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Targeting Native American lands for nuclear waste dumps is a long and shameful tradition of the nuclear power industry and its cohorts in government. A case study in blatant environmental racism, the Dept. of Energys "Nuclear Waste Negotiator" approached dozens of Native American tribes from 1987 to 1994, offering big money if tribes would only agree to become the "interim storage" site for the nations high-level nuclear waste. This policy of environmental racism in the case of nuclear waste storage is also a policy of genocide.

Putting nuclear waste on Native American lands is a proposal fraught with disaster. The members of Private Fuel Storage should be ashamed of even thinking about putting a dump at Skull Valley, Utah. Asking Native Americans to take these most deadly substances onto their lands is absolutely reprehensible, haven't the past 500 years of genocide been enough?

The NRC has held only three public hearings, all in Utah. What about all the other States through which the 4,000 containers of highly radioactive waste would be transported? Communities in 18 corridor States - Alabama, California, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Minnesota, Nebraska, Nevada, New Jersey, New York, Pennsylvania, Ohio, Tennessee, Wisconsin, and Wyoming - would be subjected to shipments of high-level atomic waste from reactors belonging to PFS member utilities bound for Utah. In fact, the very large proportion of the PFS shipments that would pass through Illinois, Iowa, Nebraska, and Wyoming would mean that these States would be nearly as heavily impacted by transport as would be Salt Lake City itself, which has had TWO public hearings. Why have none of these other States received a hearing?

NRC should hold public hearings in all the transport corridor States that would be impacted by PFS member company shipments.

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Shundahai is a Newe word meaning "Peace and Harmony with all Creation"

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In addition, as the NRC DEIS case study of a high-level atomic waste shipment from the Maine Yankee nuclear reactor shows - once PFS opens its doors to nonmember nuclear utilities wastes (for a fee), dozens of more States could suddenly find themselves subject to unprecedented numbers of commercial irradiated nuclear fuel shipments and the associated risks to health, property, and the environment. The NRC has not consulted with nor even notified the public and elected officials in these States about the DEIS on PFS. Moving 40,000 tons of high-level atomic waste - nearly all that currently exists in the U.S. - beginning as early as 2003 constitutes such a significant federal action that communities along transportation routes deserve hearings just as much as the citizens of Utah.

NRC should hold public hearings in all the transport corridor States that would be impacted by NON-member utilities which would nonetheless ship high-level waste to PFS.

Given that copies of the DEIS were not even readily available in Utah until well over a month into the public comment period, and that transport corridor States have not yet even been notified by NRC about the DEIS on PFS, **NRC should extend the public comment period at least ninety (90) days, thus allowing an adequate time for public review.**

The NRC in its DEIS has not even published the environmental and economic impacts from severe accidents involving rail shipments bound for PFS. Using the federal governments own "RADTRAN 4" computer model and assuming the accident would take place in a "low-density" urban letting such as Salt Lake City, Dr. Marvin Resnikoff of Radio-active Waste Management Associates has calculated that a severe PFS rail shipment accident releasing just a small fraction of the radioactive contents of a cask carrying 5-year-old cooled nuclear fuel (which is legal to ship under NRC regulations) would result in over 115 latent cancer fatalities to exposed individuals; the economic costs of emergency response, evacuation, interdiction and cleanup (as much as cleanup is even possible) could be between \$14 billion and \$24 billion.

Using the governments "RADTRAN 5" model, with its more in-depth economic cost analysis, Dr. Resnikoff calculated that a severe rail accident in a more dense urban area could lead to over \$300 billion in economic costs. All economic impacts over \$7 billion become the liability of the American taxpayer, under the Price-Anderson Act. The NRC must calculate and publish the full economic and health impacts from a severe accident in both urban and rural settings for all the projected transport routes. Full health impacts would include not only latent cancer fatalities, but nonfatal cancers, birth defects, genetic damage, lowered immunity, and other diseases. Again using conservative government models, Dr. Resnikoff predicts that 25 transport accidents with fully loaded casks bound for Skull Valley can be expected - many of them minor, but perhaps some severe.

A single severe rail cask accident could cause 115 latent cancer fatalities and cost tens or hundreds of billions of dollars to clean up. NRC's DEIS is severely defi-

cient in not publishing such impacts.

Espousing a "Start Clean, Stay Clean" philosophy, PFS has no plan to build a "spent" fuel pool nor a hot cell for dealing with contaminated or defective casks at its "interim storage site" in Utah. The PFS proposal is to □return to sender□ any problem casks, shipping the fully loaded containers back to the nuclear reactor from which they came. Contaminated casks are a very real issue: dozens of contamination incidents have occurred in the U.S. already, and innumerable more have occurred in Europe and Japan. Again using NRCs own case study of a shipment from Maine Yankee nuclear reactor to PFS, a single shipment of irradiated fuel could be sent to Utah. If found to be "unclean", it could then be shipped all the way back to Maine. Once "cleaned" there, it could be shipped back to Utah. Given the added distance shipped, this would increase transport risks three-fold. Defective or contaminated casks would also represent higher risks than "perfect" casks. NRCs DEIS has not taken any of this into consideration. NRC has also not considered that rail cars with three axles (which PFS proposes to use because of the extremely heavy weight of its transport casks) have a higher accident rate than the standard two-axle rail cars.

NRC's DEIS fails to calculate the ADDED risks from PFSs proposal to ship contaminated casks back across the entire country to the reactors of origin without first dealing with the leaks.

