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**STATEMENT OF
UTAH PEACE TEST
P.O. BOX 11416
SALT LAKE CITY, UT 84147**

Utah Peace Test is a citizens group which is well known for our commitment to nonviolence, our commitment to consensus decision making, and our commitment to end nuclear weapons development and deployment.

We have two concerns that need to be addressed in the Environmental Impact Statement. The geological record of the state of Utah indicates that a major earthquake occurs along one of the fault systems every three hundred fifty years on average. The experts say that it is not a matter of if another earthquake will happen but of when it will occur. The estimates range from thirty to fifty years. The most recent data indicates that the proposed project site is sitting on top of geological faults. We assert that a major earthquake will happen in Utah during the lifetime of the project that may affect the proposed site and that this constitutes a high risk to the environment. We have seen no evidence that the structural supports for the casks nor the casks themselves are being designed to earthquake proof standards. Therefore the casks could be damaged on impact due to an earthquake and leak radioactive materials.

Our other concern is that there are no proposed plans for an on site facility to transfer the spent nuclear fuel rods from an old cask to a new cask. The proposed project's lifetime is forty years. Because of aging effects like creep the casks will gradually deteriorate with time. We assert that at a minimum, the rods will need to be transferred at least once. Logic dictates that the transfer should occur after twenty years. If a safety factor of two is assumed then the rods will need to be swapped to new casks every ten years. This represents four life cycles.

In order to transfer rods it will be necessary to open up the containers. There is a high risk factor for contamination of the environment as a result of this process since there will be other radioactive materials generated by the fuel rods inside. Some of these materials may be gaseous, fine powders, or liquids. A facility to properly handle these potential problems does not exist in the proposed site plan.

There is an additional collateral waste problem generated by the asserted cask recycling process. The old casks will be contaminated after storing spent nuclear fuel rods and thus become nuclear waste. We assert the amount to be four times the current estimate because of the four life cycles. This constitutes an environmental hazard because of this proposed project. We see no evidence for the disposition of radioactive used casks.

We recognize that an alternative exists for contracting out the cask recycling process to an existing facility. Under this option then the current risk factor associated with transportation needs to be increased by a factor of eight due to the additional number of trips.

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