



## 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>	
<b>Docket Phase:</b>	Notice of Proposed Rulemaking (NPR)
<b>Phase Sequence:</b>	1
<b>Original Document ID:</b>	DOE_FRDOC_0001-DRAFT-0456
<b>Current Document ID:</b>	DOE-HQ-2017-0004-DRAFT-0002
<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>	<p>DOE has requested information in response to the following question: 6. What possibilities are there with respect to business models for a PI, and what are the benefits and disadvantages of those models? Here is our response/comment: A prior PI that should serve as a cautionary tale was the Private Fuel Storage, LLC (PFS) targeted at the Skull Valley Goshutes Indian Reservation in Utah. &lt;<a href="https://web.archive.org/web/20160220020229/http://www.nirs.org/radwaste/scullvalley/skullvalley.htm">https://web.archive.org/web/20160220020229/http://www.nirs.org/radwaste/scullvalley/skullvalley.htm</a>&gt; In addition to being a flagrant radioactive racism violation of environmental justice principles, PFS also serves as a warning about how so-called</p>
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interim surface storage facilities can turn into de facto permanent parking lot dumps. PFS was proposed to have stored 40,000 metric tons of commercial irradiated nuclear fuel (the same amount as is proposed at WCS, TX), in Holtec containers (the same model as proposed by the Eddy-Lea Energy Alliance in NM). After 20 to 40 years of so-called "interim" storage (which is itself a very long time to refer to as temporary or interim -- in fact, 40 years is 1/6th as long as the entire history of the United States thus far!), the proposal was to then move the highly radioactive wastes to the permanent burial dump at Yucca Mountain, Nevada. However, President Obama wisely canceled the unsuitable, anti-consent-based, radioactively racist and illegal (it is Western Shoshone Indian land by "peace and friendship" treaty rights) Yucca dump in 2009-2010. Thus, if PFS had opened, and irradiated fuel would have been moved there, there would have been no Yucca dump to send it to after 20-40 years. PFS's Plan B was "return to sender." Thus, 50+ Holtec casks from Maine Yankee would have traveled 5,000-miles round-trip, accomplishing absolutely nothing -- but putting countless millions in transport corridor communities across the country at risk of "Mobile Chernobyls" and "Mobile X-ray Machines That Can't Be Turned Off." Fortunately, despite NRC's high-risk rubber-stamp of the PFS construction and operation license, resistance (including that by the nationwide environmental justice movement, led by Native Americans <<https://web.archive.org/web/20151020093406/http://www.nirs.org/radwaste/scullvalley/skullvalleygoshutesgroupltr772005.pdf>>) was strong enough to stop the parking lot dump from being built and opened. \*🗳️

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Government Agency Type: 

Government Agency: 

Cover Page: 

## 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: 1k1-8ud7-yi3b 

Total Page Count  
Including Attachments: 1

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<<https://web.archive.org/web/20160220020229/http://www.nirs.org/radwaste/scullvalley/skullvalley.htm>> In addition to being a flagrant radioactive racism violation of environmental justice principles, PFS also serves as a warning about how so-called interim surface storage facilities can turn into de facto permanent parking lot dumps. PFS was proposed to have stored 40,000 metric tons of commercial irradiated nuclear fuel (the same amount as is proposed at WCS, TX), in Holtec containers (the same model as proposed by the Eddy-Lea Energy Alliance in NM). After 20 to 40 years of so-called "interim" storage (which is itself a very long time to refer to as temporary or interim -- in fact, 40 years is 1/6th as long as the entire history of the United States thus far!), the proposal was to then move the highly radioactive wastes to the permanent burial dump at Yucca Mountain, Nevada. However, President Obama wisely canceled the unsuitable, anti-consent-based, radioactively racist and illegal (it is Western Shoshone Indian land by "peace and friendship" treaty rights) Yucca dump in 2009-2010. Thus, if PFS had opened, and irradiated fuel would have been moved there, there would have been no Yucca dump to send it to after 20-40 years. PFS's Plan B was "return to sender." Thus, 50+ Holtec casks from Maine Yankee would have traveled 5,000-miles round-trip, accomplishing absolutely nothing -- but putting countless millions in transport corridor communities across the country at risk of "Mobile Chernobyls" and "Mobile X-ray Machines That Can't Be

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