

Morrie Wills
445 South 600 East
Provo, Utah 84606
[REDACTED]
mwills4048@aol.com

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E. Shum
U.S. Nuclear Regulatory Commission
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Subject: Proposed Skull Valley Nuclear Waste Storage Facility

I attended the scoping meeting held June 2, 1998 concerning the licensing of a temporary storage facility for high level nuclear waste within the reservation of the Skull Valley Band of Goshute Indians. I noticed that 28 of the 36 people who gave testimony were opposed to the licensing of the proposed facility.

The 28 people who spoke in opposition to the proposed facility presented some very compelling reasons why this request for licensing should be denied:

- The proposed site for the Private Fuel Storage facility is located within 40-60 miles of the majority of Utah's human population.
- The Skull Valley Band of Goshutes consists of approximately 120 members of which only about 30 live at the site.
- Tribal members and families living at the site are opposed to the project.
- Traditional Goshute lifestyles are endangered.
- Natural plant and animal communities are endangered (14 raptor species in Skull Valley).
- What would be the cumulative health effect of the Private Fuel Storage Facility (spent fuel rods), combined with the Deseret Chemical Depot (storage of 43% of U.S. chemical weapons), the TAD Incinerator (incineration of U.S. chemical weapons), Dugway Proving Grounds (massive military testing), and the Magnesium Corporation of America (chlorine gas).
- What are the possible negative effects on livestock and agriculture?
- Who guarantees the site will be decommissioned? Will it become a permanent storage facility?
- With a short term solution in place (temporary or long term storage) will we lose impetus in searching for a long term solution (neutralizing the waste)?
- The proposed waste containment vessels have not been adequately tested.

- Who will be responsible for environmental monitoring?
- Should an environmental insult occur, who will be responsible?
- Natural disasters (earthquake, fire, flooding)
- Terrorism
- Transportation
- Groundwater contamination
- Property devaluation

It was interesting to note that of the six people who spoke in favor of licensing this facility, one was the chairman of Private Fuel Storage LLC, one was the chairman of the Skull Valley Band of Goshute Indians, and one said that he was designing a similar facility in Box Elder County. All of these people have vested interests in the licensing of this facility. Of the remaining three, one was a representative of Coalition 21, which is apparently a pseudo environmental group, and the other two represented an organization called "Scientists for Safe Nuclear Storage". Neither Coalition 21 nor Scientists for Safe Nuclear Storage inspire me with any confidence. I would suspect that both organizations are fronts for various nuclear energy interests.

Nothing about the licensing of this facility makes any sense. Some of the members of the Skull Valley Band of Goshutes stand to make a lot of money. Unfortunately, if this license is granted they will make money at the expense of those tribal members who choose to live at the site, the people and wildlife of Utah, and all the communities (human and natural) along all of the transportation corridors.

It is unconscionable that vested interests would dump their waste in someone else's backyard. It is even more disturbing that people would desecrate their land and endanger their neighbors for money. The West is not a dumping ground. We would like to keep our open spaces natural and uncontaminated. We don't have nuclear power in Utah, and we certainly don't want the waste. It would be a much better idea to store the waste on site, as the law already dictates.

Thank you,

Morrie Wills