



## Document Details

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## Document Optional Details

### Submitter Info

<b>Comment:</b>	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? 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 permanent disposal), the following criteria must be met: scientific
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(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, 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, targeted for centralized interim storage.)

Long-distance shipments should only happen once, to suitable, 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. 2. How could a PI benefit: a. the local community and state or Tribe in which an ISF [Interim Storage Facility] is sited? b. neighboring communities? Certainly pro-nuclear Republican U.S. Senators, during related Energy and Natural Resources Committee hearing in summer 2013, have joked openly about the "incentives" (legalized bribes, and other "inducements," such as promises of jobs, for low income, often people of color communities; however, as Keith Lewis of the uranium mining and milling devastated Serpent River First Nation of Ontario put it, "There is nothing moral about tempting a starving man with money.") that cut to the heart of tempting communities to consider "consenting" to "host" de facto permanent parking lot dumps. But what about the harms to communities, states, Tribes and neighboring communities that would be caused by de facto permanent parking lot dumps? For starters, low income people of color communities must be taken off the target list, as a basic Environmental Justice principle. To do otherwise would mean radioactive racism. Even people of color communities which are no longer low income should not be targeted, given the historical oppression they have already endured in the United States. Neither should majority white low income communities be targeted. Radioactive stigma impacts should be addressed and accounted for, from the start. Even if a release of hazardous radioactivity into the environment does not occur, property values will be significantly decreased at and near a centralized interim storage site, as well as along transport corridor routes. Radioactive stigma will even mean that products from the area of the centralized interim storage facility will be avoided by a significant share of consumers, causing economic losses. So too would other economic development be deterred from the region of the de facto permanent parking lot dump. And if a release of hazardous radioactivity does occur, the radioactive stigma impacts to the economy will be all the worse. Neighboring communities can expect to get the worst of both worlds. The host community will reap the income, tax revenues, and jobs, while neighboring communities will get the short end of the stick -- which would include radioactive stigma impacts, but also the

potential for hazardous radioactivity release into air, surface waters, and groundwaters if they happen to be located downwind and downstream. \*🌐

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