhabited by millions of people. In other words, there would be more shipments in one year than all the past shipments combined. The planning of this radioactive waste transportation and storage program has taken place entirely behind closed doors and out of the public's eye between the waste generators and the proposed hosts of the storage facility. Therefore, it is imperative that the communities along the transportation routes have public hearings. The shipment of high-level radioactive waste raises a lot of questions among communities in terms of the condition of the transportation infrastructure, the emergency response readiness in case of an accident, the impact on property value, and the doses of radiation that communities will

! be inflicted with during normal operations. Individual communities understand best how the shipments will impact their community and whether they are prepared to handle a possible accident, let alone the normal shipments. The NRC is not planning on having any hearings in the corridor communities or states, which is completely irresponsible and disrespectful to those communities. The NRC must have public hearings in all corridor communities if not at least in all the corridor states. In addition with the same reasoning, the dead line for public comments on the DEIS should be extended by 60 days.

The fact that the NRC fails to address in the DEIS the degree of radiation the public along the transportation corridors would be exposed to is alarming. The NRC does not publish the doses of radiation the public along the corridor would be exposed to from routine transport of waste casks and returned contaminated casks that are rejected let alone the catastrophic health impact a severe breach in containment of a single rail cask would have. Even during "proper" routine transports of high-level radioactive, the casks would emit radiation as if they were moving x-ray machines. A severe rail cask accident could result in 115 latent cancer fatalities and a cleanup bill in the tens of billions of dollars. The limitations of the cask designs are also omitted from the DEIS.

ADM03

ER105-03
add Scott Flanders
(SCF)

Template ADM03

One of the purposes of an EIS is to also consider the overall impact of a project while analyzing and comparing alternative solutions. This DEIS is clearly lacking in that objective. First and foremost, the need for this program must be determined in comparison to other options. Many utilities are already licensed to store their high-level radioactive waste in cry casks on site. In addition based on the intent of the current Federal regulation and policy, any proposed spent fuel storage facility would serve as a temporary, so to speak, parking lot for the waste until the waste is transferred to the Department of Energy sanctioned high-level nuclear waste repository. However, the NRC has been reluctant to address the option of storing the spent fuel on site of the generating facilities and thereby avoid the risks and costs of transporting hundreds to thousands of shipments of waste half way across the country only to later incur the risks and costs of moving that waste again!

! in to the repository. If the NRC harbors unpublicized plans to later make this storage facility the location of the permanent high-level radioactive waste repository, the integrity and ability of the NRC as a regulatory agency in the interest of public safety would be highly questionable. A broader scope of the overall impact of the storage facility on the surrounding communities would also have revealed the cumulative impacts on those communities from the already existing toxic facilities in the area that raise questions about the adequacy of the proposed storage site.

The NRC's disregard for the health and socio-economic impacts on the communities surrounding the storage facility and along the transport corridors as exemplified here demands an extended review of the DEIS and the proposed spent fuel program. The NRC's hasty completion and review of the DEIS raises serious questions in terms of the integrity of the report and the agency. This either calls for public hearings in all of the impacted communities and/or a more comprehensive DEIS review by an independent commission equally represented by different sides of the issue.

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