

Private ISF

From: Barbara <warrenba@msn.com>
Sent: Tuesday, January 24, 2017 12:36 PM
To: PrivateISF
Subject: Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities.
Attachments: DOE LTR on Interim Consolidated Storage1.24.17.docx

See attached comments.

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January 24, 2017

Sent by email to

PrivateISF@hq.doe.gov

Re: Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities.

Citizens' Environmental Coalition wishes to address the fact that DOE has been proceeding on an unusual and short-circuited path to deal with the development of Interim Consolidated Storage Facilities. From the initial Federal Register notice, Dec. 23, 2015, DOE has presented the problem to be solved as "Siting" — finding sites to store the enormous quantities of spent fuel currently stored at nuclear reactors. This request addresses private parties and their interests in storing spent nuclear fuel. Private entities are likely to seek to limit their liability and their costs rather than put safety as a high priority.

However, DOE is obviously on the wrong path. There are enormous technical, safety and health issues associated with the primary problem the Agency identified in December 2015 as:

"Isolating and containing this radioactive waste is necessary to ensure the long- term safety and security of the public and the environment."

Unfortunately none of the obvious technical, safety and health issues have been comprehensively addressed from the existing and potentially degraded and leaking HLW storage casks at nuclear reactors, transportation methods, emergency plans and precautionary measures en route to the interim storage locations and a host of considerations there: including how nuclear waste will be isolated for 10,20 or more years from ground and surface water, how will leaking containers be identified and replaced, what equipment will be required of private entities beyond a concrete pad, what entity will be liable for maintaining isolation and containment?.

Unfortunately, despite decades of dealing with nuclear waste DOE has not prepared the necessary underlying scientific documents that identify the requirements for long term

nuclear waste storage. Instead DOE is taking short cuts as if the only problem is finding a parking lot where it can store this material. Short cuts have been costly for DOE and the nation and WIPP is a perfect example. Multiple decisions were made to reduce precautionary measures at WIPP before the final kitty litter error.

DOE is setting the stage for an even more serious catastrophe by dealing with siting as a first step rather than as a final step that is informed by extensive scientific, health and environmental considerations and public participation.

As the Agency involved it is your obligation to assemble the facts and provide detailed analyses so the public clearly understands the risks and can engage in the democratic process. Without this foundation there can be no legitimate consent.

We strongly agree with the entirety of the earlier prepared comments of Arjun Makhijani, Ph.D., President, Institute for Energy & Environmental Research on the consent- based siting process including:

“In brief, a consent-based process must be preceded by a science-based and health-based process that includes criteria for and analysis of a geologic isolation system and health and environmental standards by which to assess performance. Without such scientific and standard-setting process prior to any discussion of “consent” is necessarily uninformed and undemocratic.”

Respectfully,



Barbara J. Warren
Executive Director