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Rules and Directives  
Branch  
USNRC

September 18, 2000

David L. Meyer, Chief,  
Rules Review and Directive Branch  
Division of Freedom of Information and Publications Services,  
Office of Administration  
Mailstop T-6D-59,  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

Dear Mr. Meyer:

We are writing to protest the proposed plan by Private Fuel Storage to "temporarily" store high level nuclear waste fuel rods on the Goshute Reservation in Skull Valley in Utah. We wish to express in the strongest possible terms that this proposal should not be approved.

Understanding that the fuel rods must be stored somewhere, we feel in Utah's west desert, we have already accepted more than our share of hazardous waste. The area currently houses two chemical weapons incinerators, two hazardous waste landfills, a radioactive waste landfill, the nation's largest toxic air polluter (MagCorp) and a massive bombing range about the size of Rhode Island. Enough is enough!

We feel that the Draft Environmental Impact Statement does not adequately address the following concerns:

1. Earthquake and seismic evaluations are excluded from the DEIS. What would happen to these hazardous waste products if an earthquake (a Utah reality) were to strike the area?
2. Wildfire danger, including fires sparked by train operations in Skull Valley, has received inadequate evaluation. We are told that Tooele County (the location of Skull Valley Reservation) has only a volunteer fire department and the closest team qualified to respond in the event of such a disaster would be in California. What would be happening to the citizens of Utah before such a team arrived, and once it did, what damage would we already be exposed to?
3. The storage casks are not designed for long-term storage, yet they would be housed in Utah for at least 40 years. What if the Yucca Mountain, Nevada permanent repository fails to open? Severe scientific problems have been found with the Yucca Mountain site, and even if it were to open, its capacity cannot contain all the high-level waste that would exist. Could wastes remain in Utah because there is no place else to take them? We oppose both short-term storage and the likelihood of this becoming long-term.

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4. Impacts of transportation accidents and the equipment and costs needed to respond are not adequately considered. It is not enough to simply say that there has never been an accident before.
5. PFS' financial responsibility and liability are not addressed. As a limited liability corporation, PFS and the eight nuclear utility member companies forming it would not be held financially liable for any problems that might develop at the Skull Valley dump site. If PFS and its member companies are so confident in the safety of their proposal, why are they so reluctant to back it up with financial assurance?

The bottom line is the proposed site would affect all of us in the Salt Lake Valley and not only the Goshute Indian people whose land it would be located on. Why should we all accept the risks and worry of this facility when only the Goshutes who are desperate for money are willing. We have already been "down wind" of more than our share of hazardous waste facilities, and both leaders and citizens are strongly opposed. If temporary storage is so safe, then high level nuclear waste, generated in another part of the country, can stay where it is. There is no reason dry cask storage cannot be used at the reactor sites where the waste is currently located, thus eliminating the possibility of transportation accidents.

Sincerely,

A handwritten signature in cursive script, appearing to read "Matthew T. and Annette G. Weed", is written over the typed name.

Matthew T. and Annette G. Weed  
2744 Blackburn Circle  
Holladay, UT 84117