

**From:** Diana McKeown <dmckeown@cleanwater.org>  
**To:** <nrcprep@nrc.gov>  
**Date:** Thu, Sep 21, 2000 6:53 PM  
**Subject:** Draft Report Comments: NUREG-1714

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June 23, 2000  
(180)

Below is the result of your feedback form. It was submitted by  
Diana McKeown (dmckeown@cleanwater.org) on Thursday, September 21, 2000 at 18:53:10

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Affiliation: Clean Water Action Alliance of Minnesota

Comments: September 21, 2000

Mr. David Meyer  
Chief, Rules and Directives Branch  
Division of Freedom of Information and Publications Services  
Office of Administration  
Mail Stop T-6D-59  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RE: Draft EIS  
Private Fuel Storage ISFSI  
Docket No. 72-22

#### General Comments:

Please accept these comments on the DEIS for the ISFSI on the Reservation of the Skull Valley Band of Goshute Indians.

Clean Water Action Alliance of Minnesota has approximately 40,000 members in the state of Minnesota. We worked aggressively to prevent the storage of high-level nuclear waste outside of Northern States Power (NSP) Company's Prairie Island facility. We argued that it would be stored there permanently. While it is true that we didn't want it there, it is there and we don't feel that at this time it should be moved. We especially have concerns about the environmental racism issues associated with this site. I also would like to request that a hearing be conducted in Minnesota, because NSP is one of the companies associated with the PFS. Below you will find our concerns about the Skull Valley DEIS highlighted.

We believe that NRC should hold public hearings in all the transport corridor

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States that would be impacted by PFS member company shipments. Apparently, NRC doesn't currently have plans for that. Public hearings should also be held in transport corridor states that would be impacted by NON-member utilities which would nonetheless ship high-level waste to PFS. It appears that is also not in the plans for NRC.

The public comment period for the Draft Environmental Impact Statement (DEIS) should be extended at least 60 days.

There appears to be lack of information about the health impacts related to this project. A single severe rail cask accident could cause 115 latent cancer fatalities and cost tens or hundreds of billions of dollars to clean up. In addition the DEIS fails to calculate the added risks from PFS's proposal to ship contaminated casks back across the entire country to the reactors of origin without first dealing with the leaks. The DEIS also does not adequately identify the "routine" (even if there are no accidents) doses to the public from these transport casks (mobile x-ray machines that cannot be turned off) rolling down the railroad tracks through American communities.

The DEIS fails to deal with the possibility that this "interim storage site" could become a de facto permanent open air dump for high-level nuclear waste.

There is no need for NRC to license an away-from reactor dry cask storage facility, when it already licenses at-reactor facilities using the exact same technology. To ship the wastes to Utah simply adds the risks of transportation, while doing nothing to improve protection of public health, safety, and the environment.

NRC's statement in the DEIS that PFS has no environmental justice impacts is absurd. The repeated attempts to dump forever deadly high-level atomic wastes on Native American lands is environmental racism, pure and simple.

The DEIS does not address the cumulative impacts of adding a high-level nuclear waste dump to Skull Valley, which is already surrounded by numerous toxic facilities.

The DEIS is an incomplete assessment of the environmental health and racism impacts associated with a ISFSI at Skull Valley, Utah, and as such, the DEIS should be withdrawn and completely rewritten. I look forward to your responses on my comments.

Diana S. McKeown  
Energy Program Coordinator

Submit2: Submit comments

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