



Document Details

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Submitter Info

Comment:	DOE seeks information in the following areas: 1. What key factors should be considered to ensure that PIs, as part of the overall integrated nuclear waste management system, would provide a workable solution for interim storage of spent nuclear fuel and high-level waste? Here is our response: Since a private centralized interim storage facility could easily become a de facto permanent parking lot dump, or could one day well be targeted not just for storage but also for permanent disposal (such a preference has been expressed in related legislation on Capitol Hill, that the pilot-, and full-scale, centralized interim storage site also be considered for
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permanent disposal), the following criteria must be met: scientific (geologic, hydrologic, etc.) site suitability; free, fully informed, consent-based siting; environmental justice, not just for current, but also for all future generations. In addition, since consolidated interim storage would require unprecedented numbers of shipments (by road, rail, and/or waterway) of highly radioactive irradiated nuclear fuel, through many to most states, such "Mobile Chernobyl" risks must be minimized. (See, for example, projected nationwide shipping routes to Yucca Mountain, Nevada, <<https://www.nirs.org/stop-fukushima-freeways/>> which has been targeted for governmental (DOE) centralized interim storage in the past, and is still targeted for permanent disposal; see also projected cross-country shipping routes to the PI Waste Control Specialists, LLC facility in Andrews County, West Texas, <<http://static1.1.sqspcdn.com/static/f/356082/27010338/1462424717363/Transportation+Maps-1.jpg?token=TM%2FbJ6JhFDsgOA%2BtLMiwPmZVELk%3D>> targeted for centralized interim storage.) Long-distance shipments should only happen once, to scientifically suitable, truly consent-based, environmentally just permanent disposal, not to a supposedly interim storage site, from which the wastes will have to move again, multiplying transport risks. Consent should be required for transport corridor communities for such shipments, and transport container safety and security should be guaranteed, requiring significant upgrades to current shipping container integrity standards and related regulations. *🌐

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