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Greater-than-Class-C and Transuranic Waste

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Greater-than-Class-C and Transuranic Waste; Extension of Comment Period

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General Comment

Facilities licensed to dispose of Greater-than-Class-C and Transuranic Waste should be above-ground vaults or deep geologic repositories where the waste can be retrieved at a future time if necessary. Additionally due to the uncertainty of future climatic conditions in the United States, these facilities should be located in arid or semi-arid regions of the country. Disposal of this waste in a near surface facility or trench which will require vegetative cover may not be sustainable over the projected lifetime of the facility due to a lack of water resources, depending on site selection.

Aside from the issue that a near-surface facility should not be licensed, the key assumptions in the hazards analysis section 3.1.1 are not adequate. Environmental challenges due to climate change that may be present at a selected site over the next 100 years or longer are not addressed. If a site is selected that is not currently in a semi-arid or arid climate, given the rate of uncertainty in climate change in the future the site may be susceptible to flooding over the next century or longer. It's impossible to know if the long-term hydrogeologic and geomorphic conditions will indeed be favorable for the selected site during the post-closure period.