

Private ISF

From: Caitlin Scopel <CScopel@esri.com>
Sent: Tuesday, January 24, 2017 10:46 PM
To: PrivateISF
Subject: Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities

To whom it may concern,

Since a private centralized interim storage facility could easily become a de facto permanent parking lot dump, or could one day well be targeted not just for storage but also for permanent disposal (such a preference has been expressed in related legislation on Capitol Hill, that the pilot-, and full-scale, centralized interim storage site also be considered for permanent disposal), the following criteria must be met: scientific (geologic, hydrologic, etc.) site suitability; free, fully informed, consent-based siting; environmental justice, not just for current, but also for all future generations.

In addition, since consolidated interim storage would require unprecedented numbers of shipments (by road, rail, and/or waterway) of highly radioactive irradiated nuclear fuel, through many to most states, such "Mobile Chernobyl" risks must be minimized. (See, for example, projected nationwide shipping routes to Yucca Mountain, Nevada <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.nirs.org_stop-2Dfukushima-2Dfreeways_&d=DwMFAg&c=n6-cguzQvX_tUlrZOS_4Og&r=91dJNZtCYDPuity4vC303eUb0uxrKBmDS93EURExhdQ&m=F-XEs-PhB6ar0tEDZmZ1wlgBRIKfSkGr2vs0QauVuzg&s=3Mr_VR51tXZ4T76iR5Mks2K3mDKfnEwciKgmZJoahII&e=>, which has been targeted for governmental (DOE) centralized interim storage in the past, and is still targeted for permanent disposal; see also projected cross-country shipping routes to the PI Waste Control Specialists, LLC facility in Andrews County, West Texas <https://urldefense.proofpoint.com/v2/url?u=http-3A__static1.1.sqspcdn.com_static_f_356082_27010338_1462424717363_Transportation-2BMaps-2D1.jpg-3Ftoken-3DTM-252Fbj6JhFDsgOA-252BtLMiwPmZVELk-253D&d=DwMFAg&c=n6-cguzQvX_tUlrZOS_4Og&r=91dJNZtCYDPuity4vC303eUb0uxrKBmDS93EURExhdQ&m=F-XEs-PhB6ar0tEDZmZ1wlgBRIKfSkGr2vs0QauVuzg&s=THqrTJpEldhDfyYmZrvk60dFPFHs1X-F3134Byblj5k&e=>, targeted for centralized interim storage.) Long-distance shipments should only happen once, to suitable, consent-based, environmentally just permanent disposal, not to a supposedly interim storage site, from which the wastes will have to move again, multiplying transport risks. Consent should be required for transport corridor communities for such shipments, and transport container safety and security should be guaranteed, requiring significant upgrades to current shipping container integrity standards.

I urge you not to allow these storage facilities.

Sincerely,

Caitlin Scopel