

Sept. 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

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Rules and Directives
Branch
USNRC

65 FR 39206
June 23, 2000

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Dear Mr. Meyer,

I am writing to complain of the manner in which the NRC and your office have been dealing with the issue concerning public input into the process regarding the Private Fuel Storage (PFS) plan for nuclear waste generated from a consortium of commercial power plants. It is my understanding that the NRC published its Draft Environmental Statement (DEIS) on June 21, which allows only 90 days for the public to comment on what is a formidable document that has been made difficult to obtain or to know that it even exists.

That makes this letter being sent to you on the very last day of comment, and which will only be postmarked by the deadline date, not received by you. I request that you send me acknowledgment that you did indeed receive this letter and that you will include its contents in your decision making process. I will be discussing this disregard of freedom of information and refusal to accommodate public input with my legislators. Refusal to acknowledge this communication shall result in the same.

Only three hearings have been held concerning this matter, and all have been in Utah. None have been planned for any of the states through which this tens of thousands of high-level, lethal nuclear waste will travel. The NRC is clearly not shepherding this process in a democratic manner.

The NRC must hold public hearings in all the transport corridor states that would bear impact by PFS member shipments. The NRC must also hold hearings in states without members in the PFS consortium, but which would contract to ship waste to the PFS site. At this time, none are planned for these transport corridor states.

The proposal to ship contaminated casks back to the reactors of origin, without first repairing the leaks, is the most outrageous, foolhardy endeavor ever initiated. I am insulted that persons within the NRC, who are paid with my tax dollars, would remotely consider such a reckless, hands-off solution and consider it sound management. Why would the NRC want to recreate a whole new dry cask storage facility in Utah, when it already licenses facilities at reactor sites using exactly the same technology? The casks in which the waste is stored now are not transportable, and they were known to be non-transportable when they were put into place.

If the scenario proposed for PFS were put into place, every cask would have to be unloaded and then reloaded on what are extremely fragile and priceless natural

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ecosystems, such as the shores of Lake Michigan at Palisades Nuclear Plant in Covert. This capricious and needless shipment will only increase the odds of a major accident that will cost tens to hundreds of billions of dollars to clean up. If the accident were severe enough, some communities will be condemned from habitation forever.

The casks currently in operation are licensed for up to 100 years. Some of those casks have already experienced manufacturing defects and degradation of structural integrity, but at least these problems can be addressed while the waste is on a stationary site. It makes no sense to allow such defects and manufacturing mistakes to be discovered while in transport across our nation's roadways. Additionally, these wastes will experience more radioactive decay the longer they are left as is, and will therefore be less dangerous if they are not moved until well into the future, when more scientifically sound storage options have been identified.

Given that all economic impacts over \$7 billion becomes the liability of the American taxpayer under the benevolence of the Price-Anderson Act, I request that the NRC calculate and publish the full economic and health impacts from a severe accident for both rural and urban locations on projected transport routes. I further request that full health impacts not be downplayed by only including latent cancer fatalities, but also include non-fatal cancers, birth defects, immune function damage, genetic damage, and any other disease or malady currently known to be caused by radiation exposure.

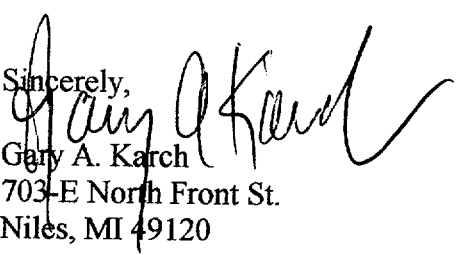
I also find it the highest of insult to the American ideal for the NRC to have found no environmental justice impact from PFS on Native American lands. Payments apparently already made to the Skull Valley Goshutes in Utah, have not been dispersed equitably, with members of the tribe opposed to PFS not receiving their share. Additionally, the lease agreement was made without a majority of the tribal membership.

Bribes financed by PFS funds have been offered to coerce members against PFS to change their stance. Members against PFS have had financial aid cut off, have been shot at, and had their homes ransacked. Obvious corruption exists. The matter has not been even unanimously decided on the Goshute Tribal level, which leads one to question the legality of the whole process.

In your position as chief of the Rules and Directives Branch of the Division of Freedom of Information and Publications Services for the NRC, it is your responsibility to be sure that all sectors of the population are given an opportunity to participate in an equitable manner concerning the dissemination of information on this topic. Assuming you have done so with so little effort at accumulating that public input is insulting and a flagrant disregard for the democratic process.

Given all the above supporting documentation, I request that you extend the deadline for public comment on the Private Fuel Storage for as long as it takes to receive proper input from all transport corridor states, and assure that these communities have had adequate notice and publicity on these events.

Sincerely,


Gary A. Karch

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