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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 third set comprised Beyond Nuclear's 13-page version of the "We Do NOT Consent!" comments, providing yet more detail. This 13-page version of the comments is attached here, as an uploaded file. *🌐

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***We Do Not Consent! Talking Points for Preparing Public Comments
re: DOE's "Consent-Based Siting" of Radioactive Waste Dumps***

***Use the following as a starting point for preparing your own public comments
by DOE's July 31 deadline (see how at bottom)***

THE RUSH JOB TO *DE FACTO* PERMANENT PARKING LOT DUMPS, FOR ALL THE WRONG

REASONS: We do not consent to DOE rushing into *de facto* permanent parking lot dumps (so-called "centralized" or "consolidated interim storage"), in order to expedite the transfer of title and liability from the nuclear utilities that profited from the generation of high-level radioactive waste, onto the backs of taxpayers.

FLOATING FUKUSHIMAS ON SURFACE WATERS: We do not consent to radioactive waste barge shipments on the lakes and rivers of this country, the fresh drinking water supply for countless millions, nor on the seacoasts. In addition to a disastrous radioactive release if the shipping container is breached, infiltrating water could spark a nuclear chain reaction, if a critical mass forms, due to the fissile U-235 and Pu-239 still present in the waste.

MOBILE CHERNOBYLS/DIRTY BOMBS ON WHEELS: We do not consent to high-level radioactive waste truck and train shipments through the heart of major population centers; through the agricultural heartland; on, over, or alongside the drinking water supplies of our nation. Whether due to high-speed crashes, heavy crushing loads, high-temperature/long duration fires, falls from a great height, underwater submersions, collapsing transport infrastructure, or intentional attack with powerful or sophisticated explosives, such as anti-tank missiles or shaped charges, high-level radioactive waste shipments, if breached, could unleash catastrophic amounts of hazardous radioactivity into the environment.

ENVIRONMENTAL INJUSTICE/RADIOACTIVE RACISM: We do not consent to the targeting, yet again, of low-income, Native American, and other communities of color, with high-level radioactive waste parking lot dumps. It is most ironic that President Obama's Blue Ribbon Commission on America's Nuclear Future, and his DOE, have yet again targeted Native Americans. Obama honored Sauk and Fox environmental activist Grace Thorpe for defending her reservation in Oklahoma against a parking lot dump, and then assisting allies at dozens of other reservations being targeted by DOE's Nuclear Waste Negotiator. Obama praised Thorpe as a "Woman Taking the Lead to Save Our Planet," alongside the likes of Rachel Carson of *Silent Spring* fame, in his March 2009 Women's History Month proclamation. Similarly, Yucca Mountain, Nevada is Western Shoshone Indian land, as the U.S. government acknowledged by signing a treaty. In addition, Yucca is not scientifically suitable. It is an active earthquake zone, a volcanic zone, and water-saturated underground. If waste is ever buried there, it will leak massively into the environment. And the State of Nevada has never consented to becoming the country's high-level radioactive waste dump.

**SITES CURRENTLY AT THE VERY TOP OF THE TARGET LIST FOR *DE FACTO* PERMANENT
PARKING LOT DUMPS:**

We do not consent to the targeting of nuclear power plants, radioactive waste dumps, or DOE sites, already heavily contaminated with radioactivity and burdened with high-level radioactive waste, to become parking lot dumps for the importation of other sites' or reactors' wastes. DOE, NRC, and industry's top targets include Waste Control Specialists in Andrews County, TX; Eddy-Lea Counties, NM, near DOE's Waste Isolation Pilot Plant; DOE's Savannah River Site, SC; Dresden nuclear power plant in Morris, IL; the list goes on. (continued over)

RISKS OF HIGH-LEVEL RADIOACTIVE WASTE STORAGE POOLS, AND NEED FOR HARDENED ON-SITE STORAGE (HOSS): As just re-confirmed by the National Academies of Science, and Princeton U. researchers Von Hippel and Schoeppner, pools are at risk of fires that could unleash catastrophic amounts of hazardous Cesium-137 into the environment over a wide region. Since 2002, a coalition of hundreds of environmental and public interest groups, representing all 50 states, has called for expedited transfer of high-level radioactive waste from vulnerable pools into hardened dry casks, designed and built to last not decades but centuries, without leaking, safeguarded against accidents and natural disasters, and secured against attack.

NUCLEAR POWER AND HIGH-LEVEL RADIOACTIVE WASTE GENERATION: The mountain of radioactive waste in the U.S. has grown 70 years high, and we still don't know what to do with the first cupful. Radioactive waste may well prove to be a "trans-solutional" problem, one created by humans, but beyond our ability to solve. The only safe, sound solution for radioactive waste is to not make it in the first place. Reactors should be permanently shut down, to stop the generation of high-level radioactive waste for which we have no good solution.

Add your additional idea(s) here! Or use the ones above verbatim, or adapt them to your own words.

How to Submit Public Comments by DOE's July 31, 2016 deadline:

Attend a DOE "Consent-Based Siting" public meeting. Citizens have successfully demanded oral public comment opportunities as part of these public meetings. See <http://www.beyondnuclear.org/radioactive-waste-whatsnew/2016/4/27/four-down-five-to-go-doe-consent-based-siting-meetings.html> for a listing of the remaining public meetings between now and July 31: **Boston June 2; Tempe June 23; Boise July 14; Minneapolis July 21.**

Email: Responses may be provided by email to consentbasedsiting@hq.doe.gov. Please **include "Response to IPC" [Invitation for Public Comment] in the subject line.**

Mail: Responses may be provided by mail to the following address: **U.S. Department of Energy, Office of Nuclear Energy, Response to IPC, 1000 Independence Ave. SW., Washington, DC 20585.**

FAX: Responses may be faxed to [202-586-0544](tel:202-586-0544). Please **include "Response to IPC" on the FAX cover page.**

Online: Responses will be accepted online at www.regulations.gov. [DOE has here only provided the general website -- **<Consent-Based Siting> must be entered in the search field to get to you to the precise site,** where you can then input your submission.]

Prepared by Kevin Kamps, Radioactive Waste Watchdog at Beyond Nuclear, on May 28, 2016. For additional information, contact Kevin at kevin@beyondnuclear.org. To see a longer, more detailed version of these talking points, with links to further background documentation, go to <http://www.beyondnuclear.org/radioactive-waste-whatsnew/2016/5/18/we-do-not-consent-sample-talking-points-you-can-use-to-prepa.html>