NRCs DEIS has done a poor job of calculating radiation doses to the public from even "incident-free" transports. To completely contain all the radiation emanating from the waste would require so much dense shielding material such as lead that the container would be too heavy to transport. Thus, the rail shipment casks would be like mobile x-ray machines that cannot be turned off rolling down the tracks exposing everyone nearby to gamma and neutron radiation. For instance, a nearly 50 mile long stretch of Interstate 15 in Utah closely parallels the proposed rail route to Skull Valley, hugging the tracks to within a very short distance. A car driving next to a shipment of high-level waste could conceivably travel next to the □mobile x-ray machine that cant be turned off for a full hour. How many other places across the country do the tracks hug the highways, or pass close by residential neighborhoods or business districts? The NRC does not address such specific questions about public exposures in its DEIS.

NRCs DEIS 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.

PFS and NRC call the proposed dump an "interim storage site" for high-level atomic waste - if one can call 40 years "temporary". But what if the Yucca Mountain, Nevada national permanent repository fails to open? At a number of points in the DEIS, NRC names Yucca Mt. as the permanent dump, as if the decision has already been made. This is a shameful betrayal of NRCs promise to the people of Nevada that it would not license Yucca Mt. until due process and scientific soundness were completely achieved and confirmed by a rigorous licensing regimen. The Dept. of Energy has not even completed its

site characterization process at Yucca Mt. - NRCs licensing process is still many years away, but it seems NRC has already given Yucca Mt. the green light! Even if NRC were to license Yucca Mt. despite its severe scientific shortcomings, its 63,000 metric ton capacity for commercial high-level waste cannot contain the 86,000 tons that are projected to exist in the U.S. by the year 2030. The excess wastes might very well remain in Utah - sitting out in the open under the sun, snow and rain - because there is no place else to take them.

NRCs 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 absolutely no need for the PFS facility in Utah. Its proposed dry cask storage plan is the very same technology already in use at more than a dozen nuclear power plants across the U.S. The NRC has licensed at-reactor dry cask storage for up to 100 years. So what's with the rush to Skull Valley, UT with all the added transportation risks? It is true that dry casks already in use at reactors have suffered from early degradation and manufacturing defects. This is all the more reason to put the brakes on PFS - such problems with zero mile per hour, stationary storage casks at reactors are much less dangerous than similar problems with 70 m.p.h. transport casks traveling the rails through American communities. NRC regulations must be changed so that the public has a meaningful voice in at-reactor dry cask storage decisions, and so that dry casks at reactors are manufactured, used, and maintained to lower the inherent dangers as much as possible. In addition, the longer high-level wastes are allowed to cool down at the reactors where they presently are, the more they will radioactively decay and the less dangerous they will be to transport in the future, if and when scientifically sound means for off-site storage are found in the future.

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 DEIS states that there would be small impacts on environmental justice from the proposed PFS, that □there are no disproportionately high and adverse impacts on low income or minority populations, and that members of the Skull Valley Band would benefit from the PFS lease payments and employment. However, tribal chairman Leon Bear has already restricted PFS monies from traditional tribal members who oppose the dump. Given the pattern of targeting Native American tribes for high-level nuclear waste dumps, and the centuries of genocidal treatment of the Goshutes by white settlers, the State and federal governments, it is scandalous, shameful and absurd that NRC claim that dumping the entire current stockpile of high-level wastes on this reservation does not impact on environmental justice. PFS represents blatant environmental racism, irregardless of the lease payments to the tribal council. As Serpent River First Nation environmentalist Keith Lewis has said, looking at the toxic aftermath of 50 years of uranium mining on his peoples Ontario reservation, "There is nothing moral about tempting a starving man with money." Utahans have also already suffered for decades as downwinders from nuclear weapons tests in Nevada. Decision-makers in Washington, D.C. at NRCs predecessor agency, the Atomic Energy Commission, found it expedient to inflict radiological health damage on the

expendable, "low-use segments of the population" in predominantly rural, Mormon Utah. NRCs finding of no environmental justice impact from PFS adds insult to injury.

NRCs 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 reservation in Skull Valley, the tiny patch of land still left to the Goshutes from their once vast territory, is already surrounded by numerous toxic facilities such as U.S. Army nerve gas and chemical weapons incinerators, the Envirocare "low level" radioactive waste dump, a U.S. military biological weapons proving ground and bombing range, and a magnesium factory whose hydrochloric acid emissions make it one of the single worst air polluters in the country. NRC has not addressed the cumulative impacts upon the health of the Skull Valley Goshutes of adding a high-level nuclear waste dump on top of all these toxic facilities already spewing poisons into the air they breath. For the Skull Valley Goshutes, radioactivity would be the modern day small pox blanket, another attempt to wipe out the traditional people and cultures from the United States.

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.

On the whole, there is nothing the people will gain from a so-called temporary nuclear waste storage facility at Skull Valley, UT. The residents there will continue to suffer from these genocidal practices of the United States government, unless action is taken to stop it.

We are asking that this proposal by Private Fuel Storage be revoked. That this DEIS be redone to calculate the cumulative impacts to the residents of Skull Valley, that it take the history of genocide against indigenous peoples into account, and that it incorporate a transportation analysis with a reasonable methodology.

Thank you for your review of these comments, I look forward to seeing your response as soon as possible.

In peace,

Susi Snyder

A handwritten signature in black ink, appearing to read 'Susi Snyder', with a long horizontal flourish extending to the right.