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CIO Reproduction and Distribution Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Comments on NUREG-1714 Draft Environmental Impact Statement

Dear Chief Information Officer,

I support the **no action alternative** not to build the proposed PFSF in Skull Valley, Utah. Under this alternative, NRC would **deny** the PFS application for a license to receive, transfer, and possess SNF on the Reservation. No lease would be approved between PFS, BIA, and the Skull Valley Band, and the Skull Valley Band would be free to pursue alternative uses for the land in the northwest corner of the Reservation. No right-of-way approvals would be granted by BLM and no amendments would be required for existing BLM Land Use Plans. The public lands administered by BLM at the proposed ITF location near Timpie, as well as at the proposed Skunk Ridge rail siding location and along the proposed Skunk Ridge rail corridor would be available for other uses compatible with existing land use plans. STB would deny the application for a license for the proposed rail line to the proposed site.

The adequacy to withstand earthquake hazards at the proposed PFSF won't be addressed until the NRC's SER which will not be available until the final EIS. The region does have a history of seismic activity. The Skull Valley Geologic Map in Figure 3.1 shows mapped and interpreted surface and subsurface structural features in the immediate area of the proposed site. The proposed site is located extremely close to two faults. The exact time of an earthquake can not be accurately predicted; however, earthquakes will occur. The dangers and risks to bystanders are not acceptable.

The adequacy of the cask design at the proposed PFSF won't be addressed until the NRC's SER which will not be available until the final EIS. Proposed dry-cask storage has only been used for 14 years. These nuclear waste canisters and casks should be subjected to tests. The results of these tests should be available to the public. Prior problems with casks has occurred due to hairline fractures during manufacturing, an explosion due to a chemical reaction during loading of a cask, and cask-weld failures. Movement of these casks is costly and there is a potential for danger and damage to them and to bystanders.

PFS supposedly "would employ a "start-clean/stay-clean" philosophy, meaning that the proposed PFSF would be intended to be a radiological contamination-free site.....Personnel would then transfer the shipping cask into a designated area for radiological monitoring. In the event contamination above acceptable levels were discovered, the canister would be returned to the shipper". (NUREG-1714, section 2.1.2 Operation, page 2-19) Further research needs to be done to verify the safety of these casks prior to any transportation from the site of origination. Additional discussion needs to address the safety risk if contamination above acceptable levels in a canister is found how will this canister be returned to the shipper.

Private shipments of nuclear waste should be required to meet strict standards demanded by the Dept. of Energy. PFS should be required to have an assessment for emergency-response needs, local emergency response training, and have sufficient safety and cleanup equipment for radioactive problems in case an incident occurs.

I continue to request an extension of the comment period on this document at least 60 more days. I also request to have additional public hearings in Utah, in the cities where the spent fuel originates, and in cities along the transportation routes.

ER105-03 Add Scott
Klanders
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I request a copy of PFS/SAR2000.

Sincerely,

Nancy Kuhn

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