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Comment:	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 second set of five: 6.) Do not reprocess (extract fissile plutonium and/or uranium from) irradiated nuclear fuel. Not only would this risk nuclear weapons proliferation, and be astronomically expensive; it would also very likely cause environmental ruin downwind and downstream of wherever it is carried out, as has been shown at such places as Hanford Nuclear Reservation in Washington; Savannah River Site, South Carolina; West Valley, New York; Sellafield, England; La Hague, France; Kyshtym, Russia; etc. 7.) Preserve and maintain "wet" storage pools - albeit emptied of irradiated nuclear fuel -- as an emergency back up location for cask-to-cask HOSS transfers, when old HOSS casks deteriorate toward failure, and need to be replaced with brand new HOSS casks. That is, do not dismantle pools as part of nuclear power plant decommissioning post-reactor shutdown. 8.) Carefully pass information about storing irradiated nuclear fuel as safely as possible, as close to the point of generation as possible, from one generation to the next, la the concept of "Rolling Stewardship" described by the Canadian Coalition for Nuclear Responsibility. 9.) Address the shortfall in funding for forevermore storage of high-level radioactive waste. Dr. Mark Cooper of Vermont Law School has estimated the first 200 years of commercial irradiated nuclear fuel storage (assuming just a single repository, although at least two will be required!) will cost \$210 to \$350 billion, even though there is only some tens of billions of dollars remaining in the now-terminated Nuclear Waste Fund, collected from nuclear power ratepayers. 10.) Environmental justice, in keeping with Bill Clinton's 1994 Executive Order 12898, demands that Native American communities and lands, as well as those of other low income and/or people of color communities, never again be targeted for high-level radioactive waste parking lot dumps or permanent burial sites, a shameful form of radioactive racism dating back decades in the U.S. *🌐

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