



Document Details

Docket ID:	DOE-HQ-2017-0004
Docket Title:	Requests for Information: Approaches Involving Private Initiatives for Consolidated Interim Storage Facilities *
Document File:	
Docket Phase:	Notice of Proposed Rulemaking (NPR)
Phase Sequence:	1
Original Document ID:	DOE_FRDOC_0001-DRAFT-0468
Current Document ID:	DOE-HQ-2017-0004-DRAFT-0001
Title:	Comment on FR Doc # 2016-26018
Number of Attachments:	0
Document Type:	PUBLIC SUBMISSIONS *
Document Subtype:	Public Comment
Comment on Document ID:	DOE-HQ-2017-0004-0001
Comment on Document Title:	Requests for Information: Approaches Involving Private Initiatives for Consolidated Interim Storage Facilities
Status:	Pending_Post
Received Date:	01/25/2017 *
Date Posted:	
Posting Restriction:	No restrictions
Submission Type:	Web
Number of Submissions:	1 *

Document Optional Details

Submitter Info

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
-----------------	--

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 first five: 1.) Stop making it. The only truly safe, sound, just solution for the radioactive waste problem, is to not make it in the first place. Electricity can be supplied by clean, safe, affordable renewable sources, such as wind and solar, and demand decreased significantly by efficiency, rather than generating radioactive waste via dirty, dangerous, and expensive nuclear power. 2.) Expedite the transfer of irradiated nuclear fuel from densely-packed "wet" storage pools into Hardened On-Site Storage (HOSS) dry casks. 3.) Store irradiated nuclear fuel in HOSS dry casks, as safely and securely as possible, as close to the point of generation as possible, in a monitored, inspectable, retrievable manner. 4.) Given the unavoidable risks of high-level radioactive waste truck, train, and/or barge shipments on roads, rails, and/or waterways (Mobile Chernobyls, Dirty Bombs on Wheels, Floating Fukushimas), transport irradiated nuclear fuel only once, such as straight to a (suitable, acceptable, just) geological repository, not to so-called centralized interim storage (de facto permanent parking lot dumps, such as those currently targeted at Waste Control Specialists, LLC in Andrews County, west Texas; at Eddy-Lea Counties, near the Waste Isolation Pilot Plant in southeast New Mexico; Native American reservations; nuclear power plants, such as Exelon's Dresden in Morris, IL; etc.). 5.) Geological repositories must be scientifically suitable (capable of isolating the hazardous high-level radioactive waste from the living environment forevermore), socially acceptable (genuinely consent-based), and environmentally just. Note that no such suitable/acceptable/just geologic repository has yet been found, in more than half a century of looking. DOE has admitted it can't open any repository (even an unsuitable/unacceptable/unjust one) till 2048 at the earliest, more than a century after Enrico Fermi, in 1942, generated the first high-level radioactive waste, in the world's first reactor, as part of the Manhattan Project to build atomic bombs; and more than 90 years years after the first "civilian" atomic reactor began generating waste at Shippingport, PA. *🌐













First Name: Kevin *🌐

Middle Name: 🌐




Last Name: Kamps *🌐

Mailing Address: Radioactive Waste Watchdog, Beyond Nuclear *🌐

Mailing Address 2: 6930 Carroll Avenue, Suite 400 *🌐

City: Takoma Park * 
Country: United States 
State or Province: Maryland 
ZIP/Postal Code: 20912 * 
Email Address: kevin@beyondnuclear.org 
Phone Number: 240-462-3216 
Fax Number: 301-270-4000 
Organization Name: Beyond Nuclear 
Submitter's Representative: Kevin Kamps, Radioactive Waste Watchdog 
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: 1k1-8ud9-dtjc 
Total Page Count Including Attachments: 1

Submitter Info

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 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 first five: 1.) Stop making it. The only truly safe, sound, just solution for the radioactive waste problem, is to not make it in the first place. Electricity can be supplied by clean, safe, affordable renewable sources, such as wind and solar, and demand decreased significantly by efficiency, rather than generating radioactive waste via dirty, dangerous, and expensive nuclear power. 2.) Expedite the transfer of irradiated nuclear fuel from densely-packed "wet" storage pools into Hardened On-Site Storage (HOSS) dry casks. 3.) Store irradiated nuclear fuel in HOSS dry casks, as safely and securely as possible, as close to the point of generation as possible, in a monitored, inspectable, retrievable manner. 4.) Given the unavoidable risks of high-level radioactive waste truck, train, and/or barge shipments on roads, rails, and/or waterways (Mobile Chernobyls, Dirty Bombs on Wheels, Floating Fukushimas), transport irradiated nuclear fuel only once, such as straight to a (suitable, acceptable, just) geological repository, not to so-called centralized interim storage (de facto permanent parking lot dumps, such as those currently targeted at Waste Control Specialists, LLC in Andrews County, west Texas; at Eddy-Lea Counties, near the Waste Isolation Pilot Plant in southeast New Mexico; Native American reservations; nuclear power plants, such as Exelon's Dresden in Morris, IL; etc.). 5.) Geological repositories must be scientifically suitable (capable of isolating the hazardous high-level radioactive waste from the living environment forevermore), socially acceptable (genuinely consent-based), and environmentally just. Note that no such suitable/acceptable/just geologic repository has yet been found, in more than half a century of looking. DOE has admitted it can't open any repository (even an unsuitable/unacceptable/unjust one) till 2048 at the earliest, more than a century after Enrico Fermi, in 1942, generated the first high-level radioactive waste, in the world's first reactor, as part of the Manhattan Project to build atomic bombs; and more than 90 years years after the first "civilian" atomic reactor began generating waste at Shippingport, PA. *🌐

First Name: Kevin *🌐

Middle Name: 🌐


Last Name: Kamps *🌐


Mailing Address: Radioactive Waste Watchdog, Beyond Nuclear *🌐


Mailing Address 2: 6930 Carroll Avenue, Suite 400 *🌐


City: Takoma Park *🌐


Country: United States 🌐


State or Province: Maryland 


ZIP/Postal Code: 20912 * 


Email Address: kevin@beyondnuclear.org 


Phone Number: 240-462-3216 

Fax Number: 301-270-4000 

Organization Name: Beyond Nuclear 

Submitter's Representative: Kevin Kamps, Radioactive Waste Watchdog 

Government Agency Type: 

Government Agency: 

Cover Page: 