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Comment:	Response to RFI on Private Initiatives to Develop Consolidated SNF Storage Facilities: The private centralized interim storage sites -- as currently proposed for example at Waste Control Specialists, LLC (WCS*) in Andrews County, West Texas; at Eddy-Lea [Counties] Energy Alliance just 50 miles from WCS near the Waste Isolation Pilot Plant in Hobbs, New Mexico; and other locations -- would launch unprecedented numbers of shipments of dangerous high-level radioactive waste by rail and barge -- subject to spillage from all-too-frequent derailments and other accidents -- on the railroads and waterways, through many states. WCS, for one, is located above
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aquifers that communicate with the Ogallala, the largest in North America, stretching from Texas to South Dakota and providing millions in numerous Great Plains states with vital drinking and irrigation water. And the plan is for title and liability for the high-level radioactive wastes to transfer from the nuclear power utilities that profited from its generation, onto the public. The public through taxpayer revenue will pay all costs, and bear all liability. The question remains what percentages will ratepayers (from the Nuclear Waste Fund) vs. taxpayers (DOE's budget, from the U.S. Treasury) bear the burden for construction and operation costs of the centralized interim storage facility. Should anything go wrong, if history holds any precedent, the public taxpayer will be left holding the bag for unlimited liabilities. These private facilities in the meantime stand to profit greatly, at public expense, in the billions of dollars. And there is a distinct probability, again if precedents hold, that erstwhile "interim" surface storage facilities will turn into de facto permanent "parking lot dumps," risking catastrophic releases of hazardous radioactivity over long enough periods of time, due to loss of institutional control. Granted a viable longterm solution is urgently needed, not one however of "interim" stopgaps, but rather a final 100% safe outcome. All the above will only exacerbate an already bad situation, adding to problems in even greater demand of solution, rather than offer any real, cost-effective, and safe alternatives. *🌐

First Name: Anonymous *🌐

Middle Name: 🌐

Last Name: Anonymous *🌐

Mailing Address: Anonymous *🌐

Mailing Address 2: Anonymous *🌐

City: Jefferson City *🌐

Country: United States 🌐

State or Province: Missouri 🌐

ZIP/Postal Code: 65101 *🌐

Email Address: 🌐

Phone Number: 🌐

Fax Number: 🌐

Organization Name: 🌐

Submitter's Representative: 🌐

Government Agency Type: 🌐

Government Agency: 🌐

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First Name: Anonymous * 🌐

Middle Name: 🌐

Last Name: Anonymous * 🌐

Mailing Address: Anonymous * 🌐

Mailing Address 2: Anonymous * 🌐

City: Jefferson City * 🌐

Country: United States 🌐

State or Province: Missouri 🌐

ZIP/Postal Code: 65101 * 🌐

Email Address: 🌐

Phone Number: 🌐

Fax Number: 🌐

Organization Name: 🌐

Submitter's Representative: 🌐

Government Agency Type: 🌐

Government Agency: 🌐

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