

Private ISF

From: Cynthia McNamara <cynthia_mcnamara@yahoo.com>
Sent: Wednesday, January 25, 2017 3:00 PM
To: PrivateISF
Subject: Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities

To Whom It May Concern:

I am contacting you to express my opposition to Private Initiatives for high-level radioactive waste Interim Storage Facilities. I urge you to heed the detailed public comments submitted by the organization Beyond Nuclear, some of which are referenced below.

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.

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, a highly dangerous arrangement. 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. All of these costly measures are unlikely to be undertaken by private, for-profit businesses.

Dangerous and toxic storage facilities are typically located in areas inhabited by poor people. This practice is unacceptable. Pro-nuclear Republican U.S. Senators, during a related Energy and Natural Resources Committee hearing in summer 2013, reportedly joked openly about the "incentives" ("inducements," such as promises of jobs, for low income, often people of color communities). Low income people of color communities must be taken off the target list, as a basic Environmental Justice principle. To do otherwise would mean radioactive racism. Nor should majority white low income communities be targeted.

The DOE should not even be conducting this Request for Information proceeding. The second highest recommendation by the BRC was for DOE to be removed from high-level radioactive waste management. This is because DOE has proven, over the course of decades, its incompetence and worse--that it cannot be trusted by the public, in such vital matters. Such high-stakes matters as defining "consent-based siting" should be carried out by a trustworthy and competent replacement for DOE. A competent and trustworthy replacement for DOE would not have even considered PIs for centralized interim storage, since this violates the law, the Nuclear Waste Policy Act, as Amended.

Responsibility for storage of nuclear waste should not ever be placed in the hands of private businesses. For-profit business models are founded on the principle of cutting costs to maximize income. The public has no assurance that cost-cutting will not involve curtailment of safety measures. (If the mining industry is any indicator, the public can be sure that private enterprise will leave behind a toxic mess to be cleaned up at public expense.) Given the current federal governmental push to relax and remove regulations placed upon businesses, this likelihood is exacerbated.

Sincerely,
Cynthia McNamara