



## Document Details

<b>Docket ID:</b>	DOE-HQ-2017-0004 
<b>Docket Title:</b>	Requests for Information: Approaches Involving Private Initiatives for Consolidated Interim Storage Facilities 
<b>Document File:</b>	 <a href="#">HTML</a>
<b>Docket Phase:</b>	Notice of Proposed Rulemaking (NOPR)
<b>Phase Sequence:</b>	1
<b>Original Document ID:</b>	DOE_FRDOC_0001-DRAFT-0468
<b>Current Document ID:</b>	DOE-HQ-2017-0004-DRAFT-0001
<b>Title:</b>	Comment on FR Doc # 2016-26018 
<b>Number of Attachments:</b>	0
<b>Document Type:</b>	PUBLIC SUBMISSIONS 
<b>Document Subtype:</b>	Public Comment 
<b>Comment on Document ID:</b>	DOE-HQ-2017-0004-0001 
<b>Comment on Document Title:</b>	Requests for Information: Approaches Involving Private Initiatives for Consolidated Interim Storage Facilities 
<b>Status:</b>	Pending_Post 
<b>Received Date:</b>	01/25/2017 
<b>Date Posted:</b>	
<b>Posting Restriction:</b>	No restrictions 
<b>Submission Type:</b>	Web
<b>Number of Submissions:</b>	1 

## Document Optional Details

### Submitter Info

<b>Comment:</b>	As we have previously noted, the lead proposals for centralized interim storage (de facto permanent parking lot dumps) are private initiatives (in fact, there are no proposed federal government owned/operated parking lot dumps). But whether PIs or government ISFs (Interim Storage Facilities, so called), they should be free, fully informed, and genuinely consent-based sitings, as the Blue Ribbon Commission on America's Nuclear Future recommended in its Final Report in January 2012. For this reason, all of the public comments submitted to DOE during its so-called "consent-based siting" public comment period in 2016 still apply. The lead private
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initiative is by Waste Control Specialists, LLC in Andrews County, West Texas, followed by the Eddy-Lea [Counties] Energy Alliance in Hobbs, New Mexico (less than 50 miles from WCS); AFCI in Loving County, TX; and Culberson County, TX. Beyond Nuclear submitted six sets of comments to the U.S. Department of Energy (DOE), by the July 31, 2016 deadline, re: "Consent-Based Siting" for so-called "centralized interim storage sites" (de facto permanent parking lot dumps), as well as permanent burial dumps (such as long targeted at Yucca Mountain, Nevada), for high-level radioactive waste/irradiated nuclear fuel. The first set comprised Beyond Nuclear's "Top Ten List" of "We Do NOT Consent!" talking points. Here are the first five: 1.) Stop making it. The only truly safe, sound, just solution for the radioactive waste problem, is to not make it in the first place. Electricity can be supplied by clean, safe, affordable renewable sources, such as wind and solar, and demand decreased significantly by efficiency, rather than generating radioactive waste via dirty, dangerous, and expensive nuclear power. 2.) Expedite the transfer of irradiated nuclear fuel from densely-packed "wet" storage pools into Hardened On-Site Storage (HOSS) dry casks. 3.) Store irradiated nuclear fuel in HOSS dry casks, as safely and securely as possible, as close to the point of generation as possible, in a monitored, inspectable, retrievable manner. 4.) Given the unavoidable risks of high-level radioactive waste truck, train, and/or barge shipments on roads, rails, and/or waterways (Mobile Chernobyls, Dirty Bombs on Wheels, Floating Fukushimas), transport irradiated nuclear fuel only once, such as straight to a (suitable, acceptable, just) geological repository, not to so-called centralized interim storage (de facto permanent parking lot dumps, such as those currently targeted at Waste Control Specialists, LLC in Andrews County, west Texas; at Eddy-Lea Counties, near the Waste Isolation Pilot Plant in southeast New Mexico; Native American reservations; nuclear power plants, such as Exelon's Dresden in Morris, IL; etc.). 5.) Geological repositories must be scientifically suitable (capable of isolating the hazardous high-level radioactive waste from the living environment forevermore), socially acceptable (genuinely consent-based), and environmentally just. Note that no such suitable/acceptable/just geologic repository has yet been found, in more than half a century of looking. DOE has admitted it can't open any repository (even an unsuitable/unacceptable/unjust one) till 2048 at the earliest, more than a century after Enrico Fermi, in 1942, generated the first high-level radioactive waste, in the world's first reactor, as part of the Manhattan Project to build atomic bombs; and more than 90 years years after the first "civilian" atomic reactor began generating waste at Shippingport, PA. \*

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**Government Agency Type:** 

**Government Agency:** 

**Cover Page:**  HTML

## Document Optional Details

**Status Set Date:** 02/13/2017

**Current Assignee:** Bacon, Cuttie (DOE)

**Status Set By:** Freeman, Yohanna (DOE)

**Comment Start Date:** 

**Comment Due Date:** 

**Legacy ID:**

**Tracking Number:** 1k1-8ud9-dtjc 

**Total Page Count Including Attachments:** 1

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