



## Document Details

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### Submitter Info

<b>Comment:</b>	DOE requests information regarding: 5. What assurances to the Government do you think would be appropriate, to ensure that SNF [Spent Nuclear Fuel] stored at a private ISF [Interim Storage Facility], would be managed effectively so as to contain costs to the Government? Here is our comment/response: An important assurance would be, that hazardous radioactivity will not be released to the environment! No current or foreseeable PI can make such an assurance. For example, at WCS, NAC [Nuclear Assurance Corporation] dual-purpose storage/transport containers would be used. But such NAC containers have exhibited major Quality Assurance [QA]
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violations, and other failures,  
<<http://www.beyondnuclear.org/waste-transportation/2016/12/21/nac-lwt-poor-qa-compliance-2015-2016.html>> both historically dating back many decades (as documented in Dr. Marvin Resnikoff's 1987 book "The Next Nuclear Gamble"), but also very recently, as revealed at Chalk River Nuclear Lab in Ontario, Canada. Similarly, Holtec transport/storage containers proposed to be used at the Eddy-Lea [Counties] Energy Alliance in Hobbs, New Mexico have long exhibited uncorrected QA violations, calling into question their structural integrity while sitting still, let alone traveling 60 miles per hour or faster on the railways, as revealed by industry  
<<https://web.archive.org/web/20160130044911/http://www.nirs.org/radwaste/atreactorstorage/shiranielleg04.htm>> and NRC whistle-blowers  
<[https://web.archive.org/web/20160331064027/http://www.nirs.org/radwaste/atreactorstorage/nrc\\_holtec.pdf](https://web.archive.org/web/20160331064027/http://www.nirs.org/radwaste/atreactorstorage/nrc_holtec.pdf)>. Any contracts signed by DOE's replacement radioactive waste management agency must be strictly fixed cost. Besides the multi-billion dollar cost overruns, and years-long schedule delays, at Hanford and SRS mentioned above, there is also the multi-billion dollar cost overruns, and years-long schedule delays, at the Vogtle 3 & 4 new reactor construction project in Georgia. DOE awarded Vogtle 3 & 4 a whopping \$8.3 billion federal loan guarantee, which means that U.S. taxpayers will be left holding the bag for that full amount, if and when the project defaults on its loan repayment. (In fact, such skyrocketing cost overruns  
<<http://www.beyondnuclear.org/nuclear-costs/>> and compounding schedule delays are not only a decades-old pattern with nuclear power plants and radioactive waste management facilities in the U.S., including DOE projects, but the same is also true internationally  
<<https://www.worldnuclearreport.org/-2016-.html>>; remarkably, the public has been asked to bailout even 40+ year old, uncompetitive atomic reactors across the U.S., at ratepayer expense, in NY, IL, and perhaps even in Texas,  
<<http://www.mysanantonio.com/opinion/commentary/article/Headwinds-threaten-Texas-nuke-plants-10872751.php>> which is quite ironic, given WCS's lead in the race to open a PI parking lot dump.) In short, any to-be-expected cost overruns should be the responsibility of the PI, not of federal taxpayers. Along similar lines, any PI should be required to be entirely privately financed, not government financed, to protect federal taxpayers' pocketbooks. \*🌐

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<[https://web.archive.org/web/20160331064027/http://www.nirs.org/radwaste/atreactorstorage/nrc\\_holtec.pdf](https://web.archive.org/web/20160331064027/http://www.nirs.org/radwaste/atreactorstorage/nrc_holtec.pdf)>. Any contracts signed by DOE's replacement radioactive waste management agency must be strictly fixed cost. Besides the multi-billion dollar cost overruns, and years-long schedule delays, at Hanford and SRS mentioned above, there is also the multi-billion dollar cost overruns, and years-long schedule delays, at the Vogtle 3 & 4 new reactor construction project in Georgia. DOE awarded Vogtle 3 & 4 a whopping \$8.3 billion federal loan guarantee, which means that U.S. taxpayers will be left holding the bag for that full amount, if and when the project defaults on its loan repayment. (In fact, such skyrocketing cost overruns

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