



## Document Details

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<b>Docket Title:</b>	Requests for Information: Approaches Involving Private Initiatives for Consolidated Interim Storage Facilities *
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## Document Optional Details

### Submitter Info

<b>Comment:</b>	DOE has requested information in response to this question: 11. What other considerations should be taken into account? Here is our response/comment: Re: DOE's eighth question, there is also the issue raised by Allison Fisher of Public Citizen at DOE's "kick off" meeting for defining "consent-based siting," held in Washington, D.C. in January 2016: What about future generations? How can current generations of decision makers doom all future generations to radioactive risks, by agreeing to "host" storage and/or disposal (as EPA has acknowledged in its Yucca Mountain regulations, irradiated nuclear fuel and high-level radioactive waste has a
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million-year hazard, which happens to be three times longer than Homo sapiens sapiens has even been a distinct species!). To this important question on inter-generational equity and environmental justice, DOE gave no adequate answer that day, nor has it since. In addition, DOE must address the risk of so-called interim storage becoming permanent parking lot-like surface storage. In its Final Environmental Impact Statement (FEIS) for the proposed dump at Yucca Mountain, Nevada, published in February 2002, DOE warned that permanent abandonment of irradiated nuclear fuel on-site at the reactors where it was generated would result in catastrophic releases of hazardous radioactivity into the local environment, as dry casks failed over time. DOE must admit, clearly and publicly, as in a PI centralized interim storage EIS, that abandonment (also known as loss of institutional control) of irradiated nuclear fuel at a so-called ISF (Interim Storage Facility) would likewise result, over long enough periods of time, in dry cask failure, and catastrophic releases of hazardous radioactivity into the environment. Along those lines, this Request for Information proceeding is not compliant with NEPA. DOE must publish a Draft EIS, allow for public comment over an adequate period of time (we suggest a nine-month public comment period), and hold multiple public hearings around the country for the collection of public comment. Public meetings must be held by the replacement agency for DOE in all proposed PI ISF "host communities" -- such as Andrews County, TX; Culberson County, TX; Loving County, TX; and Eddy-Lea Counties/Hobbs, New Mexico. So too must the state capitals of states targeted for PI ISFs, including Austin, TX and Santa Fe, NM, be granted an in-person meeting for public comments. And also the biggest cities in each targeted state, including Dallas/Fort Worth, Houston, etc. in TX, and Albuquerque in NM, be granted public comment meetings. So too must public comment meetings be held in transportation corridor communities across the country. \*🌐

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## Document Optional Details

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